

Support for projects of civil society organisations (CSO) in Montenegro within the project

## CSOs in Montenegro – from basic services to policy shaping – M'BASE

### CLARIFICATIONS <sup>1</sup>

Question 1	<b>My organization deals with the problems of the RE communities and has no implemented projects so far, hence we have a problem with one required document - a copy of the Financial report for 2020 electronically submitted to the Tax Administration. How can we solve this problem and is it enough to state that we did not have any implemented projects?</b>
Answer 1	Every non-governmental organization, in accordance with the valid Montenegrin laws, has the obligation to submit a financial report for 2020 by March 31 of the current year to the Tax Administration. Therefore, it is a legal obligation and not linked to the number of implemented projects.
Question 2	<b>Does the maximum amount of 45% of the funds provided for staff salaries/honorarium fees apply only to the CSO team that implements the project or it includes the fees of professional associates and other persons engaged in the project?</b>
Answer 2	The maximum amount of 45% of the funds provided for staff salaries/honorarium fees refers to the project team, i.e. to the costs related to budget heading 1. <i>Human resources</i> . Costs related to budget heading 4. <i>Other costs, services</i> are not included in this percentage.
Question 3	<b>Does 5% of the funds intended for the purchase of equipment relate to the purchase of equipment for CSOs, i.e. is the procurement of equipment and supplies needed for the project (e.g. diaries, pens, projector, etc. if a conference is being organized, etc.) excluded?</b>
Answer 3	The Guidelines, page 5, prescribes: <i>“The maximum amount of funds provided for staff salaries/fees, office expenses and possible costs of purchasing equipment must not exceed 50% of the total costs of the entire project, whereas the maximum amount for staff salaries/fees is 45%.”</i> Also, the budget proposal, which is an integral part of the application form, clearly states that within budget line 3. <i>Equipment and supplies</i> are eligible <i>if required for the project activities</i> . Consequently, the maximum of 50% represents the maximum allowed sum of costs of budget headings 1 and 3, with the note that a distinction should be made between equipment (e.g. projector) that is under the budget heading 3, and stationary for participants at an event (e.g. pens), which are within budget heading 4. <i>Other costs, services</i> .

<sup>1</sup> Clarifications were given based on received questions to e-mail [mbase@cgo-ccc.org](mailto:mbase@cgo-ccc.org) and during info sessions, with certain shortening during the processing of questions to address the essence

<b>Question 4</b>	<b>Do indirect costs including certain services (catering, transport, rent of training space, etc.) have a percentage limit in relation to the total funds requested?</b>
Answer 4	For budget line 4. <i>Other costs, services</i> there is no limited percentage in relation to the total funds requested. Budget line 6. <i>Indirect costs</i> have a limit of a maximum of 7% of total direct costs. Budget line 6 lists costs that cannot be identified as specific and that are directly related to the implementation of the project but not included in lines 1 to 4.
<b>Question 5</b>	<b>Can organizations whose management structures include people who are employed in the public sector (but they are not public officials) apply?</b>
Answer 5	The organizations whose authorized person is a public official at the time of submission of the application or was a public official within the past year, cannot be supported within this call.
<b>Question 6</b>	<b>Can persons employed in the public sector, as well as public officials, be engaged as professional associates (precisely, not as organizations with the status of associates, but as individuals who provide services to the project applicant)?</b>
Answer 6	Civil servants and other staff of the public administration shall not be recruited as paid experts, but in exceptional cases and with the prior approval of the contracting authority and with well-reasoned justifications and evidence on the necessity of such engagement.
<b>Question 7</b>	<b>Did we understand well: within this call, a CSO cannot be the project applicant of one project and a partner of another, but only one of the two?</b>
Answer 7	Each CSO can participate in this call only once, i.e., either as a project applicant or as a partner. Thus, CSOs can apply with only one project, regardless of the role in the project.
<b>Question 8</b>	<b>Should only copies of the balance sheet and income statement for 2020 be sent, or should a copy of the print confirmation that the final account has been submitted need to be sent as well?</b>
Answer 8	With the application package, project applicants should submit a copy of the Financial report for 2020 electronically as submitted to the Tax Administration (with the number of statements assigned by the Tax Administration, now the Revenue Administration). If the document is not submitted electronically, a copy of the confirmation of the submitted final account shall be submitted with copies of the balance sheet and income statement.
<b>Question 9</b>	<b>Should the NGO send a copy of the entire statute or is it enough to send a certain part of the statute?</b>
Answer 9	In addition to the application package, project applicants should submit the following supporting documentation (one hard copy): 1. copy of the registration of the organization; 2. a copy of the statute of the organization; 3. financial report for 2020 electronically submitted to the Tax Administration. Therefore, no special excerpt from the statute of the organization is required, but a complete document.
<b>Question 10</b>	<b>Does an electronic application mean a scanned print application that has been signed and stamped?</b>
Answer 10	Please see answer no. 8 if it refers to financial accompanying documentation. If it refers to the application package it is not signed and scanned for electronic submission.
<b>Question 11</b>	<b>Should all attachments to the application (copies of decisions, final accounts, etc.) be sent electronically?</b>

Answer 11	In addition to the application package, project applicants should submit the following supporting documentation (one hard copy): 1. copy of the registration of the organization; 2. a copy of the statute of the organization; 3. financial report for 2020 electronically submitted to the Tax Administration. Hence, only one print copy of the supporting documentation should be submitted.
<b>Question 12</b>	<b>What exactly does a “comprehensive capacity-building programme in project management” mean?</b>
Answer 12	Upon selection of the projects that will be financed within this call, beneficiaries will also be provided with a project management support programme that covers various aspects.
<b>Question 13</b>	<b>Is it enough to print a version of the financial report (consisting of the balance sheet and income statement for 2020) downloaded from the website of the Revenue Administration of Montenegro (E-portal) and send it with other administrative documents?</b>
Answer 13	Please see answers no. 8 and 11.
<b>Question 14</b>	<b>Are the costs of providing prizes to competitors eligible?</b>
Answer 14	The cost is eligible if it is related to eligible activities in accordance with the call.
<b>Question 15</b>	<b>I am the head of an NGO, but also a member of the council for cooperation between the local government of the municipality and the NGO sector, on behalf of a group of organizations from a certain area. Is that an eliminatory factor for our organization to participate in this call?</b>
Answer 15	Please see answer no. 5, as well as the decision on forming of that council whose member you are, as there is the basis on which manner that body is formed and serves for the assessment if someone is a public official or not.
<b>Question 16</b>	<b>Are projects already implemented in the past but without major success and not financed by the EU eligible to be implemented?</b>
Answer 16	The received project proposals will be evaluated as per the evaluation grid, which is an integral part of the Guidelines. The project proposals are expected to be aligned with the objectives of the call and should represent actions that are expected to be successful and sustainable.
<b>Question 17</b>	<b>Of the six partners who will apply through a call, two are in the process of obtaining registration issued by the Ministry of Public Administration. The Guideline prescribes that the applicant must be registered for at least 12 months, and the application form requires a registration number of the partner. Does this mean that partners can only be registered organizations or do we have to enter those two partners through the form for associates?</b>
Answer 17	All partners must meet the criteria prescribed by the Guidelines. Associates play a role in the project implementation, but they may not receive funding from the grant, except for per diem and travel costs, when applicable. Associates do not have to meet the criteria that apply to project applicants and partners, i.e. Associates do not have to meet the eligibility criteria that apply to project applicants and partners, i.e. associates can be public institutions, local governments, representatives of the business community, et.
<b>Question 18</b>	<b>Why is there a limitation that NGOs whose authorized persons are public officials cannot be supported within this call? We consider that the rights of our organization that meets other requirements for application in this call are limited in this manner, thus indirectly discriminating against our organization. We note this also because</b>

	<p>there are cases in which the Agency for Prevention of Corruption, in its opinion, which we consider to be contrary to the Law on Prevention of Corruption, declares members of certain councils as public officials. Also, representatives of various NGOs have been appointed to bodies or institutions in the past, but the organizations whose authorized persons they were (as public officials) used EU funds without restrictions... We do not know that this restriction has ever been prescribed before in open calls by the EU Delegation to Montenegro, nor by any other EU fund or foreign donor. Especially, because the authorized persons in NGOs primarily perform their legal and statutory function in NGOs, and they are appointed to bodies precisely on behalf of NGOs and in the public interest determined by special regulations. As a consequence of keeping this limitation in this and future calls conducted by the CCE, the entire system built over several years, in which NGOs were given the right and opportunity to appoint their representatives to various advisory bodies or other public authorities is put into question. We urge you to remove this restriction in the appropriate procedure and thus enable us to participate in this and other calls that you will launch in the coming period.</p>
Answer 18	<p>The rules established for this call cannot be changed while it is in progress, but the Technical Committee of the project will carefully analyse this argument during the preparation of the next calls. Also, please see answer no. 15.</p>
Question 19	<p><b>We had the idea to include a couple of faculties and state bodies as associates on the project, whereby some of the trainings, in addition to other professional associates, would be conducted by professors of those faculties, as well as employees in public administration. Since such activities are not in the domain of their regular work tasks (specifically, themes that would be addressed through the implementation of our project activities are not covered by curricula at the faculties), it is questionable whether employees in associate institutions would agree to do so voluntarily. There is also the question of hiring students from those faculties as potential assistants in the project, since they cannot receive fees due to their affiliation with the associate institution. Of course, the option remains not to conclude a memorandum of cooperation with faculties and public administration bodies from which we would hire educators, as we initially planned, to have the right to conclude work contracts with their employees, the basis on which they would be paid. However, such an option would harm the quality of the application itself, as it would narrow the scope of public institutions that would be willing to cooperate in project implementation, and ultimately discourage cooperation between civil society and public institutions, which is one of the priority objectives.</b></p>
Answer 19	<p>Associates play a role in the project implementation, but they may not receive funding from the grant, except for per diem and travel costs, when applicable. In the part of the payment to civil servants, please see answer no. 6.</p>
Question 20	<p><b>Can you explain to us which category the non-profit organization belongs to, the first or the second, and the basis of which it was determined?</b></p>
Answer 20	<p>It is about the financial aspect of the call, hence you apply for one of the categories and submit the appropriate supporting documentation, whereas one of the general criteria for all who apply is that they are a non-profit organization.</p>
Question 21	<p><b>Can the associates be from one of the EU countries or must they be exclusively from Montenegro?</b></p>
Answer 21	<p>Associates can be from EU member states.</p>

<b>Question 22</b>	<b>Can a sports and recreational association with the status regulated by the Law on Sports apply to this call?</b>
Answer 22	Only CSOs that are registered under at least one of the following laws are eligible for funding: Law on Non-governmental Organisations, Labour Law, Law on Representation of Trade Unions, Law on the Chamber of Economy of Montenegro, Law on Red Cross of Montenegro.
<b>Question 23</b>	<b>The Guidelines prescribes that “The maximum amount of funds provided for staff salaries/fees, office expenses and possible costs of purchasing equipment must not exceed 50% of the total costs of the entire project, whereas the maximum amount for staff salaries/fees is 45%.” Does the amount of 45% for staff salaries/fees also include fees for lecturers and experts outside the project team? Also, do office expenses and equipment purchase costs include materials for seminars and conferences, or does it refer to office rent expenses and supplies?</b>
Answer 23	Please see answers no. 2 and 3.
<b>Question 24</b>	<b>The non-governmental organization in which I work received a decision on registration from the competent Ministry on 14 February 2020, and we have been registered with the Tax Administration since 30 March 2021. The reason for that is that one of the founders was abroad, and his presence was mandatory for opening a bank account. Given this circumstance, does our NGO have the right to apply to this call?</b>
Answer 24	The condition is that the organization must be registered in Montenegro at least 12 months before the deadline for submission of project proposals.
<b>Question 25</b>	<b>Is there a possibility that our NGO can submit a project for training and empowerment of women?</b>
Answer 25	Projects that are in accordance with the conditions and objectives of the call can be submitted by 9 May 2021 until 4:00 p.m.
<b>Question 26</b>	<b>In addition to the application form and budget proposal, what else needs to be sent in the documentation, i.e. is a decision on registration of organisation needed, as well as is it necessary to stamp each page? Is the application form also a project form?</b>
Answer 26	Applicants are required to submit a filled application package. The 1st category includes an application form and budget proposal, whereas the 2nd category encompasses application form, budget proposal and logical framework matrix. In addition to the application package, project applicants should submit the following supporting documentation (one hard copy): copy of the registration of the organization; a copy of the statute of the organization; financial report for 2020 electronically submitted to the Tax Administration. The Application form with the budget proposal (1 <sup>st</sup> category), i.e. the Application form, Budget Proposal and Logical Framework Matrix (2 <sup>nd</sup> category) are the project form.
<b>Question 27</b>	<b>Which civil society organizations are targeted under this call and who is eligible to apply - for example, are media eligible? The note related to the definition of CSO is confusing.</b>
Answer 27	Only CSOs that are registered under one of the following laws are eligible for funding: Law on Non-governmental Organisations, Labour Law, Law on Representation of Trade Unions, Law on the Chamber of Economy of Montenegro, Law on Red Cross of Montenegro. The definition of the CSOs includes all subjects that are part of CSOs, but this call is open to those registered in line with the above-listed laws.

<b>Question 28</b>	<b>How many times can an organization apply to the CCE's calls within this programme? Can they apply if already financed/rejected through one of the five calls?</b>
Answer 28	Organizations that are eligible for funding can apply for all the published calls for proposals.
<b>Question 29</b>	<b>Are partnerships evaluated with more points?</b>
Answer 29	Partnerships in this call are strongly encouraged and will be scored according to the evaluation grid and mainly through the section <i>feasibility</i> of the project. The evaluation grid is part is an integral part of the Guidelines.
<b>Question 30</b>	<b>How exactly is the involvement of public officials and public servants defined? Is their involvement in the project not allowed at all, or can they be engaged as experts and how, including the questions of fees and per diems for them?</b>
Answer 30	Please see answer no. 6.
<b>Question 31</b>	<b>Who can apply as an associate – which “organisations”? And, if institutions apply as associates are they allowed to receive per diems? Also, are NGOs not registered at least one year before the call was opened allowed to be associates, etc?</b>
Answer 31	Associates can be public institutions, local governments, representatives of the business community, etc. Associates are allowed to receive per diem and travel costs, when applicable. Associates do not have to meet the eligibility criteria that apply to project applicants and partners.
<b>Question 32</b>	<b>Who are the external experts to be engaged in line with chapter 4: <i>Financial aspect of the Call</i>? How are they different from the project team if someone not working in the applicant organization is engaged through all project period?</b>
Answer 32	External experts are engaged for a specific task in the project. If an external expert is engaged throughout the entire project implementation period, that person should be part of the project team and consequently planned in the budget.
<b>Question 33</b>	<b>What exactly is the eligible equipment to be purchased within this call?</b>
Answer 33	Costs of equipment and supplies within are eligible only if they are required for the project activities. Activities focused only on the purchase of equipment are not eligible.
<b>Question 34</b>	<b>How are travel costs calculated? Is using your own car allowed?</b>
Answer 34	Travel expenses are calculated based on the submitted ticket from public transport or receipt for gas. Using your own car is permitted, and calculation is done based on kilometer.
<b>Question 35</b>	<b>Are international experts eligible to be engaged? If yes, are international travel costs eligible??</b>
Answer 35	International experts are eligible for funding and corresponding travel expenses.
<b>Question 36</b>	<b>Why one of the priority topics is not agriculture, if it is known that this represents on the North key area of work and that there are NGOs that are dealing with issues concerning agriculture?</b>
Answer 36	The first call does not encompass all topics that could be of interest and importance for our context, but the Technical Committee of the project will carefully analyse all suggestions on priorities and themes in the process of drafting other calls.