

## Financial Ex Post Controls Action Plan 2020-2021

This is a summary of internal control areas for improvement resulting from EUAA financial ex post controls during 2020 – 2021.

The Financial Ex Post Controls Corrective Action Plan for financial ex post controls is based on ongoing assessments of the severity and state of play of corrective actions and is continuously updated during the year.

Observation Form No.	CAAR Proposal	No. of Corrective Action	Corrective action proposed	Initial Target Date	Severity <sup>1</sup>	Reassessed severity <sup>2</sup>	Source
1	A user retains ABAC access rights after leaving the organisation	1.1	<b>Quarterly review of ABAC access rights - In addition to the on-going process to invalidate user access right in ABAC</b> Based on a quarterly review and the list of staff leaving the EUAA/EASO to be provided by HR Unit to ICT Unit.	Q4 2022	CRITICAL	MAJOR	Financial Ex Post Controls 2020-2021
		1.2	<b>Quarterly review of ABAC access rights - In addition to the on-going process to invalidate user access right in ABAC</b> The ExAM team to invalidate the user access rights of all former employees. A proper follow-up of the cases should be ensured.	Q4 2022			Financial Ex Post Controls 2020-2021
		1.3	<b>Quarterly review of ABAC access rights - In addition to the on-going process to invalidate user access right in ABAC</b> Such a process should be documented in a working instruction addressed by the Head of the C4 to the ExAM/CAM teams and endorsed by Head of ICTU and Head of HRS Unit.	Q4 2022			Financial Ex Post Controls 2020-2021
2	ABAC user IDs/profiles are not removed from the system after staff leaving the organisation	2.1	<b>Quarterly review of ABAC access rights</b> Based on a quarterly review and the list of staff leaving the EUAA/EASO to be provided by HR Unit to ICTU Unit.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		2.2	<b>Quarterly review of ABAC access rights</b> The ExAM team to request the CAM team in DG BUDG to remove the User IDs from the organisation. Then it should be ensured proper follow-up and monitoring of the cases by ExAM team.	Q4 2022			Financial Ex Post Controls 2020-2021
		2.3	<b>Quarterly review of ABAC access rights</b> Such a process should be documented in a working instruction addressed by the Head of the C4 to the ExAM/CAM teams and endorsed by Head of ICTU and Head of HR Unit.	Q4 2022			Financial Ex Post Controls 2020-2021

<sup>1</sup> Minor or desirable / Moderate or important / Major or very important / Critical

<sup>2</sup> Assessment results adopted in Q3 2022 based on the state of play of the corrective action. The state of play of each corrective action will be reassessed during the next round of financial ex post controls in 2023 by concluding on whether each corrective action status is planned / in progress / implemented. Any delay will be timely reported to both management and Management Board.



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3	A user retains access rights after a change of position within the organisation	3.1	We refer to our Corrective action 8.2: <b>Simplify the process of nominations</b>	Q2 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		3.2	Correct the affected security profiles The ExAM team should immediately correct the issues identified, ensuring correct access to all users. In addition the the ExAM team should run periodic reviews of the access right of staff transferred within the organisation. Such a review process should be documented in an Administrative Circular duly approved by the Head of C4 a.i..	Q4 2021			Financial Ex Post Controls 2020-2021
		3.3	<b>New Delegation Decisions for affected RAOs</b> FINU to prepare updated Delegation Decisions with regards to the above-mentioned RAOs whose Delegation Decisions refer to their old positions in the EUAA/EASO (IGATTALI, HAEGESTEASO, CASSAANEASO, ICONTITA, STANEGAEASO).	Q2 2022			Financial Ex Post Controls 2020-2021
4	RAOs not given ABAC access rights to BLs they are delegated to	4.1	<b>Correct currently assigned profiles</b> The ExAM team to immediately assign correct profiles to RAOs in ABAC based on the finding in this observation.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		4.2	Correct currently assigned profiles In addition, the Head of C4 a.i. to put in place a working instruction to document the process for checking every quarter whether budget lines granted to RAOs in ABAC correspond to their delegation form signed by the ED.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
5	Misleading profile descriptions	5.1	<b>Correct the affected security profiles</b> The ExAM team should immediately correct the security masks of the profiles in order to match their descriptions, ensuring correct access to all users.	Q4 2021	MAJOR	MODERATE	Financial Ex Post Controls 2020-2021
		5.2	Correct the affected security profile Based on a risk analysis, FINU to assess the possibility of proposing a simplification on the nomination process to the Head of C4 a.i., the ED and the Management.	Q4 2022			Financial Ex Post Controls 2020-2021
6	Access granted to Chapters instead of Budget Lines in ABAC	6	<b>Correct the affected users</b> The ExAM team should immediately correct the profiles assigned to users in line with their nominations and delegations.	Q2 2022	MINOR for FIAs/OVAs, MAJOR for RAOs	MINOR for FIAs/OVAs, MODERATE for RAOs	Financial Ex Post Controls 2020-2021



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7	All ABAC users have full access to all Income and Hors Budget regimes without formal nomination or delegation by the ED	7.1	<b>Review of all existing access rights</b> FINU to identify actors involved in the financial circuits that need to be nominated and delegated/sub delegated for the H and I budget regimes and specifically which type (VAT, missions, salaries, etc.).	Q4 2022	CRITICAL	MAJOR	Financial Ex Post Controls 2020-2021
		7.2	<b>Review of all existing access rights</b> Such a process should be documented in a working instruction addressed from the Head of C4 a.i. to the ExAM team and endorsed by Head of ICTU and FINU Units. ExAM team to remove access to H and I budget regimes for all other actors.	Q4 2022			Financial Ex Post Controls 2020-2021
8	Complex nomination process	8.1	<b>Correct currently assigned profiles</b> ICTU to correct all incorrectly assigned profiles in ABAC.	Q2 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		8.2	<b>Simplify the process of nominations</b> FINU to propose to the Head of C4 a.i. and the ED a simplified system for nomination of FIAs and OVAs that would take into account the above observations and should be included on the risk analysis of the ED taking into account cost effectiveness considerations that is referred in Observation 45: "EUAA financial circuits and ex-ante controls are not determined on the basis of a control strategy where the extent in terms of frequency and intensity of these controls is determined by the ED taking into account the result of prior controls as well as risk based and cost effectiveness consideration, on the basis of the ED own risk analysis (Article 45 of EUAA FR)".	Q4 2022			Financial Ex Post Controls 2020-2021
9	Incorrect role restrictions	9.1	<b>Remove invalid role authorisation</b> Remove the FIA ABAC security profile from the user identified.	Q2 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		9.2	<b>Correct the affected security profiles</b> The ExAM team to investigate the root cause of secondary usernames for RAOs and FVAs and consider requesting their removal from ABAC.	Q4 2022			Financial Ex Post Controls 2020-2021
10	Nested profiles in ABAC Security	10.1	<b>Formalise the process for review and deletion of nested ABAC profiles</b> The ExAM team to identify annually potential nested profiles and delete them from ABAC.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021



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		10.2	Formalise the process for review and deletion of nested ABAC profiles Such a process should be documented in a working instruction addressed from Head of C4 a.i. to the ExAM/CAM teams and endorsed by the Head of ICTU.	Q4 2022			Financial Ex Post Controls 2020-2021
11	Incorrect ceilings for RAO profiles	11.1	<b>Formalise the process for review of ceilings in RAO profiles</b> The ExAM team to identify annually potential incorrect profiles and correct them in ABAC.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		11.2	Formalise the process for review of ceilings in RAO profiles Such a process should be documented in a working instruction addressed from Head of C4 a.i., to the ExAM/CAM teams and endorsed by Head of ICTU.	Q4 2022			Financial Ex Post Controls 2020-2021
12	RAO profile ceilings set up only for B Budget regime, and infinite negative ceilings	12.1	<b>Introducing ceilings to H and I regimes</b> The output of the discussion on the ceilings for H and I budget regimes needs to be implemented accordingly and formalised in the Delegation form and ABAC.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		12.2	<b>Clarification of minimum ceilings</b> The output of the decision of the ED to be implemented accordingly by applying the respective amounts in ABAC	Q4 2022	MINOR	MINOR	Financial Ex Post Controls 2020-2021
13	(Sub-) delegation forms do not limit waivers to the recovery of amounts receivable and therefore neither do RAO security profiles in ABAC	13.1	<b>Change the minimum amounts in security delegations</b> Delegation forms models should be formally updated by the ED on proposal from FINU in order to ensure that waiving the recovery of an established amount receivable is reserved for the ED in principle, but if this right is delegated ICRS recommends aligning with the Commission Internal Rules on the implementation of the General Budget of the European Union: <ul style="list-style-type: none"> <li>• waivers of recovery of amounts receivable / amount receivable are limited in principle to less than EUR 15 000.00 for each Responsible Authorising Officer (Model Sub-delegation Form provided by the DG BUDG specifying the powers that may be subdelegated to an AOSD).</li> <li>• Independently of the above, the decisions on waiving the recovery of an established amount receivable shall be reserved for the ED in the following cases:  - where the amount to be waived is EUR 1 000 000 or more;  - where the amount to be waived is EUR 100 000 or more, where this represents 25 % or more of the established amount receivable.</li> </ul>	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021



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		13.2.1	<b>Change the minimum amounts in ABAC security profiles</b> The ExAM team (if applicable) to ensure, when setting up new profiles and based on an annual review, that the limits for waivers of recovery orders and cancellations of amounts receivable are set a in line with the delegations forms linked above.	Q4 2022			Financial Ex Post Controls 2020-2021
		13.2.2	Change the minimum amounts in ABAC security profiles Such a process should be documented in a working instruction addressed from the Head of C4 a.i. to the ExAM/CAM teams and endorsed by Head of ICTU.	Q4 2022			Financial Ex Post Controls 2020-2021
14	Empty ABAC Profiles	14.1	<b>Consider deleting empty profiles</b> The ExAM team to annually assess and identify empty profiles and delete them from ABAC.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		14.2	<b>Consider deleting empty profiles</b> <b>Such a process should be documented in a working instruction addressed from the Head of C4 a.i to the ExAM/CAM teams and endorsed by Head of ICTU.</b>	Q4 2022			Financial Ex Post Controls 2020-2021
15	ABAC security profiles are invalidated but not removed from users	15.1	<b>Inquire with ABAC about the reasons behind security carry over</b> ICTU to launch an inquiry to understand the reasons behind the invalid profiles being carried over during the year-end exercise to limit the risks of repeating the issue.	Q2 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		15.2.1	<b>Formalise the process for review and deletion of ABAC profiles invalidated but still attached to users</b> The ExAM team to identify annually profiles that are invalidated but still attached to users and delete them from ABAC.	Q4 2022			Financial Ex Post Controls 2020-2021
		15.2.2	Formalise the process for review and deletion of ABAC profiles invalidated but still attached to users Such a process should be documented in a working instruction addressed from Head of C4 a.i to the ExAM/CAM teams and endorsed by Head of ICTU.	Q4 2022			Financial Ex Post Controls 2020-2021
16	Incorrect end dates of ABAC users access rights	16.1	<b>Quarterly review of ABAC access rights</b> The ExAM team to change all existing profiles end date parameters to 01/01/n+1.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021



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		16.2	<b>Quarterly review of ABAC access rights</b> Furthermore, in order to follow the recommendation of DG Budget in the future, the practice should be documented in working instruction addressed from the Head of the C4 a.i. to the ExAM team and endorsed by the Head of ICTU.	Q4 2022			Financial Ex Post Controls 2020-2021
17	Payment authorisation over delegated amount	17.1	<b>Check RAO delegation ceilings at the level of verification</b> FINU to assess whether checking the RAO delegation ceilings should be a part of the ex ante verification at the level of FINU as well as a prospect of a related awareness campaign for RAOs in particular when combining fund sources (for example exceptional payments linked to both C8 and C1).	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		17.2	<b>Technical solution to address the issue to be sought with ABAC help desk</b> ICTU to address a request to ABAC help desk and to follow up with ICTU on the potential solutions.	Q1 2022			Financial Ex Post Controls 2020-2021
18	Irrelevant security access (Budget Lines)	18	<b>Clarify requirements</b> ICTU to clarify the requirements for creating profiles vis-à-vis security masks for different transaction areas and DEA profiles.	Q2 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
19	The number of EUAA/EASO RAOs and their security limits are not risk based and cost effective	19.1	<b>Check RAO delegation ceilings at the level of verification</b> FINU should assess the needs in terms of number of RAOs to be subdelegated taking risk and cost effectiveness considerations and advise accordingly to the ED and the Management. Then the management should decide on the adequate number of RAOs to be sub-delegated.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		19.2	<b>Check RAO delegation ceilings at the level of verification</b> The maximum limits amounts established in the EUAA/EASO for AOSD need to be defined in a homogeneous manner, based in a FINU proposal to the ED taking into account cost-effectiveness considerations, the risk profile of the staff delegated as well as the risk appetite of the ED. Such a proposal needs to be endorsed by the Management and formalised in the delegation forms.	Q4 2022			Financial Ex Post Controls 2020-2021





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20	Efficiency considerations regarding the number of FIAs	20	<b>Review the current approach</b> The ED, with the support of FINU, to propose a review of the current approach to FIA nominations, taking risks and cost effectiveness into consideration, to assess if there is a need to optimise the number of FIAs in line with the principle of sound financial management of the Financial Regulation.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
21	DWH access issues	21.1	The EUAA/EASO LDWM (FINU) to periodically review the ABAC DWH users based on input from the HR regarding staff departures and to request the CAM team to remove invalid user-role assignments accordingly.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		21.2	The EUAA/EASO LDWM to store the emails sent to ABAC Helpdesk requesting access to ABAC Data Warehouse for all users in a single public depository in ERDMS.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		21.3	The EUAA/EASO LDWM to annually verify whether staff members are utilizing their access to ABAC DWH and to request the CAM team to remove not used/non needed users.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		21.4	The EUAA/EASO LDWM to request the CAM team to merge the two separate usernames for a single staff member (IMUSPIER and IMUSPIEROLD) and remove the “Confidential” access right.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
22	Renewal of sub-delegations by new appointed AODs (Heads of Centres)	22	Renewal of delegations With the recent EUAA re-organisation, FINU to envisage as soon as possible, a full confirmation of all AOSDs of the Agency and in particular those for which as from 11 April 2021 the newly appointed Head of C4 a.i (AOD) became the line manager a of AOSD sub-delegated by former AOD (former Head of C4 a.i.).	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
23	Lack of compliance with provision of Art. 73(6) of the General Financial Regulation	23.1	<b>Compliance with Art. 73(6) of the General FR (Central Register of deficiencies)</b> The ED of the EUAA/EASO shall ensure that a process / working instruction is well documented to ensure compliance Art. 73(6) of the General Financial Regulation and in particular. To this end the scope and internal process for the implementation of Article 73(6) is to be benchmarked with DG BUDG, control bodies and other EU-bodies.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		23.2	<b>Compliance with Art. 73(6) of the General FR (Central Register of deficiencies)</b> Based on the feedback from DG BUDG and the benchmarking with control bodies and other EU-bodies, the ED is provided with, on a case-by-case basis – any decisions/rules on financial matters to decide whether those fall under the scope of Article 73(6) or not.	Q4 2022			Financial Ex Post Controls 2020-2021



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		23.3	<p><b>Compliance with Art. 73(6) of the General FR (Central Register of deficiencies)</b> Based on output of corrective actions 23.1.1 and 23.1.2, the ED to assess whether the EUAA/EASO shall inform the European Parliament, the Council, ECA and the accounting officer of the Commission within two weeks of:</p> <ul style="list-style-type: none"> <li>• new appointments and terminations of duties of Authorising Officers by Delegation.</li> <li>• any internal rules the Agency has adopted in respect of financial matters, including those on Delegations and Nominations</li> </ul>	Q4 2022			Financial Ex Post Controls 2020-2021
24	Enhancing compliance with document management rules of IT applications holding financial documents, information and/or records	24.1	<p><b>Governance documents life cycle of EDD on nominations and delegations</b> With the introduction of the new EUAA approach for the management of the governance document life cycle, all governance-related documents, including those relating to financial matters (e.g., EDDs on delegations and sub-delegations and charters of tasks and responsibilities) follow the same document and quality management process. This will include retention of final documents in a centralised ERDMS Public folder and Governance Framework library.</p>	Q1 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		24.2.1	<p><b>Completeness of information in Paperless - ICTU to implement/finalise the following developments in Paperless:</b> In order to ensure the integrity, authenticity, reliability and accessibility of the records, in line with the EUAA Records Management Policy, when a record is transferred from Paperless to ERDMS, it should contain the original document that has been duly signed and dated, metadata and the format (for example, electronic signatures are currently not visible in EDDs for delegation available in the PDF file generated from Paperless).</p>	Q1 2022			Financial Ex Post Controls 2020-2021
		24.2.2	<p><b>Completeness of information in Paperless - ICTU to implement/finalise the following developments in Paperless:</b> All the documents and records concluded in Paperless, when transferred to ERDMS, are to be individually retained/archived in accordance with the EUAA Record Retention and Disposal Policy and be adequately labelled with the appropriate metadata in accordance with the Business Classification Scheme.</p>	Q1 2022			Financial Ex Post Controls 2020-2021





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		24.2.3	<b>Completeness of information in Paperless - ICTU to implement/finalise the following developments in Paperless:</b> 24.2.3 Paperless workflows are suitably archived to show which actor uploaded which document, that is – what documents were in the workflow at the time of signature (corrective action implemented by ICTU at the end of March 2022).	Q1 2022			Financial Ex Post Controls 2020-2021
		24.3	<b>Carry out a detailed analysis of the current IT applications in use across the Agency</b> The reorientation of the focus of the activities, as well as the ongoing internal validation of preliminary ex post control observations, are an opportunity to carry out a detailed analysis of the current IT applications in use across the Agency that potentially hold documents, information and/or records, followed by an assessment of their alignment with the applicable Agency policies and standard criteria/requirements, as well as fulfilment of IC Principle 13. As an outcome of the exercise, areas for improvement or action can be identified and recommendations made for subsequent implementation. The full exercise from analysis through to recommendations will require cross-Agency participation of ICTU colleagues and business owners. A completion deadline of the end of December 2022 is foreseen. Implementation of improvement/corrective actions will follow thereafter.	Q4 2022			Financial Ex Post Controls 2020-2021
25	Document Management of Charters of tasks and Responsibilities	25.1	<b>Audit trail of charters of tasks and responsibilities</b> ExAM team to ensure that charters of tasks and responsibilities are duly signed before introducing any ABAC access right in the central accounting system.	Q2 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		25.2	<b>Audit trail of charters of tasks and responsibilities</b> With the introduction of the new EUAA approach for the management of the governance document life cycle, GSSU to support FINU to guarantee the audit trail of Charters of tasks and responsibilities by recording all the Charters of tasks and responsibilities and the Codes of Professional Standards in a single depository in ERDMS and providing assurance at that stage that those documents are duly signed.	Q2 2022			Financial Ex Post Controls 2020-2021
26	Maintenance and optimisation of the Nomination and Delegation monitoring table	26.1	<b>Updated Nominations Table</b> Considering the current delegations/nominations system in place, FINU need to keep the Nominations table duly updated in accordance with Art. 9 of EDD on delegations and nominations.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021



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		26.2	<b>Updated Nominations Table</b> Management, with the support of FINU, need to assess whether to put in place a more effective monitoring tool in order to provide the Management with up to date (real time) information reflecting any new change in the organisation's delegations and nominations. The scope of such a tool in terms of content and management needs to be discussed and agreed with relevant stakeholders, in particular RAOs and line managers.	Q4 2022			<b>Financial Ex Post Controls 2020-2021</b>
27	Ex post and ex ante controls scope, roles and responsibilities	27	Internal rules on nomination to align with EUAA organisational structure ED, with the support of Head of C4 a.i. and FINU, to ensure that: - EDD on Delegation and Nominations is updated in accordance with EUAA organisational structure by ensuring that Financial Verifying Agents are not empowered to implement ex post controls. - Where applicable, nominations, code of professional standards and acknowledgement of receipt forms are up-dated to clarify the scope is only for ex ante financial verification and does not include ex post financial verification.	Q4 2022	<b>MODERATE</b>	<b>MODERATE</b>	<b>Financial Ex Post Controls 2020-2021</b>
28	Nomination of staff involved in procurement financial circuits	28	Internal nomination rules to include a procedure to formally nominate staff involved in contract award ex ante controls financial circuits The Head of C4 a.i., with the support of FINU and PFMU, to ensure that internal rules on nominations and delegations include a process to formally empower staff involved in contract awards ex ante controls by analogy to other financial circuits in the EUAA.	Q4 2022	<b>MODERATE</b>	<b>MODERATE</b>	<b>Financial Ex Post Controls 2020-2021</b>
30	Financial Actors mismatch in Paperless and ABAC	30.1.1	<b>Increasing awareness and understanding of the roles within specific financial workflow processes</b> To seek advice from DG BUDG and control bodies on the scope of this observation and assess whether it is possible to go for an approach where all FIAs and FVAs input themselves as OIA/OVA in ABAC and audit trail of the actual OIA/OVAs is kept only in Paperless and not in ABAC.	Q2 2022	<b>MODERATE</b>	<b>MODERATE</b>	<b>Financial Ex Post Controls 2020-2021</b>
		30.1.2	To seek advice for DG BUDG to check if there is an efficient and automated way to have all OIAs and OVAs in the agency into ABAC as users, only to DG BUDG.	Q2 2022			<b>Financial Ex Post Controls 2020-2021</b>
		30.2.1	Based on the feedback from DG BUDG FINU to ensure that a homogeneity approach is implemented through of financial circuits workflow in line with DG BUDG proposal.	Q2 2022			<b>Financial Ex Post Controls 2020-2021</b>



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		30.2.2	Based on the feedback from DG BUDG, if needed, FINU to up-date the checklists in place to ensure that they align with the agreed approach. At present checklists mention that ex-ante controls need to ensure that there is no mismatch between ABAC and Paperless, please refer to point 13 of checklist extract from FINU intranet page.	Q2 2022			Financial Ex Post Controls 2020-2021
32	Inconsistent use of invoice type for staff reimbursement	32	<b>Inconsistent encoding of staff reimbursement</b> All FIAs and RAOs should be made aware of the correct encoding for staff reimbursement, such as by means of including this information in the Finance Guidance, in the respective step descriptions in Paperless or by issuing an Administrative Circular.	Q2 2022	MINOR	MINOR	Financial Ex Post Controls 2020-2021
33	Clarification of rules for late payment interest and time limit for payment	33.1	<b>Staff reimbursement late payment interest rate</b> All FIAs and FVAs should be made aware of the correct applicable late interest rate to be used with staff reimbursement, such as by means of highlighting this information in the Finance Guidance and including the step in the payment checklists available in Paperless.	Q2 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		33.2	<b>Staff Reimbursement payment time limit</b> All FIAs and FVAs should be made aware of the correct applicable time limit to be used with staff reimbursement, such as by means of highlighting this information in the Finance Guidance and including the step in the payment checklists available in Paperless.	Q2 2022			Financial Ex Post Controls 2020-2021
		33.3	<b>Expert reimbursement late payment interest rate</b> FINU should clarify which late interest rate is applicable to the MedCOI expert reimbursement and share this information with all FIAs and FVAs, such as by means of highlighting this information in the Finance Guidance and including the step in the payment checklists available in Paperless.	Q2 2022			Financial Ex Post Controls 2020-2021
34	Document management in Procurement procedures.	34	The EUAA/EASO should create, for each procurement procedure, at least for procedures above the directive threshold, a consolidated file of the type referred to in the Vademecum, in the form of an extended/elaborated standard award decision, as well as with the introduction of checklists to ensure that all documents are appropriately filed. Adequate supervision and ex ante internal control arrangement should be defined in the SOP on procurement to be implemented by procurement officers to provide assurance to RAOs that the full procurement file and supported document are duly documented to ensure integrity, authenticity, reliability and accessibility so that the full procurement file can be retrieved at any time to ensure audit trail.	Q2 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021



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35	Risk management for high level expenditure procurement procedures.	35.1.1	Potential critical risks identified by PFMU and/or other actors in the procurement process need to be reported to the ICC for the Agency's risk management exercise and, if endorsed by Management and the ED, managed and monitored through the EUAA/EASO's central risk register and reported to the MB.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		35.1.2	The SOP should specify the coverage, when, and who should implement procurement risk management in the Agency. In particular the risk tolerance, which procurement phases will be assessed, who is responsible and how they will be supported as well as the methodology to be used for the risk review.	Q4 2022			Financial Ex Post Controls 2020-2021
36	Update and review of the SOP on procurement.	36	A thorough review of the SOP needs to be done as soon as possible to ensure that information is up to date and corrected as necessary.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
37	Lack of compliance with contractual provisions	37.1.1	ED, with the support of PFMU should revise Sections 2.3 "Framework contracts vs direct contracts" and 13.4 "Implementation of the EUAA/EASO Framework Contracts" of 'SOP on Procurement rules and Contracts management' in order to assist OIA's analysis with public procurement and technical related advice and expertise. FINU to identify specific risk scenarios based on ex ante control result when it will be deemed necessary to consult expertise from procurement colleagues as for example when order forms (OFs) adding products and/or services to the original tender/price list.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		37.1.2	The responsible Operational Unit should further evaluate the tender documents and seek technical advice as well as involve the PFMU/FINU in the assessment of the situation.	Q4 2022			Financial Ex Post Controls 2020-2021
		37.1.3	Following internal analysis indicated above, the appropriate actions to safeguard the interests of the EUAA/EASO Budget to be taken. In particular, AOD with the support of FINU, to issue a recovery order (RO). It would be advisable for the Responsible Authorising Officer (RAO) to consider pursuing a recovery order covering the ineligible additional costs for adapting the containers to electrical standard BS 7671. In case the same contractor has any other existing contractual arrangements with the EUAA, then it might be more willing to comply with such a recovery request (through an offsetting procedure). However, it would not be advisable to seek a court-action on this matter, as the Agency's legal standing would be quite vulnerable. Therefore, it is advisable to seek prior agreement with the contractor before issuing any RO.	Q4 2022			Financial Ex Post Controls 2020-2021



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		37.1.4	PFMU and C1-Operations to further increase awareness among staff on the safeguarding of its financial interest and in particular drafting technical specifications in a concise and comprehensive way by using this observation as an example of shortcoming to procurement rules during their training sessions.	Q4 2022			Financial Ex Post Controls 2020-2021
		37.1.5	In addition, in order to strengthen its governance, the EUAA should also report such a financial irregularity to the Commission without delay as for the provision of EUAA FR .	Q4 2022			Financial Ex Post Controls 2020-2021
38	Lack of legal commitments and monitoring of external training for staff	38.1.1	The Paperless workflow for “Approval to attend an external training” needs to include the Procurement team, for supporting on the implementation of the procurement procedure, signature and dispatch of Purchase orders (i.e. adequate document proving the legal commitment) for training costs paid directly to the provided by the Agency with a value of over EUR 1 000.00, or these training purchases need to be integrated in the normal procedure for purchases. If the training is not planned well enough in advance or the contractor does not facilitate the signature of legal commitments to follow the EUAA FR provision above, the procedure should foresee for staff members to pay the training fees in advance following prior approval of the RAO and the subsequent reimbursement steps.	Q1/Q2 2023	MAJOR	MODERATE	Financial Ex Post Controls 2020-2021
		38.1.2	In parallel, the Head of C4 a.i., with the support of HR and PFMU, to assess the possibility of engaging a contractor/broker to support the EUAA on managing ad-hoc external training contracts.	Q1/Q2 2023			Financial Ex Post Controls 2020-2021
		38.1.3	FINU to ensure that legal commitments for low value purchases are well established before FVA validate payment operations. In addition, Financial Verifying Agents should not only ensure legality and regularity but also support the RAOs to ensure that internal control objectives defined in article 30 of the EUAA FR are met and in particular that financial procedures in place are legal, regular and sound financial management.	Q1/Q2 2023			Financial Ex Post Controls 2020-2021
		38.2	A more detailed planning of needs for external training should be provided to HR from all Units, consolidated in training needs planning and, if needed, in procurement planning in order to foresee possible needs to set up Framework contracts and/or Service Level Agreements. A system for monitoring the aggregated cost for specific training requests, taking into account the most recurrent needs for training and development needs to be put in place.	Q1/Q2 2023			Financial Ex Post Controls 2020-2021





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39	Lack of effective and efficient use of LCK	39.1	It is suggested that a clear instruction in the form of a finance guidance is implemented by the PFMU in agreement with the Head of C4 a.i. – to register Legal Commitments in a uniform manner in the Agency by encoding them in ABAC LCK (or any other central system) no later than 30 days after their signature. An additional step is also to be added at the end of the individual budgetary commitment workflows, instructing the FIA to register the legal commitment after it has been signed by the RAO and countersigned by the contractor.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		39.2.1	The Head of C4 a.i, should ensure that encoding of legal commitments is done correctly. To this end, the process to be documented and endorsed by Head of C4 a.i..	Q4 2022			Financial Ex Post Controls 2020-2021
		39.2.2	An additional step is also to be added at the end of the individual budgetary commitment workflows, instructing the FIA to finalise the registration of the legal commitment after it has been signed by the RAO and countersigned by the contractor.	Q4 2022			Financial Ex Post Controls 2020-2021
		39.3.1	Seeking cost-effectiveness of the Agency operations, it is suggested that the Head of C4 a.i. with the help of PFMU assess the possibility that any parallel monitoring tools are abolished, and more effort is put into maintaining correct and up to date information within this existing database. To this end, PFMU to provide central advice, training, and support to all EUAA (formerly EASO) services (Centres, Units and Sector) on the use of LCK (or any other central system).	Q4 2022			Financial Ex Post Controls 2020-2021
		39.3.2	The requirement to use an excel spreadsheet for contract management is based on the administrative circular on the working instruction for “Setting up of improved contract management mechanisms in EASO ” of 03 March 2017. Given that, it was agreed to discontinue the proposed corrective actions as alternative solutions were proposed by the PFMU, and that we believe that such duplication of efforts is inefficient, we recommend that the circular is repealed and replaced with a clear working instruction on the use of LCK (or any other central system), prepared by PFMU and endorsed by the Head of C4 a.i..	Q4 2022			Financial Ex Post Controls 2020-2021
		39.4	There is room to improve the management and monitoring consumption of FWC for missions. Based on DG BUDG best practices, it is suggested for FINU to assess the possibility that a global commitment covering such expenses is made for each year, which will ensure simple follow-up and monitoring using LCK.	Q4 2022			Financial Ex Post Controls 2020-2021





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40	Lack of an internal management and monitoring of SLAs	40.1.1	In addition to the SLA depository in ERDMS, a comprehensive database of all SLAs signed by the Agency (either in force or planned, obsolete) is to be created, clearly stating the owner and the status for management planning, monitoring and reporting purposes.	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021
		40.1.2	The reporting in the CAAR should be improved by including a summary of the SLAs as per the guidelines provided in Annex VI of the CAAR as part of the Budgetary and financial management CAAR reporting packages (Part II.2.3.).	Q4 2022			Financial Ex Post Controls 2020-2021
		40.1.3	The ED needs to assess the possibility to register SLAs in the Legal Commitment Kernel (LCK) in ABAC[1] taking into account risk and cost effectiveness considerations as well as the principle of sound financial management, in order to ensure comprehensive registration of this type of legal commitments and to ensure consumption monitoring. If the ED takes a final decision to phase out LCK, such a decision first needs to be discussed within the Management based on a documented risk analysis report proposed by PFMU taking into account cost effectiveness considerations. If a final decision is taken to phase out LCK, transitional measures need to be in place to ensure compliance until phase out of LCK is effective	Q4 2022			Financial Ex Post Controls 2020-2021
		40.2.1	The Head of C4 a.i., with the support of the PFMU, and following approval of the ED, should put in place a process/procedure approved in the form of Standard Operating Procedure agreed with RAOs, to ensure proper consultation of actors involved in SLA initiation, signature.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		40.2.2	Relevant guidance to staff on practical management of SLAs, including trainings and awareness raising needs to be provided. Particular attention should be given to the costing models under SLAs, timely initiation of budgetary commitments and proper cooperation and communication with service providers.	Q4 2022			Financial Ex Post Controls 2020-2021
		41	Management should assess and take decision on Legal Commitments' organisational structure and IT systems changes.	41	The Head of C4 a.i., with the support of ICTU, PFMU and FINU, to implement a documented cost-effectiveness analysis addressed to the ED and management, considering, inter alia, the following criteria: <ul style="list-style-type: none"> <li>• Ensure rationalization and avoid duplication of IT financial systems for management of legal commitment in EUAA (formerly EASO);</li> <li>• Assess the cost-effectiveness of phasing out the system, given that LCK is a tool that the Agency can currently use at no additional cost, and it is an integral part of the central ABAC financial system.</li> <li>• Compare the added benefit of spending significant resources on the</li> </ul>	Q4 2022	MAJOR



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			<p>development of Paperless 2.0 when continuous development of LCK is free to EUAA</p> <ul style="list-style-type: none"> <li>• Assess whether key automated controls already in place are not be abolished. For example, an automated control that blocks payments that in ABAC workflow for payments linked to individual budgetary commitment when the legal commitment is not registered in LCK</li> <li>• Ensure that every budgetary commitment has a legal commitment timely registered in the system. While this control is implemented in the ABAC LCK module, it remains to be seen whether it is also implemented in the proposed new system and at what level the ABAC Workflow (non-LCK) and the new proposed Paperless 2.0 system will be linked.</li> <li>• Ensure that reliable and accurate reporting of legal commitments from Paperless 2.0 to DataWareHouse (a database containing all data in ABAC) is possible to ensure compliance with internal control objective on “Reliable Financial Reporting” defined in article 30 of EASO FR.</li> <li>• Clearly explain to Management and ED the existing monitoring and reporting facilities in LCK regarding legal commitments and FWCs</li> <li>• Given that the EC is slowly moving towards replacing the existing ABAC accounting system with the new SUMMA accounting system, assess the efficiency and effectiveness of establishing a new system only for EUAA (formerly EASO). If the new Paperless 2.0 system is linked to ABAC, it will have to be, at additional cost, linked to SUMMA. If the Paperless 2.0 system is not linked to ABAC, then all existing controls (as mentioned above) will cease to exist.</li> <li>• Justify, in line with Observation 39, how Paperless 2.0 will ensure that all services can discontinue the current practice of using parallel tools for contract monitoring (such as Excel tables). In case the final decision is to phase out LCK, the recommendations and corrective action in Observation 39 should be duly implemented in Paperless 2.0 to ensure mitigating the risks highlighted therein.</li> </ul> <p>Management should assess on the possibility of going for a more cost-effective Legal commitment’s organisational structure and IT systems developments to avoid potential overlaps and duplication of efforts by introducing a single legal commitments management tool.</p>				



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42	Systematic exceptions linked to a lack of compliance with Article 73.2 of the EASO/EUAA FR	42.1	<b>Alternative mitigating controls need to be proposed to comply with article 73.2 of EUAA FR</b> Comprehensive planning and budgetary commitments monitoring tools should be enhanced by Management at an agency level, in order to eliminate systematic non-compliances and exceptions to Article 73.2 of EUAA FR. If the controls in place prove not to be effective and satisfactory for their intended purpose, alternative mitigating controls need to be proposed by FINU, PFMU and ICC to the ED and Management.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
		42.2	<b>Specific guidance on premises management should be established for the EUAA/EASO</b> Considering the number of instances of exceptions/non-compliance events related to the absence or insufficient amounts in budgetary commitments in relation to premises management, the Agency should focus on processes/procedures in place in this particular area. To this end guidance on premises management should be established for all the EUAA/EASO. As the Agency has adopted a premises management policy at central level, a practical tool for its implementation needs to be developed, for example, checklists of very practical steps as regards to rent, utilities, etc. In addition, a checklist for anticipated commitments for the upcoming financial year to be prepared and shared with OIAs/PMs responsible for premises management before the end of financial year.	Q2 2023			Financial Ex Post Controls 2020-2021
		42.3	<b>Assessment of the OF and the related budgetary commitments in the area of premise management</b> Possibility to include contingency provisions in the OF (by clearly adding such a reference in the terms of reference of the FWC during the procurement process) and respective budgetary commitments to be considered.	Q4 2022			Financial Ex Post Controls 2020-2021
		42.4	<b>FINU to increase awareness when contract managers are appointed</b> When procurement nominates a new contract manager, as part of the kick of meeting FINU to be involved to increase awareness and ensure that this kind of non-compliances are anticipated and addressed before materialised.	Q4 2022			Financial Ex Post Controls 2020-2021



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		42.5	<b>Knowledge building on premise management</b> As premise management requires certain technical understanding as well as good working knowledge of national legislation in place, the establishment of a network of colleagues working on premises management in different local operational offices would be helpful, with centralised management of FPMU. It would allow organisation of more targeted trainings by PFMU as regards to specifics of the contract management related to premises and it would also facilitate sharing the lessons learned and the best practices used.	Q2 2023			Financial Ex Post Controls 2020-2021
		42.6	<b>Reporting in the CAAR on exceptions/non-compliance related to instances of "saisine a posteriori"</b> The ED and Management should report and explain in the CAAR in the section on Budgetary and financial management (2.3), with the support of FINU and PFMU on the indicators of the "legality and regularity" of the underlying transactions resulting from ex ante controls and in particular systematic financial errors and irregularities identified by specifically indicating instances identified through ex ante controls when a budgetary commitment is recorded in the accounts after the legal commitment. In addition, the programming document should include a strategy for preventing this recurrence of irregularities as for the provisions of EUAA FR	Q4 2022			Financial Ex Post Controls 2020-2021
43	Four eyes principle to be fully applied to enforce compliance with Article 73.2 of the EASO/EUAA FR	43	<b>Existence of a valid budgetary commitment in ABAC to be checked by an ex ante control function before signature of legal commitments by RAO</b> PFMU, with the support of FINU and ICTU, to introduce additional two validation steps in the Paperless workflow for individual budgetary commitments (one for the OIA and another for the RAO), where the OIA ensure that the budgetary commitment is signed and finalised in ABAC to 100 % before the RAO signs the legal commitment in a second step after the OIA. The same applies to the financial workflow for an Additional or Amendment of Individual Commitment when there is an increase of the amount of the budgetary/legal commitment.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021
44	Some legal commitment financial workflows internal control weaknesses are not logged centrally and approved by the ED and ICC before corrective action is taken.	44	<b>Introduction of additional checks in the current Paperless workflows</b> If the last actor in the financial Paperless workflow responsible for the dispatch of the signed legal commitment identifies a control weakness and in particular that the RAO did not sign the budgetary commitment, the instances should be logged by PFMU and reported to the ICC for any further corrective action and decision on whether	Q4 2022	MODERATE	MODERATE	Financial Ex Post Controls 2020-2021



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			there is a need to logged centrally. PFMU to keep audit trail of any correction.				
45	Lack of a control strategy where the extent in terms of frequency and intensity of these controls is determined by the ED taking into account the result of prior controls as well as risk based and cost effectiveness considerations	45.1.1	Ex ante Control Strategy Head of C4 a.i. to propose an ex ante risk-based control strategy to the ED and Management. The Head of C4 a.i. to determine the business owner for the implementation of this corrective action. The proposed strategy to be discussed and agreed with the main stakeholders before submission for approval to Management. In particular, FINU, PFMU, RAOs, ICC and Accountant. ICC to take into account an ex ante control strategy in the overall EUAA Internal Control Strategy.	Q2 2023	CRITICAL	CRITICAL	Financial Ex Post Controls 2020-2021
		45.1.2	<b>Ex ante Control Strategy</b> ICC to take into account an ex ante control strategy in the overall EUAA Internal Control Strategy.	Q2 2023			Financial Ex Post Controls 2020-2021
		45.1.3	<b>Ex ante Control Strategy</b> ICRS deems that the SOP on Procurement may be considered a control strategy for ex ante controls defined and implemented by PFMU in line with Article 45 of the EUAA FR. However, in order to align with performance and cost-effectiveness requirements (including CAAR reporting), PFMU to develop an action plan together with ICRS as part of the development of the new EUAA internal control strategy.	Q4 2022			Financial Ex Post Controls 2020-2021
		45.2.1	Availability of the description of checks to be implemented for all workflows in Paperless The Management, RAOs and staff involved in the financial Paperless workflows should have access to an overall overview of the extent of tasks and checks implemented by ex ante functions (IAs and VAs) at the level of all steps of each financial workflow. Those should be well documented To this end, the Head of C4 a.i., with the support of FINU, to propose to the ED the most suitable process for ensuring that the extent and intensity of ex-ante control check descriptions are well documented for every step in each financial workflow , where all actors involved in the context of a Financial Circuit workflow should confirm by their validation that they have carried out the expected checks as defined. Relevant stakeholders, and in particular RAOs, ICC and Accountant must be involved by FINU. The full history of checks implemented at the level of each step on the financial workflow must be traceable. The financial payment workflows must be adequately documented in	Q4 2022			Financial Ex Post Controls 2020-2021



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			writing (including tasks and checks allocation) and be maintained and regularly revised with all relevant stakeholders.				
		45.2.2	<p><b>Improvements in the assignment of tasks for the checks to be implemented at the level of each financial workflow in Paperless</b></p> <p>In the meantime, and until the process indicated in the corrective action 45.2.1. is developed,</p> <p>In the meantime, and until the process indicated in the corrective action 45.2.1. is developed,</p> <ul style="list-style-type: none"> <li>all nine financial workflows sampled by ICRS and listed above need to be revised partially or in total, both in relation to the instructions drafted by FINU (“Invoice registration and payment” is the only financial workflow for which a step instruction document has been foreseen and uploaded by on the EUAA/EASO intranet), and also in relation to the step descriptions presented in Paperless based on the conclusions of the ICRS ex post control working document available in the following link.</li> <li>FINU to check the reliability and completeness of other financial workflow step descriptions that have not been sampled and therefore not assessed by ICRS.</li> </ul>	Q4 2022			Financial Ex Post Controls 2020-2021
		45.3.1	<p><b>Endorsement of ex ante control checks by Management</b></p> <p>The description and extent of checks and the updates for each financial workflow shall be formally approved following the new EUAA approach for management of the governance documents life cycle and in consultation with all key stakeholders and in particular RAOs, the Accountant and the ICC.</p>	Q4 2022			Financial Ex Post Controls 2020-2021
		45.3.2	<p><b>Risk assessment implementation</b></p> <p>The extent in terms of frequency and intensity of the controls and checks for each financial workflow should be based on the results of prior controls as well as risk-based and cost-effectiveness considerations, on the basis of a risk analysis endorsed by the ED. The ED is responsible for the implementation of the budget at all times and therefore also for the controls being carried out. The ED should be aware of the checks performed ex ante and ex post as (s)he is responsible for setting them up. Such an approach and interpretation of article 45 of EUAA FR is clarified in guidance provided by DG BUDG available in the following links: PUBLIC-9564, PUBLIC-8785 , PUBLIC-12427 and PUBLIC-12367.</p>	Q4 2022			Financial Ex Post Controls 2020-2021





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		45.3.3	Design separate workflows per risk typology The Head of C4 a.i., based on the feedback from FINU, to propose separate financial operation Paperless workflows with distinct check descriptions for payment operations under different regulatory frameworks and with different risk typologies based on a risk analysis endorsed by the ED.	Q4 2022			Financial Ex Post Controls 2020-2021
		45.4.1	Develop a process methodology to support the ED in the risk assessment of the implementation and monitoring of financial circuits The Head of C4 a.i. to develop a process methodology to support the ED in the risk assessment of the implementation and monitoring of financial circuits. Such a methodology needs to be aligned with EUAA risk management provisions. The Head of C4 a.i. to appoint a business owner to support him on the implementation of this corrective action.	Q4 2022			Financial Ex Post Controls 2020-2021
		45.4.2	ED Risk Assessment of Financial Circuits Based on the methodology endorsed by the ED to implement and document a risk analysis proposed in Corrective Action 45.4.1, the Head of C4 a.i. to ensure that a risk assessment of the EUAA financial circuits and ex-ante controls is implemented and endorsed by ED. Head of C4 a.i. to appoint a business owner to support him on the implementation of this corrective action.	Q4 2022			Financial Ex Post Controls 2020-2021
		45.4.3	EDD Financial Circuits Model The Financial Circuits model should be formally endorsed by the ED in line with the provisions of the Agency's new policy on controlled governance-related documents. Consequently, the ED Decision on the Finance decentralisation scheme of 7 November 2016 should be repealed. The EDD setting up the Financial Circuits model should be subject to periodical review based on organisational changes and updated risk analyses. Based on the above, the ED should examine whether and how the number of intervening actors could be optimised while keeping risk at an acceptable level. In parallel, the number of staff nominated and delegated should be optimised. The Head of C4 a.i. to appoint a business owner to support him on the implementation of this corrective action.	Q4 2022			Financial Ex Post Controls 2020-2021
		45.4.4	Outcome of previous Financial Circuits risk analyses and ex post controls When implementing the risk analysis of the Financial Circuits, the ED, to assess the outcome of former risk analysis and ex post controls. Head of C4 a.i. to appoint a business owner to support him on the implementation of this corrective action.	Q4 2022			Financial Ex Post Controls 2020-2021



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		45.5.1	<p>Cost effectiveness and performance of ex ante controls</p> <p>The Head of C4 a.i. should identify a process and methodology to support the ED in the implementation of a performance and cost-effectiveness analysis of the resources allocated to ex ante controls. As this cost-effectiveness analysis is a prerogative of the ED according to Art. 45.5 of the EUAA/EASO FR, the methodology needs to be endorsed by the ED.</p> <p>Among others, the following elements need to be considered for a solid performance and cost-effectiveness analysis of ex ante controls:</p> <ul style="list-style-type: none"> <li>• Data collection tool</li> </ul> <p>The Head of C4 a.i. to put in place a data collection tool to quantify the full-time equivalents (FTEs) allocated to ex ante controls. At a later stage, and once the Activity Based Management is fully implemented in the EUAA/EASO, the costs allocated to ex ante controls will also be quantified. When implementing such a tool, the Head of C4 a.i. to consider the outcome of the PDN network working group on the guidance to assess cost of controls.</p> <ul style="list-style-type: none"> <li>• Quantifiable analysis of the prevented erroneous or non-compliant operations</li> </ul> <p>In order to ensure reporting on performance, the Head of C4 a.i. to use the registration of the results of ex ante financial verification controls in order to implement at the end of the year a quantifiable analysis of the prevented (errors detected and corrected before the authorisation of the financial operations) erroneous or non-compliant operations compared to the allocated full-time equivalents. The analysis of this data to be endorsed by the ED. The Head of C4 a.i. to appoint a business owner to support him on the implementation of this corrective action.</p>	Q4 2022			Financial Ex Post Controls 2020-2021
		45.5.2	<p>Analysis of the prevented erroneous or noncompliant operations</p> <p>The Head of C4 a.i. to implement, document and introduce to Management, a qualitative analysis of the yearly errors detected through ex ante controls in order to contribute to the assessment and improvement of the effectiveness of the internal control system by addressing a report to RAOs and the ED allowing them to:</p> <ul style="list-style-type: none"> <li>• identify and correct system weaknesses</li> <li>• define risk criteria in order to increase and/or lessen the frequency and intensity of controls</li> <li>• improve ex ante controls based on the lessons learnt (Update guidance, awareness sessions etc).</li> </ul> <p>The Head of C4 a.i. to appoint a business owner to support him in the implementation of this corrective action.</p>	Q4 2022			Financial Ex Post Controls 2020-2021



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		45.5.3	<p>Identification of CAAR indicators on cost effectiveness of ex ante controls</p> <p>Based on the corrective actions above and in accordance with Art. 48(1) of the EUAA/EASO FR, The Head of C4 a.i., to propose to the ED an analysis on the efficiency and effectiveness and an overall assessment of the costs and benefits of ex ante control results including as a minimum the following information:</p> <ul style="list-style-type: none"> <li>Indicators on how ex ante controls contribute to the “legality and regularity” of the underlying transactions, and of the other internal control objectives set in Art. 30.2 FFR (sound financial management, prevention/detection/correction and follow-up of irregularities and fraud, reliable reporting and, where applicable, safeguarding of assets and information) .</li> <li>Cost and benefits of controls (report on the balance between effectiveness (including benefits), efficiency and economy of controls).</li> </ul> <p>This analysis to be posted in the CAAR 2022 by the ED. Head of C4 a.i. to appoint a business owner to support him in the implementation of this corrective action.</p>	Q4 2022			Financial Ex Post Controls 2020-2021
		45.5.4	<p>Performance Considerations</p> <p>A trend analysis of the human resources allocated to ex ante controls has to be compared with the needs and the results achieved in order to ensure:</p> <ul style="list-style-type: none"> <li>that decisions regarding allocation of staff to cover ex ante control needs (IAs and VAs) are based on performance and cost effectiveness considerations</li> <li>compliance with new performance considerations required by the EUAA/EASO FR 2019 Art. 45 (1) &amp; (2) and the requirement for the ED to report on performance. Based on the result of such an assessment the number of IAs, VAs and RAOs in the EUAA/EASO should be streamlined and optimised.</li> </ul> <p>The Head of C4 a.i. to appoint a business owner to support him in the implementation of this corrective action.</p>	Q4 2022			Financial Ex Post Controls 2020-2021
46	There is room for improvement of the EUAA/EASO Finance Guidance alignment with the regulatory framework and increase content quality.	46.1.1 related to Findings that are either moderate or minor	FINU to consider the agreed findings above where a risk level is assessed as either moderate or minor and to re-draft accordingly the relevant chapters of the Finance Guidance. Before those are released to request for formal feedback of ICRS and to share it with the Extended Management for comments. For findings above (from 46.1 to 46.6) where a risk level is assessed as either major or critical, specific corrective actions are proposed in this observation form.	Q4 2022	MAJOR	MAJOR	Financial Ex Post Controls 2020-2021



Observation Form No.	CAAR Proposal	No. of Corrective Action	Corrective action proposed	Initial Target Date	Severity <sup>1</sup>	Reassessed severity <sup>2</sup>	Source
		46.1.3 related to Finding 46.1	<p><b>related to Finding 46.1 “Finance Guidance provisions might put at risk the independence of Verifying Agents”</b></p> <p>All cases of RAOs overruling FVAs should be endorsed by internal rules on financial matters approved by the ED that has to set up his/her own procedures for recording. Such procedures should be established beforehand at Agency level and in case an event of overruling appears, the concerned Agents must follow the internal procedures, which should normally, and at least, provide that:</p> <ul style="list-style-type: none"> <li>• Audit trail and justifications on the reasons for overruling must be kept and the information must be reported to the ED.</li> <li>• Both opinions, those of the FVAs and RAOs should be recorded in ABAC as the EUAA/EASO central financial systems (or Paperless for OVAs) following the assessment of the ICC.</li> <li>• Provision for conciliation before addressing the matter to the ED, where both FINU and ICC should be involved.</li> <li>• For instances, where the matter should be reported to the ED - The internal rules should also clarify that when applicable, that an exception event should be recorded according to the internal rules on exceptions and non-compliances.</li> <li>• Last but not least, they should clarify that all instances where RAOs overrule FVAs should be reported to the MB through the CAAR.es where RAOs overrule FVAs should be reported to the MB through the CAAR.</li> </ul>	Q4 2022			<b>Financial Ex Post Controls 2020-2021</b>



Observation Form No.	CAAR Proposal	No. of Corrective Action	Corrective action proposed	Initial Target Date	Severity <sup>1</sup>	Reassessed severity <sup>2</sup>	Source
		46.1.5 related to Finding 46.3	<p><b>related to Finding 46.3 “Finance Guidance provisions regarding the whistleblowing hotlines are not precisely aligned with the EUAA/EASO FR”</b></p> <p>Finance Guidance provisions regarding fraud deterrence and whistleblowing hotlines to be precisely aligned with the EUAA/EASO FR to avoid staff misunderstanding on the existing whistleblowing hot lines in the Agency. In particular:</p> <ul style="list-style-type: none"> <li>• Finance Guidance should not limit whistleblowing reporting channel to three actors: the immediate superior, the Executive Director, or directly OLAF and should clarify that EUAA/EASO regulatory framework foresees also other two possibilities: reporting to the management board (MB) and European Public Prosecutor's Office.</li> <li>• Finance Guidance should clarify that requirements from the EUAA/EASO FR (Art. 45(12) apply not only to financial actors, but also to any member of staff or other servant, including seconded national experts to the Union body and therefore, to all the roles to be listed in the Finance Guidance and not only Financial Actors.</li> <li>• Finance Guidance to include the information requested by the MB in the Antifraud Strategy corrective action 2.2 and in particular provisions on the roles and responsibilities of financial actors regarding conflicts of interest, fraud and irregularities reporting, financial irregularities panel, Governance and Internal Control.</li> <li>• Last but not least, to avoid further confusion it would be useful to add hyperlinks in the document to the whistleblowing hotlines.</li> </ul>	Q4 2022			Financial Ex Post Controls 2020-2021
		46.1.7 related to Finding 46.5	<p><b>related to Finding 46.5 “There is room to further clarify Finance Guidance provisions on budgetary commitments”</b></p> <p>Considering the number of newly recruited RAOs and the frequency of exceptions and non-compliance events, where a budgetary commitment is not signed before a legal commitment, the Finance Guidance should firmly establish this rule and should provide guidance that RAOs shall make and validate in ABAC a budgetary commitment before entering into a legal commitment with third parties.</p> <p>Finance Guidance shall also provide some tips on the implementation of the corrective actions proposed by the RAOs in the central register of exceptions action plan. Where applicable some of these corrections might be explained in the Finance Guidance.</p>	Q4 2022			Financial Ex Post Controls 2020-2021



Observation Form No.	CAAR Proposal	No. of Corrective Action	Corrective action proposed	Initial Target Date	Severity <sup>1</sup>	Reassessed severity <sup>2</sup>	Source
		46.1.8 related to Finding 46.6	<p><b>related to Finding 46.6 “There is room to further clarify the Finance Guidance provision for payment against invoice”</b></p> <p>The Finance Guidance provisions on “payment against invoice” need to be concise on the scope of these specific kind of payments. In particular, the Finance Guidance should clarify at least that:</p> <ul style="list-style-type: none"> <li>• Authorisation of expenditure for staff reimbursements and payment against Invoices is used when there are no other means in the Agency to obtain goods and services or it is not sound financial;</li> <li>• The fact that no procurement procedure takes place is allowed in line with the Agency’s Standard Operation procedure on public procurement and the EUAA/EASO Financial Regulation;</li> <li>• Payments against invoice are referring to invoices below EUR 1 000.00 only;</li> <li>• Reference to Administrative Circular (EASO/DOA/2018/476) that describes the procedure that shall apply in relation to purchases under EUR 1 000.00 to be explicitly provided.</li> </ul>	Q4 2022			<b>Financial Ex Post Controls 2020-2021</b>