

**ANNEX 11**  
**UNIT COSTS**  
**OF THE EUROPEAN JOINT MASTER'S IN STRATEGIC BORDER MANAGEMENT**  
**IMPLEMENTATION**

under the Call for Proposals 2023/FPA/TRU/01

This annex aims to present the methodology for determining unit costs by the applicants participating in Frontex' Call for Proposals concerning actions of common interest to implement the European Joint Master's in Strategic Border Management (hereinafter "the Call for Proposals").

### **1. Definition**

The administrative and educational unit cost (hereinafter "the administrative and educational unit cost") is hereby defined as all direct cost of educational and administrative support necessary for the practical implementation of the EJMSBM in accordance with the list of eligible costs defined in this Call under section 11.

When establishing the unit cost as defined above, the applicant shall take into account the provisions below.

### **2. Methodology for determining unit cost**

The methodology for determining unit costs by the grant beneficiary may be based on a beneficiary-by-beneficiary approach by:

- reference to certified or auditable historical data of the beneficiary, or
- reference to its usual cost accounting practices, or
- a combination of the two approaches, depending on the cost categories which constitute a given unit cost.

The average cost determined shall be rounded up to a full number in order to count as a unit cost.

- **The methodology for determining unit costs by reference to certified or auditable historical data**

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The unit costs are established following the collection of historical data from accounting statement of the grant beneficiary on actual costs incurred for the categories of eligible costs to be covered by unit costs.

The reference period from which the data are collected shall be at least two years so as to identify any potential exceptional circumstance which would have affected actual costs in a specific year as well as the tendencies in the cost amounts.

Frontex may, depending on its risk assessment, require that those data are certified by an approved auditor or, in the case of public bodies, by a competent and independent accounting officer, so as to ensure reliability of the reference data used. This certification of data may be made in the framework of statutory audits or contractual audits. Where the risk of error or irregularity in the accounting statements used is deemed low, the calculation method may be made on the basis of non-audited data (without any requirement of a certificate), provided they may be checked if need be.

- **The methodology for determining unit costs by reference to usual cost accounting practices**

The beneficiary's usual cost accounting practices (such as: collection of historical data, officially available statistical data or similar objective sources of data, data drawn from existing contracts of the beneficiary, rates established in the national regulations) may be used to determine unit costs if they comply with the following boundary conditions:

- the cost accounting practices used constitute the beneficiary's usual cost accounting practices and are applied in a consistent manner, based on objective criteria independent from the source of funding;
- the costs declared can be directly reconciled with the amounts recorded in its general accounts.

### **3. No profit principle**

Profit is defined as a surplus of the receipts over the eligible costs incurred. It shall not be interpreted as deviance from the actual costs covered by the unit cost, which is legal and regular. The no-profit principle means the prohibition of using commercial rates or unit costs including a profit margin i.e. unit costs are to be established on the basis of real costs incurred over a period of time, not inflated by any commercial component.

### **4. The process of establishing the unit cost**

The unit cost shall be indicated by the training institution in the application form submitted under the Call for Proposals. The unit cost established by the applicant shall be supported by justification of the amount in accordance with the methodology for determining unit costs established in this decision. Frontex may request additional clarification as to the justification provided, which may lead to correction of the unit cost proposed.

### **5. Validity and evolution of the unit costs**

The unit cost determined by the beneficiary are valid for the purpose of grant agreements signed under the Call for Proposals. In exceptional cases, justified in particular by change of legislation or unprecedented increase/decrease of the prices, unit costs may be adjusted during the implementation phase of operational activities and following Frontex' approval.

**6. Check and audits**

The verification of the compliance of the unit cost determined by the beneficiary may be conducted ex-ante or ex-post, based on the risk analysis carried out by Frontex. This verification may be carried out by Frontex' staff or a contracted auditor. Audits or controls of costs declared or covered on the basis of unit costs may not lead to correction of the amounts of those unit costs where those have been approved by Frontex ex-ante. In all other cases when Frontex carries out the verification of the unit costs determined by beneficiaries, and they do not comply with the conditions laid down in this decision, the unit costs shall be corrected.