

Eva-Liisa Mõistlik

From: Stephanie.Hardy@ec.europa.eu
Sent: kolmapäev, 3. jaanuar 2018 14:44
To: Eva-Liisa Mõistlik
Subject: RE: Question

Follow Up Flag: Follow up
Flag Status: Completed

No worries. We can schedule the dialogue in Jan or Feb, as suits everyone best. The revision of the NP can take longer...and I would advise waiting - as there are also some new funds for the EES that will probably come in Jan or Feb. So there is no real hurry.

Kind regards

Stephanie



European Commission

DG Migration and Home Affairs

E3: National programmes for North and West Europe, MFF, Evaluation

From: Eva-Liisa Mõistlik [mailto:Eva-Liisa.Moistlik@siseministeerium.ee]
Sent: Wednesday, January 03, 2018 1:31 PM
To: HARDY Stephanie (HOME)
Subject: RE: Question

Thank you! As I understand, the policy dialogue (video conference) is planned to take place in January? We have to go to the government in order to change our NP therefore the revision could take some time and since the deadline is already in the end of January I am just wondering and a little bit worried if we will have enough time (taking into consideration the new information that policy dialogue will be held). Right now I will not start the process of revising our NP before we have had the dialogue.

Kind regards,
Eva-Liisa

From: Stephanie.Hardy@ec.europa.eu [mailto:Stephanie.Hardy@ec.europa.eu]
Sent: Wednesday, January 3, 2018 1:47 PM
To: Eva-Liisa Mõistlik <Eva-Liisa.Moistlik@siseministeerium.ee>
Subject: RE: Question

Yes.

Kind regards

Stephanie



European Commission

DG Migration and Home Affairs

E3: National programmes for North and West Europe, MFF, Evaluation

From: Eva-Liisa Mõistlik [<mailto:Eva-Liisa.Moistlik@siseministeerium.ee>]
Sent: Wednesday, January 03, 2018 12:46 PM
To: HARDY Stephanie (HOME)
Subject: Question

Hello!

Was the last letter (below) meant to be the answer to my e-mail that I sent in regard to additional allocation for ISF-Borders and revising the NP? ☺

Kind regards,
Eva-Liisa

From: <Stephanie.Hardy@ec.europa.eu>
Date: 3 January 2018 at 13:35:22 EET
To: <Aivi.Kuivonen@siseministeerium.ee>
Cc: <Tairi.Pallas@siseministeerium.ee>, <Kristi.Lillemagi@siseministeerium.ee>
Subject: RE: SoA 2017 Audit - CL 8989 - Estonia

And my best wishes for 2018 to you all. Lets hope for a calmer year.

I am sure the reply will be fine.

As for your other email. The letters got stuck, but I will send you an unofficial version today. They want us to have policy dialogue with all the MS. In the case of Estonia I plan a video conference with my head of unit. Nothing too heavy.

Otherwise the letter has lots of comments from the policy units but nothing substantial in your case.

Kind regards

Stephanie

European Commission
DG Migration and Home Affairs
E3: National programmes for North and West Europe, MFF, Evaluation

-----Original Message-----

From: Aivi Kuivonen [<mailto:Aivi.Kuivonen@siseministeerium.ee>]
Sent: Wednesday, January 03, 2018 12:25 PM
To: HARDY Stephanie (HOME)

Cc: Tairi Pallas; Kristi Lillemägi
Subject: Re: SoA 2017 Audit - CL 8989 - Estonia

A Happy New Year! Hope you had a great holiday!

Yes, we drew our AA's attention to the same point. Anyway, I think they already submitted their comments to the ECA, and let's wait for the response.

Sent from my iPhone

On 3 Jan 2018, at 13:04,
"Stephanie.Hardy@ec.europa.eu<mailto:Stephanie.Hardy@ec.europa.eu>"
<Stephanie.Hardy@ec.europa.eu<mailto:Stephanie.Hardy@ec.europa.eu>>
wrote:

Dear Aivi,
Thank you and sorry for my late reply.
We have just a point to add that we think will help.

The issue of advances has been improved in SFC.
From the 2017 accounts onwards, the RA will indicate whether a payment is an interim or final payment as from the next accounts. The logic is that any remaining payments not indicated as interim or final are prefinancings/advances. Hence there will be a clear overview of the different types of payments made.

Kind regards

Stephanie
<image007.png>

European Commission
DG Migration and Home Affairs
E3: National programmes for North and West Europe, MFF, Evaluation

From: Aivi Kuivonen [<mailto:Aivi.Kuivonen@siseministerium.ee>]
Sent: Thursday, December 21, 2017 1:14 PM
To: HARDY Stephanie (HOME)
Cc: Tairi Pallas; Kristi Lillemägi
Subject: RE: SoA 2017 Audit - CL 8989 - Estonia

Dear Stephanie,

Thank you for the good wishes. Our e-card will come soon 😊.

I got the draft and quick translation is here:

Herewith we present the comments from the Ministry of the Interior on the initial audit findings of the ECA's audit CL-8989.

The ECA found two minor weaknesses in the audit strategy and risk assessment of the AA.

Firstly, you have stated that the AA did not disclose the fact that 97,6% of the amounts reported in the ISF accounts were considered advances contrary to the provisions of Regulation 966/2012, which requires this information to be disclosed in the accounts.

In preparation of the Annual Accounts, the Estonian Ministry of the Interior has been pursuant to a model that has been laid down by to the Commission implementing regulation (EU) 2015/377 and compiled the report by using pre-defined data fields in SFC2014.

Please note that there is no separate way to distinguish pre-payments from other payments in the model and in the IT system. Valid forms allowed for such distinction to be made only for final payments. We admit that as the module does not allow clear distinction of the type and structure of payments, in some cases, it might cause misapprehensions by the users of financial data provided. We will take into account the analysis you have made in future audit declarations.

Secondly, you have pointed out that it is alleged that the audit authority has not adequately addressed the consequences of widespread use of prepayments for its sound financial management in its audit strategy and risk analysis. The impact of potential consequences is exemplified in the analysis by the Internal Security Fund's 2016 Annual Accounts, in which negative figures for five out of nine completed projects are presented.

To mitigate that risk the AA, on the basis of the annex to Delegated Regulation 1042/2014 and in line with the audit strategy and risk assessment, has audited the management and control systems applied annually in order to give the audit opinion to the Annual Accounts.

Given that the five re-payments in the pool are marginal, amounting to approximately 0.6% of the total subsidy payments made by the responsible authority in the financial year, we consider that the risk presented in the analysis is rather theoretical and financially small in terms of reliability of the sound financial management of the fund.

Thank you for your feedback on the activities of the audit authority, which is a great help in improving our work.

Estonian version:

Käesolevaga esitame Eesti Vabariigi Siseministeeriumi kommentaarid Euroopa Kontrollikoja auditi CL-8989 esialgsete auditileidude kohta.

Euroopa Kontrollikoda leidis audititoimingute käigus kaks väiksemat puudust auditeerimisasutuse auditistrateegias ja riskihindamises.

Esiteks, olete esitanud arvamuse, et auditeerimisasutus ei avalikustanud asjaolu, et 97% Sisejulgeolekufondi raamatupidamise aastaaruandes esitatud summadest käsitletakse eelrahastamisena, kuigi määruses 966/2012 nõutakse sellise teabe avalikustamist raamatupidamise aastaaruandes.

Siseministerium on Sisejulgeolekufondi raamatupidamise aastaaruande koostamisel lähtunud rakendusmäärusega 2015/377 kehtestatud aruande vormidest ning kasutanud aruande koostamiseks SFC2014 süsteemi, mis määrab kindlaks aruande andmeväljad.

Juhime tähelepanu, et antud vormidel ega infosüsteemis ei ole loodud eraldi võimalust eristada ettemakseid teistest maksetest. Kehtinud vormid võimaldasid esitada taolist eristust vaid lõppmaksete osas. Mõõname, et kuna vormid ei võimalda edastada selgelt infot maksete olemusest ja struktuurist, võib mõningatel juhtudel aruande kasutajatel tekkida moonutatud arusaam esitatud finantsandmestikust. Võtame teie poolt koostatud analüüsi arvesse edaspidiselt auditi arvamuse koostamisel.

Teiseks olete juhtinud tähelepanu asjaolule, et väidetavalt ei ole auditeerimisasutus käsitlenud oma auditi strateegias ja riskianalüüsis asjakohaselt ettemaksete laialdase kasutamise tagajärge fondi usaldusväärsele finantsjuhtimisele. Võimaliku tagajärje mõju näitlikustatakse analüüsis Sisejulgeolekufondi 2016. aasta raamatupidamise aruandega, milles üheksast lõpetatud projektist viie kohta on esitatud negatiivsed summad.

Auditeerimisasutus on auditeerinud viidatud riski maandamiseks rakendatud juhtimis- ja kontrollisüsteeme delegeeritud määruse 1042/2014 lisa põhiselt iga-aastaselt finantsaasta aruandele arvamuse andmisel vastavalt auditi strateegiale ning riskihinnangule. Arvestades, et viie projekti tagasimaksed kogumis on marginaalsed, moodustades vastutava asutuse poolt finantsaastal teostatud toetuse kogumaksetest ligikaudu 0,6%, on meie arvates analüüsis välja toodud riski fondi finantsjuhtimise usaldusväärsele pigem teoreetiline ja rahaline mõju väike.

Täna Teid tagasiside eest auditeerimisasutuse tegevusele, millest on suur abi meie töö paremaks muutmisel.

Let me know, if you have any comments.
Thanks!
Aivi

From:
Stephanie.Hardy@ec.europa.eu<<mailto:Stephanie.Hardy@ec.europa.eu>>
[<mailto:Stephanie.Hardy@ec.europa.eu>]
Sent: Wednesday, December 20, 2017 4:38 PM
To: Aivi Kuivonen
<Aivi.Kuivonen@siseministerium.ee><<mailto:Aivi.Kuivonen@siseministerium.ee>>>
Cc: Tairi Pallas

<Tairi.Pallas@siseministeerium.ee<<mailto:Tairi.Pallas@siseministeerium.ee>>
>; Kristi Lillemägi
<Kristi.Lillemagi@siseministeerium.ee<<mailto:Kristi.Lillemagi@siseministeerium.ee>>>
Subject: RE: SoA 2017 Audit - CL 8989 - Estonia

Ok thank you AIVI I understand. No worries. I found the question from the ECA not very interesting/clever....

All my very best wishes of the season and for a wonderful calm New Year

Stephanie
<image008.png>

European Commission
DG Migration and Home Affairs
E3: National programmes for North and West Europe, MFF, Evaluation

From: Aivi Kuivonen [<mailto:Aivi.Kuivonen@siseministeerium.ee>]
Sent: Wednesday, December 20, 2017 3:12 PM
To: HARDY Stephanie (HOME)
Cc: Tairi Pallas; Kristi Lillemägi
Subject: FW: SoA 2017 Audit - CL 8989 - Estonia

Dear Stephanie,

I know you had an agreement with Tairi that we will send you the draft of the audit reply before the official submission. Unfortunately, the head of audit hasn't had time to proofread the draft. The AA said that the earliest they can send the draft is in the 2nd of January. If I get it earlier, I'll forward it ASAP. The submission deadline is January 3rd. The AA also said that the reply will be very short, they will not repeat the answers given during the audit mission and it will be written in Estonian. I'll do my best in translating the reply for you, if I ever get it in time.

Sorry for any inconvenience!
Kind regards,
Aivi

Aivi Kuivonen
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From: Stephanie.Hardy@ec.europa.eu<<mailto:Stephanie.Hardy@ec.europa.eu>>
[<mailto:Stephanie.Hardy@ec.europa.eu>]
Sent: Wednesday, December 06, 2017 4:19 PM
To: Tairi Pallas
<Tairi.Pallas@siseministeerium.ee<<mailto:Tairi.Pallas@siseministeerium.ee>>
>
Cc: Paul.Capeyron@ec.europa.eu<<mailto:Paul.Capeyron@ec.europa.eu>>;
Sinziana-Oana.MACOVEI@ec.europa.eu<<mailto:Sinziana-Oana.MACOVEI@ec.europa.eu>>; HOME-NOTIFICATIONS-E3@ec.europa.eu<<mailto:HOME-NOTIFICATIONS-E3@ec.europa.eu>>
Subject: FW: SoA 2017 Audit - CL 8989 - Estonia

Dear Tairi,

Please find the letter 8989 for ISF-B Estonia (2017 DAS) from the European Court of Auditors. We would be very grateful to receive a draft of your reply.

The finding refers to weaknesses in Audit strategy and risk assessment.

-
- a) the AA did not disclose the fact that 97,6% of the amounts reported in the ISF accounts for ISF are considered advances contrary to the provisions of Regulation 966/2012, which requires this information to be disclosed in the accounts. Moreover, the non-disclosure of this important information undermines the AA's strategy objective of presenting the information understandably.
 - b) the AA did not properly address in its audit strategy and its risk analysis the implications that the extensive use of pre-financings may have an impact on the sound financial management of the fund and whether this could call in question the assertions made in the management declaration that the Union expenditure was used in accordance with the principle of sound financial management.

I apologise for this late request however I have only just received this letter.

Kind regards

Stephanie
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