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Professor Filippo de Rossi, Rector
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Email: rettore@unisannio.it

Subject: Final Report 561621-EPP-1-2015-1-IT-EPPKA2-CBHE-JP

Dear Professor de Rossi,

In relation to your request for payment of the balance under the above-mentioned agreement, we would like hereby to inform you on the result of the assessment of the Final Technical Implementation Report and the Financial Statement of the above-mentioned Capacity Building in the field of Higher Education (CBHE) project.

For the reasons explained below, the Agency considers that your project implementation is "**WEAK**" (please refer to the Categories of qualification at the end of this letter) and intends to apply a grant reduction for poor implementation (1). At the same time, the Agency considers that some costs should be rejected as they are ineligible (2). However, in order to determine the final amount of the grant, both the grant reduction and the costs rejection do not accumulate, and only one of those two measures will have a financial effect (3).

1. Final Technical Implementation Report and grant reduction for poor and partial implementation

Further to the examination of your Final Technical Implementation Report, we intend to reduce your grant initially provided for by **25%**, for the reasons explained below:

It must be highlighted first of all that your report did not provide a comprehensive picture of your project achievements, as the answers did not respect the instructions of the "CBHE final report explanatory note" and some of the same replies were simply copy-pasted into different sections. Even the answers that we received following our request for further information still provided the information in a relatively confusing manner, with references to 52 different annexes, which made the analysis even more burdensome. Moreover, the majority of the extremely numerous documents uploaded on the Erasmus+ Project Results Platform did not correspond to what we expect as results for publication in terms of type and quality, and it was difficult to identify relevant information among the documents submitted.

On the basis of the provided information, we can conclude that the project has reached some but not all of its objectives, and that the quality of the results is low. The lack of evidence on some of the outcomes also raised doubts on the accuracy of some of your statements.

Referring to the objectives of the project, we note that the Master programme "Computer Systems for Medicine" was developed by the consortium, but was not launched during the project lifetime due to the lacking approval from the National Authorities. We understand that this approval was received by the Tashkent University of Information Technologies in July 2019, more than 6 months after the project end. However, this is in contradiction with the Table of Achieved / Planned Results, which stated that the Master was "deployed on a yearly basis".

Your report mentions that three students were to some extent trained during the project lifetime in the topics of the new Master, by participating in training abroad and choosing dissertation topics in the field – this can however not be considered in line with the CBHE requirement of piloting new study programmes for one year during project implementation.

Your project was also supposed to modernise the Master programme in Medical Rehabilitation at the Nukus branch of Tashkent Pediatric Medical Institute. We were disappointed to learn that this modernisation only consisted of the development of one new course in "Modern information technologies in Medical rehabilitation". We cannot consider a study programme as having been modernised by only developing one new course.

One of the main cooperation tools and outputs of your project was supposed to be an ICT platform, delivering both theoretical and practical educational services. Your report indicates that this platform was developed and successfully used for dissemination, e-learning and document management. However, the Moodle platform hosted by the coordinating institution only contains a selection of pdf-documents linked to each course, with no clear elements of e-learning. Very low numbers of participants appear on the platform and no interaction between them is visible. Also the platform hosted in Uzbekistan (<http://moodle/techreh.uz>) does not show any evidence of course participation or interaction between participants. Moreover, the registered participants on both platforms seem to be simply project partners, no students or other external users. We conclude on this basis that there is no common, multilingual, ICT learning platform of the type that you have described in the report.

We understand that the project website was first hosted by the coordinating institution and a new version was created later by the Uzbek partners (www.techreh.uz). We noted that the Uzbek website works very slowly and does not contain any project deliverables. Moreover, the News section contain no updates since 2017. This is in contradiction with statements in your report indicating that the website "included the most relevant outputs (methodologies, results, reports and recommendations from WPs)".

Concerning the results uploaded on the Erasmus+ Project Results Platform, most of these could not be approved and published, either because they were considered as internal documents or because they did not respect the visibility requirements of the programme. A series of very low quality videos and copies of study materials with no references to the project also had to be rejected.

As far as sustainability is concerned, the Exploitation Plan remains at a very general level and some of its statements have clearly not been followed up. For example, the project website is not regularly updated and there is no evidence that the IT learning platform continues to be used.

Finally, it seems that the most useful outcome of the project was the purchase of specialised laboratory equipment for the Uzbek partner institutions and the staff training provided at European partner institutions. We also understood that the foreseen short courses for professionals from the medical and technical fields were launched during the project lifetime, with 26 course sessions delivered during the project. Nevertheless, the rest of the achievements remain poor for the reasons explained above and are not in line with the high level of staff costs declared.

As a result, the Agency considers that your project implementation is weak, in the sense that the consortium has not fulfilled its objectives in terms of project implementation and/or delivery of expected results as outlined in the Grant Agreement. This applies to the low quality of most of the results and outputs, serious weaknesses in the project's implementation, lack of impact on partner

countries institutions and/or Higher education systems, and /or sustainability and exploitation of results not addressed. The score awarded to your project amounts to **48** (out of 100).

Article II. 25.4 of the above mentioned Grant Agreement provides that the Agency may reduce the grant initially provided for in case of poor, partial, or late implementation of the action. The grant initially provided for amounts to € **744.346,00** (Article I.3). In accordance with Article I.10.6, such reduction will be of **25%** if the project scores at least 40 and below 50 points.

On the basis of the above-mentioned provisions, we intend to reduce your grant initially provided for by **25%**. Since your grant initially provided for amounts to € **744.346,00** (Article I.3 of the Grant Agreement), the final grant amount after reduction would be € **558.259,50** (744.346,00 - (744.346,00 * 25%).

2. Financial Assessment of ineligible costs

We intend to consider the following costs declared in your request as ineligible (and therefore reject them) due to the reasons specified below (please refer to the relevant budget heading(s) of your awarded budget):

Subcontracting Costs

Ref. no. – Name	Problem identified	Amount concerned (€)
4451	According to Art. II.10 of the Grant Agreement and Section 3.2.6.2. <i>Subcontracting: tasks to be subcontracted must have been identified in the proposal (based on relevant supporting information, along with clear reasons as to why the task cannot be carried out by the beneficiaries) and the estimated amount entered in the budget. Sub-contracting initially not foreseen in the budget will need <u>prior written authorisation from the Agency</u> during project implementation. In addition, in order to prevent double funding by the grant, catering and hospitality costs (e.g. during project events) for participants receiving Costs of Stay cannot be covered by subcontracting. Under no circumstances should these costs be charged to the project twice. For these reasons, these hospitality costs are considered ineligible.</i>	2.032,80
Total		2.032,80

The ineligible total amount under the "Subcontracting Costs" budget heading is € **2.032,80**.

Summary

On the basis of the above analyses, the total eligible costs have been calculated as follows:

BUDGET HEADINGS	AWARDED BUDGET (in €)	DECLARED EXPENSES (in €)	CONFIRMED EXPENSES (in €)	INELIGIBLE (in €)	ELIGIBLE (in €)
Staff Costs	264.856,00	291.289,00	291.289,00	0,00	291.289,00
Travel Costs	119.340,00	80.200,00	80.200,00	0,00	80.200,00
Costs of Stay	104.490,00	82.960,00	82.960,00	0,00	82.960,00
Equipment Costs	191.160,00	190.076,00	190.076,00	0,00	190.076,00
Subcontracting Costs	64.500,00	15.015,60	15.015,60	2.032,80	12.982,80
TOTAL	744.346,00	659.540,60	659.540,60	2.032,80	657.507,80

Declared co-financing: € **65.950,00**

3. Final amount of the grant and launch of adversarial procedure

We therefore intend to determine the **final amount of the grant** in accordance with Article II.25 of the above mentioned Grant Agreement.

Such final amount of the grant will be the lower between:

- the amount after grant reduction calculated in **section 1. Reduction of the maximum amount of the grant**; and
- the amount after cost rejections calculated in **section 2. Financial Assessment of ineligible costs**.
- the maximum amount of the grant as specified in **Article I.3 of the Grant Agreement (744.346,00)**.

Once the final amount of the grant will be determined, we intend to recover the amount unduly paid in accordance with Article II.26 of the Grant Agreement. Such amount to be recovered will be the difference between the final amount of the grant and the amount of pre-financing already paid (**€ 669.911,40**).

You are kindly invited to submit your observations and those on behalf of all beneficiaries on the intention of the Agency to reduce the maximum amount of the grant and to reject some costs as ineligible (as explained in sections 1 and 2 of this letter), and the resulting recovery by the Agency within **30 calendar days from the reception of the present letter**. An extension of 30 days may be granted by the Agency upon duly justified request **if** submitted within the initial 30 day-period.

Please note that, in the current state of the file, and without observations from you leading to a change of the Agency position, the final amount of the grant will be the one after grant reduction determined in accordance with **section 1** of this letter: **€ 558.259,50**. Since a pre-financing of **€ 669.911,40** has already been paid, the amount of the recovery will be **€ 111.651,90** (final grant of **€ 558.259,50** minus the amount of pre-financing already paid of **€ 669.911,40**).

Please note also that the Agency's financial assessment done in **section 2** is based exclusively on the documents that were submitted to us. If after having considered our comments carefully you wish to contest costs that were rejected by us, the amounts contested by you must be *identified individually and accompanied by the corresponding supporting documents*.

Each supporting document should be numbered and its reference number recorded in **a list detailing all the supporting documents provided with their respective amounts indicated, and showing as the result the total amount contested**. If there are several documents to justify a single cost, the total of the various amounts must be given. Absence of supporting documentation to justify the declared costs will mean that the corresponding amounts remain ineligible.

In order to be accepted for further review, your observations - presented as indicated above - must be **signed by the legal representative of your institution and be sent by post or by email by the prescribed deadline to the following address:**

Education, Audiovisual and Culture Executive Agency
Mr Ralf RAHDERS
Unit A4 - Erasmus+: Higher Education - International Capacity Building
J-59 04/033
1, Avenue du Bourget
BE-1049 Brussels
EACEA-EPLUS-CBHE-PROJECTS@ec.europa.eu

If you do not submit any observations by the prescribed deadline, or if despite the observations submitted the Agency decides to pursue either the reduction of the grant amount or the rejection of costs, and the recovery, you will receive:

- another letter taking the decision to reduce the amount of the grant, reject costs, and/or on the recovery as well as indicating the final amount of the grant as finally calculated by the Agency.
- a "debit note" stating that the amount of € **111.651,90** is to be repaid to the Agency before the date specified. If payment has not been received by this date, the principal of your debt will be increased by default interest at the rate given in the debit note. The Agency may recover the amount due, including default interest where applicable, either by offsetting it against a payment due to you or by enforcing payment.

Yours sincerely,



Ralf RAHDERS
Head of Unit

Cc (by email): daponte@unisannio.it

Very good (at least 75 pts out of 100): The consortium has achieved its objectives and delivered the expected results in full, as outlined in the Grant agreement. All the results and outputs are of very good quality. No major concerns or areas of weakness have been identified during the project implementation phase. Impact on partner countries institutions and/or Higher education systems, sustainability and exploitation of results are fully addressed.

Good (between 74 and 60 pts out of 100): To a large extent, the consortium has fulfilled its objectives and delivered (most of) its expected results as outlined in the Grant agreement. Most of the results and outputs are of good quality. Some concerns or areas of weaknesses may have been identified in the project implementation and/or its final results. Impact on partner countries institutions and/or Higher education systems, sustainability and exploitation of results are satisfactorily addressed.

Fair (between 59 and 50 pts): The consortium has fulfilled some of its objectives and delivered some of its expected results outlined in the Grant agreement. The quality of some results and outputs are acceptable. Weaknesses and concerns have been identified in the project's implementation and/or delivering of its final results. Impact on partner countries institutions and/or Higher education systems, sustainability and exploitation of results are not satisfactorily addressed.

Weak (less than 50 pts out of 100): The consortium has not fulfilled its objectives in terms of project implementation and/or delivery of expected results as outlined in the Grant agreement. This may apply to the low quality of most of the results and outputs, serious weaknesses in the project's implementation, lack of impact on partner countries institutions and/or Higher education systems, and /or sustainability and exploitation of results not addressed.

