





Contract Title: "Technical Assistance to the Operating Structure for SOPEES"

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Questions and Answers (2nd edition)

Support provided through help-desk function to Grant Beneficiaries of the following grant schemes managed by the MLSW in scope of SOPEES:

- "Training and education activities for deficit occupations and for boosting employability of RE population" (EuropeAid/163191/IH/ACT/ME),
- "Support to Provision of Social and Child Protection Services" (EuropeAid/162650/IH/ACT/ME).

(The 2nd edition of Q&A is derived from helpdesk operation and implementation workshops held for selected GBs by the cut-off date: 30/April/2020).

This project is implemented by ALTERNATIVE CONSULTING in Consortium with Expertise Advisors and International Consulting Expertise EEIG (ICE).

The answers provided in this document are those of the Contractor implementing the Project.

They are not approved and nor do they reflect the official position or views of the European Union or the Delegation of the European Union or the Contracting Authority.

This document has been prepared as a team effort of the project key experts.













Questions and Answers

- Q1. Is there a template for the partnership agreement?
- A1. No, such template is not developed. Grant beneficiaries are free to depict their mutual responsibilities and cooperation arrangements using their own usual practices.
- Q2. Should the partnership agreement be developed, is it mandatory to have it in English?
- A2. As the language of the Call for Proposals is English, applicants are advised to provide at least the translation of relevant parts of such documents into English. However, as noted in Q1, the Contracting Authority does not provide any specific template for this document.
- Q3. Within the tools published, Tool 4 relates to a specific template for the timesheet(s). Shall we use this document as it is always in its entirety, or can we slightly modify the contents of the template?
- A3: The timesheet tool (Tool 4) is provided for instructive purposes, and contains basic elements that should be found in such document. If, within the pace of implementation, grant beneficiaries find that the template needs to be amended, it can be done so, however in the cases of significant changes, it is recommended to consult the helpdesk (and CA if need be) prior to using such amended template.
- Q4. Shall we prepare a 'note to the file' for the purchases below 2,500 EUR?
- A4. As mentioned in the Tool 5 Procurement procedures, 'The beneficiaries may procure supplies or services based on invoice (asking one provider/supplier for pro-forma invoice) for services/supplies below 2,500 EUR. Providers/suppliers should demonstrate clear preparedness and ability to supply goods/supplies or deliver services as required. It is always recommended to archive records (documentary proofs) of the procedure (such as e-mail enquiry by grant beneficiary and pro-forma invoice by supplier/provider received).' Notes to the files may be prepared, in line with the grant beneficiaries' normal procurement/purchasing practices.
- Q5. Should the 'note to tender' be developed and signed for each single tender procedure?
- A5. A 'note to tender' is developed as a part of the 'single tender package', and should be developed (signed) for each single tender procedure within the grant action.
- Q6. As a part of our grant action, a visibility related procurement is planned, to the amount of 20,000 EUR. Shall we use the single tender procedure?
- A6. Yes.







- Q7. Can we invite private entities to take part in tender procedures?
- A7. Yes.
- Q8. If our suppliers/service providers are outside of the VAT system (they do not charge VAT), what shall we do in regard to VAT exemption?
- A8. The CFCU's Guide on VAT exemption can be found at http://www.cfcu.gov.me/biblioteka/dokumenta/, however if an entity is not charging VAT, exemption is not applicable.
- Q9. Within our grant action we planned to sub-contract an expert to provide us with support in secondary procurement procedures. The amount is above 2,500 EUR. Shall we develop a single tender package for these services?
- A9. Yes. You are also advised to have such expert sign the <u>Declaration</u> on objectivity and impartiality for all secondary procedures planned within the grant action, where they shall take part in the preparation of single tender documents, in line with the instruction provided in the document 'To be completed by all persons involved in preparing terms of reference, technical specifications or other documents relating to the (call for tenders) (call for proposals).'
- Q10. Are there any tender packages for works?
- A10. No, such packages are not developed. Applicants may advise DS1 PRAG Annexes, that contain tender dossier for simplified tender procedure in cases of works.
- Q11. Are salaries of national administration eligible?
- A11. Please note that standard General conditions for grants, article 14.11 states that 'salary costs of the personnel of national administrations, unless otherwise specified in the special conditions and only to the extent that they relate to the cost of activities which the relevant public authority would not carry out if the action were not undertaken' are NOT considered eligible. Please check whether this article has been derogated in your Special conditions.
- Q12. Are there any special rules in relation to the employment of project staff in partner organizations?
- A12. The term 'beneficiary(ies)' refers collectively to all beneficiaries, including the coordinator of the action and co-applicants. Hence, provisions related to the cost of staff assigned to the action in Article 14.2 of the General conditions relate also to 'partner organizations' i.e. co-applicants. Recruitment, employment, and staff's carrying out of related duties, needs to be in line with the grant contract, applicable national legislation and beneficiaries' practices. The eligible costs are constituted by gross salaries or wages in respect of the actual time devoted to the project and include income taxes, social security etc., and other statutory costs included in the remuneration, provided they are standard human resources policy of the beneficiary and can be proved by supporting documents of the beneficiary (or affiliated entity).







Q13. What is the maximum number of installments to be paid to contractors?

A13. Please note that rules in relation to payments are defined in general condition templates for services, supplies and works (simplified procedures and above) in the articles titled 'Payment and interest on late payment'. Number of installments to be paid to contractors (and amount of such installments) will vary from situation to situation, hence no maximum number of such is defined as a general rule (note however that in the cases of global price service contracts, under the simplified procedure and above, lasting less than 2 years, the number of payments will be, for example 2).

Q14. Do partner organizations provide individual reports (interim and final reports)?

A14. No, in line with the Article 2.1 of the General conditions, 'The coordinator shall collect all the necessary information and draw up consolidated interim and final report'. The term 'coordinator' refers to the beneficiary identified as the coordinator in the Special conditions (this is the Lead Applicant).

Q15. Shall partner organizations have separate bank accounts? Do partner organizations manage their own finances within the action?

A15. According to the General conditions, Article 1.5 the grant beneficiaries shall 'agree upon appropriate internal arrangements for the internal coordination and representation of the beneficiary(ies) vis-a-vis the contracting authority for any matter concerning this contract, consistent with the provisions of this contract and in compliance with the applicable legislation(s)'. Arising from this, the management of partnership, including in financial terms should be agreed between the partners. Accounts (Article 16.1, General conditions), 'shall enable income and expenditure relating to the action to be easily traced, identified and verified' — hence, a separate bank account may assist in the adherence to this rule, but it is not a mandatory feature arising from your grant contract. Grant beneficiaries are reminded to use Tool 2 (Accounting system checklist) to further self-evaluate accounting requirements.

Q16. Can you elaborate on the VAT exemption? Do partner organizations need to submit a copy of the contract to the Tax Authority and how can they be exempted from VAT if they are not signatories to the contract?

A16. The parties to the grant contract are ALL grant beneficiaries and the contracting authority. For details on VAT exemption procedure please consult the CFCU's Guide on VAT exemption that can be found at http://www.cfcu.gov.me/biblioteka/dokumenta/.

Q17. Are travel expensed paid using Via Michelin calculations? Do we need to have invoices for travel expenses?

A17. Please note that documentary proofs of purchase, for the direct eligible costs are, inter alia, invoices and receipts. Beneficiaries may reimburse travel and subsistence costs of the action to their staff on the basis of real costs incurred by their staff (documented by invoices) or on the basis of per diems (daily allowances).







Q18. Are there any templates for travel orders?

A18. No, the grant beneficiaries are advised to use their own internal templates for both travel orders and for reporting on the missions including travels.

Q19. If we have invited 3 entities to a single tender, do we also need to receive 3 valid offers?

A19. In simplified procedures, as defined in PRAG (section 3.5.2 in cases of services for example), the contracting authority draws up a list of at least three service providers and justifies its choice. If, having consulted the tenderers, the contracting authority receives only one tender that is administratively and technically valid, the contract may be awarded provided that the award criteria are met. In single tender procedures, as described in Tool 5, contracts may be awarded based on a single tender. The grant beneficiary might decide to contact/compare more offers if it considers that this would improve efficiency of the procedure (i.e. improve quality of supplier/provided goods or services or decrease prices). However, it is sufficient to invite one entity/receive one valid offer (provided of course all Annex IV principles are respected).

Q20. What is the deadline for the submission of the Communication plan?

A20. As a general rule, such plan shall be developed and submitted to the Contracting Authority one month after the start of the action.

Q21. How can we change the location of the counselling office, a community-based service which is to be developed within the grant action? Originally, we intended to launch it at the locality A, but currently, we are considering revising this original plan.

A21. All steps and procedures for the contract modification, including activities are described in section Grant contract modifications of the <u>Guidelines for project implementation by Grant Beneficiaries</u>. Please also note that no amendment to the grant contract (either unilateral or by addendum) may call into question the initial award of the grant or the equal treatment of applicants.

Q22. Are there any special rules for the payment of fees for staff working in CSWs or in schools?

A22. Please consult Q11.

Q23. Can we obtain a VAT exemption for the expenditure under indirect costs?

A23. As a general rule, beneficiaries have to apply for tax (including VAT) exemption whenever possible. Steps related to the procedures can be found at the CFCU's Guide on VAT exemption: http://www.cfcu.gov.me/biblioteka/dokumenta/.

Q24. How can we pay per diems to the seminar participants?

A24. Beneficiaries may reimburse the costs of accommodation, meals, local travel...) on the basis of per diems (daily allowances), according to their own human resources procedures. 'Per diems' are not







considered a simplified cost option for the purposes of EU financing when a beneficiary reimburses a fixed amount to its staff in accordance with its staff rules and requests the reimbursement of that same amount in the budget of the action. Such per diems are considered actual costs, as any other. Where a 'per diem' is agreed, not all supporting documents are required (restaurant's bills, fuel invoice, taxi slips...), but only those proving that the travel/participation at the seminar actually took place.

Q25. In Tool 7, (Quarterly Monitoring Information) in the section on budget expenditure, do we present only the funds spent from the EU grant, or also our co-financing?

A25. The section mentioned is related to your entire budget, including the funds received from the CA and any co-financing, hence it relates to total grant related expenditure paid.

Q26. How can we revise the agreed Procurement plan?

A26. In cases of revisions, you will notify the Contracting Authority on such revisions. In terms of the reporting on the execution of the Procurement Plan, you shall use Tool 7, and present the events that took place (launching of tenders, submission of invitations, selection.....) in applicable section of this Tool, for the purposes of monitoring.

Q27. Can you please clarify if project coordinator's and project assistant's costs are to be presented in Budget heading 6?

A27. As a general rule, such costs are presented in Budget heading 1 (human resources), as they are essential for the implementation of the Action.

Q28. What is the level of detail expected in the applicable sections on service/technical specification within the Part A of the single tender package? We find it unusual not to have a template for the terms of reference for service contract. Shall we then describe all requirements usually presented in the ToR in this section? For example, experts' requirements etc.?

A28. If grant beneficiaries find the section on service specification in part A document of the single tender package overly simplified, a template for ToR published within the simplified tender procedure package can as well be used. In all cases, yes, all requirements, scope of work, timing, specification of outputs etc. shall be described in applicable section of the single tender package, document A. This extends to selection criteria if they are included in the tender.

Q29. Single tender package does not include an evaluation grid. How can we then evaluate/assess technical quality of the offers received?

A29. If a technical quality of the offers (using best value for money as the award criteria) is evaluated/assessed, grant beneficiaries are advised to develop appropriate assessment tools for these purposes and include them in part A of the single tender packages. An evaluation grid, already a part of the package for the simplified tender procedure, can be used (global price or fees).

Q30. Who shall complete the Services required column in Part B of the single tender package?







A30. This column shall fully reflect the service specification/technical specification presented in the Part A of the single tender package. To that end, it may be pre-completed by the entity launching tender. Potential service providers shall use columns 3 and 4 to present their offers.

- Q31. Can you please clarify if contracts with trainers and evaluators, presented in the budget heading 5, are to be presented in the procurement plan? These will be the contracts with private entities.
- A31. Yes, they should be presented in the procurement plans.
- Q32. Shall Tools 6 and 11 (Procurement Plan, Communication Plan) be completed for the entire action?
- A32. Yes, these are the procurement and communication plans that cover your entire grant action, from start to end.
- Q33. Can we address helpdesk only via email?
- A33. No, individual consultation sessions are also possible and welcomed.
- Q34. Can we suspend the contract?

A34. Yes, both grant beneficiaries and the Contracting Authority may suspend the contract. The articles defining the suspensions are explained in Articles 11.2-11.7 of the General Conditions. The coordinator may suspend implementation of the action, or any part thereof, if exceptional circumstances, notably of force majeure, make such implementation excessively difficult or dangerous. If the contract is not terminated as the consequence of the suspension, the beneficiary (ies) shall endeavor to minimize the time of its suspension and any possible damage and shall resume implementation once circumstances allow, informing the contracting authority accordingly.

Q35. Can you please clarify our reporting obligations?

A35. Your reporting obligations are described in Article 2 of your General conditions. In principle, you will be submitting an Interim report following the 12 months of implementation, and a final report following the end of the action. The reporting period is intended as a twelve-month period unless otherwise provided for in the Special conditions. When the remaining period to the end of the action is up to 18 months, the reporting period shall cover it entirely.

Q36. Is alcohol an eligible cost?

Q36. In principle, consumption of alcohol at trainings, public events etc. is not considered necessary for the implementation of the action; and as such considered eligible. However, in some specific circumstances, such as training of waiters, for example, such cost relates to a consumable necessary for the implementation of the action, i.e. learning.







Q37. We are planning to sub-contract an accountant under the action. When shall their contract start? After the start of the action or on the day when the CA transfers the payment?

A37. Both dates are possible, depending on your contracted budget and needs. Grant contract enters into force on the date when the second of the two parties signs the contract; however, the implementation starts either the following day or on a later specific date, as defined by the beneficiary and the CA, regardless of when the initial pre-financing is paid.

Q38. Shall all human resources staff be asked to complete timesheets, regardless of the % of time they work under the project?

A38. Yes, a pro-rata system based on estimations cannot be used to justify direct costs, including those of staff. For example, it may be accepted that a project officer works 20% on a contract if supported by timesheets, justifying that she/he actually worked those hours or days on this action.

Q39. Can project results (impact, outcomes, outputs) be modified?

A39. Modification of project results shall be set in writing, by the exchange of letters between the GB and the CA. Indicators and targets may be modified unilaterally, whereas the CA is informed on those modification at the latest in the next report (interim, final).

Q40. Can you provide some advice in relation to the activities to be presented in the Communication Plan?

A40. Please consult your Description of the Action (DoA) and Budget and present all visibility and communication activities planned there, in your Communication plans, without adding any additional activities that are not a part of the DoA/budget.

Q41. Shall we state maximum budget available in secondary procurement packages for a supply contract?

A41. No.

Q42. May we state maximum budget available in a secondary procurement of services?

A42. Yes.

Q43. Is it possible to prepare a single tender package using the local language (Montenegrin)?

A43. Single tender procurement documents can be written in the Montenegrin language (translated package of documents available under Tool 5) and offers can be in the Montenegrin language, if this is explicitly stated/requested in the tender documents. You may decide to translate relevant parts of such dossiers into English for future audit purposes.

Q44. Are there any single tender package templates in the local language?







A44. No.

Q45. Can we initiate procurement earlier than planned (in the Procurement plan)?

A45. Procurement plan is an indication of your plans, and as such can be revised. Should you decide to initiate some procedures earlier than planned, you can simply notify the Contracting Authority on these events, prior to submitting invitations.

Q46. When shall we submit the next request for payment?

A46. The frequency of pre-financing payments depends on the duration of the action and on the total amount of the grant. The option applicable to the action in question will therefore be stated in Article 4 of the Special conditions of the contract. In Option 2 (consult Article 15.1 of the General conditions, also described in applicable section in the Guidelines for Project implementation by Grant Beneficiaries), if at the end of the reporting period eligible costs incurred are less than 70% of the last payment (and 100% of the preceding payments), the further pre-financing payment may not be paid in full. If the coordinator presents a payment request, the payment is reduced by the amount corresponding to the difference between the 70% of the last pre-financing payment (and 100% of the preceding payments) and the part of the eligible costs incurred that is financed by the contracting authority. Alternatively, the coordinator may present a summary of the progress of the action, and present a payment request later, when the 70% threshold is reached (the narrative and financial report have then to cover the elapsed period since the last payment request). The following reporting period starts anew from the end date of the period covered by the payment request.

Q47. Is there any template for a breakdown of expenditures that shall be submitted alongside the report?

A47. There is no particular template. The Beneficiary has to provide a list detailing each item of expenditure incurred in the period covered by the report, and indicating for each its *title, amount, relevant heading in the Budget of the Action and the reference of the justifying document,* annexed to it.

Q48. Can we evaluate offers received within the single tender procedure without the Evaluation Committee?

A48. In single tender procedures, the evaluation committee is not necessary, evaluation may be done based on YES/NO criteria, with no scoring. Taking into consideration that single tender procedures are actually negotiation procedures, where applicable, we advise that persons participating in the negotiation process are nominated and that they prepare the Negotiation Report. The authorizing officer within the grant beneficiaries' organization afterwards approves the Negotiation Report (it should not be the same person participating in the process and evaluating offers).

Q49. If we decide to invite more parties to submit offers, using single tender procedure, shall a list of invited entities be shared with all those invited to submit an offer?







A49. A list of invited entities may be prepared using a template provided in the package for a simplified procedure. Informing all invited parties on these details is considered a good practice.

- Q50. Shall we complete a negotiation report (Annex A10a) once a simplified procedure is finalized?
- A50. Only in cases where negotiation took place. In the event of a failure of the simplified procedure, the contract may be concluded by negotiated procedure - in these cases Annex A10a must be completed. Otherwise, the Evaluation Report template shall be used.
- Q51. What does it mean 80/20 at the criteria in determining best value for money?
- A51. The best value for money is established by weighting technical quality against price on an 80/20 basis. This is done by multiplying: - the scores awarded to the technical offers by 0.80; - the scores awarded to the financial offers by 0.20.
- Q52. Our project duration is 12 months, and we planned a 12-month rental for the project office, however we still did not contract the rental provider. What shall we do?
- A52. Your costs related to rental provider, under the grant action have to be related to and generated by activities carried out within the implementation period of the action (as defined in Article 2 of the Special conditions). Shall some unspent costs or 'savings occur, you may either claim less costs than contracted (as contracted budget amount is a maximum estimate) or, if justified and reasonable, request a budget modification.
- Q53. We would appreciate a clarification in relation to the role of the Government of Montenegro in cofinancing of our grant action, referring to the instruction to visualise their logo in our visibility materials. As you know, the project partners will provide co-financing through salaries of two project team members, who are premanent employees of partner institutions.
- A53. The visual identity of the grant actions is a reflection of the SOPEES Programme, which is in its entirety funded by both EU and Montenegro. For further details, please consult https://ec.europa.eu/neighbourhood-

enlargement/sites/near/files/pdf/montenegro/ipa/2015/ipa 2015 2017 037895 me multiannual acti on programme.pdf (section 3, Budget).

- Q54. Can our co-financing be in a form of fuel, or electricity bills? Can this co-financing cover only a part of these bills (for example 50 EUR on an electricity bill totaling 195 EUR)?
- A54. Co-financing to the action may constitute a part/total expenditure of any related budget line within your overall contracted budget. Co-financing is presented as a percentage of the total contracted amount, and it cannot be a part of the only one or two budget lines.
- Q55. What to do in cases of supply tenders where suppliers are offering prices that are exceeding the available budget?







A55. In cases of supply contracts (Section 4.3.9.6. Choice of contractor) the successful tenderer is the one submitting the least expensive tender classified as 'technically compliant' during the technical evaluation. It must be declared to the successful tenderer if it is equal to or lower than the maximum budget available for the contract. If the chosen tender exceeds the maximum budget available for the contract, Section 4.2.6.1(j) applies, as follows: "Where the tender procedure has been unsuccessful, that is to say, where no qualitatively and/or financially worthwhile tender has been received, in which case, after cancelling the tender procedure, the contracting authority may negotiate with one or more tenderers of its choice, from among those that took part in the invitation to tender, provided that the procurement documents are not substantially altered". If the negotiation process fails, the procurement should be repeated.

Q56. Shall we present achieved or planned numbers of beneficiaries in the QMI templates? (section related to SOPEES indicators)

A56. Both. QMIs are slightly modified to allow such presentation.

Q57. Can we launch a tender procedure for services divided per lots, and so procure expertise from various individual experts?

A57. Procurement of services per lots is possible.

Q58. What evidences need to be submitted to claim travel costs? Travel orders only or also tickets and invoices? Is cost for taxi eligible?

A58. See Q17. Beneficiaries may reimburse travel and subsistence costs of the action to their staff on the basis of real costs incurred by their staff (documented by invoices) or on the basis of per diems (daily allowances). If travel costs are not presented in budget line for per diems, invoices/tickets are necessary to claim the costs. Taxi costs may constitute a part of the per diem, or a travel cost, provided they are as such presented in the budget justification, inter alia

Note however that travel expenses must correspond to affordability (inexpensiveness) criteria, demonstrable on the basis of an assessment. This means that the most cost-efficient means of transportation shall be used (normally public transportation). In case of transport by taxi or by hire car, reimbursement may be permissible on the basis of the actual cost, provided that this cost is not excessive in relation to expenditure for the use of alternative means of transport. Detailed information about evidences related to travel costs are detail explained in the Guidelines for project implementation by grant beneficiaries – Tool 9 on page 3.

Q59. If some service is defined as requiring 20 days to be finalised, is this 20 calendar or working days?

A59. Such provisions should be defined in the tender dossier (defining that a service shall be finalised within 20 calendar or working days. In cases of fee-based contracts, where experts will untimately be required to present timesheets as per work done, and using the general rule that weekend work may take place only exceptionally and with authorisation of the Contracting Authority, it is more likely that the duration in question shall relate to working days and not to calendar days.







Q60. Should we request the non-cost extension due to COVID-19 situation?

A60. Such request may be prepared, however note that all grant actions are in their early start and that submission of such requests may, in some situations, be considered overly preempted. It is quite likely that current delays, caused by COVID-19 may be easily compensated later, in accelarated implementation.

Q61. Our organisation, a Coordinator under the XX grant action is at the same time an organisation accredited to carry out a certain training programme. While the organisation is a holder of an accreditation permit, a certain number of individuals, some our organisations' staff, some our long — term consultants are accredited trainers of such programme. We cannot procure the services of these accredited trainers to conduct such a programme, as this would be the breach of a conflict of interest principle. On the other hand, the training in question is a core activity under our grant action. What shall we do?

A61. Please note the provisions of the DEVCO Companion (https://ec.europa.eu/europeaid/companion/document.do?nodeNumber=19.3.1.2)

As a general rule, tasks performed by consultants, experts and/or other service providers (e.g. accountants, lawyers, translators, external IT staff, etc...) are to be considered as resulting from implementation contracts (Article 10). Consequently, beneficiaries must award these contracts in accordance with Annex IV. These costs are thus not considered as human resources (budget heading 1) but as other costs/services (notably budget heading 5 or 6).

However, as an exception to the rule, the costs of 'in-house consultants' may be considered as personnel costs regardless of whether the consultants are self-employed or employed by a third party, if the following <u>cumulative conditions</u> are fulfilled in accordance with the terms of the call for proposals and subject to the eligibility of costs:

- (a) a beneficiary has a contract to engage the consultant to work for it and (some of) that work involves tasks to be carried out under the action funded by the grant;
- (b) the consultant must work under the instructions/supervision of the beneficiary;
- (c) the consultant must work in the premises of the beneficiary as a member of the project team;
- (d) the output of the work belongs to the beneficiary;
- (e) the costs of employing the consultant are reasonable, are in accordance with the normal practices of the beneficiary and are not significantly different from the personnel costs of employees of the same category working under a labour contract for the beneficiary;
- (f) travel and subsistence costs related to such consultants' participation in project meetings or other travel relating to the action is directly paid by the beneficiary or in any case according to the beneficiary's own staff procedures.
- (g) the consultant uses the beneficiary's infrastructure (i.e. user of the 'indirect costs').

These conditions describe a de facto situation of subordination, as in a traditional labour contract (regardless of the legal form). Therefore in these cases, if the national applicable legislation allows for a de facto employee to be hired under a service contract, and provided that all the conditions stated above







(similar costs, property of results, subordination, etc.) are satisfied, these service contracts may be assimilated to staff costs in the budget and for all useful purposes (for instance, procurement principles set out in Annex IV would not apply). Unless otherwise specified in the Guidelines for applicants, service contracts meeting these criteria may be charged to heading 1 - human resources.

Hence, you are advised to present such costs under BH 1 – Human resources

If such costs are presented unde budget heading 5, or 6, Grant Beneficiary can enagage his own personnel for services provided under budget heading 5, if the following conditions are met:

- Those employees cannot be already engaged in the project through budget heading Human resources
- Justification must be provided explaining why the specific employee from Grant Beneficiaries institution will be engaged in the particular activity. When special accreditation is required for the lecturers, proof of the accreditation must be provided for the lecturers as well as a list indicating the individuals which possess this accreditation in Montenegro in order to depict the expertise of these particular employees of Beneficiary's institution and justify why these services could not be provided by another person which is independent from Beneficiariy's organization.

Q62. We have been asked by the CFCU to group certain costs (supplies) under one procurement procedure. What shall we do now if tenderers offer to us supplies that are in some cases compliant with our budget, and in some not?

A62. If, following the procurement procedure a budget modification is required, regardless of the number of budget lines affected, you are advised to follow procedures for unilateral contract modification/addendum described in the Guidelines for Project Implementation by Grant Beenficiaries. A detailed market research should precede any tender launch, inter alia, with an aim to avoid such situations.