

CALL FOR PROPOSALS

2021/CFP/POST/01

FOR FRAMEWORK PARTNERSHIPS FOR REINTEGRATION ASSISTANCE

**Frequently asked questions - FAQs**

Frequently asked questions

Last update: 14.12.2021

**Disclaimer:**

**In the interest of equal treatment of applicants, Frontex cannot issue a prior opinion on the eligibility of an applicant, an action or specific activities.**

On the 5 November 2021, Frontex launched its first **Call for Proposals for the establishment of Framework Partnership Agreements with Reintegration Partners providing reintegration services to non-EU nationals returning to their countries of origin**. The Call is open to non-profit organisations and to international organisations, who can submit their applications until **17 December 2021 23:59 CET**

Since the launch of the Call, Reintegration Partners have been submitting questions to Frontex. To ensure transparency and clarity, interested parties can find below all questions as well as answers provided by Frontex.

This FAQ is divided into 5 parts:

- I- General aspects (Questions 1 to 21)
- II- Thematic aspects (Questions 22 to 39)
- III- Financial aspects (Questions 40 to 74)
- IV- Operational aspects (Questions 75 to 77)
- V- Next steps (Questions 78 to 82)

This document is updated regularly. The questions added since the 10 December version are n°24, N°26, n°32, n°38, n°70, n°71 and n°74.

## I- General aspects

### Question 1

Frontex mentions in the Call that the Reintegration Partner (RP) needs to submit a proposal and somewhere else a strategic action plan, are they both the same document?

Answer:

Yes. Frontex is not asking for anything specific nor a particular format. Based on what is asked in this Call, it is a description of how the RP sees the implementation of the objectives and the project going forward for the 4 years.

### Question 2

If the conditions are fulfilled, the RP can separately apply and at the same time be a partner for other countries?

Answer:

Yes, each country will be evaluated separately during the second step of the process.

### Question 3

Is it better to apply for more countries in case the RP is on the reserved list?

Answer:

Yes, the best is to apply to all the countries in which the RP have the possibility to work in.

### Question 4

The proposal mentions "Embeddedness" with certain organisations, what does embeddedness mean? Does it mean having an MoU or a written or verbal agreement or working understanding with these organisations?

Answer:

Embeddedness/networks of your organisation. List organisations that you have a documented operational relationship within the field of (local/regional/national). Documented relation means any kind of legal bilateral agreement (MoU, agreement, contract etc.)

### Question 5

If the RP have various types of offices (e.g. fully functional, shared offices and some only used if a returnee returns to a particular area), should all these office types of offices included in the number of offices?

Answer:

It is recommended including all of them with short specification of the listed offices.

#### Question 6

There is embeddedness with administrative office as well, can you please clarify what type of offices come under the administrative offices?

Answer:

The list of all types of agreements with offices that would be helping with any of the eligible reintegration activities, like ID documents procurement or similar should be listed.

#### Question 7

Is the electronic signature compulsory?

Answer:

No, it is a possibility because it is easier, but it is not necessary.

#### Question 8

Does the RP have the right to apply to countries where they have partners? If so, do they need to have different proposals for each country?

Answer:

RPs are able to apply to any countries to which they are able to provide reintegration services in. They would be the ones applying for the grant, not their partners.

Only one proposal is required. The RPs need to tick the countries they want to apply for and provide separate budget for each country.

#### Question 9

Which criteria apply for the main applicant and which for the subcontractor or is it equal? Does the RP need to do the application for both?

Answer:

All the criteria apply to the general hub and the in-country local reintegration partner, whether it is the RP's own offices or sub-contractors.

The first phase refers to more general criteria and the second phase goes deeper with the details for each TC. But there are some elements that link the two.

No, the RP does not need to do the application for both. The first application is to be done now and the second one will need to be filled out one time for each country. Therefore, now the RP only lists the countries, and later for the second part the specifics for each TC will be looked at.

#### Question 10

When referencing to Congo, does that mean COD or Brazzaville?

Answer:

It is both because the MS did not make the distinctions.

#### Question 11

Is it an issue if the RP only applies for a single country?

Answer:

No, the number of countries applied for does not matter.

#### Question 12

Is Frontex looking for NGOs to work directly with or do they want a liaison in between? What is the format that Frontex is hoping to achieve in the future?

Answer:

It is up to the partner. If the RP wants to have a direct contact with Frontex, that is the preferred way because then there is a direct line, but if the RP feels like they would like to go to another partner it is equally fine because that partner (main applicant) needs to make sure that the sub-contracted partner upholds the same standards than the main applicant.

**Question 13**

How detailed does the summary of actions needs to be, since there is a 200-word limit? And the specific action plan?

Answer:

There are no specific criteria, it is a way to understand how the RP works and intends to achieve the objectives.

The summary of actions is not the specific action plan, the latter does not have a word limit and is a generic format. It is up to the RP to decide how long it will be. It is recommended to make it as short as possible but as long as everything is addressed. The summary of actions is just a short concise summary of the whole plan. Both documents need to be done for the 17th.

Also, the timeline being quite short between the first and second phase, it might be good to already start working on a specific working plan for the specific TC.

**Question 14**

Is there any word limit to the responses in Annex 2, the guidelines say "keep the answer as short as possible" but in order to explain the reintegration process the answer needs to be elaborated? Would marks be deducted if the very first question about reintegration assistance runs to three pages?

Answer:

Indeed, there is no limit imposed for the response. Please use as many words as you feel is necessary to convey your message and to fully explain your vision.

**Question 15**

Can we put graphics in Annex 2?

Answer:

Yes, graphics can be used.

**Question 16**

The mode of submission for the project is sending the proposal through courier, this method provides an unfair advantage to the organisations that are based in Poland and in Europe as they can have more time for compilation of project while RPs from Pakistan for example have to send the proposal around 5th of December in order for it to make it to Poland in time, as Covid has hampered deliveries in the worst ways. Aren't online submission or submission through emails possible?

Answer:

Kindly refer to the Call for Proposals document. Under the point 14 Procedure for the submission of proposals it is clarified that if a Beneficiary (applying party) submits an application by post an evidence will be constituted by the postmark. Meaning that the application is considered within the deadline as long as the postmark is before the 17th of December, even if the application reaches Frontex after this date. An email should be sent to [HoU.POST@frontex.euroap.eu](mailto:HoU.POST@frontex.euroap.eu) informing us of the transmission of the application.

**Question 17**

The courier companies in some countries require a telephone number, the name of the contact person, besides the address. Which phone number and name of the person should we use?

Answer:

Detailed contact info for Frontex:

**FRONTEX**

ATTN: POST-return Unit, European Centre for Returns

**Address**

Plac Europejski 6  
(corner of Towarowa and Łucka streets)  
00-844 Warsaw

**tel.**

(+48) 22 205 95 00

**fax.**

(+48) 22 205 95 01

Poland

#### Question 18

Should we send the project proposal by email as well as through courier? Should two sets of hardcopies of the proposal be couriered?

Answer:

The project proposal should only be sent by courier. RPs should only inform by email that they have dispatched the package by courier and include the name of the courier and date/time of sending. This email is necessary so that Frontex is informed about the application and that we should expect it even if the courier would arrive later than December 17.

#### Question 19

Is it preferable to apply directly or as a local RP under another partner?

Answer:

Frontex is not intervening in the decision of the RP to make a direct application or work under a main applicant as a local RP. Frontex seeks to have a broad spectrum of small and large RP, hence direct applications of RP with a limited scope (e.g. only one country of origin) is also possible.

#### Question 20

Concerning the Strategic Action Plan, there is no specific form to be used. However, is there any guideline to be followed, concerning especially the information required and the expected length of the document?

Answer:

There is no specific form to be used for the development of the Strategic Action Plan. There are no guidelines either for this document. It should reflect the RP's vision on how their organisation can help Frontex to achieve the objectives of this call.

#### Question 21

Could Frontex confirm that, with an overall budget of > EUR 750 000, the following is the full list of documents to be included?

- Annex 1 - Application For
- Annex 3 - Estimated budget
- A copy of the certificate of official registration or another official document attesting the establishment of the entity;
- A copy of the articles of association/founding act/statutes or equivalent;
- A copy of a document confirming the applicant's tax or VAT number (for example Annex 7 - Legal Entity Form);
- Declaration of honour (Annex 6);
- The profit and loss account as well as the balance sheet for the last 1 financial year;
- An audit report produced by an approved external auditor for the last two years available, where such an audit report is available or whenever a statutory report is required by law;
- Curriculum vitae or description of the profile of the people primarily responsible for managing and implementing the operation;
- Organigram of the organisation;
- An exhaustive list of previous projects and activities performed and connected to the provision of reintegration assistance;
- Supporting documents for each country of return we apply for demonstrating that the RP or its affiliates/subcontractors have been registered there for a minimum of 3 years

Also, is it possible to attach letters of supports from additional entities (e.g. police bodies)?

Answer:

Yes, Frontex confirms that this is the list of documents to be submitted.

Please be aware that Annex 1 - Application form lists several documents relating to section 6.1 of the Call for Proposals, that have to be provided as well, either as a link to the published document or in copy.

Letters of support are not required at this time. If there will be a need for additional documentation, Frontex will request them at a later stage.

## II- Thematic aspects

- Needs Assessments and referrals

### Question 22

Needs assessments by EU Member States (MS) are mentioned in the Call. Could Frontex clarify if these will be done for all cases and sent to the Reintegration Provider (RP) as part of the process?

Answer:

The needs assessment is done by the sending MS prior to departure for all cases to identify urgent needs of returnee upon arrival.

### Question 23

Would the RP receive these five days or more before being referred the case by the MS?

Answer:

The post arrival package can be only provided if MS informs RP minimum 5 working days prior to departure of returnee.

### Question 24

Does this Call for FPA exclude vulnerable cases?

Answer:

The Call for FPA is for reintegration assistance to returnees but it does not exclude vulnerable cases, of course they are also part of this Call for FPA. If MS are requesting reintegration assistance for vulnerable cases or specialised care and the RP can provide it, through its own means or it can refer the case for specialised care, then they should. Each case will be evaluated individually and Frontex will cover the costs within the budget and timeframe for reintegration. Frontex will further analyse the need to launch another Call for FPA that would address very specific vulnerabilities at a later date, but the RPs that will be selected in this Call for FPA are expected to already provide reintegration services to vulnerable categories of returnees.

### Question 25

Could Frontex also underline which types of vulnerabilities will be specifically looked at by MS?

Answer:

Vulnerable groups including victims of trafficking, unaccompanied minors and those with health-related issues are included in the Call for FPA. Frontex acknowledges that vulnerable groups require tailored protection and assistance that directly responds to their immediate needs and addresses the risk factors that contribute to their vulnerability. In case the needs assessment done by the sending MS prior to return does not match the kind of assistance the local RP can provide, the latter are obliged to make referrals to cover the needs. Moreover, Frontex will aim to launch a second Call for Proposals in autumn of 2022 for specialised reintegration assistance related to vulnerable persons. To that end, a number of workshops and meetings will be organised to gather the needs of the MS, as well as with reintegration partners to obtain a clear view on what can be delivered.

**Question 26**

Regarding unaccompanied children, will the family tracing take place before the cases refer to the RP?

Answer:

Family tracing is not an activity eligible for reimbursement under this Call for FPA. Frontex' approach is that the tracing should take place before return and it is the responsibility of the MS to already have set up the handover to the family or the legal guardian by the time the UAM is returned. Then, the reintegration will take care of the monitoring of that process and whatever needs the minor would have. The best interest of the child should always be taken into account.

**Question 27**

What criteria will MS use to refer cases for post-arrival/post-return assistance in countries of origin where more RPs will be selected?

Answer:

Depending on the outcome of the mini competitions a second procedure within the group of partners that have obtained a partnership agreement, one or more RP can be allocated to a TC. The choice of the RP is up to the MS, which they will be able to indicate in RIAT.

- **Reintegration package limits and exceptional cases**

**Question 28**

Noting the maximum amounts of the standard reintegration package, occasional cases might exceptionally require additional assistance. If special needs are identified and also not included in the support packages as detailed in the Call for FPA, can the RP request approval of additional support to the EU MS?

Answer:

An additional assistance packages are not foreseen under Frontex's assistance. The solution for providing this kind of support would be done on a bilateral basis between MS and the RP.

**Question 29**

Will MS top up the reintegration on a case-by-case basis? Or for all returnees benefiting from the program who return from their country?

Answer:

Please note that the amount for top-up is nor imposed nor requested by Frontex and is entirely up to the MS to decide if it would be a blanket top-up for all cases from that particular MS or if it would be decided on a case by case basis. Frontex will in any case not be a party in the conclusion of the bilateral agreements between the MS and the RP.

Frontex explored several options to accommodate MS need for providing top-ups to the Agency's reintegration package. The most viable solution for providing top-ups would be done one a bilateral basis between MS and the RP. To secure the legal basis for a bilateral agreement between MS and a selected RP from the Call for FPA, the Agency will embed the JRS activity into the Frontex Operational Plan for Returns 2022 (FOA-R), through the establishment of a Specific Activity Plan on JRS. This Specific Activity Plan, through its acknowledgement by all MS will provide for the appropriate legal basis to conclude bilateral agreements, using the Frontex agreements with the RP. The provision for its possibility will also be included in the FPA as well as in the Specific Agreements.

- **Temporary suspensions or special procedures in specific contexts**

**Question 30**

It is noted that Member States will suspend returns when necessary due to the international context or internal policy change. If the RP has similar internal procedures for temporary suspension or special procedures, in the event a MS has not yet made the suspension decision, could the RP request that discussion if necessary?

Answer:

Yes, this should be possible. In addition, the EBCG Regulation, in particular Article 46 stipulates the provisions to give the power to the Frontex executive director to suspend, terminate or not launch activities.<sup>1</sup>

In practice, In RIAT, there is the need for the RP to accept every case. This means that at the beginning when MS enter the cases it will come to Frontex to be validated regarding the eligibility and then it will go to the RP and they will decide whether to accept the case or not.

At the same time if a larger issue appears, with the provision of reintegration assistance in general to a specific TC, the RP should immediately inform Frontex about it so that solutions can be found.

- **Return from criminal detention**

#### Question 31

To what extent MS could share with the RP profiles of returnees subject to forced return before the return takes place, including whether they are coming from criminal detention?

Answer:

MS can share with the RP profiles of returnees subject to forced return before the return takes place to the extent that their national Data Protection rules allow.

#### Question 32

Could Frontex share its thoughts on the cases of safety concern when returnees have criminal profile?

Answer:

Beside all the documents listed within the Call for FPA, there will be another document at the end which will be the operational guidelines. This document will be attached to the Specific Grants and will act as an explanation of how certain things should be addressed and solved. It will be a living document and will include this issue.

At the same time safety of all of the participants to the return process should be a priority and cases that turn out to present with safety concerns should be flagged.

- **Cooperation between sending and receiving countries**

#### Question 33

How involved are receiving, origin countries in the preparations of this program? Should challenges be detected during implementation (e.g., agreement on number of flights, arrival times, etc.) could the RP bring that to Frontex attention to help find solutions?

Answer:

No involvement of authorities from the countries of origin are foreseen in this program. Of course, challenges that arise during implementation can be brought to the attention of Frontex and solutions can be explored. Please note that Frontex is developing a framework on reintegration capacity building for TC authorities which might be closely linked with the JRS.

- **Number of eligible returnees to receive reintegration**

#### Question 34

The Call for Proposals guidelines refers to a formula on how to calculate the number of returnees eligible to receive reintegration. Could Frontex further clarify how this should be calculated? If possible, could Frontex provide a practical example of such calculation?

Answer:

E.g.: IRAQ: 1400 returnees/year would consist of:

Family members:  $1400 * 0.4 = 560$  family members

<sup>1</sup> [EUR-Lex - 32019R1896 - EN - EUR-Lex \(europa.eu\)](#)



Main applicant FR:  $(1400 \text{ returnees} - 560 \text{ family members}) * 5.5\% = 840 * 0.055 = 46$  main applicants FR (rounded)  
 Main applicant VR:  $1400 - 560 - 46 = 794$  main applicants VR

- **Monitoring and Evaluation**

#### Question 35

Could Frontex also clarify how monitoring of the reintegration outcomes based on the Quality Monitoring Framework will be organised?

Answer:

M&E will be done across the board by all RPs based on a Quality Monitoring Framework that is currently under development (in cooperation with ERRIN + Migration Police Initiative Europe) and will be provided at a later stage. It will be part of the Operating Guidelines to be attached to the Specific Agreements.

#### Question 36

How will the reporting work?

Answer:

There are 3 types of costs (operating costs, handling fees and the packages) and some MS will give top ups (because of their national policies) through bilateral agreements. For the handling fees and the reintegration packages, RIAT will be used for reporting. For the operating costs, there will be once per year a very short report to provide. Monitoring for the cases in this programme will only be for the period that the reintegration is eligible, meaning 12 months after the time of arrival.

- **Eligible activities**

#### Question 37

Can the RP include actions related to the outreach, meaning public awareness raising about the project?

Answer:

Unfortunately, only the activities expressed in the Call for FPA are eligible. However, Frontex is well aware of this issue and is open to discuss with RPs possibilities for communication awareness projects.

#### Question 38

Can the RP include pre-departure counselling in their proposal?

Answer:

The Call for FPA does not cover the costs that incur before arrival in the country of origin, therefore pre-departure counselling is out of scope. However, since Frontex is investing in return counselling (not only for its own SC but for the MS), ways of cooperation can be found.

As a sidenote, the RP are expected to be available for a quick call with returnees, before departure, to reassure them of their availability in the TC of return once the returnee arrives.

#### Question 39

In the future, will there be more activities related to prevention?

Answer:

For the moment, the Call for FPA is limited to the activities listed. However, in the future Frontex could set other projects with RPs outside of this Call. Frontex could explore issuing a grant for certain activities possible within the limit of its mandate.

## III- Financial aspects

#### Question 40

Is there a specific structure you expect the applicants to adopt for the budget breakdown? Are there some specific information that you deem necessary to be included?

Answer:

The budget should be split in the following way:

- First page to contain the budget for the whole action of 4 years, including all costs for all TC and packages for reintegration.
- One separate sheet for each TC that your organisation is active in, detailing the data and method used for the calculation of the proposed unit costs for both operating costs and handling fees.

For the submission, please be informed that the applicant is not asked to send all the supporting documents (such as invoices). Please provide us rather with the methodology of the calculation (based on historical data of 12 months). The supporting documents shall of course be made available to Frontex upon request.

#### Question 41

The Call for FPA indicates that for packages based on unit costs, the selected RP will need to upload in RIAT all invoices proving the costs incurred. Annex 4 - Framework Partnership Agreement, Article II.20, indicates that for unit costs / unit contributions / lumpsums, no supporting documents are needed to prove the costs incurred. Could Frontex clarify what will be applicable?

Answer:

The RP has to provide the invoices in order to check the eligibility of services delivered and in case of ex-ante control or audit purposes. The invoices confirm the number of units consumed.

#### Question 42

With regard to point 11.6 of the Call for FPA, the calculation of the final grant amount refers to reduction due to the no-profit rule and is in line with Article II.25.3 of Annex 4. However, the calculation considers the unit costs for which invoices are required to be uploaded, while as per point 11.2 of the Call guidelines, it should not be required to report on actual costs. Could Frontex clarify how the reduction will be applied, based on actual cost or unit cost?

Answer:

The possible reduction concerns only the number of ineligible unit costs, not the value of unit costs.

#### Question 43

The point 11.1.2 a. (iv) of the Call for FPA refers to the eligibility of the office running costs. Article II.19 of Annex 4 does not seem to list office costs other than consumables and supplies. Could Frontex clarify what types of costs will be considered eligible as office running costs?

Answer:

Please be informed that the invoices covering e.g. the office rental, electricity, water, office supplies etc. will be considered as eligible.

#### Question 44

Could Frontex clarify if the RP can budget to produce knowledge based on the M&E data collected as well as for the evaluation?

Answer:

No, because this type of expenditure is not eligible.

#### Question 45

COVID-19 tests at arrival are included as eligible costs under the post-arrival package. There are countries of origin which in addition to a COVID-19 test also require quarantine measures. Will Frontex consider eligible quarantine costs, where applicable?

Answer:

Unfortunately, quarantine costs are not considered as eligible.

#### Question 46

Regarding the Financial Identification Form (FIF) in 1.1.7 it states that if an organisation has already submitted a FIF to EU then it is only required to enter the bank details. For example, if the financial identification form has been submitted to BAMF Germany, BMI Austria, OFII France etc. In this case does the RP need to include it with the application as well?

Answer:

Financial Identification Form has to be submitted in order to register the entity in Frontex financial system or to check if the already registered data are updated. Meaning that this applies only to submission to Frontex, not other European or Member States Institutions.

#### Question 47

Regarding the budget, are the 14 million for 2022 only for the operational costs and not the packages?

Answer:

No, it includes everything. It is the sum of all the costs in the system (operational costs, handlings fees and packages).

#### Question 48

Regarding the calculations of the budget, should the RP take into consideration the total 80 million euros budget?

Answer:

The 80 million euros are for the whole 4 years and for all the countries. It should not affect the RP's calculation since it refers to their own costs.

#### Question 49

Regarding the excel table required, does the RP need to fill it for one year or 4 years?

Answer:

The indicative budget needs to be filled out for 4 years, because this Call for Proposals is for a 4-year FPA. That includes the figures but of course the final budget may be different, it is not set in stone.

The FPA does not mean necessarily that all these partners that Frontex select will receive a grant and will have opportunity to work from the start. It means that there is a partnership for 4 years and during this time there is always the possibility to start working together. It is a 2-step process which means that following this Call for FPA, there will be another one that will be for the yearly grant. Not all of the 53 countries that Frontex is looking for partners for will be activated immediately. The goal is to already have partnerships and then if a situation changes and there is a need for more returns in some countries, then we will activate that destination.

#### Question 50

When it comes to the operational costs of the RP, will it be on monthly basis? And regarding the handling fee, is it a sum per unit or does the RP have to create a budget where all the details of the costs are put?

Answer:

Regarding the operating costs, it is the minimum costs that the RP needs to keep the organisation functional. This refers to the offices, rent, electricity, internet etc. The financial tool that Frontex is using is the unit cost which makes it easy from an administrative point of view because in the future, in the grant itself, not every invoice will be needed. This means that from the very beginning this unit cost needs to be set up between Frontex and the RP: the RP must propose it by stating how much money they need every month to function and then demonstrate this one time how they came up with this amount, meaning proving it with the invoices (rent, electricity, water etc) from the last 12 months.

Regarding the handling fees, that is linked to the actual work done on the case. That could be travel costs to the village if the RP needs to meet the person there, phones calls, meetings rooms, rent of an office somewhere other than the main office. It is what the RP puts into the work that needs to go into each case. For the post-return package, there must be a reintegration plan and must be approved by Frontex and the MS, and once this plan is approved then the RP is eligible to receive the handling fee or the service fee for that package. For the post-arrival package there is no plan because it is only for 3 days. That package will not be granted to everybody, it is linked to the MS giving the RP enough time

to organise themselves: the MS need to inform Frontex and the RP at least 5 days prior to arrival so that the RP is able to arrange the airport pickup or the medical assistance etc. Again, the RP needs to tell Frontex how much it costs to arrange this post-arrival package, how they came to this amount, and to provide the supporting documents that prove the calculations.

#### Question 51

For the handling fee, the RP has to show a detailed budget but are invoices necessary or only calculations? How detailed does that need to be? And should it be now or later after signing the first grant agreement?

Answer:

It should be done now. In the excel document the RP needs to show the calculations, the data and the method used. The supporting documents are the invoices and these calculations need to go back one year. However, to reduce the administrative burden, it was decided that the RP does not need to send the invoices now, only the calculations. Nevertheless, the RP does need to have the supporting documents available if Frontex ask for a sample and in case an audit happens 100% of the invoices need to be kept for 5 years.

#### Question 52

Each MS used to have different packages and now it will be one package. Will additional funds only be bilateral, meaning between the RP and the MS?

Answer:

Yes, this package that Frontex provides is uniform for all the MS. Expanding to 31 MS instead of 15 with ERRIN, most MS will only keep this package because it covers the necessity of most MS. However, there are some MS which have in their national policy the responsibility to spend more. In these cases, those MS will need to have bilateral agreements and they will provide extra amounts.

#### Question 53

Division VR and FR - does it need to put in the application? Does it have an effect on the handling fee or does the RP need to calculate it generally?

Answer:

The RP needs to provide an estimated budget which includes the estimation of the number of VR and FR. The figures in the Call for FPA (table of the 53 countries with an estimation for one year) are a starting point and then it is up to the RP to make an estimation of how many are main applicants, VR or FR, and then calculate the reintegration amount.

If the RP applies for x number of countries, they need to do it separately for each of them. Finally, the budget needs to be done for the whole framework meaning 4 years. To do so, the RP calculates for one year and multiplies by 4.

#### Question 54

In some countries, the organisation itself is automatically taxed according to each individual payment that they do to a beneficiary. Are these taxes eligible costs?

Answer:

Unfortunately, they are not. A solution could be found such as an agreement in advance with the returnee mentioning that they will need to take upon themselves the tax from the cash assistance.

#### Question 55

Are the equipment and the overhead reimbursed?

Answer:

Equipment is not an eligible cost. The amount needs to be split over the 12 months and to be added as an office related cost, it cannot be a separate one-month cost because it needs to be 12 equal units.

The operating costs include the traditional overheads, so Frontex will not be paying overheads. All costs that need to be covered should be included in the operating costs.

#### Question 56

Will the RP receive the money in advance?

Answer:

Yes, pre-financing is possible. The second day after the grant agreement is signed, the RP can request the pre-financing. It can be up to 80% of the total amount of the grant. It will be a fluid situation, Frontex works with a yearly budget so a lot of cases that will start in 2022 will only finish in 2023.

#### Question 57

Is there a limit for the unit costs?

Answer:

No, there is not but of course there needs to be a correlation between the number of estimated returnees and the operating costs.

#### Question 58

Could Frontex clarify the percentage of 5% of forced returns?

Answer:

The percentage is indicative and might vary from TC to TC or from sending MS to MS. Frontex can change it along the way according to the caseload.

#### Question 59

The Call for FPA mentions that funds will be reimbursed to the RP. In this case the reintegration partner first has to provide reintegration assistance to the returnee from its own funds and then send an invoice to Frontex for reimbursement?

Answer:

Kindly refer to the Call for Proposals document. Under the point 11.7. Reporting and payment arrangements it is stipulated that the pre-financing is intended to cover a beneficiary's future expenditures related to the implementation of the Agreement. Following the signature of the Agreement by the last party and its receipt by Frontex, a Beneficiary may send to Frontex a request for the pre-financing up to 80% of the cost.

#### Question 60

Regarding the budget, why is there a discrepancy between the number of estimated cases and the budget?

Answer:

There is this discrepancy between the number of estimated cases and the budget because Frontex sees and understands that there is a timeframe for the reintegration assistance which means that only the cases starting in 2022 and finishing by December 2022 will be in the budget. The cases that will start for instance in September 2022 but finish in 2023 will go into the budget of 2023. Therefore, the 14.7 million will not cover 7000 cases but less. It is impossible to say how many packages will be covered for 2022. Of course, if there is a necessity for an extra budget meaning that a lot more cases than estimated are entered and finished, then Frontex can reallocate. The Agency is very flexible this way and can reallocate budget from other activities. At the same time, it can also be decreased if in October the cases are not there. This is an indicative budget and can change depending on how the things are going.

#### Question 61

Regarding the budget, how is co-financing handled?

Answer:

There is no co-financing, Frontex is financing 100% so there is no need of co-financing from the RP. Regarding the top-ups from MS, some MS will require larger amounts for reintegration because of their national policies so there will be a need of bilateral agreements to get the extra amount.

**Question 62**

The reintegration package comes from Frontex, so if a MS will top-up, would that mean that the RP gets money from two different entities and manage themselves? For the reporting, does the RP report to Frontex or the MS?

Answer:

If there is a top-up, there will be 2 financing streams: the main packages from Frontex and top-ups from MS. However, the reporting is only done through RIAT, which aims at making it as simple as possible.

**Question 63**

Are exchange losses ineligible costs? Does it need to be discussed in the bilateral agreements with the MS?

Answer:

Exchange rate losses are not part of the eligible costs so Frontex does not reimburse them and everything needs to be in euros. It is obliged to use the European Commission rate, not the normal bank rate.

Frontex will work with unit costs so the amounts will not be checked. It is up to the RP to manoeuvre; in some cases they will lose and in some cases they will gain so they will have to balance it. What is reported is the number of units used.

There will be no financial checks from the MS because Frontex pays directly for the reintegration.

**Question 64**

Regarding bank fees and bank charges, how can the RP justify bank charges in the normal running cost in the operational cost budget? Is it possible to have a budget line for bank commissions in the budget proposal just for the calculations?

Answer:

Unfortunately, in line with the provisions of Article II.19.4 of the model FPA, such costs are deemed ineligible and Frontex cannot cover them.

**Question 65**

Could Frontex confirm if the agreed fees will be indexed annually in line with Inflation for the concerned Country of Return?

Answer:

Yes, according to Article 184 of the EU financial Regulation, the units costs shall be adjusted periodically. The frequency and the scope of assessments shall depend on the evolution and the nature of the costs, in particular taking into account substantial changes in market prices and other relevant circumstances.

**Question 66**

In Annex 1 it says that the amount of the estimated budget should be the same as in the Annex 3 - Estimated budget. Since the RP needs to provide separate budgets for each country it applies for, is the budget reported in Annex 1 their total?

Answer:

Yes, Annex 1 should reflect the grand total for the whole action, covering all TC and spanning 4 years. At the same time, as stated before, a separate excel sheet for each TC covered should reflect the data and calculation method that was used to reach the proposed unit costs for both operating costs and handling fees. This is due to the fact that in the case that two or more potential reintegration partners may get the same amount of points in the second phase of the evaluation, the individual budget for each TC will be taken into account to choose the cheaper option.

**Question 67**

At page 14 of the Call for Proposal it mentions an "estimated yearly budget provided in the Strategic Action Plan". Does this mean that there need to be an overall budget in the Strategic Action Plan, in addition to the budgets in excel for each of the countries the RP applies for?

Answer:

The Strategic Action Plan should reflect the RP's proposal on how to reach the objectives mentioned in the Call for FPA. Of course, it should reflect the actions to be taken and at the same time it should show the budget needed to take said actions. This budget as it is stated is a preliminary estimated budget for the 2022-2026 period. Each yearly budget will be established before the award of each yearly grant.

#### Question 68

Could you shed some light on the conversion from the local currency into EUR via the InforEUR and potential exchange rate losses?

Answer:

InforEUR is used for calculation related to the month (not the day) of the invoice or distribution slip in case of cash assistance. There is no actual currency conversion at the level of Frontex. Frontex makes all payments in EUR. Also, Frontex will reimburse units based on the statistics from RIAT and the unit cost for each category (for example 1 unit for operating cost for each month, 1 unit for handling fee for each package spent), not based on invoices. The currency conversion would come into play only at the time of an audit or when Frontex would check the proof of payments. At that point, if the proof of payments is not in EUR, the InforEUR exchange rate will be used for reference.

It is up to the RP to manage any exchange from EUR to local currency. As Frontex does not specifically look at the amounts on the invoice, the issue with the exchange rate can be mitigated.

#### Question 69

If a RP is basing their budget on the estimate provided but Frontex decides to choose two or more service providers from a single country, the budgetary estimate will definitely change. Would the organisations have the option of revising their budget if two or more organisations are selected from the same country?

Answer:

The estimated budget that RPs will provide at this stage is used by Frontex to paint the big picture of the reintegration landscape for the next years. Prior to Frontex awarding the yearly grants to the selected partners, a specific budget for each grant will be calculated at that time. This exercise will be repeated every year before the award of each subsequent grant. Therefore, yes, the partner will have the opportunity to revise the budget on a yearly basis, based on new estimates and the possibility of price fluctuations.

#### Question 70

In typical financing modalities, it is either result based or actual expenditure based, but in the Call for FPA there seems to be a combination of the two. How is this result-based approach foreseen to be implemented within the programme?

Answer:

Under this Call for FPA, Frontex will use only unit costs and not actual costs. When it comes to verification, the need to upload proof of payments is not used as a verification method for the actual amounts but only to verify the eligibility of services provided. The actual calculation for reimbursement is based on the number of units claimed and if they are also equal to the number of units used.

#### Question 71

At point 11.6 of the Call for FPA, there is a reference to the calculation of the final grant amount and also a requirement to upload invoices, could Frontex clarify if this means invoices strictly speaking?

Answer:

No, it means any documents that justify the expenditure of funds for that particular case, be it invoices, distribution receipts for cash or any other proof of payment.

#### Question 72



For X country, if the estimated number of returnees is 600 for the first year for example, should the RP provide a budget with 2400 estimated returnees for four years?

Answer:

Yes, the estimate should cover 600 returnees per year x 4 years = 2400 returnees

#### Question 73

It is mentioned that SAP should also have a budget, should this be the copy of Annex 3?

Answer:

Yes, the same budget amount should be used in the SAP.

#### Question 74

Regarding the audit, a certificate on cost-accounting practices is one of the conditions. What is the expectation from Frontex?

Answer:

It is a simple certificate about the organisation in general that will clarify the fact that the RP is in line when it comes to the accounting procedures. Auditors can provide such certificates.

## IV- Operational aspects

#### Question 75

Regarding the daily operations of the activities, will it continue like ERRIN, for example the RP will be in contact directly with the MS, or Frontex will be the RP's main focal point for the daily exchanges on return and getting approval?

Answer:

There is a difference between how ERRIN is operating and how Frontex will operate. It derives from the fact that there will be no other financial flow than the 3 types of costs planned. Of course, MS will be able to top-up based on bilateral agreements with the RP as in ERRIN. Frontex will be active PMO with a very strong role in the case management. The MS will have to insert the cases but the Agency is doing the eligibility checks, looks at the reintegration package, does the final check and monitors. Therefore, there is a difference but of course the coordination with the MS per case will remain.

#### Question 76

MS will continue the registration and documentation in the host country, and when returnees arrive in the TC the RP will be the one responsible meaning that the RP does not have to intervene inside the EU?

Answer:

The process is as follows: MS select the returnees eligible to receive the reintegration assistance based on their national policy (it is their responsibility) then they start the case in RIAT, it comes to Frontex which checks the eligibility. Therefore, the RP's work starts when the case arrives to them so no responsibility in the MS.

#### Question 77

RPs have to show their operational capacities. If the RP deals with many activities and migration is only a small part, should they only demonstrate the migration part or the whole capacity?

Answer:

Only show the part of the organisation which will work on the relevant activities.



## V- Next steps

### Question 78

After having the FPA, would the mini competition occur every year or is it valid for the 4 years?

Answer:

The mini competition is to decide which RP gets which TC but when the RP is selected it is for 4 years with a possibility of a 2 year extension, which allows Frontex to renew the grant yearly without having to launch another Call for FPA.

### Question 79

If the RP apply for X country and loose the competition, would Frontex have at a certain point during the 4 years a second service provider or would the service provider selected be changed if the job done is not satisfactory, and another organisation from the ones who passed the first phase could be activated?

Answer:

The second competition will give Frontex a list of RP for each TC and the first one on the list will get the grant for this particular country, but Frontex do have the freedom to award more than one partner on the list. If the first one does not provide satisfactory results, the second one on the list will be activated automatically without another competition. It is a reserve list. At any time, these reserved partners can be activated. This saves time and make the later on procedures simpler and quicker.

### Question 80

If for various reasons the reintegration does not work the first time, is there a second chance to re-finance?

Answer:

Unfortunately, not under this Call for FPA. There is a discussion ongoing at the European level to know whether the returnees would be eligible to receive reintegration assistance a second time but there is no conclusion yet.

### Question 81

By mid-February, Frontex will be informing the applicants and FPA will be signed. Does that mean that the RP selected can start working on the detailed proposal or is there another evaluation? Will there be only one entity selected in TC or will Frontex open the application to more than one entity?

Answer:

In February Frontex will have all the partners, and the competition will be sent out for each TC. If in a TC there are 2 or more applicants, the one that wins the competition gets the grant agreement but there is also a possibility for Frontex to award a grant to a second partner in the event that there is such an increase of cases that the organisation cannot cope and then Frontex would be able to distribute among the partners. Therefore, there could be 2 partners in the same country and then it would be up to the MS to choose whom to select within RIAT.

### Question 82

About the post-call contracting of subcontractors for TC, is it possible to apply for a TC where only later a local RP is contracted that is not mentioned in the strategic action plan?

Answer:

Technically no, because in the first Call Frontex is asking the RP to indicate what they can cover, and invitation for specific TC will only go to those RP who expressed already the availability for that specific TC. Also, this would affect the budget estimation that needs to be submitted.