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**Republika Kosova - Republic of Kosovo**  
*Qeveria - Vlada - Government*  
*Zyra e Kryeministrit - Ured Premijera - Office of the Prime Minister*

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**ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION  
PROGRAMME 2022-2027**

September, 2022

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## List of abbreviations

<b>AIS</b>	Agency for Information Society
<b>DEIPC</b>	Department of European Integration and Policy Coordination
<b>EC</b>	European Commission
<b>NCEI</b>	National Council for Economy and Investments
<b>SPMF</b>	Strategic Planning and Management Framework
<b>SPC</b>	Strategic Planning Committee
<b>LGAP</b>	Law on General Administrative Procedure
<b>SCM</b>	Standard Cost Model
<b>EM</b>	Explanatory Memoranda
<b>RPG</b>	Rules and Procedure of the Government
<b>NDS</b>	National Development Strategy
<b>SPAR</b>	Strategy for Public Administration Reform
<b>SEG</b>	Strategy for Electronic Governance
<b>OPM</b>	Office of the Prime Minister
<b>LO</b>	Legal Office within the Office of the Prime Minister
<b>SPO</b>	Strategic Planning Office

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## Introduction

The Government of the Republic of Kosovo aspires to improve service delivery to citizens and businesses by developing, implementing, and effectively reviewing public policies. The unnecessary administrative burden, which causes unnecessary expenses, is time-consuming, causes frustration, and drives corruption, is one of the primary topics relating to the contact between the administration, citizens, and businesses. Some of the effects caused by the administrative burden include a poor environment for doing business, a lower rate of business registration and formalization, a low level of quality in public administration services, increased costs due to frequent legislative changes, and so on. These effects are caused by unnecessary procedures, contradictory legislation, improper legislative implementation, duplication of legal obligations, unclear information, insufficient capacities for quality service delivery, insufficient digitization, poor translation of the legislation, failure to implement general administrative principles, etc.<sup>1</sup>

Considering the causes and effects of the administrative burden, the Administrative Burden Prevention and Reduction Programme aims at preventing and reducing the unnecessary administrative burden from legislation without endangering its essential purpose. By reaching this aim, citizens' and businesses' savings will increase, which can be diverted to other related activities, business conditions will improve, the informal economy will be reduced, and the overall effectiveness of public administration and the government will improve, resulting in increased satisfaction and trust of citizens and businesses in the administration and the government.

The Programme was prepared and drafted by a working group established for this purpose, accompanied by the analysis and reports drawn up by the Strategic Planning Office, as well as consultations with line ministries, civil society, the business community, municipalities, development partners, and credible international organizations for public administration, such as SIGMA.<sup>2</sup> In addition to strategic aspects, the Programme contains instructions, some of which are detailed, to facilitate the work of public officials for reform implementation. As a result, in addition to serving as a strategy document, the Programme also acts as a guide for administration on how to prevent and reduce administrative burden, up to the development of relevant modules and guides.

The Programme is a flexible document that integrates and adapts to current circumstances and processes for public administration reform, and it is combined with other strategic documents, with clear goals and outcomes, as well as concrete activities that have a synergistic impact.

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<sup>1</sup> For more summaries, analyses, studies and comparisons on the administrative burden process, see the *Concept Document on Administrative Burden Reduction*, approved by Decision No. 03/05 of 06.03.2020.

<sup>2</sup> With the assistance of GIZ and the EU Office in Kosovo, the Office for Strategic Planning developed special evidence-based analyses and reports for concept documents, explanatory memoranda, standard cost model, service delivery in Kosovo, administrative burden trainings, and consulted SIGMA during the preparation of this Programme, as well as detailed international reports such as SIGMA's *2021 Monitoring Report*.

# 1. Strategic approach to administrative burden prevention and reduction

The strategic approach to administrative burden prevention and reduction is part of the **strategic map for the country's development**. In this regard, the National Development Strategy 2030 (hereinafter NDS) is the primary strategic document that defines the country's development orientations, the baseline for establishing the hierarchy of objectives and indicators, and the boundaries of sectors, allowing for a more stable connection with budget planning, monitoring, and reporting. The detailing method has been installed for this purpose, where the high-level goals and objectives defined within the NDS will be further detailed in the lower-level strategic documents such as **sector strategies** and **programs**.<sup>3</sup>

Sector strategies outline medium-term objectives and goals for a respective sector. The Public Administration Reform Strategy (hereinafter PARS) specifies medium-term objectives and goals for the strengthening and modernization of public administration, the achievement of which results in enhanced efficiency, effectiveness, transparency, and accountability. The PARS includes objectives and actions for improving service delivery quality, which affects various economic and social aspects, as well as strengthens citizens' trust to and communication with the government and public administration.<sup>4</sup> Similarly, the Strategy for Electronic Governance (hereinafter SEG) sets the objectives and goals for digitization in public administration, including high and secure interoperability across systems and the expansion of the E-Kosova platform in the function of the digitization of administrative services. Among other things, the strategic documents for local self-government will include goals for the simplification and digitization of services delivered at the local level.

Reducing the administrative burden for citizens, businesses, and administration is a broad topic that is related to many elements and processes of public administration, as well as its overall organic functioning. In this context, administrative burden reduction contributes to (1) **organic or structural simplification in public administration**, such as the rationalization of agencies and inspections, and so on, (2) **administrative simplification**, or the removal of the unnecessary administrative burden from legislation, and (3) **digitization** or technological infrastructure investments for the interconnection of public registers and the automatic generation of data, as well as the development of electronic platforms for informing and serving citizens, businesses, and the administration itself.

These elements and processes that affect administrative burden reduction necessitate proper planning, coordination, management, and maintenance, which can be costly and time-consuming, but deliver savings to both parties and the public administration. However, **in**

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<sup>3</sup> See *Decision 03/2022* of the Strategic Planning Committee, dated 24/11/2021, with Protocol No. 2735, for the implementation of the Strategic Planning and Management Framework.

<sup>4</sup> In addition to the PARS, the Strategy for Electronic Governance and Digital Agenda will be prepared, which will contain concrete objectives and actions for the advancement of digitization in the country, including the digitization of services and the interoperability of systems.

combination, they motivate and complement one another, resulting in outcomes and synergistic impacts.

Strategic planning for treating the administrative burden entails **preventing and reducing it by incorporating it into all policy-making processes**. The Programme will focus only on administrative simplification along with the digitization of simplified administrative procedures, accompanied by capacity building and promotional actions that, on the one hand, ensure **institutional sustainability** and, on the other, **increase awareness among citizens, businesses, and the administration itself**.

## 1.1. Objectives

The main objectives of the Government, expressed in the Programme, are:

- **reducing** the administrative burden for citizens, businesses and the administration;
- **preventing** unnecessary administrative burden during the development, implementation and review of public policies.

With the achievement of the Programme's objectives, it is intended to:

- **increase the savings among citizens and businesses;**
- **ensure that citizens and businesses are satisfied** with the administrative services provided by the public administration;
- **increase the value of global indicators** pertinent to the Program's objectives, such as the Balkan Barometer, the World Bank, SIGMA, etc.

The objectives and goals expressed in the Programme will be quantified and operationalized with concrete measures and actions in the Action Plan.

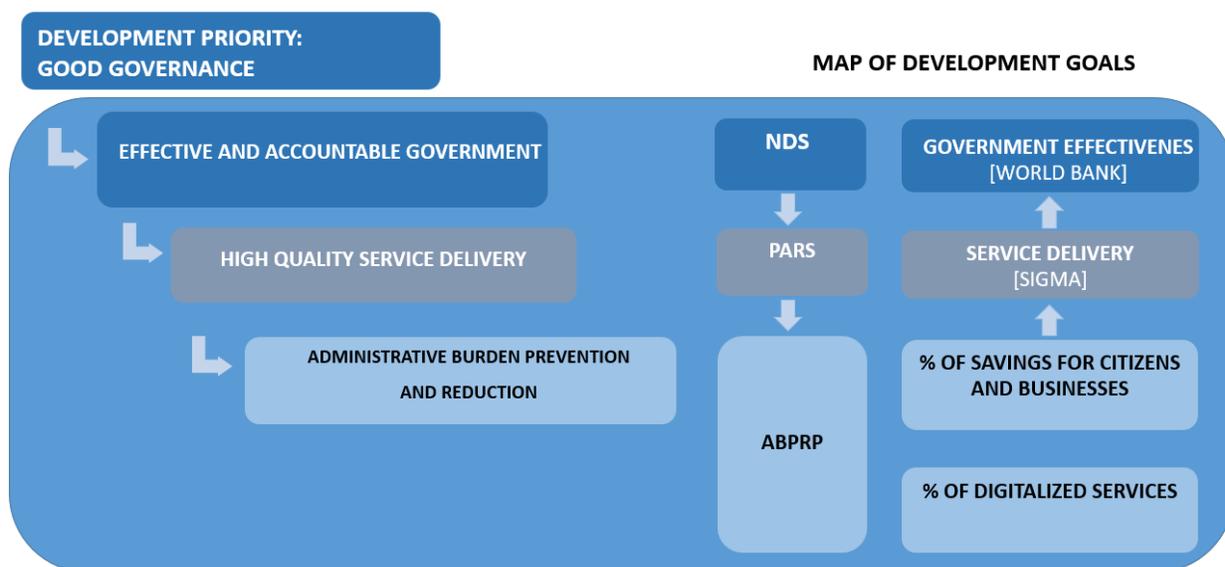


Figure 1: Map of objectives related to the strategic framework and types of indicators

## 1.2. Principles

Two types of principles will be used to prevent and reduce the administrative burden: the **European Commission** (hereinafter EC) e-government **principles** and the general **administrative principles** of the LGAP, which are related, directly or indirectly, to the defined elements, the simplification of which reduces the administrative burden.

European Commission's e-government principles are:

- *'once-only'* – no public administration body demands information from a user that they have already provided to the administration, in order to ensure that "the data moves and not the user". The full application of this principle is hampered by technological, technical, structural, and legal issues. As a result, in order to enable and facilitate the application of this principle, the Programme will focus, among other things, on the legal aspects that enable this, as well as on digitization, which allows the movement of data rather than users.
- *'personalization'* - users express their preferences for interacting with the public administration, which they then use to make the interaction as simple as possible. Personalization is an effective tool for developing close relationships with users. As a result, to the greatest extent feasible, the Programme demands and directs that the laws be framed in such a way that the provision of services by the public administration is as accessible, easy, and simple as possible, as well as flexible to new changes. The Programme provides and requires the implementation of instructions and consultation and communication elements to enable and facilitate the application of this principle.
- *'proactive service delivery'* - the public administration is aware of a user's circumstances and proactively delivers services and information that the user needs, tailoring them to the user's needs, circumstances, preferences, and so on.
- *'digital-first'* - unless there is a reason not to, the user interacts with the public administration digitally.

The general principles of the administrative procedure in Kosovo are based on EC principles for electronic governance. General administrative principles provide **a new opportunity** for public administration, through the use of modern tools for increasing efficiency and effectiveness in service delivery. Therefore, in order to apply administrative simplification, the defined elements for reducing administrative burden will be related to general administrative principles such as the principle of lawfulness, the principle of proportionality, the principle of legitimate and reasonable expectations, the principle of open administration, the principle of non-formality and efficiency, the principle of gratuity of the proceeding and other general principles.

To implement or facilitate the implementation of the aforementioned principles, the Strategic Planning Office (hereinafter SPO) within the Office of the Prime Minister (hereinafter OPM) can conduct special analyses and plans, as well as request that institutions develop concept documents and propose concrete measures and actions through strategic documents.

### 1.3. Priorities

The Programme's priority in the first two operational years will be the simplification of mandatory information<sup>5</sup> at the central level, based on real events, which include **permits, licenses, registrations, certifications, consents, authentications, authorizations, recognitions**, and so on, as well as mandatory information at the local level and services for **subsidies and grants** at the central level.<sup>6</sup> The digitization of simplified services is a special priority for the government, even though digitization frequently encourages simplification. **Building capacity for prevention and reduction** will also be a major priority, with training for the administrative burden of relevant personnel in OPM, line ministries, and their subordinate agencies, based on need and evaluations. It should be underlined that **inspections, as an administrative burden**, will be tackled as a process in and of itself, with law harmonization, electronic inspection, and rationalization of inspection bodies.

Among other things, **raising awareness and promoting the results** is a special priority in the Programme, which will be used to inform citizens and institutions, inform and raise awareness of the public administration itself, promote the Government's results, increase transparency, communication, and consultation.

In the framework of the simplification and digitization of administrative services, priority will be given to those services which, based on the analysis, are concluded to be used more by **women and vulnerable groups**.

### 1.4. Elements

Administrative burden is any unnecessary burden that causes administrative costs, wastes time for citizens and businesses, due to the obligation to comply with legislation. However, it should be noted that while administrative costs are an administrative burden, not the entire administrative burden is an administrative cost, as reducing the administrative burden is also related to efficiency in the implementation of principles by public officials. The efficiency and effectiveness of public administration is not only about reducing the administrative burden or clearing legislation of unnecessary elements, but also about enforcing **general administrative**

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<sup>5</sup> The term mandatory information is used for standardization with OECD countries' practices, but for the definition of mandatory information in the Programme, depending on the context, terms such as 'administrative service' and 'administrative procedure' will be used, but they all mean the same thing: the procedure from the moment the party submits the request to the moment the public authority responds for a specific service. The Programme's priority is the **mandatory information** that the party must request. This excludes health and similar services, which are an obligation of the administration to citizens, for which the OSP will request their addressing in other strategic documents.

<sup>6</sup> It should be highlighted that, with the exception of services derived from their own competencies, nearly the whole administrative burden in municipal services is created by central administration legislation. It should be highlighted that for payments or fees for administrative services delegated by the central level, the municipalities have the competence to determine them. As a result, reducing the administrative burden in municipal services entails, among other things, reducing the administrative burden generated by central-level legislation. Most of these services are the same in all municipalities, but due to different tariffs and low reform implementation, municipalities will be worked on one at a time, unless a municipal service is digitized and offered to all in a single centre, such as the digitization of civil registry certificates.

**principles**, which falls under the responsibility of drafters, on the one hand, and implementers of legislation, on the other hand.

During their activity in relation to public administration, citizens and businesses face regulatory costs or costs which follow as a result of compliance with legislation. Regulatory costs can be broken down into direct costs, indirect costs, compliance costs, long-term structural costs and difficulty costs.

**Compliance costs** are the costs that are most associated with administrative burden. Compliance costs are divided into substantive and **administrative** costs. Substantive costs are investment liabilities while **administrative costs** are **the mandatory information and documents required** for them that create **costs** as a result of the legal obligation.

The focus of the Programme will be on the **cost of compliance** (excluding substantive cost), on the elements as below:

**Element 1: Mandatory information:** each mandatory information can be simplified, merged with another or eliminated altogether, to avoid overlapping and complexity, through the direct application of the principle of lawfulness and proportionality [Articles 4 & 5, LGAP].

**Element 2: Payment of the application for mandatory information and other payments for documents for obtaining mandatory information:** some of the mandatory information is available for a fee to citizens and businesses. One of the principles of good governance is the principle of cost recovery. Therefore, in each measurement for administrative burden, this payment is also calculated and its simplification is recommended, which is related to the direct implementation of the principle of gratuity of administrative proceeding [Articles 10 & 12, LGAP].

**Element 3: Documents:** to complete the process for mandatory information, the party is obliged to provide various documents, some of which constitute an unnecessary administrative burden. Therefore, all documents that constitute an administrative burden are simplified and removed, which is related to the direct application of the principle of lawfulness, proportionality, non-formality and efficiency [Articles 4, 5 & 10, LGAP].

**Element 4: Validity of mandatory information:** The validity of mandatory information is one of the main elements for reducing the administrative burden. The simplification of this element is accomplished when the validity of the mandatory information is extended and the frequency of application is reduced for the same mandatory information: for the extension of the validity of a mandatory information from 1 to 2 years, the administrative burden is reduced by 100%, for the extension from 2 to 3 years, the administrative burden is reduced by 50%, for the extension from 4 to 5 years, the administrative burden is reduced by 20%. The simplification of this element is related to the direct application of the principle of lawfulness and the principle of proportionality [Art. 4 & 5, LGAP].

**Element 5: Waiting period:** the waiting period for receiving the response to the mandatory information constitutes indirect financial costs, which in most cases are determined by legislation. Therefore, depending on the relevant mandatory information, when it is considered that the deadline set in the legislation is too long, it will be shortened accordingly. This element is also related to the cost of difficulty, which can produce corruption, manifested in informal

payments. The simplification of this element is related to the direct application of the principle of lawfulness and proportionality [Art. 8, LGAP].

**Element 6:** *Additional administrative requests:* in some cases, after the completion of the procedure for obtaining mandatory information and commencing the activity, the party is required to provide additional data, such as the request to submit frequent or annual reports and other similar requests.

**Element 7:** *Administrative conditionality:* in some cases, in order to complete the procedure for obtaining mandatory information, conditions or other actions are imposed, which have nothing to do with mandatory information, or the service to which the party has applied, such as conditionality of payment of fines. This does not mean the elimination of fines, but the elimination of conditionality for their payment, for obtaining mandatory information or relevant service. Elimination of administrative conditionality is related to the direct application of the principle of lawfulness and proportionality [Article 4 & 5, LGAP].

The simplification of these elements in services directly affects the reduction of time and cost in administrative procedures for citizens and businesses.

## 1.5. General methodology for prevention and reduction of administrative burden

The prevention and reduction of the administrative burden is carried out in two phases: the *ex-ante* phase and the *ex-post* phase. **In the *ex-ante* phase, the administrative burden will be prevented, while in the *ex-post* phase it will be reduced.**<sup>7</sup> The program focuses on reducing the administrative burden through **administrative simplification or legislation clearing**, in combination with **procedure redesign**. For administrative simplification or legislation clearing, the focus will be on the elements outlined above, while for redesign of procedures the focus will be on the procedural processes or steps, which are planned to ensure the quality and lawfulness of the administrative procedure, which in many cases, produce high complexity, low efficiency, cost and delay. It should be noted that the **simplification** of administrative services also means the complete elimination of an administrative service (e.g., license) or **the merging of two** administrative services into one. It should be emphasized that the decision-making for the simplification and the level of simplification of the above elements, in the context of the analysis, belongs to the Office of the Prime Minister, while the decision is taken by the Office of the Prime Minister and the Ministries on the basis of good coordination. In case of any obstacle, this issue is addressed in the Strategic Planning Committee.

The standard cost model (hereinafter SCM) does not indicate which element should be simplified, but only shows the level of administrative burden caused by the element or the totality of the elements together.<sup>8</sup> Therefore, for the selection of unnecessary elements and procedural steps for simplification, it is necessary to perform a test of proportionality and current

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<sup>7</sup> See the 'Means' subsection, in the *Ex-ante vs Ex-post section: prevention and reduction of the administrative burden*.

<sup>8</sup> See below, in the 'Standard cost model' subsection.

readiness, which helps the official in the selection of simplification. When identifying the public interest, the principles outlined above in the 'Principles' subsection should be embodied. As guidance and orientation of public officials who are involved in the prevention and reduction of administrative burden, mainly legal officials and policy planning officials, the guiding questions highlighted in Annex 4 will serve. Depending on the process, *ex-ante* or *ex-post*, these questions will be used by all public officials who are involved in the drafting of public policies (legal officials and officials for drafting and coordinating policies).

For those analyses or reforms that require the amendment of many laws for the same purpose, the 'omnibus' technique will be applied **which is simpler, clearer, more effective, and brings quick results and reduces the administrative burden on the work of the Government and the Assembly.**<sup>9</sup> This will be followed by measuring the cost after reducing the administrative burden, by means of SCM.

Also, during the process, the '**one in, one out**' method will be initiated, which serves to prevent and reduce the administrative burden. A plan and analysis will be initiated for this, to identify the mandatory information which can be subjected to this method more quickly. After identifying this mandatory information, then in any case that the line ministries propose legislation that contains mandatory information, with the necessary argumentation, the removal of the old will be required for the acceptance of the new. To accelerate the implementation of this method, the same will be discussed together with the ministers in the Strategic Planning Committee.

Finally, in order not to facilitate the work of legal reading and reference, the tool of consolidation of primary and secondary legislation will be applied.

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<sup>9</sup> The connection of the reduction of the administrative burden with the process of legal harmonization of special laws with the LGAP and the connection of the mitigation of the administrative burden with the general reform of inspections, is emphasized in the *Concept Document on the Reduction of the Administrative Burden*, p. 21-22, as approved with the Decision No. 03/05 dated 06 March 2020. However, after discussions with the Legal Office of the Prime Minister's Office, it is planned that this unification of processes will not happen, but a single law will be drawn up for the simplification of permits and licenses at the central level, using the 'omnibus' technique.

## 2. *EX-ANTE* & *EX-POST*: prevention and reduction of administrative burden

In order to prevent and reduce the administrative burden, good, integrated and organic planning and coordination of the types of public policies in a single place within the OPM, as well as good cooperation with line ministries, is necessary. Efforts to prevent and reduce the administrative burden are necessary and will be fully integrated into the local regulatory circular. Although the *ex-ante* and *ex-post* processes are conceptually different from each other, they are placed in a single chapter, for the reason that the means that can be used in these two are in most cases the same and their separation could constitute textual duplication, although not so substantive.

### 2.1. Processes

Throughout the regulatory circular in Kosovo, the main phases are the *ex-ante* phase and the *ex-post* phase, while the main policy-making processes are the public policy development process, the public policy implementation process and the public policy review process. For this purpose, the prevention and reduction of the administrative burden are part of the three policy-making processes, the integration of which will be done through the application of the principles, the use of means and methods for the prevention and reduction of the administrative burden, explained in the following subsection.

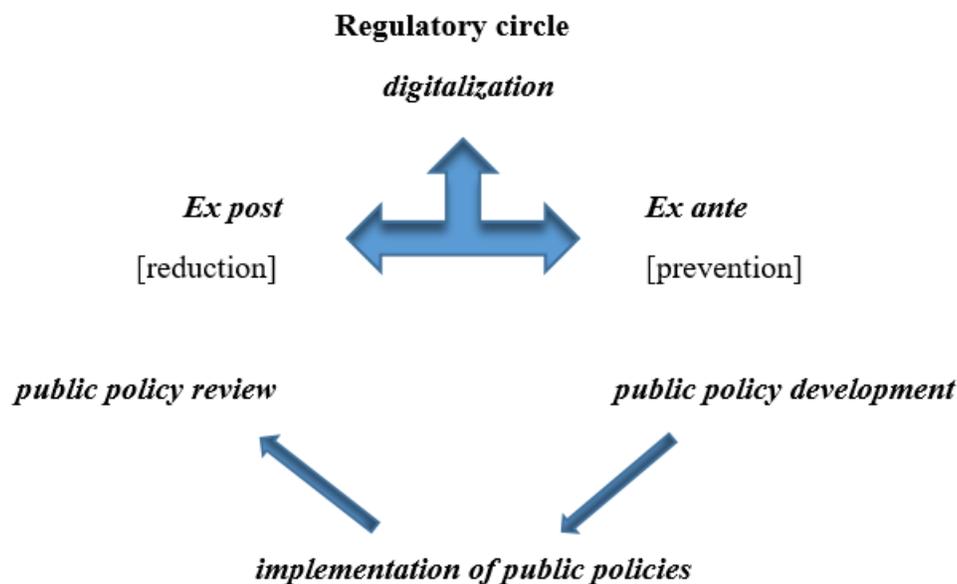


Figure 2: The regulatory circular of policymaking in Kosovo

## 2.2. Means

The means for preventing and reducing the administrative burden are the means of better regulation, which serve for the development and revision of public policies. By means for better regulation, which are applied in Kosovo, the identification, prevention and reduction of the administrative burden will be done. Consultation, communication and digitization are some of the other means that contribute to the prevention and reduction of the administrative burden, highlighted below, as separate chapters of the Programme.

### 2.2.1. Standard Cost Model

The reduction of the administrative burden created by the legislation is **quantified** through the Standard Cost Model (hereinafter SCM). SCM can be used in both phases, i.e., *ex-ante* phase for prevention and *ex-post* phase for reduction. SCM is a **neutral means** to the legislation, that assesses the administrative costs related to the implementation of the legislation, provides information on the efficiency of the implementation of the legal provisions, **does not address whether** the information and data required are reasonable, whether the legislation **is necessary** and whether the stock of the current administrative burden **justifies the benefits**. Therefore, for the selection of elements for simplification (before or after quantification), it is necessary to make a test of proportionality and the current readiness of the public administration, through the guiding questions highlighted in Annex 4.

When there is no data on the volume of the administrative burden, **then the measurement can be done parallel to the changes in the legislation, or after approval, when the results are also measured**, broken down into percentages of simplification, savings, time, etc. If results are not measured, then success cannot be distinguished from failure. In order to adapt to the needs and prioritization of the Program, **SPO updates the SCM and the guideline** for its use. However, SCM is a flexible means that can be simplified, can be adapted to local needs and to the elements for reducing the administrative burden, highlighted above, in the subsection 'Definition and elements', but SPO will take care that this simplification or adaptation will not have an effect on the quality of measurement and analysis. All rules, divisions and other aspects for quantification needs are explained in the SCM guideline and in the excel or electronic file, which enables generic calculation, according to the standard formula.

### 2.2.2. Regulatory impact assessment

The prevention and reduction of the administrative burden will be done during the drafting of concept documents through the **regulatory impact assessment**, as a mean that represents the empirical element or the data base for the design of public policies, especially legislation. Before the approval of the concept document by the Government, at the stage of issuing the opinion, SPO examines the concept document, if the option recommended in the concept document has also included the regulatory impact assessment on administrative burden for citizens and

businesses, so that the **new legislation or revised existing legislation does not have unnecessary administrative burden**. The quantification of the administrative burden during the regulatory impact assessment, both for *ex-ante* phase for prevention or *ex-post* phase for reduction, will be done through the use of SCM.

The application of SCM for the prevention of administrative burden in case of new legislation for issues that previously had no regulation is rarer and more difficult. For this purpose, the best way, and in some cases, the only way to prevent the administrative burden in the new legislation, that contain mandatory information for businesses and citizens, is the analysis of good practices of other countries and the application of principles for reducing the administrative burden. After quantifying the administrative burden in the existing legislation during the regulatory impact assessment for the selection of the elements that create unnecessary administrative burden and should be removed, the **guiding questions** highlighted in Annex 4 should be taken into account.

In order to adapt to the principles, elements and prioritization of the Programme, but also to other needs and requirements, the **OPM reviews and updates the rules and guidelines** for drafting concept documents.

### **2.2.3. *Ex-post* evaluation of legislation**

The *ex-post* evaluation of legislation is the review of legislation in force for adequacy, efficiency, effectiveness, coherence, impact and sustainability during implementation. For this reason, it is more complex and used less often. *Ex post* evaluation as a means of good regulation can also be used to reduce the administrative burden. For this purpose, in the evaluation of the effectiveness of the legislation during implementation, the evaluation of the administrative burden of the mandatory information contained in the legislation will also be done. For the quantification of the administrative burden during the *ex-post* evaluation of the legislation, SCM is used.

In every case that it turns out that the evaluated legislation contains an administrative burden, then the *ex-post* evaluation of the legislation must contain the recommendation for its reduction and the evaluation of the results, after its reduction. As appropriate, the OPM helps the institution responsible for the *ex-post* evaluation of the relevant legislation **for the use of SCM**, whereas LO controls and requires that the *ex-post* evaluations also contain the analysis and recommendation for reducing the administrative burden and the implementation of the recommendation in the legislation. After the quantification of the administrative burden in the existing legislation, during the *ex-post* evaluation of the legislation, for the selection of elements that create unnecessary administrative burdens and should be removed, the **guiding questions** highlighted in Annex 4 should be taken into account.

#### 2.2.4. Explanatory memorandum

**Explanation and justification** of legislation is one of the main pillars for the understanding of legislation by decision makers and practitioners. For this reason, the explanatory memorandum (hereinafter EM) is a very useful tool in the process of preventing and reducing the administrative burden. For each legal act, for which the regulatory impact evaluation will not be carried out in advance, then the EM will contain the elements of the regulatory impact evaluation, where the **mandatory part** will be the emphasis on the reduction of the administrative burden. The proposing institution will emphasize the aspect of reducing the administrative burden, of course, where this approach is applied according to the type of legislation and where the principles for reducing the administrative burden are valid. EM will contain the explanations for the harmony of the draft law and the concept document, as well as the justification for the inconsistency of each other. Among other things, the EM will also contain the justification for the method or technique used for legal drafting, such as the use of the 'omnibus' for legal harmonization, that reduces the administrative burden for the Government and the Assembly, as well as enables the rapid achievement of planned changes or reforms. The EM will be forwarded together with the legislation to the Government and the Assembly. SPO in cooperation with LO, will update the guidelines for the drafting of the EM.

### 3. Digitization and reduction of administrative burden

The traditional concept of service delivery focuses on the public administration, a concept that leaves aside the demands and experiences of citizens and businesses. The Program's approach recognizes and is based on e-government with the user at the centre and on real events, taking into account the needs and experiences of the user. It should be emphasized that **digitization, in itself, reduces, but not significantly, the administrative burden and does not necessarily improve the efficiency and effectiveness of public administration, if administrative simplification is not applied first.** Proper digitization means fewer administrative 'walks', less paper, fewer scans, less expenses, less need for clarifications and more time for other activities. For this reason, in order to achieve its end effect, digitization must be preceded by the administrative simplification of the procedure for obtaining mandatory information. However, taking into account the complexity of the legal framework in the country, as well as processes that can take time, such as the process of preparing legal acts, then it is possible to proceed with digitization before administrative simplification, with proper planning of simplification in the future.<sup>10</sup>

Thus, **proper** digitization increases citizens' trust in public administration, increases accountability and transparency, increases citizens' involvement in the work of public administration, improves access by marginalized groups and contributes to environmental protection. For this purpose, digitization will be applied in the simplest way possible, easy and quick to use, avoiding physical appearance in public administration, testimonies, verifications by the party and printed paper. **Therefore, the legislation should be drafted in such a way that it enables and not hinders digitization.**

Through the E-Kosova platform, the **principle of "a single window"** will be applied, where **all** digitized services will be published, while all other electronic platforms through which services are offered will be connected to E-Kosova, following the **'single sign-in' principle**, which means that the user can sign in any system with a single account, where services will be provided 24/7. In E-Kosova, the principle of 'single window' and the principle of 'single sign-in' will be continuously applied, and the same will contain all the means of good communication, highlighted below, in the chapter 'Consultation and communication'. The E-Kosova platform will be connected to all public registers, in such a way that for each service integrated in it, the same data will be used, so that the user does not need to repeat the information actions towards the public administration. The E-Kosova platform will also include the electronic payment method, documents with an electronic seal, etc. Another aspect that contributes to reducing the administrative burden is the use of electronic signatures, which the public and the public administration itself must be aware of. However, the necessary orientations and actions for this aspect will be placed in the PARS, SEG and other strategic documents.

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<sup>10</sup> This has been proven in the case of the service of continuing car registration, as a priority service in this Program for simplification, expressed in measure 2 of the Action Plan.

## 4. Capacity building

In order to implement the Program, the capacities of the coordinating and implementing officials must be built continuously, starting with the officials of the OPM and those of the line ministries. For this purpose, the combined approach will be followed and the **administrative burden training module** will be developed, which will be a **combination of the main components for preventing and reducing the administrative burden**: SCM, regulatory impact assessment, principles of general administrative procedures and legal drafting.<sup>11</sup> These components **are accompanied by conceptual parts**, such as the definition of the administrative burden and digitization in function of the administrative burden. It should be borne in mind that the *ex-post* evaluation of legislation is one of the best regulation means and can only be used to reduce the administrative burden. However, because the *ex-post* evaluation of legislation is done less often and is more of a priority selection, it is left out of this module, although the same rules for reducing the administrative burden, as in the case of the regulatory impact assessment, also apply during the *ex-post* evaluation of the legislation.

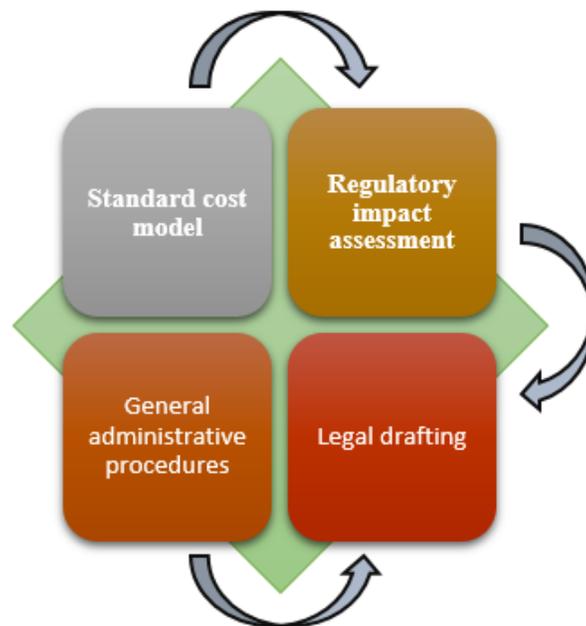


Figure 3 Training components and their interrelationship

Participation in the training will be combined, which means that officials with **different functions** will attend the **same training** at the same time, where challenges, problems, questions, lessons and experiences are shared between them. The combined approach to capacity building, which **motivates interactivity**, makes the training useful for creating institutional sustainability in order to prevent and reduce administrative burden. This approach will serve, among other things, to raise public officials' awareness of the administrative burden process, from beginning

<sup>11</sup> Although each of these components has its own special training module, they are general and do not focus on AB, according to the analysis carried out by SPO.

to end, as well as its importance and impact on the economy and society. The training will be accompanied by guidelines and practicals prepared by the OPM, in cooperation with other relevant institutions, so that trained officials have a means they refer to during their daily work, in order to prevent and reduce the administrative burden. Training will be organized according to institutional prioritization, no more than two trainings per month and no less than three days per training. The training will be followed by a knowledge test, at the beginning and at the end of the training, to assess the impact of the training. Likewise, the training will be conducted **electronically**, so that interested public officials and the public have the opportunity to be trained and aware of the main aspects of the administrative burden. The electronic version will also have the form of testing and certification, electronically and will be displayed online.

## 5. Consultation and communication

Properly organized consultation and communication are means for better regulation of public activation and involvement in policy development and they raise awareness of administrative burden and the results of its reduction. Communication and promotion of the good results of reducing the administrative burden will be made as simple as possible and with the user at the centre. Well-organized consultation and communication, as well as raising awareness in the right way, improves reputation, increases trust and changes the perception of public administration and public officials.

Internal communication is a good way to better understand and coordinate the process of preventing and reducing the administrative burden, which affects the knowledge, behaviour, responsibility and innovation of public officials. Therefore, in order to raise awareness of the administrative burden and create a sustainable administrative culture for policy development and better service delivery, **a combined approach between public activation and training and communication of public officials** will be used.

### 5.1. Focused consultation

Good public policies are developed through the involvement of as many parties as possible who are affected by that policy. For this reason, the organization of consultation with the relevant parties that are affected by the policies is one of the essential elements in preventing and reducing the administrative burden. The proposing body should gather in the focused consultations the groups that are affected by public policy, such as during the drafting of strategies, concept documents, etc., based on real events. Real events often reveal the hidden effects of legislation. The aspects that should be discussed with the focus groups on the administrative burden are the mandatory information, the documents required to provide the mandatory information, the validity of the mandatory information, the costs, time and other issues that constitute the administrative burden, according to the approach established with this Program.

Focused consultation will be done with clear and concise public policy documents, appropriate targeting, appropriate and accessible calls for input, sufficient time and publication of input and results. For ensuring and conducting focused consultation, line ministries and OPM include and seek the opinion of focus groups, preferably for each proposed policy. For this, the methodologies of strategic and policy documents, as well as EM, should emphasize, among other things, the aspect of focused consultation. In case of any review or major change of the sector, which follows with rigorous legal changes or the development of relevant legal packages, the **OPM** can request the organization of meetings of the **relevant mechanisms for economic development**, in order to carry out the **public-private dialogue** between the Government and the business community, in order to identify the administrative burden and prevent and reduce it.

Some of the guiding questions that serve to identify the focused public are the following:

- Who is affected by the public policy and the mandatory information proposed therein?
- Who implements the public policy and the mandatory information proposed therein?

The means that will be used for the focused consultation to prevent and reduce the administrative burden are questionnaires, interviews, SMS, roundtables, conferences, and various other innovative means.

## 5.2. Communication

Communication will be clear and it will clarify the Government's proposals and results, in order to prevent and reduce the administrative burden. The public will be informed about aspects that save time and money in receiving services from the public administration. Considering the great technological and media development, the preferred means of the public remain social media, television and the Internet. Because of this great diversity, communication must be comprehensive, simple and effective, allowing the public to form their own impressions of good results. Communication will be oriented towards the user, by linking the results of the reforms with the experiences of the users, how they improve the quality of life and their daily activity, avoiding descriptions that follow formality and administrative complexity.

Communication for the prevention and reduction of the administrative burden will be carried out through the message and political appeal, the organization of events, printed materials, various videos and through electronic platforms that provide services, which will not only contain statistical data, but results and benefits of the focused group.

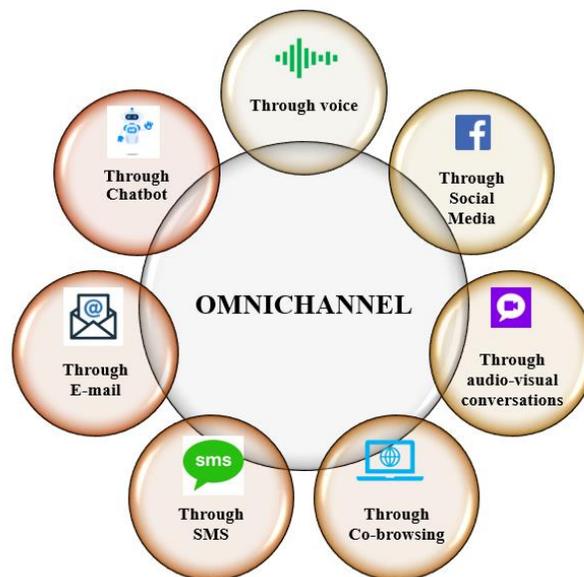
The communication of the results of the reduction of the administrative burden **through the message and the political call will be made by the Prime Minister, the Deputy Prime Minister and the Ministers**, depending on the importance and ownership of the reform. Their messages and calls can be in the form of social media posts, media interviews and short videos that appear in the media and internet, which will be well prepared and with clear political messages. The OPM platform will contain **a window or a special column for administrative burden**, which serves for information and promotion.

The organization of various events in the form of meetings, conferences, seminars, workshops, surveys and roundtables, with different groups **of young people, the elderly, representatives of businesses, civil society, public officials, students, farmers, gastronomists, etc., will be held by the political level and the civil service**. These organizations will be covered by the media or by various online platforms. For the best promotion of the results of reducing the administrative burden, the organized events will be accompanied by various communication materials, such as brochures, leaflets, banners, manuals, etc.

Based on real events and the effect of reducing the administrative burden, **various animated videos** will be created, which will be displayed in the **media, the Internet and on electronic platforms of the public administration that provide services**. Animated videos will not be in **descriptive** format, but in **explanatory** format, translated into **three languages**. To promote and

facilitate the provision of services electronically, the E-Kosova platform and other platforms will be oriented and will try to implement the following principles:

- *Self-assistance or digital self-service*, which allows citizens to be completely autonomous on a website and find solutions without the need for further walking and research. For this purpose, among other things, AIS is obliged to, for each service offered electronically through the E-Kosova platform, contain 'frequent questions', which can be updated based on complaints, comments and ideas from users.
- *Omnichannel*, which offers a complete and comprehensive approach to support users for receiving services from the electronic platform.



- ❖ *Voice communication*, which allows users to chat with platform maintainers over the phone. This form is very useful for the elderly and marginalized groups.
- ❖ *Social media*, which allow users to choose the type of media they know how to use. This form is used more by young people.
- ❖ *Chatbot*, enabled by automated programs, which have quick solutions to simple problems.
- ❖ *SMS*, which allows users to solve problems and challenges textually over the phone. This form is used more by the elderly and marginalized groups.
- ❖ *E-mail*, which allows users to explain problems and challenges in detail. This form is used more when the problems and challenges are complicated and is considered the most reliable form of communication.
- ❖ *Co-browsing*, which allows users to better understand the use of the system. This form is most often used when the service is received for the first time.

## 6. Coordination of the Government with the Assembly and Municipalities

For the smooth running of the process of reducing the administrative burden, the coordination of the Government with the Assembly and the municipalities is necessary. Coordination with the Assembly is necessary for achieving results, while coordination with the municipalities, among other things, is necessary for the implementation of changes as well. The first Deputy Prime Minister of the Government is responsible for communicating with the Assembly to reduce the administrative burden.

In terms of coordination with the Assembly, in the legislation that does not include controversial political aspects, the Assembly commitment will be higher, but with effective parliamentary supervision. Among other things, cooperation with the Assembly is necessary to reduce the administrative burden on legislation and mandatory information caused by regulatory agencies.<sup>12</sup>

An important aspect of coordinating the reduction of the administrative burden between the Government and the Assembly is the amendment of many laws with a single 'omnibus' act. Since we are dealing with a major reform which has major effects on the lives of citizens and on the activities of businesses, the Assembly must be notified in a timely manner and the intervention should be explained to them, in order to avoid possible misunderstandings and delays. Therefore, before the legislation goes to the Assembly for major reforms and through the 'omnibus', then meetings will be organized with the relevant parliamentary committees, so that the reform is well coordinated and there are no unnecessary delays.

In terms of coordination with the municipalities, it should be taken into account that the administrative burden on services provided by the municipalities, in an extremely large percentage, is caused by the legislation drafted and approved at the central level. Therefore, their involvement in the working groups, informing, training and raising the awareness of municipal officials on the interventions in order to reduce the administrative burden, are necessary. **Each municipality will designate a person responsible for the administrative burden, so that the latter communicates with the public administration and the public** about the results achieved. Moreover, the persons responsible for the administrative burden in the municipalities will be part of the trainings, which will result in enhancing their capacities and raising awareness for reducing the administrative burden.

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<sup>12</sup> In the framework of the analysis of the administrative burden, the Action Plan includes the analysis of mandatory information within the regulatory agencies. See the first measure within the Action Plan.

## 7. Implementation, monitoring, evaluation and reporting

### 7.1. Political coordination

The **First Deputy Prime Minister of the Government is politically responsible** for the successful implementation of the Program. To this end, the First Deputy Prime Minister will be committed to advancing the measures in the Program for reducing the administrative burden, asking the ministers and their deputies for political commitment and dedication.

The inter-institutional structure at the political level responsible for the successful implementation of the Program is the **Strategic Planning Committee** (hereinafter SPC). The SPC meetings are attended by ministers who should be informed and asked to implement measures to reduce the administrative burden, according to the Program.<sup>13</sup>

At SPC meetings, **decisions and recommendations can be made** for the implementation of the Program, as well as solutions to challenges and problems in the process can be requested.

### 7.2. Professional coordination

For the successful implementation of the Program, there are two types of coordination at the civil service level, i.e., **structural coordination and regulatory coordination**.

Structural coordination can generally be summarized in the following trinity:

- **Strategic Planning Office** is responsible for planning the administrative burden, coordinating, monitoring, evaluating and reporting the implementation of the Program, measuring or quantifying the administrative burden, as well as other aspects highlighted in this Program.
- **Legal Office** of the Office of the Prime Minister, is responsible for the legal review of all legal acts in order to prevent and reduce the administrative burden, before they are approved by the Government or the relevant ministers.
- **Agency for Information Society**, in cooperation with other institutions, is responsible for the coordination of the process of digitizing the administrative services and their placement on the E-Kosova platform, as well as for other aspects highlighted in this Program.

To facilitate the work of coordination and breakdown of institutional responsibility from top to bottom, in the framework of structural coordination, these coordinating categories will also be established and serve:

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<sup>13</sup> See Government Decision 04/12, dated 09.07.2020 on the subject of the Strategic Planning Committee. The SPC is chaired by the Prime Minister, but according to the legislation in force, the First Deputy Prime Minister can chair the SPC for specific issues, such as the administrative burden.

- **Official responsible for administrative burden** across line ministries and relevant executive agencies, appointed by decision of the Secretary General of the line ministry. The appointment of an official responsible for administrative burden is also necessary in some of the executive agencies, therefore, based on needs and assessments, the executive agencies will appoint the same. The person responsible in line ministries can be an official of **the legal department or the department for European integration and policy coordination**. In case it is deemed necessary and based on institutions, two responsible officials can be appointed. Also, the person responsible for the administrative burden will be appointed in each municipality.
- **The inter-ministerial council for the prevention and reduction of the administrative burden, as a government body, that evaluates and takes care of the implementation of the Program**, as well as provides solutions for challenges and problems, before they pass for political coordination. Members of Inter-ministerial council will be all the **responsible persons** selected for administrative burden and regulatory impact assessment in line ministries and relevant subordinate executive agencies. The members of the government body **meet according to the sectors and topics that are discussed**. Among other things, in the government body, the persons responsible for administrative burden in municipalities can be invited as members, while in the capacity of observers and supporters, **experts in relevant fields for administrative burden, civil society, the business community and representatives of development partners can be invited**. The responsibilities and duties of the government body are defined by the decision of the Government.

Regulatory coordination can be summarized in general, in the following aspects:

- In case the legislation (new or revised) in the drafting process was preceded by a concept document or *ex-post* evaluation of the legislation, then, if possible, **a number of the same officials who have drafted the concept document** or the *ex-post* evaluation of the legislation participate in the working group for drafting the legislation;
- The working group for drafting legislation **includes the person responsible for administrative burden** and regulatory impact assessment in the proposing institution;
- During the preliminary consultations, **LO will examine the new legislation in order to reduce the administrative burden**, according to the approach established in this Program and will give its recommendations for changes. In case the proposing institution insists on the provisions that create an administrative burden, they must be well justified in the EM;
- During the preliminary consultations, for the new legislation or the existing revised legislation, SPO and LO, together will examine the same **on the compliance with the concept document** that preceded it (if any) and will give its recommendations, according to the approach established in this Program. In case the proposing institution insists on

changes that are not in line with the concept document that preceded it, then this should be well justified in the EM, by integration of the regulatory impact assessment for new changes;

- During the preliminary consultations, LO will review the existing revised legislation in terms of compliance with the recommendations arising from the *ex-post* assessment of the legislation (if any);
- Prior to the adoption of legislation by the Government or the Minister, in case new or revised legislation creates an unnecessary administrative burden and is inconsistent with the concept document or *ex-post* evaluation of the legislation, and this is not sufficiently justified in the EM, **LO and SPO issue negative**, well-argued **opinions**, recommending to the Government or the Ministry not to adopt the proposed legislation

The department responsible for the administrative burden process is the Strategic Planning Office, while regarding the function of coordinating concept documents, they will continue to be coordinated in the Secretariat of the Office of the Prime Minister, but the concept documents that are estimated to be examined in the context of the administrative burden should be initiated, examined and approved in cooperation with the SPO. Also, concept documents that will be drawn up only because of the administrative burden process, will be initiated, coordinated and headed by the SPO. Responsibilities for abovementioned functions can be changes through internal organisation of Office of the Prime Minister and ministries.

These general aspects of regulatory coordination, but necessary for the successful implementation of the Program, **will be translated into legal provisions in the Rules of Procedure of the Government (hereinafter RPG) and concrete instructions in the relevant guidelines**. The SPO may amend the guidelines for the use of **better relevant regulation tools** so that they are appropriate for the implementation of the Program.<sup>14</sup>

The review and revision of the approach, goals, principles and prioritization of the Program and Action Plan are changed according to **needs, assessments and circumstances**.<sup>15</sup> For the needs of the implementation of the Program, **SPO**, together with other institutions, can **develop concrete plans**, which are attached to the Program. The same can be **approved in the SPC or in the Government**, depending on the nature of the actions in the specific plan. For the successful implementation of the Program, SPO will take care that the actions in the AP of the Program **are part of the annual operational planning, as concrete objectives and actions**.

For the implementation of the Program as a whole, **the assistance of development partners will be coordinated and requested**. For the implementation of the measures and actions of the Program, the assistance and engagement of **experts, students** may be requested, depending on the topic and priority. The last category can be especially helpful for **interviewing the parties**

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<sup>14</sup> Actions to amend the RPG and the relevant guidelines are also planned in PARS, as, in addition to changes in order to prevent and reduce the administrative burden, they are updated for other needs within the policy-making, according to local findings and recommendations of international institutions, such as SIGMA.

<sup>15</sup> The Program or Action Plan can be revised depending on the circumstances. It should be noted that aspects planned in the Program, such as the digitization part, can be transferred and further advanced in the Strategy for Electronic Governance.

**and measuring the baseline value of the administrative burden and field indicators**, as well as other administrative aspects in order to implement the Program.

### **7.3. Coordination with development partners**

Among the main development partners for the administrative burden process in Kosovo are the EU Office in Kosovo, GIZ and IFC. Consultation and cooperation with development partners is one of the key priorities highlighted in the Program. The main goal of the development partners is to create a stable platform for the administrative burden process, respectively for the simplification and digitization of administrative services, based on some principles such as those of the European Commission for electronic governance and the principles of local administrative procedure.

Coordination will be done through regular meetings, especially within the technical assistance project for the process of reducing and preventing the administrative burden, financed by IPA and the German government and implemented by GIZ. In the meetings of the Steering Committee, all partners who support the process will be invited and the tasks and activities that will be carried out by each partner will be divided.

### **7.4. The budgetary impact of the implementation of the Program**

The budgetary impact of the Program for the Prevention and Reduction of the Administrative Burden 2022-2027 is considered to be **around 40 million euros**. The modality for the successful implementation of the Program and its connection with the budget is the connection of the administrative burden process with the Medium-Term Expenditure Framework and good coordination of the support of development partners.

#### *Years 2022-2024*

The implementation of the Programme for the year 2022-2024 is covered under the Action Plan 2022-2024, and these activities have a financial value of 14 471 682 euros, of which 4 600 204 euros are planned within the Kosovo budget of 2022 and in the Medium-Term Expenditure Framework for the years 2023-2024.

9 871 478 euros are commitments from development partners, which include the following partners: The European Union and the German Government through the project implemented by the German Agency for International Cooperation (GIZ) and the Swiss Government through

funds contracted by the Swiss Development Cooperation (SDC) and other partners. Therefore, the Action plan 2022-2024 and its costs are fully funded.

### *Years 2025-2027*

The indicative evaluations for the second part of the implementation of the Program, for the years 2025-2027 have a value of **indicatively 25 million euros**. These financial means are necessary for the continuation of the simplification and digitization of administrative services at the central and local level, during the years 2025-2027, and other aspects that are directly related to the reduction of the administrative burdens.

### *Financial gap*

The financial means of **25 million euros for the years 2025-2027**, which are necessary for the implementation of the second part of the Program, are not yet foreseen in any budgetary documents and there are no secured commitments from donors at this early stage.

The implementation of the cost recovery principle, embodied in Article 12 of the Law on General Administrative Procedure will entail a reduction or elimination of payments for obtaining certain services. The estimated foregone revenues from the implementation of this principle is will amount to **indicatively 2 million per year in total** at both central and local levels. While it is difficult to estimate exactly the revenue gap on a yearly basis stemming from the implementation of this principle, it can be estimated that by the end of the Program, in 2027, own source revenues at the local level for example may decrease by more than 10 million euros.<sup>16</sup>

Therefore, at the moment, **25 million euros for the implementation of the Program from 2025 onwards and 10 million euros of decreased revenues** from the elimination or reduction of payments for administrative services, **the estimated financial gap for the implementation of the Programme is approximately 35 million euros**.

Some investments and activities, which will have an impact on some of the foreseen activities in the current Programme, are not included in this Programme and its costing, as these activities are foreseen to be included in the e-Government strategy.

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<sup>16</sup> Based on the General Revenues of the Government, reported in the Government Accounts by the Statistics Agency of Kosovo (<https://ask.rks-gov.net/sq/agjencia-e-statistikave-te-kosoves/ekonomi/llogarite-qeveritare>), payments for administrative services are included in category P131 Payments for non-government products (sales). This category is divided based on the European System of Accounts 2010 (ESA 2010). Considering various aspects, such as the registration of new businesses, the validity of services, etc., as well as the lack of detailed breakdown of these revenues, it is difficult to establish as an indicator. However, the reduction of the budget, as a result of the elimination or reduction of the amount of payments for receiving services, will be calculated at the moment of measuring the savings after reducing the administrative burden, as presented in Indicator 1 of the general goal in the Action Plan (for more see Appendix 5 – Passport of Indicators).

### *Ensuring the funding for Program implementation*

Ensuring the budget for the implementation of the Program will be done through the inclusion of actions planned in the Program in the Medium-Term Expenditure Framework for the following years until 2027. Line ministry budget allocations combined with the support of development partners will enable the successful and timely implementation of the Program.

For the successful and timely implementation of the Program, the IPA funds will also be considered through sectoral budget support, where the achievement of the relevant indicators brings direct budgetary funds. Such funds disbursed into the budget, after reaching relevant indicators for simplification and digitization of administrative services, based on budget estimates but also discussions in the Commission for Strategic Planning, should preferably be allocated for the for the simplification and digitization of administrative services.

### **7.5. Monitoring, evaluation and reporting**

Monitoring the implementation of the Program will be conducted in several ways, according to hierarchy or institutional responsibility. **The SPO will be the main body for monitoring the Program as a whole, preparing reports according to the legal deadline and upon request.**

The **government body**, for prevention and reduction of administrative burden, will discuss the level of implementation of the Program in **six-month periods**, which will be presented to the SPO as evidence that serves for the preparation of reports. This monitoring will focus on (1) the implementation of the necessary actions foreseen in the action plan, such as the establishment of working groups, the implementation of the recommendations outlined in this chapter, as well as other technical aspects that have an impact on the progress of the Program, and (2) achievement of the results of reducing the administrative burden.

SPO through monthly half-year reports from government bodies, will prepare semi-annual reports and an annual report. **The annual report will be presented and approved by the SPC.** All aspects of the Program, including reduced administrative burden, results of local surveys, international indexes or reports of credible institutions, related to administrative burden, will be presented in the report. In this regard, the SPO will use the reporting period for the operational planning of the work of the Government, in case the actions of the Program are part of it, **in order not to duplicate the reporting of officials and so that the data do not contradict each other.**

In accordance with the systemic approach of the Program, the report will also contain other results integrated in **other strategic documents**. These results directly or indirectly reduce the administrative burden. To this end, the annual report will contain the results of reducing the administrative burden such as the percentage of burden reduction, savings, time and setbacks,

challenges, problems and recommendations, which will be taken into account by institutions, working groups and government bodies.

**Furthermore, as far as possible, the SPO will include in the report the actions and results of preventing the administrative burden.** The identified setbacks, challenges and problems will be presented to the SPC, so that the Prime Minister, the First Deputy Prime Minister and the Ministers are informed about the process, progress and push forward the necessary actions for the implementation of the Program.

**The evaluation and change (if necessary) of the Program will take place after the expiration of the term of the Action Plan,** after the review in the SPC, while the evaluation and change of the Action Plan will take place every last quarter of the second year. The details and instructions needed to monitor and report on the implementation of the Program will be provided through the general guideline on administrative burden developed by the SPO.

## ACTION PLAN 2022-2024

No.	General purpose	Baseline value 2022	Goal 2023	Goal 2024	Outcome				
<b>Prevention and reduction of administrative burden</b>									
1	<b>Indicator:</b> <i>Cumulative savings of citizens and businesses after reducing of the administrative burden</i>	0	>1 mil. €	>6 mil. €	The savings of citizens and businesses have increased as a result of reducing the administrative burden, savings which can be oriented to other areas of the economy.				
2	<b>Indicator:</b> <i>Business licences and permits</i>	2.7	3	>3	The administrative burden for obtaining a license from the business side is lower.				
Nr.	Measures, indicators and actions	Baseline value 2022	Aim 2023	Aim 2024	Outcome				
1	<b>Simplification and digitization of public administrative services at the central level</b>								
1	<b>Indicator:</b> <i>Number of administrative services, simplified</i>	44	>150	>250	Administrative services at the central level simplified, consuming less cost and time.				
2	<b>Indicator:</b> <i>Number of administrative services, digitized</i>	0	>50	>150	Applying for services digitally, through the E-Kosovo platform, is more qualitative and more accessible.				
3	<b>Indicator:</b> <i>Social schemes in MFLT, digitized</i>	2	12	28	Social schemes in MFLT digitized and displayed in E-Kosova.				
4	<b>Indicator:</b> <i>The percentage of businesses that use electronic invoices in relation to businesses that have a legal obligation</i>	0	30%	90%	Facilitation of doing business through the involvement of businesses in issuing electronic invoices.				
5	<b>Indicator:</b> <i>The number of businesses fiscalized through the cash management software platform</i>	0	>8000	>15000	Raising revenues and efficiency in declaring taxes, as well as reducing the administrative burden for businesses through the gradual elimination of fiscal cash registers.				
6	<b>Indicator:</b> <i>The number of TAK administrative services integrated in E-Kosova</i>	0	5	15	The E-Kosova platform enriched with the administrative services of TAK, following the "one-stop-shop" principle.				
No.	Action	Deadline	Budget			Source of financing	The leading and supporting institution	Output	Reference to documents
			Year 1	Year 2	Year 3				

1.1	Implementation of recommendations for simplification of administrative services of MAFRD <sup>17</sup>	Q4 2023	16,168	24,672	/	BRK, Financing from donors	LO/MAFRD	Simplified administrative services according to the analysis approved by the GRK, in Annex 1.	Government Program 2021-2025 [2.4 Governance], Concept Document on reduction of the administrative burden; and European Reform Agenda – ERA II
1.2	Implementation of recommendations for simplification of administrative services of MESPI	Q4 2023	16,168	24,672	/	BRK, Financing from donors	LO/MESPI	Simplified administrative services according to the analysis approved by the GRK, in Annex 1 and Annex 2 <sup>18</sup> .	Government Program 2021-2025 [2.4 Governance], Concept Document on the reduction of the administrative burden; and Analysis approved by the GRK through Decision No. 03/50, dated 23.12.2021.
1.3	Implementation of recommendations for simplification of administrative services of MoH	Q4 2023	16,168	24,672	/	BRK, Financing from donors	LO/MoH	Simplified administrative services according to the analysis approved by the GRK, in Annex 2.	Government Program 2021-2025 [2.4 Governance]; and Analysis approved by the GRK through Decision No. 03/50, dated 23.12.2021.
1.4	Implementation of recommendations for simplification of administrative services of MIA	Q4 2023	16,168	24,672	/	BRK, Financing from donors	LO/MIA	Simplified administrative services according to the analysis in Annex 2.	Government Program 2021-2025 [2.4 Governance]; and Analysis approved by the GRK through Decision No. 03/50, dated 23.12.2021.
1.5	Conducting analysis for simplification of administrative services of MESTI, MoJ, MFLT, MCYS and ME	TM4 2022	23,084	/	/	BRK, Financing from donors	LO/line ministries	Analysis with recommendations for simplification of administrative services of MESTI, MoJ, MFLT, MCYS and ME,	Government Program 2021-2025 [2.4 Governance]; and Economic Reform Program 2022 - 2024 [Reform 9 measure].

<sup>17</sup> Due to the delayed and improper implementation of the reforms, as well as after discussions with the Legal Office of the Office of the Prime Minister, it has been decided that the Legal Office, supported by the International Financial Corporation - IFC, draft all legal acts according to the analyses and then send to the ministries as final, so that they can consult and approve the same. This comment is valid for all actions, from 1.1 to 1.8.

<sup>18</sup> Annex 2 was approved at the 50th Meeting of the Government of the Republic of Kosovo through Decision No. 03/50 dated 23.12.2021.

								approved by the Government. <sup>19</sup>	
1.6	Implementation of recommendations for simplification of administrative services of MESTI, MoJ, MFLT, MCYS and ME	Q2 2024	30,794	43,176	21,558	BRK, Financing from donors	LO/Line ministries	Simplified administrative services according to the analysis approved by the Government with recommendations for simplification of AP of MESTI, MoJ, MFLT, MCYS and ME.	Government Program 2021-2025 [2.4 Governance]; and Economic Reform Program 2022 - 2024 [Reform 9 measure].
1.7	Conducting analysis for simplification of administrative services in ERO, IMC, ICMM, RAEPC, CBK, KSAA and CAA	Q2 2023	53,878	62,756	/	BRK, Financing from donors	LO/Regulatory agencies	Simplified administrative services according to the analysis approved by the GRK for AP of ERO, IMC, ICMM, RAEPC, CBK, KSAA and CAA.	Government Program 2021-2025 [2.4 Governance]; and Economic Reform Program 2022 - 2024 [Reform 9 measure].
1.8	Implementation of recommendations for simplification of public administrative services of ERO, IMC, ICMM, RAEPC, CBK, KSAA and CAA	Q4 2024	13,878	95,512	95,512	BRK, Financing from donors	LO/Regulatory agencies	Simplified administrative services according to the analysis approved by the GRK with recommendations for simplification of AP in ERO, IMC, ICMM, RAEPC, CBK, KSAA and CAA.	Government Program 2021-2025 [2.4 Governance]
1.9	Updating the Central Registry of Permits and Licenses with the new changes	Q3 2023	/	4,626	/	BRK	LO	Updated CRPL	Government Program 2021-2025 [2.4 Governance]
1.10	Analysis for digitization of permits at the central level	Q4 2022	149,252	/	/	BRK, Financing from donors	AIS	Analysis for digitization of permits, completed.	Government Program 2021-2025 [2.4 Governance]; and Economic Reform Program 2022 - 2024 [Reform 9 measure].
1.11	Digitization of administrative services according to the analysis for digitization (1.10)	Ongoing	0	1,500,000	3,000,000	BRK, Financing from donors	AIS/LM	Digitization of administrative services and those located in E-Kosova.	Government Program 2021-2025 [2.4 Governance]

<sup>19</sup> The final analysis will be approved by the Government, as an Annex to the Program for the prevention and reduction of the administrative burden.

1.12	Digitization of procedures for subsidies in MAFRD	Q4 2023	/	330,000	/	BRK Financing from donors	MAFRD/AIS	Procedures for subsidies in the MAFRD, digitized and located in E-Kosova.	Government Program 2021-2025 [2.4 Governance]
1.13	Digitization of services of social schemes in MFLT	Q2 2024	/	500,000	500,000	BRK, Financing from donors	MFLT/AIS	Procedures for social schemes in MFLT, digitized and located in E-Kosova.	Government Program 2021-2025 [2.4 Governance]
1.14	Digitization of Employment Agency services	Q4 2023	/	500,000	/	BRK, Financing from donors	MFLT/AIS	Digitization of administrative services and those located in E-Kosova.	Government Program 2021-2025 [2.4 Governance]
1.15	Digitization of the administrative services of the Tax Administration of Kosovo	Q2 2024	/	1,500,000	1,500,000	BRK, Financing from donors	MFLT/AIS	Digitization of administrative services and those located in E-Kosova.	Government Program 2021-2025 [2.4 Governance]
1.16	Digitization of administrative services of Kosovo Customs	Q2 2024	/	1,000,000	500,000	BRK, Financing from donors	MFLT/AIS	Digitization of administrative services and those located in E-Kosova.	Government Program 2021-2025 [2.4 Governance]
1.17	Digitization of the administrative services of the Kosovo Treasury	Q3 2024	/	/	500,000	BRK, Financing from donors	MFLT/AIS	Digitization of administrative services and those located in E-Kosova.	Government Program 2021-2025 [2.4 Governance]
1.18	Analysis for the development of the business passport	Q2 2023	/	4,626	/	BRK	MIET/SPO	Analysis for the development of the business passport completed.	Government Program 2021-2025 [2.4 Governance]
	<b>Total Budget for Measure 1:</b>		<b>335,558</b>	<b>5,639,384</b>	<b>6,117,100</b>				
	<i>Of which capital:</i>								
	<i>Of which current:</i>								
<b>2</b>	<b>Simplification of selected administrative services based on real events</b>								
<b>1</b>	<b>Indicator:</b> <i>Reducing the time required to complete the application procedure for selected services individually</i>	Current state is defined [2022]	20%	40%	Selected public administrative services take less time and are completed faster.				
<b>No.</b>	<b>Action</b>	<b>Deadline</b>	<b>Budget</b>		<b>Source of</b>	<b>Leading</b>	<b>Output</b>	<b>Reference</b>	<b>on</b>

			Year 1	Year 2	Year 3	financing	and supporting institution		documents
2.1	Establishment of the working group for the preparation of legal acts and ensuring the implementation of recommendations for selected administrative services	Q3 2022	15,420	/	/	BRK	SPO/line ministries	Working group established by decision of the Government.	Government Program 2021-2025 [2.4 Governance]
2.2	Implementation of the recommendation for simplifying registration for the first time (R), continuation of registration (V) and change of ownership (P), of cars	Q2 2023	15,420	15,420	/	BRK	MIA	Simplified administrative services according to the recommendations of the analysis in Annex 3.	Government Program 2021-2025 [2.4 Governance]
2.3	Digitization of administrative services for the first-time registration and change of ownership of cars	Q4 2023	/	90,840	/	BRK, Financing from donors	MIA/AIS	Administrative services digitized and accessible on the E-Kosova platform.	Government Program 2021-2025 [2.4 Governance]
2.4	Implementation of the recommendation for simplifying administrative services for construction permit – Category I and II	Q2 2023	15,420	15,420	/	BRK	MESPI	Simplified administrative services according to the recommendations of the analysis in Annex 3.	Government Program 2021-2025 [2.4 Governance]
2.5	Digitization of administrative services for construction permit - Category I (C1) and Category II (C2) <sup>20</sup>	Q2 2024	/	130,840	/	BRK, Financing from donors	MESPI/Municipalities/AIS	Administrative services digitized and accessible on the E-Kosova platform.	Government Program 2021-2025 [2.4 Governance]
2.6	Implementation of the recommendation for simplifying the administrative service for obtaining the Certificate for the criminal past	Q2 2023	3,084	3,084	/	BRK	KJC	Simplified administrative service according to the recommendations of the analysis in Annex 3.	Government Program 2021-2025 [2.4 Governance]
2.7	Full digitization of the administrative service for obtaining the Certificate for the criminal past <sup>21</sup>	Q2 2023	/	43,878	/	BRK, Financing from donors	KJC/AIS	Administrative service digitized and accessible on the E-Kosova platform.	Government Program 2021-2025 [2.4 Governance]

<sup>20</sup> This service is quite complex and is closely related to the municipalities, since for the building permit it should be applied in the municipalities. Therefore, the digitization of this selected service can be preceded by a detailed analysis, and it can be done in one or several municipalities, as a pilot.

2.8	Implementation of the recommendation for the simplification of administrative services for the recognition of bachelor (B), master (M) and doctorate (PhD) degrees	Q1 2023	7,710	7,710	/	BRK	MEST	Simplified administrative services according to the recommendations of the analysis in Annex 3.	Government Program 2021-2025 [2.4 Governance]
2.9	Complete digitization of administrative services for the recognition of bachelor's, master's and PhD degrees	Q4 2023	/	120,840	/	BRK, Financing from donors	MESTI AIS	Administrative service digitized and accessible on the E-Kosova platform.	Government Program 2021-2025 [2.4 Governance]
2.10	Implementation of the recommendation for the simplification of the administrative service for obtaining ID for persons aged 16-18 and those over 18	Q1 2023	7,710	7,710	/	BRK	MIA/CRA	Simplified administrative service according to the recommendations of the analysis in Annex 3.	Government Program 2021-2025 [2.4 Governance]
2.11	Digitization of the administrative service for obtaining ID for persons aged 16-18 and those over 18	Q4 2023	/	90,840	/	BRK, Financing from donors	CRA/AIS	Administrative service digitized and accessible on the E-Kosova platform.	Government Program 2021-2025 [2.4 Governance]
2.12	Implementation of the recommendation for simplifying the administrative service for obtaining the Tax Residency Certificate for citizens and businesses	Q1 2023	7,710	7,710	/	BRK	MFLT/TAK	Simplified administrative service according to the recommendations of the analysis in Annex 3.	Government Program 2021-2025 [2.4 Governance]
2.13	Digitization of the administrative service for obtaining the Tax Residency Certificate for citizens and businesses	Q4 2023	/	60,840	/	BRK, Financing from donors	TAK/AIS	Administrative service digitized and accessible on the E-Kosova platform.	Government Program 2021-2025 [2.4 Governance]
2.14	Implementation of the recommendation for simplifying the administrative service for applying for an apostille stamp	Q2 2023	7,710	7,710	/	BRK	MFAD/SPO	Simplified administrative service according to the recommendations of the analysis in Annex 3.	Government Program 2021-2025 [2.4 Governance]

<sup>21</sup> This action belongs to the Kosovo Judicial Council, which means that it does not belong to the intervention of the executive (Government). However, the working group for the drafting of the Program had a meeting with the KJC and they agreed that this action will remain in the AP and if necessary, the KJC will be supported by donors for the full achievement of this action. It should be noted that the KJC has already started the first procedures for the full digitization of the Certificate.

2.15	Digitization of the administrative service for the application for an apostille stamp	Q4 2023	/	130,840	/	BRK, Financing from donors	MFAD/AIS	Administrative service digitized and accessible on E-Kosova.	Government Program 2021-2025 [2.4 Governance]
2.16	Measuring results after simplification for evaluating goal achievement	Q3 2023	/	6,168	/	BRK	SPO	The results measured and placed in the annual report for administrative burden.	Government Program 2021-2025 [2.4 Governance]
2.17	Drawing lessons from the simplification and digitization of selected administrative services and updating modules and trainings with these lessons	Ongoing	6,168	6,168		BRK	SPO	Lessons learned and prepared for the needs of working groups	Government Program 2021-2025 [2.4 Governance]
2.18	Preparation of the plan and analysis for other selected administrative services	Q1 2023	/	6,168	/	BRK	SPO	Plan and analysis prepared and approved by the Government, as an Annex to this Program.	Government Program 2021-2025 [2.4 Governance]
	<b>Total budget for Measure 2:</b>		<b>86,352</b>	<b>744,476</b>	<b>6,168</b>				
	<i>Of which capitals:</i>								
	<i>Of which current:</i>								
<b>3</b>	<b>Increasing institutional coordination and raising capacities for prevention and reduction of administrative burden</b>								
<b>1</b>	<b>Indicator:</b> <i>Number of public officials trained for administrative burden</i>	0 [2022]	>200	>400				Relevant public officials of OPM, line ministries, relevant executive agencies and municipalities, trained to prevent and reduce administrative burden.	
<b>2</b>	<b>Indicator:</b> <i>All line ministries, relevant executive agencies and municipalities have designated the person responsible for administrative burden</i>	NO [Q2 2022]	YES [Q3, 2022]	N/A				All relevant institutions have designated persons responsible for administrative burden, who contribute and ensure the smooth running of the process of prevention and reduction of administrative burden.	
Nr.	Action	Deadline	Budget			Source of financing	Leading and supporting institution	Output	Reference on documents
			Year 1	Year 2	Year 3				

3.1	Designation of the responsible person in the line ministry and a responsible person in the relevant subordinate executive agencies, for prevention and reduction of administrative burden	Q3 2022	3,084	/	/	BRK	Line ministries and relevant executive agencies	Responsible officials designated by Decision of the General Secretaries.	Government Program 2021-2025 [2.4 Governance]
3.2	Designation of persons responsible for administrative burden in Municipalities	Q3 2022	3,084	/	/	BRK	Municipalities/ MLGA	Officials responsible for AB in the municipalities designated by decision of the mayor.	Government Program 2021-2025 [2.4 Governance]
3.3	Establishment of the inter-ministerial Council for the prevention and reduction of the administrative burden	Q3 2022	3,084	/	/	BRK	GRK	Government body established by Government Decision.	Government Program 2021-2025 [2.4 Governance]
3.4	Development of the calendar of meetings of the governing body	Q3 2022	3,084	/	/	BRK	Inter-ministerial council for prevention and reduction of administrative burden	Calendar of meetings of the governing body, approved by the governing body.	Government Program 2021-2025 [2.4 Governance]
3.5	Organization of government body meetings, according to the meeting calendar	Ongoing	2,056	6,168	6,168	BRK	Inter-ministerial council for prevention and reduction of administrative burden	6 meetings per year, held by the governing body, according to the calendar of meetings.	Government Program 2021-2025 [2.4 Governance]
3.6	Organization of the annual meeting with the relevant parliamentary committees to discuss the administrative burden	Ongoing	1,028	2,056	2,056	BRK	SPO	Annual meeting with the relevant parliamentary committees, held.	Government Program 2021-2025 [2.4 Governance]
3.7	Development of training module for administrative burden (including test plan and method)	Q4 2022	27,710	/	/	BRK, Financing from donors	SPO/KIPA	Module developed and ready for use.	Government Program 2021-2025 [2.4 Governance]; and Program for Economic

									Reforms 2022 – 2024 [Reform 9 Measure].
3.8	Development of the practicum for administrative burden	Q4 2022	12,710	/	/	BRK	SPO/LO	Practicum developed and distributed to the officials during the training, as well as to the working groups for the drafting of the legislation.	Government Program 2021-2025 [2.4 Governance]
3.9	Updating the concept document guidelines	Q4 2022	8,084	/	/	BRK, Financing from donors	SPO	Guideline for concept documents, approved by the Government.	Government Program 2021-2025 [2.4 Governance]; and Program for Economic Reforms 2022 – 2024 [Reform 9 Measure].
3.10	Updating the guidelines for Standard Cost Model and excel file, according to the Program approach	Q4 2022	12,710	/	/	BRK, Financing from donors	SPO	Guidelines for Standard Cost Model and excel file, approved by the Government.	Government Program 2021-2025 [2.4 Governance]; and Program for Economic Reforms 2022 – 2024 [Reform 9 Measure].
3.11	Development of Standard Cost Model electronic file	Q2 2023	12,710	/	/	BRK, Financing from donors	SPO	SCM electronic file, developed and ready for use.	Government Program 2021-2025 [2.4 Governance]
3.12	Drafting of the manual for explanatory memoranda	Q4 2022	8,668	/	/	BRK, Financing from donors	SPO/LO	Manual for explanatory memoranda, approved by the Government.	Government Program 2021-2025 [2.4 Governance]; and Program for Economic Reforms 2022 – 2024 [Reform 9 Measure].
3.13	Training of officials responsible for administrative burden with the administrative burden training module	Q1 2023	/	9,168	/	BRK, Financing from donors	KIPA	Officials responsible for administrative burden, trained.	Government Program 2021-2025 [2.4 Governance]; and Program for Economic Reforms 2022 – 2024 [Reform 9 Measure].
3.14	Training of selected officials of line ministries and executive agencies, according to the administrative burden training plan	Q4 2024	/	34,672	39,672	BRK, Financing from donors	KIPA	20 trainings for administrative burden. 10 per annum, held.	Government Program 2021-2025 [2.4 Governance]; and Program for Economic Reforms 2022 – 2024 [Reform 9 Measure].

3.15	Holding Digital Camps for civil servants (workshops tailored to increase cooperation and raise awareness for the digitization of services and its effects)	Ongoing	/	20,140	20,140	BRK, Financing from donors Donor funding	SPO, AIS, LM	At least 1 Digital Camp held per year.	Government Program 2021-2025 [2.4 Governance]
3.16	Development of e-training for administrative burden	Q3 2023	/	42,336	/	BRK, Financing from donors	SPO/KIPA	E-training for administrative burden developed and accessible on the website of OPM and the E-Kosova platform.	Government Program 2021-2025 [2.4 Governance]
3.17	Drafting of the plan and analysis for the implementation of the 'one in, one out' method".	Q1 2023	6,168	6,168	/	BRK	SPO	Completed plan.	Government Program 2021-2025 [2.4 Governance]
	<b>Total budget for Measure 3:</b>		<b>107,264</b>	<b>120,708</b>	<b>68,036</b>				
	<i>Of which capitals:</i>								
	<i>Of which current:</i>								
<b>4</b>	<b>Simplification of administrative services at the local level<sup>22</sup></b>								
<b>1</b>	<b>Indicator:</b> <i>The number of municipalities whose services have been simplified</i>	2 [2022]	5	9	Simplified public administrative services at the local level, consuming less expense and time.				
No.	Action	Deadline	Budget			Source of financing	Leading and supporting institution	Output	Reference on documents
			Year 1	Year 2	Year 3				
4.1	Conducting the analysis for the simplification of public administrative	Q4 2022	32,336	/	/	BRK, Financing from donors	MLGA/SPO	Analysis with recommendations for the simplification of public	Government Program 2021-2025 [2.4 Governance]

<sup>22</sup> This measure concentrates on two aspects: the revision and simplification of the central legislation that causes administrative burden in local level procedures, as well as the provision of administrative services by the municipality, through municipal legislation. Savings for citizens and businesses from their simplification enter the cumulative measurement of savings in indicator 1 of the overall goal. As it was emphasized in the narrative part, the municipalities have the competence to determine the payments or fees for the administrative services delegated by the central level. Therefore, the reduction of the administrative burden in the services provided by the municipalities means, among other things, the reduction of the administrative burden caused by the central level legislation. In most cases, these services are the same in all municipalities, but due to different tariffs and low implementation of reforms, municipalities will be worked on one by one, except when a municipal service is digitized and offered to all in a single centre, such as the digitization of civil registry certificates.

	services in the municipality of Ferizaj and the municipality of Peja							administrative services for the municipality of Ferizaj and the municipality of Peja, completed.	
4.2	Implementation of recommendations for the simplification of public administrative services in the municipality of Ferizaj and Peja	Q4 2023	/	57,008	/	BRK, Financing from donors	Municipality /MLGA	Simplified public administrative services according to the analysis for the municipality of Ferizaj and the municipality of Peja.	Government Program 2021-2025 [2.4 Governance]
4.3	Establishment of the informative Electronic Register for public administrative services in the municipality of Ferizaj and the municipality of Peja	Q2 2023	/	48,504	/	BRK, Financing from donors	Municipality /MLGA	Electronic Register established and accessible on the portal of the municipality of Ferizaj and the Municipality of Peja.	Government Program 2021-2025 [2.4 Governance]
4.4	Conducting the analysis for the simplification of administrative services in five (5) other selected municipalities <sup>23</sup>	Q4 2023	/	224,016	/	BRK, Financing from donors	MLGA/SPO	Analysis with recommendations for the simplification of public administrative services for five (5) selected municipalities, completed.	Government Program 2021-2025 [2.4 Governance]
4.5	Implementation of recommendations for the simplification of public administrative services in five (5) selected municipalities.	Q4 2024	/	68,504	124,016	BRK, Financing from donors	Municipalities/MLGA	Simplified public administrative services according to the analysis for the five (5) selected municipalities.	Government Program 2021-2025 [2.4 Governance]
4.6	Establishment of informative Electronic Registers for administrative procedures in five (5) other selected municipalities	Q2 2024	/	74,672	68,504	BRK, Financing from donors	Municipality /MLGA	Electronic Registers established and accessible on the portals of the five (5) selected municipalities.	Government Program 2021-2025 [2.4 Governance]
4.7	Implementation of the plan for the expansion of administrative simplification in all municipalities	Q2 2023	/	18,504	224,016	BRK	SPO/MLGA	Drafted plan.	Government Program 2021-2025 [2.4 Governance]

<sup>23</sup> Municipalities will be selected during the process based on economic potential.

4.8	Development of the E-Municipalities section within the E-Kosova platform <sup>24</sup>	Q2 2023	/	30,000	/	BRK	MLGA/AIS	E-Municipalities section within the E-Kosova platform, completed and functional.	Government Program 2021-2025 [2.4 Governance]
	<b>Total budget for Measure 4:</b>		<b>32,336</b>	<b>521,208</b>	<b>416,536</b>				
	<i>Of which capitals:</i>								
	<i>Of which current:</i>								
<b>5</b>	<b>Increasing communication and raising awareness on administrative burden <sup>25</sup></b>								
<b>1</b>	<b>Indicator:</b> <i>% of respondents from citizens and businesses who have knowledge and are satisfied with the progress of the process of reducing the administrative burden</i>	Baseline value is determined [2022]	>30%	>50%				Citizens and businesses are informed and satisfied with the Government's work on reducing the administrative burden.	
<b>2</b>	<b>Indicator:</b> <i>% of respondents in the public administration who have knowledge of the administrative burden and its effects</i>	Baseline value is determined [2022]	>30%	>50%				Public administration informed and involved in the process of administrative burden and its effects.	
No.	Action	Deadline	Budget			Source of financing	Leading and supporting institution	Output	Reference on documents
			Year 1	Year 2	Year 3				
5.1	Preparation of the Calendar of meetings for consultation and communication of the administrative burden process	Q4 2022	4,112	/	/	BRK	SPO	The calendar prepared and approved in SPC.	Government Program 2021-2025 [2.4 Governance]
5.2	Organization of meetings of the Commission on Strategic Planning	Ongoing	1,028	2,056	2,056	BRK	DPM/SPO	2 meetings per year, held with SPC.	Government Program 2021-2025 [2.4 Governance]

<sup>24</sup> The first phase of the E-Municipalities section within the E-Kosova platform provides cooperation between citizens and the municipality for municipal public policies and efficient communication about their demands, challenges and problems. The digitization of the services offered by the municipalities, which is the second phase of the E-Municipalities project, will be planned in the first amendment and supplementation of the Action Plan of the Program, together with the relevant actions and indicators.

<sup>25</sup> Among other things, this measure aims to address or motivate focused consultation, where the general public is involved in the development of public policies.

5.3	Organization of meetings of the Commission on Economy and Investments	Ongoing	1,028	2,056	2,056	BRK	DPM/SPO	2 meetings per year, held with NCEI.	Government Program 2021-2025 [2.4 Governance]
5.4	Organization of the annual regional conference on administrative burden	Q4 of each year	31,028	31,028	31,028	BRK, Financing from donors	DPM/SPO	1 annual regional conference, held.	Government Program 2021-2025 [2.4 Governance]
5.5	Organization of the annual local conference on administrative burden	Q4 of each year	1,028	1,028	1,028	BRK	DPM/SPO	1 annual local conference, held.	Government Program 2021-2025 [2.4 Governance]
5.6	Organization of the annual meeting with the business community to discuss the administrative burden	Ongoing	1,028	1,028	1,028	BRK	SPO/ line ministries	1 annual meeting per year, held with the business community.	Government Program 2021-2025 [2.4 Governance]
5.7	Organization of periodic meetings with the persons responsible for the administrative burden of the municipalities, to discuss the administrative burden and ways of cooperation	Ongoing	1,028	2,056	2,056	BRK	SPO/ line ministries	2 periodic meetings per year, held with the representatives of the municipalities.	Government Program 2021-2025 [2.4 Governance]
5.8	Organization of semi-annual meetings with NGOs to discuss administrative burden	Ongoing	1,028	2,056	2,056	BRK	SPO/ line ministries	2 semi-annual meetings per year, held with NGO.	Government Program 2021-2025 [2.4 Governance]
5.9	Organization of meetings with development partners for coordination and discussion on administrative burden	Ongoing	1,028	2,056	2,056	BRK	ZVKM/SPO	2 meetings per year, held with development partners.	Government Program 2021-2025 [2.4 Governance]
5.10	Organization of meetings with students of human sciences (legal, economic, political science)	Ongoing	1,028	2,056	2,056	BRK	SPO/ line ministries	2 meetings per year held with students of human sciences.	Government Program 2021-2025 [2.4 Governance]
5.11	Preparation and publication of the six-month report and the annual report on administrative burden	Ongoing	1,028	2,056	2,056	BRK	SPO/ line ministries	The six-monthly report and the annual report, prepared and published.	Government Program 2021-2025 [2.4 Governance]
5.12	Development of the administrative burden window within the OPM website	Q2 2023	/	14,252	/	BRK, Financing from donors	OPC/SPO	Window developed within the OPM website.	Government Program 2021-2025 [2.4 Governance]

									Governance]
5.13	Preparation of leaflets, brochures, banners and other administrative materials (physical and electronic) for the outcome, promotion and information of prevention and reduction of administrative burden	Ongoing	/	39,672	39,672	BRK, Financing from donors	SPO	Leaflets, brochures, banners and other materials, prepared.	Government Program 2021-2025 [2.4 Governance]
5.14	Creating video animations for simplified administrative procedures (especially selected ones) based on real events	Ongoing	/	9,556	9,556	BRK, Financing from donors	SPO/DPM	At least 5 video animations of 1 minute per year, published on AP platforms, social networks of PM and Ministers, portals and TV.	Government Program 2021-2025 [2.4 Governance]
5.15	Creating video animations about the administrative burden and its consequences	Ongoing	/	5,056	5,056	BRK, Financing from donors	SPO	At least 2 video animations of 1 minute per year, published on AP platforms, portals and TV.	Government Program 2021-2025 [2.4 Governance]
5.16	Development of the video for the Prime Minister and the ministers for the political commitment to prevent and reduce the administrative burden	Ongoing	2,056	2,056	2,056	BRK	OPC/SPO	At least 1 video per year for the Prime Minister and 3 videos per year for 3 ministers, published on social networks, portals and TV.	Government Program 2021-2025 [2.4 Governance]
5.17	Development of infographics for information on simplified administrative procedures	Ongoing	/	2,056	2,056	BRK	SPO	At least 3 infographics per year for information on simplified administrative procedures, published on platforms, portals, social networks and TV.	Government Program 2021-2025 [2.4 Governance]
5.18	Sending SMS for simplified administrative procedures to businesses	Ongoing	/	2,056	2,056	BRK	KBRA/TAK /SPO	SMS sent to businesses for simplified administrative procedures.	Government Program 2021-2025 [2.4 Governance]
	<b>Total budget for Measure 5:</b>		<b>46,448</b>	<b>122,180</b>	<b>107,928</b>				
	<i>Of which capitals:</i>								
	<i>Of which current:</i>								

	<i>Total budget for the Action Plan:</i>		<i>607,958</i>	<i>7,147,956</i>	<i>6,715,768</i>				
	<i>Of which capitals:</i>			<i>5,910,000</i>	<i>6,050,000</i>				
	<i>Of which current:</i>		<i>607,958</i>	<i>1,237,956</i>	<i>665,768</i>				

**Annex 1: Legal Analysis for the Simplification, Merging or Elimination of Permits and Licenses issued by the MAFRD and MESPI (environmental part)**

**Annex 1: Legal Analysis for the Simplification, Merging or Elimination of Permits and Licenses issued by the MAFRD and MESPI (environmental part)**

**Annex 3: Analysis to simplify selected public administrative services based on life events**

**Annex 4: Guiding questions for prevention and reduction of administrative burden**

**Annex 5: Passport of Indicators**

**Annex 6: Risk Assessment for ABPRP 2022-2027 implementation**

**Annex 1: Legal Analysis for the Simplification, Merging or Elimination of Permits and Licenses issued by the MAFRD and MESPI (environmental part)**

Annex 1 of the Program for the prevention and reduction of the administrative burden is approved together with the Concept Document for the administrative burden reduction, approved by Decision no. 03/05 dated 06.03.2020, as annex no. 17.

**Ministry of Environment, Spatial Planning and Infrastructure**

Ministry	Ref nr.	Permit name	Permit type	Responsible authority	Findings	Recommendations	Justification
Ministry of Environment, Spatial Planning and Infrastructure		Export permit, import permit and waste transit permit	Permits	MESPI - DEPW	The fee is not calculated based on the principle of the cost of the procedure.	Amending and Supplementing AI of MESP No. 02/2019 for Export, Import and Transit of Waste	These fees have been placed without any proper analysis, according to discussions with representatives of MESPI, their elimination has been recommended.
Ministry of Environment, Spatial Planning and Infrastructure		Consent for the management of natural resources in rocky areas	Consent	MESPI - DEPW	They consent appears unnecessary due to the lack of requirements for this consent këtë pëlqim	Amendimi dhe plotimi i sistemit të mbrojtjes së natyrës supplement of Law 03/L-233 on Nature Protection	This permit has been implemented in practice in the absence of requests from the parties and therefore it is not logical to remain in force
Ministry of Environment, Spatial Planning and Infrastructure		Permit for the implementation of scientific research in nature, Permit for research and educational visits in the strict reserve and Permit for activities in the speleological facility into a joint permit	Permits	MESPI - DEPW	The assessment is that the scope of the permit for all three permits is similar	Amendment and supplement of Law 03/L-233 on Nature Protection	Since the scope of the permit for all three permits is similar and therefore their merging into one permit is recommended

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Ministry of Environment, Spatial Planning and Infrastructure	Permit for the collection of wild plants protected by the permit and permit for the collection of mushrooms and their parts	Leje	MESPI - DEPW	The assessment is that the scope of the permit for both permits is similar	Amendment and supplement of Law 03/L-233 on Nature Protection	Since the scope of the permit for two permits is similar and therefore their merging into one permit is recommended
Ministry of Environment, Spatial Planning and Infrastructure	Permit for import/export of wild plant species and Permit for export, import for scientific purposes of certain strictly protected animals, fungi and plants for scientific purposes	Leje	MESPI - DEPW	The assessment is that the scope of the permit for both permits is similar	Amendment and supplement of Law 03/L-233 on Nature Protection	Since the scope of the permit for two permits is similar and therefore their merging into one permit is recommended
Ministry of Environment, Spatial Planning and Infrastructure	Permit for the conditions of keeping, marking and identification of protected animals in captivity, Permit for keeping domestic or foreign species of wild animals	Leje	MESPI - DEPW	The assessment is that the scope of the permit for the three permits is similar	Amendment and supplement of Law 03/L-233 on Nature Protection	Since the scope of the permit for all three permits is similar and therefore their merging into one permit is recommended

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		in captivity for the purpose of showing them to the public in zoos, aquariums, terrariums or similar spaces and Permit for keeping in captivity, cultivation, sale and purchase of strictly protected species of wild animals					
Ministry of Environment, Spatial Planning and Infrastructure		Water Consent and Permit	Consent and Permit	MESPI - RRBA	The assessment is that the fees for these two permits are high and are not calculated according to the principle of administrative procedure costs.	Amendment and supplement of AI of MESP No. 03 /2018 on Procedures for Water Permits	These fees have been placed without any proper analysis and it is necessary to determine new fees calculated according to the principle of the administrative procedure cost.
Ministry of Environment, Spatial Planning and Infrastructure		Water Consent and Permit	Consent and Permit	MESPI - RRBA	The request for authentication of a copy of the ID or Business Certificate (only for legal entities) and the party's fiscal number of the certificate are an unnecessary burden for the party.	Amendment and supplement of AI of MESP No. 03 /2018 on Procedures for Water Permits	Since the request for authentication of a copy of the ID or Business Certificate (only for legal entities) and of the party's fiscal number of certificate are an unnecessary burden

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							for the party, it is therefore recommended that only copies of this documentation shall be asked to the party
Ministry of Environment, Spatial Planning and Infrastructure		Environmental Permit	Permit	MESPI - RRBA	The assessment is that the fees for environmental permits are high and are not calculated according to the principle of administrative procedure costs	Repeal of the decision of the Ministry of Environment and Spatial Planning no. 66, dated 19.11.2015 and issuing the Decision on Environmental Permit Fees by the Government of Kosovo.	The issuance of this decision by the Government of Kosovo is required by Article 5, subparagraph 1.1.9 of Law No. 03/L-025 for Environmental Protection.

**Ministry of Agriculture, Forestry and Rural Development**

Ministry	Ref nr.	Permit name	Permit type	Responsible authority	Findings	Recommendations	Justification
	DAPM-1	Permit for responsible persons in agricultural pharmacies	Permit	MAFRD Department for Agricultural Policies	The legal basis is determined by the Administrative Instruction (MAFRD) no. 02/2010 for the amendment and supplement of Administrative Instruction no.	The Law on Products for Plant Protection to be amended and supplemented. The Administrative	This permit is determined only by administrative instruction, without being based on the Law on Plant Protection Products and is in

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				<p>Markets (DAPM)</p> <p>09/2009 on authorization for certification of plant protection products. This permit is not based on any law providing for the issuance of such a permit. The Law on Plant Protection Products does not expressly require that a permit be issued to responsible persons in agricultural pharmacies (DAPM-1). According to the Law on the System of Permits and Licenses, permits can only be provided by law, after determining the degree of danger to public health, public safety and the environment.</p> <p>Besides the legal basis issue explained above, the list of documents to apply for this permit is very long. Accordingly, the following documents are required: permit request (original), business certificate and information on the business (original), minutes from the phytosanitary inspectorate on the condition of the warehouse (certified copy), professional background diploma (faculty of agriculture, certified copy), the</p>	<p>Instruction no. 02/2010 on the Amendment and Supplement of Administrative Instruction No.09/2009 Authorization for Certification of Plant Protection Products to be amended.</p>	<p>contradiction to the law on system for permits and licenses.</p> <p>Given that changing of legal basis takes time, it is recommended that in the meantime the application procedure for the DAPM-1 permit be simplified, by amending the Administrative Instruction (MAFRD) no. 02/2010 for the amendment and supplement of Administrative Instruction no. 09/2009 on authorization for certification of plant protection products.</p>
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					consent for the facility from the municipal assembly (original) and the tax payment receipt (original) and the contract, in case the owner of the company is not an agricultural engineer (certified copy). The request for certified copies, for original documents is an additional financial cost for the parties as well as a waste of time to provide these documents from different institutions.		
	DAPM-2	Temporary permit for disinfection, disinsection and deratization	Permit	MAFRD Department for Agricultural Policies and Markets (DAPM)	-The situation regarding the granting of a temporary permit for disinfection, disinsection and deratization (DDD) (DAPM-2) is even more problematic because there is not even an administrative instruction for this permit. DAPM-2 is neither based on an administrative instruction nor on the Law on Plant Protection Products. Consequently, the existence of this permit is contrary to the Law on the System of Permits and Licenses. Because this permit is important for public safety, public health and the	Sub-legal act to be drafted. Extend the validity period to five years;	The legal basis for this permit must be established, and the validity period of this permit is extended.

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					environment, therefore it is recommended that the ministry draft the legal basis for its existence. Accordingly, it is recommended to amend the Law on Plant Protection Products, the Law on the Prevention and Combat of Infectious Diseases and the Law on Veterinary		
					The validity period for this permit is only six months.		
DAPM – 13 DAPM – 19 DAPM – 23 DAPM – 27	License for seed producers Grape vine seedling material producer license License for seedling material producers of decorative plants License for fruit seedling material producers	License	MAFRD Department for Agricultural Policies and Markets (DAPM)	-These permits shall regulate the registration and licensing procedures, and it is not explicitly stated why producers should be registered and licensed, this is a heavy burden for seedling producers. The continued existence of these permits as separate ones is an additional cost to the private sector as they have to pay fees for application and other necessary expenses during the preparation of documents for each permit, instead of paying only once.	The Administrative Instruction (MAFRD) no. 12/2004 on registration and licensing of producers of seedling material to be amended and supplemented; re-designate from License to Permit for seedling material producers remove the payment of 20 euros; and the tax amount should reflect the cost of expenses; the duration of the permit shall be 3 years; G8	The merger is necessary because the permits that are proposed to be merged have the same purpose, relate to the same products, and to apply for those permits, the same application procedure and documents shall apply. Furthermore, the existence of these permits as separate ones is an additional cost to the private sector as they have to pay a fee for application and other necessary expenses during the preparation of documents for each permit, instead of paying only once.	

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							Extending the validity of these permits would save time for businesses and reduce the financial costs and time incurred for the preparation of application documents for these permits. Also, the extension of the validity period would relieve the ministry officials of the obligation to cross-check every year whether each operator has renewed the license.
DAPM-33 DAPM-34 DAPM-35 DAPM -36	License to import artificial fertilizers  License for trading artificial fertilizers  Licensing of artificial fertilizer producers  License for repackers of artificial fertilizers	License	MAFRD Department for Agricultural Policies and Markets (DAPM)	-These permits shall regulate the licensing procedures, it is a heavy burden for those who work with artificial fertilizers to be provided with four different types of permits instead of only one.	Administrative Instruction (MAFRD) no. 04/2009 on setting of taxes for license of subjects that are dealing with import and trading of the artificial fertilizers to be amended and supplemented; The Administrative Instruction (MAFRD) no. 04/2016 on licensing of producers and repackers of artificial fertilizers to be amended and supplemented	"The merger is necessary because the permits that are proposed to be merged have the same purpose, relate to the same products, and to apply for those permits, the same application procedure and documents shall apply. Furthermore, the existence of these permits as separate ones is an additional cost to the private sector as they have to pay a tax for application and other necessary expenses during the preparation of documents	

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							for each permit, instead of paying only once.  Extending the validity of these permits would save time for businesses and reduce the financial costs and time incurred for the preparation of application documents for these permits. Also, the extension of the validity period would relieve the ministry officials of the obligation to cross-check every year whether each operator has renewed the license.
	DF-1 DF-2	License for carrying out forest works - local entities  License for carrying out forest works - foreign entities	License	MAFRD Department Forestry (DF)	of Both permits are provided only by sub-legal act. The Department of Forestry does not have a legal basis for issuing these two licenses, since the licensing of local and foreign entities to carry out forestry works is not expressly provided for by the Law on Forests of Kosovo.	Establish the legal basis;  Re-designate "Permit for carrying out forest works"  Remove the payment of 20 euros; and  The tax amount should reflect the cost of the expenses and not be 300 euros;  Abolish the requirement that obliges businesses to provide original documents or certified copies during the	The merger is necessary because the permits that are proposed to be merged have the same purpose, relate to the same activity, and to apply for those permits, the same application procedure and documents shall apply. The existence of these permits as separate ones is an additional cost to the private sector as they have to pay a tax for application and other necessary expenses during

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						application procedure; remove the fine of 100 euros for each month of delay.	the preparation of documents for each permit, instead of paying only once. Moreover, their merger is necessary because even the KBRA does not differentiate between the activities of local or foreign businesses.
DF-3	License for processors of wood products (sawmills)	License	MAFRD Department of Forestry (DF)	The application fee (of 20 euros) must be removed. The Department of Forestry must ensure that the fee of 300 euros per permit and 200 for the renewal of the DF-2 permit does not exceed the amount necessary to cover the expenses incurred by this department to administer the permit (as provided by Article 18 of the Law on System of Permits and Licenses).	Re-designate "Permit for processors of wood products (sawmills)" Remove the payment of 20 euros; The tax amount should reflect the cost of the expenses and not be 300 euros; Abolish the requirement that obliges businesses to provide original documents or certified copies during the application procedure;	Simplification is necessary because both the application fee and the permit fee are paid for this permit, which does not reflect the cost of expenses. Unnecessary expenses are incurred during the preparation of documents because they are required to be originals or certified copies	
KFA-1	Certificate for lack of interest in the purchase of privately owned forest land	Certificate	MAFRD – Kosovo Forestry Agency (KFA)	This permit is not expressly provided for in the Law on Forests of Kosovo and therefore, based on the Law on the System of Permits and Licenses, in the absence of a legal basis, it cannot be qualified as a permit. Permit as such does not pose a	It is recommended that this permit be eliminated by amending and supplementing the Administrative Instruction No. 12/2005 on the setting of prices - taxes for the use of forestry - wood and non-wood products and for	Certificate for lack of interest in the purchase of privately owned forest land KFA-1 has no legal basis. The Law on Forests of Kosovo does not foresee that KFA provides citizens with such certificates and the same,	

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					<p>medium or high risk to public health, public safety or the environment. Also, according to the information collected by the KFA, the MAFRD or the KFA has not purchased any privately owned forest land, which means that the permit does not apply but is left over from past practice.</p>	<p>professional - technical services.</p>	<p>according to the Law on the System of Permits and Licenses, cannot be qualified as a permit.</p>
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Annex 2: Legal Analysis for simplification, merger or elimination of permits and licenses issued within the Ministry of Health, Ministry of Internal Affairs and Ministry of Environment, Spatial Planning and Infrastructure (infrastructure part)<sup>1</sup>

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<sup>1</sup> This legal analysis has been approved in the 50<sup>th</sup> Meeting of the Government of the Republic of Kosovo, with the decision No. 03/50 dated 23.12.2021.

### **Simplification of permits and licenses at the Ministry of Internal Affairs**

In the process of simplifying permits and licenses at the Ministry of Internal Affairs and harmonizing them with Law No. 04/L-202 on Permit and License System, a total of 59 permits and licenses were analyzed, of which 36 procedures fall within the scope of the Department of Public Safety - Department of Weapons, Ammunition and Explosives, 19 procedures fall within the scope of the Department of Public Safety - Division of Private Security Services, and 4 procedures fall within the scope of the Department of Prevention.

During the analysis process, special focus was given to the legal basis of all relevant permits and licenses issued within the MIA, the procedure followed by the relevant departments, the documents required and the form of submitting them. Further, the flow of applications for relevant permits and licenses and the flow of permits issued by the MIA were also analyzed during the research. Moreover, the necessity of the existence of the permits and licenses, the function they perform as well as the possibility of simplifying them in terms of required documentation and payments were also considered during the analysis. At the same time, in the process of simplification, the possibility of merging some of them and removing them from the existing procedures within the Ministry was analyzed. During the analysis process, legal persons/businesses and companies exercising respective functions concerning which such permits and licenses are required were also consulted. During these meetings, the administrative burden that these procedures create for these businesses was discussed, as well as their necessity in the context of the risk associated with respective activities.

Of the 59 procedures analyzed, 28 of them have been proposed to be removed from the register, with 40 existing licenses remaining and 1 professional license added therein. Whereas, concerning all these 41 licenses, it is proposed to simplify the procedures by reducing the requirement for submitting documents issued by the MIA itself and lowering applicable fees.

## ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Ministry of Internal Affairs	DSP1	<p>1. Licence for manufacturing explosives and fireworks</p> <p>2. Licence for import, export, transit and transfer of explosives and fireworks</p> <p>3. Licence for use of explosives and fireworks</p>	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Paragraphs 1 and 2 of Article 29 of Law No. 04/L-022 on Civil Use of Explosives stipulate that the general license is issued for manufacturing, import/export/ transfer and use. These three licenses are issued parallel to the business registration procedure with the KBRA. Upon obtaining these licenses, companies are registered as entities for the manufacturing, import, export, transit, transfer and use of fireworks and explosives, but they are not granted the right to exercise the specified activity upon obtaining the general license.</p> <p>2. Paragraph 9 of Article 29 of Law No. 04/L-022 on Civil Use of Explosives specifies that licenses are valid for a period of 5 years, which implies that companies should be re-licensed after five years.</p> <p>3. The Minister's Decision No. 154/2016 on Setting of Fees specifies that the cost for obtaining each of these licenses is EUR 500. In other words, a company has to pay a fee of EUR 500 three times for each license, and they should be licensed every 5 years.</p> <p>4. Administrative Instruction No.</p>	<p>1. Amend in entirety Law No. 04/L-022 on Civil Use of Explosives, specifically paragraph 1 of Article 20 thereof, in order to abolish the obligation of legal persons to obtain a general license for the manufacturing, import, export, transit, transfer and use of fireworks and explosives, requiring instead of obtaining a license general registration at the Ministry of Infrastructure which would serve for all three activities (manufacturing, import/export/transfer and use).</p> <p>2. Amend Articles 31, 32, 33, 38 and 39 of Law No. 04/L-022 on Civil Use of Explosives in order to abolish the obligation to obtain a license by legal persons and to require their registration according to Article 7 of Law No. 04/L-202 on Permit and License System.</p> <p>3. Amend paragraph 9 of Article 29 of Law No. 04/L-022 on Civil Use of Explosives in order to determine the obligation of companies to notify the MIA every five years that they</p>	<p>1. Paragraph 1.41 of Article 2 of Law No. 04/L-022 on Civil Use of Explosives stipulates that the license is the authorization issued from the competent body of legal person, by which the holder is authorized to be engaged in a special type of business or other activity in compliance with terms prescribed in the license according to this law. This procedure is equivalent to the procedure required for business registration with KBRA. So, in addition to the application for business registration with KBRA, the legal person is obliged to be licensed (which is essentially a registration procedure) at the MIA. And with the licensing of the company, the legal person cannot start exercising its activity again since it requires special permits, so the practical relevance of licenses is the same as registering a business with KBRA. Therefore, for the sake of public safety and the state need to have knowledge about the existence of companies that exercise these activities, it is required that they be registered in the Ministry of Infrastructure</p>

## ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>04/2013 on Criteria and Procedures for Licenses and Permits, and Administrative Instruction (MIA) No. 07/2013 – on UN Hazards Classification and Compatibility Groups foresee the licensing obligation in the same line as the Law.</p> <p>5. When applying for a license, the legal person is required to submit two documents which are issued by the MIA: (i) Certificates of authorized persons and (ii) Certificates of qualified persons. Also, when applying for a license for import, export, transit and transfer of explosives and fireworks, two additional documents are required which are also issued by the MIA, such as: (i) Driving certificate (special driving license for the transport of dangerous goods) (Copy).</p> <p>6. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>continue to exercise the same activity.</p> <p>4. Propose to the Ministry that the fee of EUR 500 applied for this procedure be calculated within the cost of this registration, to ensure compliance with Article 18 of the Law on Permit and License System.</p> <p>5. Amend Administrative Instruction No. 04/2013 on Criteria and Procedures for Licenses and Permits and Administrative Instruction (MIA) No. 07/2013 on UN Hazards Classification and Compatibility Groups in the respective sections where the licensing obligation is determined so that the registration and notification obligation is determined.</p> <p>6. Amend Administrative Instruction No. 04/2013 on Criteria and Procedures for Licenses and Permits and Administrative Instruction (MIA) No. 07/2013 on UN Hazards Classification and Compatibility Groups to abolish the obligation</p>	<p>according to Article 7 of the Law on Permit and License System. And at the time of registration of the company, this registration serves for all three types of activity (manufacturing, import/export/transfer and use). With the current regulation, the legal person is obliged to pay EUR 500 for each license (i.e., 3 x EUR 500), and for the same to apply every 5 years. Such payment is a very heavy administrative burden for legal persons that want to exercise this activity, given that this licensing procedure does not offer the possibility to start exercising the activity.</p> <p>2. Since by registration the legal person is already part of the register of the MIA, for security purposes, based on Article 6 of the Law on Permit and License System, the legal person may notify the competent authority that it continues to exercise the same activity every 5 years. The same cannot be registered for the second time since it is already registered.</p> <p>3. The fee that a competent</p>

## ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>to submit: (i) Certificates of authorized persons and (ii) Certificates of qualified persons. Also, abolish the requirement to submit: (i) Driving Certificate (special driving license for transport of dangerous goods) (Copy).</p> <p>7. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500 reflects the costs incurred by the authority in this procedure.</p> <p>4. Since Law No. 04/L-022 on Civil Use of Explosives will be amended, the same amendments should be reflected in the Administrative Instruction No. 04/2013 on Criteria and Procedures for Licenses and Permits and Administrative Instruction (MIA) No. 07/2013 on UN Hazards Classification and Compatibility Groups so as to abolish the obligation to obtain three different licenses with 5 years validity.</p> <p>5. Documents such as (i) Certificates of authorized persons and (ii) Certificates of</p>

ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
							<p>qualified persons), as well as (i) Driving Certificate (special license for driving vehicles for transport of dangerous goods) (Copy) are documents issued by the MIA to the legal person. Therefore, it is meaningless and unnecessary to require from the legal person to submit them during this procedure. This represents an unnecessary additional cost for the applicant.</p> <p>6. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DSP2	<p>1. Permit for import, export, transit or transfer of explosives and fireworks;</p> <p>2. Permit for retail shop to sell fireworks;</p> <p>3. Permit for storage;</p> <p>4. Permit for</p>	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Law No. 04/L-022 on Civil Use of Explosives treats explosives and fireworks as the same category. Such arrangement is contrary to Directive 2013/29/EU of the European Parliament and Directive 2014/28/EU of the European Parliament.</p> <p>2. Law No. 04/L-022 on Civil Use of Explosives and Administrative</p>	<p>1. Amend in entirety Law No. 04/L-022 on Civil Use of Explosives, so that explosives and fireworks are regulated as separate categories.</p> <p>2. Amend current law so that for each category the following permits are required for the exercise of their activity: 1. Permit for import, export,</p>	<p>1. The division into two separate categories of explosives and fireworks is done in accordance with the EU Directives and in accordance with the degree of risk associated with explosives and fireworks. Such practice is also followed in Montenegro, where a clear distinction is made between these categories.</p> <p>2. Permits for import, export,</p>

## ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
		destruction; 5. Permit for manufacturing; 6. Permit for use of fireworks; 7. Permit for manufacturing building; 8. Permit for use (blast permit);			Instruction No. 04/2013 on Criteria and Procedures for Licenses and Permits stipulate that when applying for a permit for import, export, transit or transfer of explosives and fireworks, the legal person must also submit documents such as: i) Copy of the relevant permit for sale, manufacturing or use of explosives and fireworks (Copy) and (ii) Certificate of professional qualification (relevant experience) (Copy); for a permit for retail sale of fireworks, the legal person must submit documents such as: Copy of the storage permit and Copy of the certificate of qualified persons (Certified copy); for a storage permit, the legal person is obliged to submit documents such as: Copy of the relevant permit for sale, manufacturing or use of explosives and fireworks (Copy) and Certificate of professional qualification (relevant experience) (Copy); for the permit for destruction, the legal person is obliged to submit documents such as: Copy of license and Certificate of professional qualification (relevant experience) (Copy); for manufacturing permit, the legal person is obliged to submit documents such as: Certificates of	transit or transfer, sale, storage and manufacturing of explosives; 2. Permit for use of explosives; 3. Permit for destruction of explosives; 4. Permit for import, export, transfer, retail sale, manufacturing of fireworks; 5. Permission for use of fireworks; 6. Permit for destruction of fireworks;  3. Amend Law No. 04/L-022 on Civil Use of Explosives and Administrative Instruction No. 04/2013 on Criteria and Procedures for Licenses and Permits, so that the following documents are not required for the following permits:  - Permit for import, export, transit or transfer of explosives and fireworks, the legal person must also submit documents such as: i) Copy of the relevant permit for sale, manufacturing or use of explosives and fireworks (Copy) and (ii) Certificate of professional qualification (relevant experience) (Copy); - Permit for retail sale of fireworks, the legal person must	transit or transfer, sale, storage and manufacturing of explosives and fireworks respectively should be merged into a single permit because the same criteria apply to both. On the other hand, the permit for the use of explosives on the one hand and the permit for the use of fireworks should be separate permits due to the conditions and criteria that must be met for each. The same reasoning applies to permits for destruction. 3. With the current regulation, the legal person must apply 8 times to obtain each of these permits.  3. The abolition of the obligation to submit documents issued by the MIA as different types of permits and different certificates is done for reasons of non-existence of the need for legal persons to submit these documents to the same entity that issued them. Such practice creates a great administrative burden for businesses and is completely meaningless. Also, by merging 8 permits into 3, they are integral to each other. 4. LGAP is a framework law

## ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>authorized persons and Certificates of qualified persons; for Permit for use of fireworks, the legal person is obliged to submit documents such as: Certificate of professional qualification (relevant experience) (Copy), Certificate of authorized persons (Copy), Identity card (Copy); for the Permit for manufacturing building, the legal person is obliged to submit documents such as: Copy of license for use of explosives or fireworks or Copy of license for manufacturing of explosives or fireworks (Copy), Certificate of professional qualification (relevant experience) (Copy), Location of Safety Plan and Risk Assessment. (Copy); for the Permit for use (blast permit), the legal person is obliged to submit documents such as: Certificate of professional qualification (relevant experience) (Copy), Certificate of authorized persons (Copy), Identity card.</p> <p>3. The appeals procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>submit documents such as: Copy of storage permit and Copy of certificate of qualified persons (Certified copy);</p> <ul style="list-style-type: none"> <li>- Permit for storage, the legal person is obliged to submit documents such as: Copy of the relevant permit for sale, manufacturing or use of explosives and fireworks (Copy) and Certificate of professional qualification (relevant experience) (Copy);</li> <li>- Permit for destruction, the legal person is obliged to submit documents such as: Copy of license and Certificate of professional qualification (relevant experience) (Copy);</li> <li>- Permit for manufacturing, the legal person is obliged to submit documents such as: Certificates of authorized persons and Certificates of qualified persons;</li> <li>- Permit for the use of fireworks, the legal person is obliged to submit documents such as: Certificate of professional qualification (relevant experience) (Copy), Certificate of authorized persons (Copy), Identity card (Copy);</li> <li>- Permit for manufacturing building, the legal person is</li> </ul>	<p>which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>obliged to submit documents such as: Copy of license for use of explosives or fireworks or Copy of license for manufacturing of explosives or fireworks (Copy), Certificate of professional qualification (relevant experience) (Copy), Location of Safety Plan and Risk Assessment. (Copy);</p> <p>- Permit for use (blast permit), the legal person is obliged to submit documents such as: Certificate of professional qualification (relevant experience) (Copy), Certificate of authorized persons (Copy), Identity card.</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	
Ministry of Internal Affairs	DSP3	<p>Authorization for commencing operations of Private Security Company</p> <ul style="list-style-type: none"> <li>• Authorization for commencing operations of Basic Security Services</li> </ul>	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Authorization for commencing operations of the Private Security Company, according to the Law on Permit and License System, meets all legal criteria to be recognized as Notice. 2. Decision of the Minister No. 154/2016 on Setting of Fees dated 30.05.2016, abrogated by Decision No. 328/2016 dated 16.11.2016 and Decision No. 394/2017 dated 15.12.2017</p>	<p>1. Amend Articles 23 and 24 of Law No. 04/L-004 on Private Security Services, so that the Authorization for commencing operations of the private security company is named as the Notice for the commencing operations of the private security company; 2. Amend Decision of the Minister No. 154/2016 on Setting of Fees</p>	<p>1. The authorization for commencing operations of the private security company fulfills all the conditions defined in Article 6, paragraph 2 of Law No. 04/L-202 on Permit and License System. Therefore since Law No. 04/L-202 on Permit and License System does not recognize the Authorization, then its name is changed to Notice as it serves</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
		<ul style="list-style-type: none"> <li>• Authorization for commencing operations of Close Protection Services</li> <li>• Authorization for commencing operations of CIT Services</li> <li>• Authorization for commencing operations of Electronic Property Surveillance</li> <li>• Authorization for commencing operations of Security Services of Public Gatherings</li> <li>• Authorization for appointment of CPOs</li> </ul>			<p>foresees the fee of EUR 20 for obtaining the Authorization for commencing operations of a private security company, which in essence is the notification of MIA on clients of the security company, so that the MIA knows who the clients of the company are.</p> <p>2. Decision No. 12/20 on Setting of Fees, dated 16.01.2020 specifies in Annex 2 five (5) types of authorization by service, with fees ranging from EUR 5 to EUR 20. This fee paid upon obtaining the authorization for commencing operations of Private Security Company is in essence a notice to the MIA on the clients of the security company which ensures the MIA is informed on the company's clients. The fees due for each authorization are as follows:</p> <ul style="list-style-type: none"> <li>• Authorization for commencing operations of Basic Security Services (EUR 10)</li> <li>• Authorization for commencing operations of Close Protection Services (EUR 20)</li> <li>• Authorization for commencing operations of CIT</li> </ul>	<p>dated 30.05.2016, abrogated by Decision No. 328/2016 dated 16.11.2016 - and by Decision No. 394/2017 dated 15.12.2017, in order to abolish the foreseen fee of of EUR 20 for notification.</p> <p>2. Amend Decision No. 12/20 on Setting of Fees, dated 16.01.2020 Annex 2, to abolish the foreseen fee of EUR 5-20 for notification purposes.</p> <p>3. Change the practice of the MIA for requesting a copy of the license of the company to perform the relevant services.</p>	<p>the same purpose.</p> <p>2. While the removal of the administrative fee upon application is done in accordance with Article 18 of Law No. 04/L-202 on Permit and License System.</p> <p>3. The abolition of the obligation to submit a copy of the relevant license issued by the MIA is done for reasons of non-existence of the need for legal persons to submit these documents in the same place that issued them. This practice creates a great administrative burden for businesses and is completely meaningless.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>Services (EUR 20)</p> <ul style="list-style-type: none"> <li>• Authorization for commencing operations of Electronic Property Surveillance (EUR 5)</li> <li>• Authorization for commencing operations of Security Services of Public Gatherings (EUR 5)</li> <li>• Authorization for appointment of CPOs (EUR 5)</li> </ul> <p>3. During the application for obtaining the authorization for commencing operations, it is required to submit a document such as: Proof of licensing of the company to perform the relevant services (Copy)</p>		
Ministry of Internal Affairs	DSP4	Certification of Control Center	/	Ministry of Internal Affairs, Department of Public Safety	<p>1. The certification of the control center is a criterion for issuing a license to a company for the provision of specialized security services, including cash in-transit services, security services of public gatherings, close protection services, and property electronic surveillance services. At the moment of receiving the license from the competent body, the company can start providing the</p>	<p>1. Amend Articles 13 and 21 of the Law on Private Security Services and merge them. 2. Such a certificate should be removed from the register of permits and licenses.</p> <p>2. Amend Decision No. 12/20 on Setting of Fees dated 16.01.2020, Annex 2, point 11, in order to abolish the requirement to pay the fee of</p>	<p>1. This certificate is a criterion which must be met when the company obtains a license for the provision of specialized services. As such it should not be included in the register of permits and licenses.</p> <p>2. The abolition of the payment for obtaining this certificate, which is a criterion for obtaining a license, is done because the</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>service immediately.</p> <p>2. Decision No. 12/20 on Setting of Fees dated 16.01.2020 in Annex 2 point 11 sets the payment of EUR 50 for obtaining this certificate.</p>	EUR 50 for obtaining this certificate.	financial cost of issuing it must be calculated as part of the financial cost for obtaining a license. The project can help calculate the cost.
Ministry of Internal Affairs	DSP5	1. License for Basic Security Worker; 2. License for Close Protection Operative; 3. License for CIT Guard; 4. License for dog-handler; 5. License for Electronic Surveillance Operator; 6. License for Security Manager/Duty Officer	/	Ministry of Internal Affairs, Department of Public Safety	1. According to Article 14 of the Law on Private Security Services, companies that are licensed to provide services must also license their employees to provide those services. Whereas, in the case of licensing the company, the company submits the list of employees who have already been verified. Also, there is a legal obligation for the security company to inform the MIA about the movements of their staff.	1. Amend Article 14 of the Law on Private Security Services to abolish the requirement for licensing employees for the services provided by the company and for which the company is already licensed. More specifically, abolish the following licenses: 1. License for Basic Security Worker; 2. License for Close Protection Operative; 3. License for CIT Guard; 4. License for dog-handler; 5. License for Electronic Surveillance Operator; 6. License for Security Manager/Duty Officer	Such requirement is considered to be excessive and a great administrative and financial burden for the company and the relevant officials. When a company is licensed to provide protection services, it means that it meets the necessary criteria for obtaining a license. Therefore, the requirement to license employees individually following the licensing of the company is unnecessary and excessive. Such recommendation has also been supported and proposed by Ministry officials.
Ministry of Internal Affairs	DSP6	Official identification cards	/	Ministry of Internal Affairs, Department of Public Safety	1. Article 35 of the Law on Private Security Services provides for the need to equip all employees of security companies with cards issued by the Ministry.	1. Amend Article 35 of the Law on Private Security Services which provides for the need to equip all employees of security companies with cards issued by the Ministry. 2. Amend Article 9	Since every security employee is verified when licensing a private company, obtaining cards from the Ministry is not necessary. Such cards can be issued by the company itself to its employees.

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>2. Article 9 of Administrative Instruction No. 27/2011 on Licensing Procedures stipulates that private security employees should be equipped with official identification cards by the Ministry.</p> <p>3. The private security company submits a request to the competent body for identification cards for all their licensed security employees. After reviewing the case, the senior officer for standardization, training and licensing at the Department of Public Safety at the Ministry of Internal Affairs issues the company identification card for their security personnel.</p>	of Administrative Instruction 27/2011 on Licensing Procedures which stipulates that the Ministry shall provide official identification cards to private security employees.	
Ministry of Internal Affairs	DSP7	License for close protection services	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Law No. 04/L-004 on Private Security Services in Article 10, paragraph 1.2 provides for the License for Close Protection Services.</p> <p>2. Administrative Instruction No. 27/2011- MIA on Licensing Procedures stipulates that the legal person which applies for this license, must submit the following documents at the time of application: (i) copy of the license for basic security service manager (Copy) and the certificate of the Control Center.</p>	<p>1. Amend Law No. 04/L-004 on Private Security Services, Article 10, paragraph 1.2 which foresees the License for Close Protection Services, so that it foresees the Permit for Close Protection Services.</p> <p>2. Amend Administrative Instruction No. 27/2011- MIA on Licensing Procedures which stipulates that the legal person applying for this license, must submit the following documents at the time of application: (i)</p>	<p>1. The license for close protection services is changed to Permit for close protection services since it is issued to legal persons and meets all the criteria according to Article 8 of Law No. 04/L-202 on Permit and License System to be classified as a permit. On the other hand, the license is issued for professional activities to natural persons.</p> <p>2. The abolition of the obligation to submit a copy of the relevant license issued by the MIA for</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>3. Decision of the Minister No. 154/2016 on Setting of Fees, dated 30.5.2016 determines the fee of EUR 500 to be paid upon receipt of this license.</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>copy of the license for the manager of basic security services (Copy) and the certificate of the Control Center, so that the submission of these documents is no longer required.</p> <p>3. Propose to the Ministry to include the fee of EUR 500 for obtaining this license in the cost of the license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project. The cost should be calculated taking into account the administrative cost of issuing the certificate to the control center (see recommendation above).</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>security manager and of the requirement of submitting the certificate of the Control Center is recommended because there is no need for legal persons to submit these documents to the entity that issued them. Such practice creates a great administrative burden for businesses and is completely meaningless. Furthermore, based on the above recommendation, after the proposed amendment, the Basic Security Services Manager License will no longer be issued.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500 for the license and EUR 50 for the certificate of the control center reflects the costs incurred by the authority for granting this license.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
							4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.
Ministry of Internal Affairs	DSP8	License for Cash in-Transit services (CIT)	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Law No. 04/L-004 On Private Security Services in Article 10, paragraph 1.3 provides for the License for Cash in-Transit Services (CIT).</p> <p>2. Administrative Instruction No. 27/2011- MIA on Licensing Procedures stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (i) copy of 5 licenses of employees of basic security, (ii) Copy of the basic security services manager license, (iii) Control Center certificate, (iv) accredited transport vehicle certificate and an accompanying vehicle.</p> <p>3. Decision of the Minister No. 154/2016 on Setting of Fees, dated 30.5.2016 determines the fee of EUR 500 to be paid upon receipt of this license.</p> <p>4. The appeal procedure is not</p>	<p>1. Amend Law No. 04/L-004 on Private Security Services, Article 10, paragraph 1.3, which provides for the License for Cash in-Transit Services (CIT), so that it provides for the Permit for Cash in-Transit (CIT) Services.</p> <p>2. Amend Administrative Instruction No. 27/2011- MIA on Licensing Procedures which stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (i) copy of 5 basic security workers' licenses, (ii) Copy of the basic security services manager license, (iii) Control Center certificate, (iv) Certificate of accredited transport vehicle and an accompanying vehicle, so that submission of these documents is no longer required.</p> <p>3. Propose to the Ministry to</p>	<p>1. The license for cash in-transit (CIT) services is changed to Permit for cash on-transit (CIT) services since it is issued to legal persons and meets all the criteria according to Article 8 of Law No. 04/L-202 on Permit and License System to be classified as a permit. On the other hand, the license is issued for professional activities to natural persons.</p> <p>2. Abolition of the obligation to submit (i) copy of 5 licenses of basic security workers, (ii) Copy of license for manager of basic security services, (iii) certificate of Control Center, (iv) certificate of vehicle accredited transporter and an accompanying vehicle, all documents issued by the MIA is recommended because it is not necessary for legal persons to submit these documents in the same place that issued</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					regulated in accordance with the provisions of the LGAP.	<p>calculate the fee of EUR 500 for obtaining this license in the cost of the license, to ensure compliance with Article 18 of the Law on Licenses.</p> <p>The project can assist with this calculation. The cost should be calculated taking into account the administrative cost of issuing the certificate to the control center (see recommendation above).</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>them. Such practice creates a great administrative burden for businesses and is completely meaningless.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500 for the license and EUR 50 for the certificate of the control center reflects the costs incurred by the authority for administering this license.</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DSP9	License for basic security services	Permit	Ministry of Internal Affairs, Department of Public Safety	1. Law No. 04/L-004 on Private Security Services in Article 10, paragraph 1.1 provides for the License for basic security services.	1. Amend Law No. 04/L-004 on Private Security Services in Article 10, paragraph 1.1 which provides for the License for basic security services, so that	1. License for basic security services is changed to Permit for basic security services since it is issued to legal persons and meets all the criteria under

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>2. Administrative Instruction No. 27/2011- MIA on Licensing Procedures stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (i) copy of 5 licenses of employees of basic security, (ii) Copy of the license for manager for basic security services,</p> <p>3. Decision of the Minister No. 154/2016 on Setting of Fees, abrogated by Decision No. 328/2016 dated 16.11.2016 and Decision No. 394/2017 dated 15.12.2017, determines the fee of EUR 500 to be paid for obtaining this license and EUR 250 for renewing it.</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>the same provides for the Permit for basic security services.</p> <p>2. Amend Administrative Instruction No. 27/2011- MIA on Licensing Procedures which stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (i) copy of 5 licenses of basic security workers, (ii) Copy of the license for manager for basic security services, so that the submission of these documents is no longer required.</p> <p>3. Propose to the Ministry to calculate the fee of EUR 500 for obtaining this license and EUR 250 for renewing it within the cost of the license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>Article 8 of Law No. 04/L-202 on Permit and License System to be classified as a permit, while the license is issued for professional activities to natural persons.</p> <p>2. Abolition of the obligation to submit (i) a copy of 5 licenses of basic security workers, (ii) Copy of the license for manager of basic security services, all documents issued by the MIA, is done for reasons of non-existence of the need for legal persons to submit these documents to the same country that issued them. Such practice creates a great administrative burden for businesses and is completely meaningless.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500 for obtaining a license and EUR 250 for</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
							<p>renewing it is in accordance with the law.</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DSP10	License for Electronic Property Surveillance Services	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Law No. 04/L-004 on Private Security Services foresees in Article 10, paragraph 1.4 the License for electronic property surveillance services.</p> <p>1. Administrative Instruction No. 27/2011- MIA on Licensing Procedures stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (i) Copies of 5 licenses of electronic surveillance operators, (ii) Certificate of the Control Center</p> <p>2. Decision of the Minister No. 154/2016 on Setting of Fees, dated 30.5.2016 determines the fee of EUR 500 to be paid for obtaining this license and EUR 250 for renewing it.</p>	<p>1. Amend Law No. 04/L-004 On Private Security Services in Article 10, paragraph 1.1 which provides the License for electronic property surveillance services, so that the same provides for the License for electronic property surveillance services.</p> <p>1. Amend Administrative Instruction No. 27/2011- MIA on Licensing Procedures which stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (: (i) copy of 5 licenses of electronic surveillance workers, (ii) the certificate of the Control Center.</p> <p>2. Propose to the Ministry to</p>	<p>1. License for electronic property surveillance services changes to Permit for electronic property surveillance services since it is issued to legal persons and meets all criteria under Article 8 of Law No. 04/L-202 on Permit and License System to be a permit. While the license is for professional activities and is issued to natural persons.</p> <p>1. Abolition of the obligation to submit: (i) copy of 5 licenses of electronic surveillance workers, (ii) certificate of the Control Center, all documents issued by the MIA, is done for reasons of non-existence of the need that legal persons submit these documents to the same country that issued them. This practice creates a great administrative</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>3. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>calculate the fee of EUR 500 for obtaining this license and EUR 250 for renewing it within the cost of the license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project. The cost should be calculated taking into account the administrative cost of issuing the certificate to the control center (see recommendation above).</p> <p>3. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>burden for businesses and is completely meaningless.</p> <p>2. The fee that a competent authority may charge for a permission shall not exceed the amount (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500 for obtaining a license and EUR 250 for renewing it, as well as EUR 50 for the certificate of the control center is in accordance with the law.</p> <p>3. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DSP11	License for Security Services of Public Gatherings	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Law No. 04/L-004 on Private Security Services foresees in Article 10, paragraph 1.4 the License for security services of public gatherings.</p> <p>2. Administrative Instruction No. 27/2011- MIA on Licensing Procedures stipulates that the legal person who applies for this license,</p>	<p>1. Amend Law No. 04/L-004 on Private Security Services, Article 10, paragraph 1.1, which provides for the License for Security Services of Public Gatherings, so that the same provides instead for the Permit Security Services of Public Gatherings.</p>	<p>1. License for security services of public gatherings is changed to the Permit for security services of public gatherings since it is issued to legal persons and meets all the criteria according to Article 8 of Law No. 04/L-202 on Permit and License System to be classified as a permit. On the other hand, the license is issued</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>must submit the following documents at the time of application: (i) Copies of 15 licenses of basic security workers; (ii) Certificate of Control Center</p> <p>3. Decision of the Minister No. 154/2016 on Setting of Fees, dated 30.5.2016, determines the fee of EUR 500 to be paid for obtaining the license and EUR 250 for renewing it.</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>2. Amend Administrative Instruction No. 27/2011- MIA on Licensing Procedures which stipulates that the legal person who applies for this license, must submit the following documents at the time of application: i) copy of 15 licenses of basic security workers, (ii) the certificate of the Control Center.</p> <p>3. Propose to the Ministry to calculate the fee of EUR 500 for obtaining the license and EUR 250 for renewing it within the cost of the license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project. The cost should be calculated taking into account the administrative cost of issuing the certificate to the control center (see recommendation above).</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>for professional activities to natural persons.</p> <p>2. Abolition of the obligation to submit: (i) copies of 15 licenses of basic security workers, (ii) the certificate of the Control Center, which are issued by the MIA is recommended because there is no need to require from legal persons to submit these documents to the entity that issued them. This practice creates a great administrative burden for businesses and is completely meaningless.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500 for obtaining a license and EUR 250 for renewing it, as well as EUR 50 for the certificate of the control center is in accordance with the law.</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and</p>

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							handling complaints in any administrative procedure including the procedure concerned.
Ministry of Internal Affairs	DSP12	License for institution to provide basic professional training in the field of private security specialized in the field of private security	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Law No. 04/L-004 on Private Security Services foresees in Article 10, paragraph 1.4 the License for institution to provide basic professional training in the field of private security specialized in the field of private security.</p> <p>2. AI (MIA) No. 06/2012 on Training, Certification, Recertification and Licensing of Training Institutions determines that the legal person who applies for this license, must submit the following documents at the time of application: (i) Request for background checks for the applicant entity, founders, owners and responsible persons (Original), (ii) Certificate of qualified legal lecturer (Verified copy), (iii) Certificate of qualified first aid instructor (Copy of verified), (iv) Certificate of qualified instructor for fire prevention (Verified copy), (v) Certificate of qualified instructor for private security in each respective field (Original), (vi) Report of the competent body that the object I meets the prescribed criteria (Original), (vii) Copy of the contract</p>	<p>1. Amend Law No. 04/L-004 on Private Security Services, Article 10, paragraph 1.1 which provides for the License for institution for the provision of basic professional training in the field of private security specialized in the field of private security, so that it foresees instead a Permit for an institution for providing basic professional training in the field of private security specialized in the field of private security.</p> <p>2. Amend AI No. 06/2012- MIA on Training, Certification, Recertification and Licensing of Training Institutions to abolish the requirement for the legal person applying for this license to submit the following documents at the time of application: (i) Request for background checks for the applicant entity, founders, owners and responsible persons (Original), (ii) Certificate of qualified legal lecturer (Verified copy), (iii) Certificate of qualified first aid instructor (Verified copy), (iv) Certificate of qualified instructor for fire prevention (Verified copy), (v) Certificate of qualified instructor for private security in each respective field (Original), (vi) Report of the competent body that the object I meets the prescribed criteria (Original), (vii) Copy of the contract</p>	<p>1. License for an institution to provide basic professional training in the field of private security specialized in the field of private security is changed to a Permit for an institution for providing basic professional training in the field of private security specialized in the field of private security since it is issued to legal persons and meets all the criteria under Article 8 of Law No. 04/L-202 on Permit and License System to be classified as a permit. On the other hand, the license is issued for professional activities to natural persons.</p> <p>2. Abolition of the obligation to submit: ((i) Request for background checks for the applicant entity, founders, owners and responsible persons (Original), (ii) Certificate of qualified legal lecturer (Verified copy), (iii) Certificate of qualified first aid instructor (Verified copy), (iv) Certificate of qualified instructor for fire</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>of the contract manager (Verified copy).</p> <p>3. Decision of the Minister No. 154/2016 on Setting of Fees, dated 30.5.2016 determines the fee of EUR 500 to be paid on the occasion of obtaining this license and 250 for the continuation of the same</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>first aid instructor (Verified copy), (iv) Certificate of qualified fire prevention instructor (Verified copy), (v) Certificate of qualified private security instructor for each relevant field (Original), (vi) Report of the competent body that the facility meets the prescribed criteria (Original), (vii) Copy of the contract of the contract manager (Verified copy).</p> <p>3. Propose to the Ministry to calculate the fee of EUR 500 for obtaining the license and EUR 250 for renewing it within the cost of the license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>prevention (Verified copy), (v) Certificate of qualified instructor for private safety in each relevant field ( Original), (vi) The report of the competent body that the facility meets the prescribed criteria (Original), which are issued by the MIA is recommended because there is no need to require from legal persons to submit these documents to the entity that issued them. This practice creates a great administrative burden for businesses and is completely meaningless. In addition, abolition of the requirement to submit a copy of the manager’s contract (certified copy) is recommended as this constitutes an administrative burden for the applicant. A simple copy could serve the same purpose.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission. (Article 18 of the Law on Permit and License System). The project can assist</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
							<p>with this calculation, as well as with the analysis whether the fee of EUR 500 for obtaining a license and EUR 250 for its renewal is in accordance with the law.</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DSP13	License for an institution to provide basic professional training in the field of private security	Permit	Ministry of Internal Affairs, Department of Public Safety	<p>1. Law No. 04/L-004 on Private Security Services foresees in Article 10, paragraph 1.4 the License for an institution to provide basic professional training in the field of private security.</p> <p>2. Administrative Instruction No. 27/2011- MIA on Licensing Procedures stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (i) Request for background checks for the applicant entity, founders, owners and responsible persons (Original), (ii) Certificate of qualified legal lecturer (Certified copy), (iii) Certificate of qualified first aid instructor</p>	<p>1. Amend Law No. 04/L-004 on Private Security Services, Article 10, paragraph 1.1, which foresees the License for an institution to provide basic professional training in the field of private security, so that it foresees instead the Permit for an institution to provide basic professional training in the private field of security.</p> <p>2. Amend Administrative Instruction No. 27/2011- MIA on Licensing Procedures, which stipulates that the legal person who applies for this license, must submit the following documents at the time of application: (i) Request for</p>	<p>1. The license for an institution to provide basic professional training in the field of private security is changed to Permit for an institution for providing basic professional training in the field of private security since it is issued to legal persons and meets all criteria under Article 8 of Law No. 04/L-202 on Permit and License System to be classified as a permit. On the other hand, the license is issued for professional activities to natural persons.</p> <p>2. Abolition of the obligation to submit: (i) Request for background checks for the applicant entity, founders,</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>(Certified copy), (iv) Certificate of qualified fire prevention instructor (Certified copy), (v) Certificate of qualified private safety instructor in each respective field (Original), (vi) Report of the competent body that the facility meets the prescribed criteria (Original) .</p> <p>3. Decision of the Minister No. 154/2016 on Setting of Fees, dated 30.5.2016 determines the fee of EUR 500 for obtaining the license and EUR 250 for renewing it.</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>background checks for the applicant entity, founders, owners and responsible persons (Original), (ii) Certificate of qualified legal lecturer (Certified copy), (iii) Certificate of qualified first aid instructor (Certified copy), (iv) Certificate of qualified fire prevention instructor (Certified copy), (v) Certificate of qualified private safety instructor in each respective field (Original), (vi) Report of the competent body that the facility meets the criteria of foreseen (Original).</p> <p>3. Propose to the Ministry to calculate the fee of EUR 500 for obtaining the license and EUR 250 for renewing it in the cost of this license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>owners and responsible persons (Original), (ii) Certificate of qualified legal lecturer (Certified copy), (iii) Certificate of qualified first aid instructor (Certified copy), (iv) Certificate of qualified fire prevention instructor (Certified copy), (v) Certificate of qualified private safety instructor in each respective field (Original) ), (vi) The report of the competent body that the facility meets the prescribed criteria (Original), which are issued by the MIA, is recommended because it is not necessary to require from legal persons to submit these documents to the same entity that issued them. This practice creates a great administrative burden for businesses and is completely meaningless.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission. (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
							<p>with the analysis whether the amount of EUR 500 for obtaining a license and EUR 250 for renewing it is in accordance with the law.</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DSP14	License for shooting ranges	Permit	Ministry of Internal Affairs, DAME	<p>1. Law No. 05/L -022 on Weapons foresees in Article 64 the License for civil shooting ranges.</p> <p>2. AI (MIA) No. 10/2010 Regarding Minimum Technical and Security to be Met in the Premises of Civil Shooting Ranges determines that the legal person applying for this license must submit the following documents to apply: (i) Evidence from the competent body of possession of space for safe storage and placement of firearms and ammunition, (ii) Number of certified and registered workers (Copy), (iii) Certificates of construction materials used (Copy).</p> <p>3. A fee of EUR 500 must be paid for obtaining this license, and a fee of</p>	<p>1. Amend Law No. 05/L-022 on Weapons Article 64 which foresees the License for civil shooting ranges so that the same foresees instead the Permit for civilian shooting ranges.</p> <p>2. Amend AI (MIA) No. 10/2010-Regarding Minimum Technical and Security to be Met in the Premises of Civil Shooting Ranges and abolish the requirement for the legal person applying for this license to submit the following documents: (i) Evidence from the competent body of possession of space for safe storage and placement of firearms and ammunition, (ii)</p>	<p>1. The license for civil shooting ranges is changed to Permit for civil shooting ranges, since it is issued to legal persons and meets all criteria under Article 8 of Law No. 04/L-202 on Permit and License System to be classified as permit. On the other hand, the license is issued for professional activities to natural persons.</p> <p>2. Abolition of the obligation to submit (i) Evidence from the competent body of possession of space for safe storage and placement of firearms and ammunition, (ii) Number of certified and registered workers (Copy), (iii) Certificates of construction materials used</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>EUR 250 for renewing it.</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>Number of certified and registered workers (Copy), (iii) Certificates of construction materials used (Copy).</p> <p>3. Propose to the Ministry to calculate the fee of EUR 500 for obtaining this license and EUR 250 for renewing it in the cost of this license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>(Copy), which are issued by the MIA, is recommended because it is not necessary to require legal persons to submit these documents to the same entity that issued them. This practice creates a great administrative burden for businesses and is completely meaningless.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the amount of EUR 500 for obtaining a license and EUR 250 for renewing it is in accordance with the law.</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Ministry of Internal Affairs	DAME1	<p>Authorization on requirements for fire protection advancement work, with nine categories of authorizations issued:</p> <ul style="list-style-type: none"> <li>- Authorization for carrying out studies on fire protection organization</li> <li>- Authorization for carrying out analyzes of the existing fire protection situation</li> <li>- Authorization for the development of fire protection improvement and advancement programs</li> <li>- Authorization for carrying out analyzes of dangerous areas and the definition</li> </ul>	Professional license	Ministry of Internal Affairs, EMA	<p>1. Paragraph 5 of Article 19 of Law No. 04/L-012 on Fire Protection states that "Control of regularity and servicing of apparatus may be practiced by authorized persons who are technically and professionally trained, according to the authorization of the Ministry-Agency. While Administrative Instruction No. 25/2012 on requirements for fire protection advancement work specifies 9 categories in Article 1</p> <p>2. For these authorizations that are already issued by the MIA, the parties pay the amount of EUR 250 for each.</p>	<p>1. Amend Article 19, paragraph 5, of the Law on Private Security Services, So that it lays down the need for professional licensing of natural persons applicable to all categories, instead of their authorization. Add this professional license in the register.</p> <p>2. Propose to the Ministry that the fee of 9 x EUR 250 to obtain this license be calculated within the cost for obtainin it, to ensure compliance with Article 18 of the Law on Permit and License System. This calculation can be done by the project.</p>	<p>1. These authorizations meet all the requirements of a professional license under Article 9 of the Law on Permit and License System. This law does not recognize the term authorization.</p> <p>2. The proposal to merge the 9 authorizations aims at reducing the administrative burden and is based on their redundancy.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis if the fee of 9 x EUR 250 for a license is in accordance with the law.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
		<p>of these areas in places endangered by the occurrence of explosive mixtures</p> <ul style="list-style-type: none"> <li>- Authorization for the design of apparatus and installations for fire detection, notification and extinguishing</li> <li>- Authorization for testing the earthing resistance in lightning installations</li> <li>- Authorization for testing physical-chemical properties of flammable solids, liquids and gases, as well as the suitability of use of all substances in facilities with fire risk;</li> <li>- Authorization for the development</li> </ul>					

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
		<p>of trainings for the preparation of candidates for passing the professional exam for work with dangerous substances</p> <p>- Authorization for the development of trainings for the preparation of candidates for passing the professional exam in the field of fire protection</p>					
Ministry of Internal Affairs	DAME2	On-site consent for the construction of facilities for hazardous substances (landfills, gas stations)	Permit	Ministry of Internal Affairs, EMA	<p>1. Law No. 04/L-012 on Fire Protection does not explicitly acknowledge this consent.</p> <p>2. In order to obtain this consent, the following document must be submitted: (i) Fire protection plan (Elaborate) (Copy)</p> <p>3. For obtaining this consent, a payment of EUR 150 is required for obtaining the consent and EUR 50 for the site visit.</p> <p>4. The appeal procedure is not regulated in accordance with the</p>	<p>1. This consent should not be part of the register.</p> <p>2. Abolish the requirement and change the practice of requesting the document known as: (i) Fire protection plan (Elaborate) (Copy).</p> <p>3. Propose to the Ministry to calculate the fee of EUR 150 for obtaining consent and EUR 50 for the field visit within the cost of this consent, to ensure compliance with Article 18 of the Law on Licenses.</p>	<p>1. This consent should not be included in the register as it should be part of the procedure for obtaining a construction permit. The same serves neither as a notice, nor as a registration, nor as a permit, nor as a professional license within the criteria of Law No. 04/L-202 on Permit and License System.</p> <p>2. Abolition of the obligation to submit the document known as: (i) Fire protection plan (Elaborate) (Copy) is recommended because it is not</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					provisions of the LGAP.	<p>This calculation can be done by the project.</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>necessary to require legal persons to submit these documents to the entity that issued them. This practice creates a great administrative burden for businesses and is completely meaningless.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission. (Article 18 of the Law on Permit and License System). Furthermore, the same must be taken into account during the process of obtaining the construction permit.</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DAME3	Consent for investment-technical documentation (projects) on fire protection	/	Ministry of Internal Affairs, EMA	<p>1. Law No. 04/L-012 on Fire Protection does not explicitly acknowledge this consent.</p> <p>2. For obtaining this consent, a payment of EUR 150 is required for</p>	<p>1. This consent should not be part of the register.</p> <p>2. Propose to the Ministry to calculate the fee of EUR 150 for obtaining the consent and EUR</p>	<p>1. This consent should not be part of the register since it does not serve as a notification, a registration, a permit or a professional license within the criteria of Law No. 04/L-202 on</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
		measures			<p>obtaining the consent and EUR 50 for the field visit.</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>50 for the field visit within the cost of this consent, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p> <p>3. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>Permit and License System.</p> <p>2. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission. (Article 18 of the Law on Permit and License System). Furthermore, the same must be taken into account during the process of obtaining the construction permit.</p> <p>3. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>
Ministry of Internal Affairs	DAME4	Certificate for passing the professional fire protection exam	Professional license	Ministry of Internal Affairs, EMA	<p>1. Law No. 04/L-012 on Fire Protection does not explicitly provide for this certificate.</p> <p>2. Administrative Instruction (MIA) No. 16/2017 on Preparing Candidates for Passing the Professional Exam in the Area of Fire Protection provides that the candidate must submit the following documents when applying for a certificate: (i) Identification</p>	<p>1. Change the name from Certificate for passing the professional fire protection exam to License for fire protection.</p> <p>2. Amend Administrative Instruction (MIA) No. 16/2017 on Preparing Candidates for Passing the Professional Exam in the Area of Fire Protection in order to abolish the</p>	<p>1. The function of this certificate is the training of candidates/natural persons for fire protection. Therefore, the same is a professional license under Article 9 of Law No. 04/L-202 On Permit and License System.</p> <p>2. Abolition of the obligation to submit the following documents: (i) Identification</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>card (Copy), (ii) Birth certificate (Copy), (iii) Proof of special training (Copy).</p> <p>3. A fee of EUR 150 must be paid for obtaining this license.</p> <p>4. The appeal procedure is not regulated in accordance with the provisions of the LGAP.</p>	<p>requirement of the candidate to submit the following documents when applying for a certificate: (i) Identification card (Copy), (ii) Birth Certificate (Copy), (iii) Proof of special training (Copy).</p> <p>3. Propose to the Ministry that the fee of EUR 150 for obtaining the certificate be calculated within the cost of obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p> <p>4. The appeal procedure should be regulated in accordance with the provisions of the LGAP.</p>	<p>card (Copy), (ii) Birth Certificate (Copy), (iii) Proof of special training (Copy) is recommended because it is not necessary to require the legal persons to submit these documents to the same entity that issued them. This practice creates a great administrative burden for businesses and is completely meaningless.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System).</p> <p>4. LGAP is a framework law which regulates the procedure and deadlines for filing and handling complaints in any administrative procedure including the procedure concerned.</p>

### **Simplification of Infrastructure Sector permits and licenses at the Ministry of Environment, Spatial Planning and Infrastructure (MESPI)**

In the process of simplifying permits and licenses for the infrastructure sector in the Ministry of Environment, Spatial Planning and Infrastructure (MESPI) and harmonizing them with Law No. 04/L-202 on Permit and License System, a total of 38 permits and licenses were analyzed. More precisely, these 38 permits and licenses include: fifteen (15) procedures that fall within the scope of the Department of Vehicles, two (2) procedures that fall within the scope of the Department of Civil Aviation, twenty (20) procedures that fall within the scope of the Department of Transport, and one (1) procedure that fall within the scope of the Department of Road Management.

During the analysis process, special focus was given to the legal basis of all relevant permits and licenses issued within the MESPI for infrastructure issues, the procedure followed by the relevant departments, the documents required and the form of submitting them. Further, the flow of applications for relevant permits and licenses and the flow of permits issued by the MESPI for the infrastructure sector were also analyzed during the research. Moreover, the necessity of the existence of the permits and licenses, the function they perform as well as the possibility of simplifying them in terms of required documentation and payments were also studied and evaluated during the analysis. At the same time, in the process of simplification, the possibility of merging some of them and removing them from the existing procedures within the Ministry was analyzed. During the analysis process, legal persons/businesses and companies exercising respective functions concerning which such permits and licenses are required were also consulted. During these meetings, the administrative burden that these procedures create for these businesses was discussed, as well as their necessity in the context of the risk associated with respective activities, including the applicable standards (where they exist) of the European Union or member states with comparable characteristics.

Of the 38 procedures analyzed, for four (4) of them it was proposed to abolish the re-certification procedure, ten (10) of them were proposed to be removed from the register, three (3) of them were merged into one (1), while for all it is proposed to simplify the procedures by reducing the requirement for submitting documents issued by the Ministry itself and lowering applicable fees.

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Ministry of Environment, Spatial Planning and Infrastructure	DA1	Licence of driving school	Permit	MESPI - Department of Vehicles	<p>1. Law No. 05/L-064 on Driving License stipulates in Article 6 that the Driving School is issued a license for categories A, B, C1, C1 + E, C, C + E, D, or D + E after it has met the conditions and the criteria provided by Law, and that this license is issued only for one (1) category, which is valid for five (5) years, with the possibility of renewal.</p> <p>2. When applying for licensing for two or more categories, a driving school must complete the forms and provide the required documents for each category</p>	<p>1. Amend Article 6 of Law No. 05/L-064 on Driving License so that the License of driving school is transformed into Permit of driving school. Second, amend this Article so as to allow obtaining a permit for two or more categories with one procedure and to determine that the validity of the permit is permanent and not 5 years, i.e. temporary. In case the Driving School initially receives the permit only for one category, at the moment it requests permission for other categories as well, it should only add the necessary documents for the other category or categories and not start the procedure</p>	<p>The change from License to Permit is based on Article 8 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit may be required by a competent authority for an activity that poses a medium or high risk to public health, public safety or the environment, which is not regulated by a professional license. And in this case, we are dealing with a permit and not a professional license which is issued to a natural person. Second, in the case of merging the admission procedure into a single one, the applicant is relieved of the burden of providing the same documents for each category. In case the applicant receives the permit only for one category and in the future, he wants to be licensed for other categories, he offers only the evidence of fulfillment of the conditions provided by law and does not duplicate documents that are already in the Ministry with the existence of permit</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>separately, although most of them are the same.</p> <p>3. The applying driving schools must pay a fee of EUR 50 for each category, in accordance with paragraph 1.9 of Article 11 of Administrative Instruction (MI) No. 20/2017 on Licensing of Driving Schools.</p> <p>4. The license is valid only for five (5) years, obliging the driving schools to go through the same procedure every 5 years, filling in the forms for each category and making the payment of the procedure for each category.</p>	<p>from the beginning.</p> <p>2. Amend paragraph 1.9 of Article 11 of Administrative Instruction (MI) No. 20/2017 on Licensing of Driving Schools so that the fee of EUR 50 per procedure is not required.</p> <p>3. Propose to the Ministry that the fee of EUR 100 - 500 for obtaining this permit be calculated within its cost, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	<p>categories proving their existence. Such a fusion of the procedure, in addition to easing the administrative burden of an applicant, also facilitates the work of the responsible officials. Furthermore, since the driving school has already proved that it meets the criteria for obtaining a permit, the re-permit procedure should be completely abolished. For this purpose, control mechanisms should be developed that ensure that the entity that holds a permit continues to meet the legal criteria for the permit it holds. In this way, the administrative and financial burden of the driving school and the relevant institutional officials is alleviated. Further, the applicable fee for obtaining a permit is abolished in accordance with the provision of Article 18 of the Law on Permits and Licenses.</p> <p>The fee that a competent authority may charge for a permission shall not exceed</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					4. The fee paid for obtaining this license ranges from EUR 100 to EUR 500.		the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation.
Ministry of Environment, Spatial Planning and Infrastructure	DA2	Licence for professional lecturer in driving school	Professional Licence	MESPI - Department of Vehicles	<p>1. Law No. 05/L-064 on Driving License stipulates in Article 10, paragraph 2, that the license for professional lecturer is issued with a validity of five (5) years, with the possibility of renewal.</p> <p>2. The documents required to apply include the Certificate for basic training, while the law recognizes this only as a criterion.</p> <p>3. Article 31 of AI</p>	<p>1. Amend Article 10, paragraph 2, of Law No. 05/L-064 on Driving License so that it is determined that the validity of the license is permanent and not 5 years.</p> <p>2. Change the practice of requiring submission of the Certificate for basic training during applications for a license.</p> <p>3. Amend Article 31 of AI No. 04/2018 and regulate the appeal procedure in accordance with the LGAP.</p>	<p>The relicensing requirement is unnecessary considering the fact that the applicant, following licensing and commencement of activity of professional lecturer, during the 5-year period trains hundreds of candidates who then receive a permanent driving license. Therefore, the requirement that he/she undergo the same examinations and administrative procedures every five (5) years is difficult to understand and objectively unnecessary considering the five (5) year expertise that he/she acquires following licensing. In case of abolition of the obligation to renew the license and recognition of the permanent validity of the license for professional lecturer, the fee of EUR 50 for renewing the candidate's</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>No. 04/2018 regulates the appeal procedure, which is not in accordance with the LGAP.</p> <p>4. The fee for basic training for professional lecturers in driving school is EUR 250.</p>	<p>4. Propose to the Ministry that the fee of EUR 250 paid for basic training and the fee of EUR 100 for obtaining this license be calculated within the cost of the training, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	<p>license is avoided.</p> <p>2. The Certificate for basic training is issued by MESPI or any licensed operator of the Ministry. The applicant should be spared the additional administrative burden for submitting duplicate documents issued by the Ministry itself.</p> <p>4. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether EUR 250 + EUR 100 reflects the costs that the authority covers during the organization of training and licensing.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DA3	Licence for driver instructor	Professional Licence	MESPI - Department of Vehicles	<p>1. Law No. 05/L-064 on Driving License stipulates in Article 18, paragraph 1,</p>	<p>1. Amend Article 18, paragraph 1, of Law No. 05/L-064 on Driving License so that it determines that the</p>	<p>The relicensing requirements is unnecessary considering the fact that the applicant, following licensing and commencement of activity of driver instructor, during</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>that the license for driver instructor is issued with a validity of five (5) years, with the possibility of renewal.</p> <p>2. Amend Article 4 of Administrative Instruction (MI) No. 19/2017 on Driver Instructor, which requires that applicants submit their certificate, diploma or instructor's permit.</p> <p>3. The appeal procedure is not in accordance with the LGAP.</p> <p>4. The fee for basic training for professional lecturers in driving school is EUR 250.</p>	<p>validity of the license is permanent and not 5 years, and lays down the requirement for completing mandatory training.</p> <p>2. Amend Article 4 of Administrative Instruction (MI) No. 19/2017 on Driver Instructor, which requires that applicants submit their certificate, diploma or instructor's permit.</p> <p>2. Regulate the appeal procedure in accordance with the LGAP.</p> <p>4. Propose to the Ministry that the fee of EUR 250 paid for basic training and the fee of EUR 100 for obtaining this license be calculated within the cost of the training, to ensure compliance with</p>	<p>the 5-year period trains hundreds of candidates who then receive a permanent driving license. Therefore, the requirement that he/she undergo the same examinations and administrative procedures every five (5) years is difficult to understand and objectively unnecessary considering the five (5) year expertise that he/she acquires following licensing. In this regard, it is suggested to require by law completion of mandatory training. In case of abolition of the obligation to renew the license and recognition of the permanent validity of the license for driver instructor, the fee of EUR 50 for renewing the candidate's license is avoided.</p> <p>2. The Certificate for driving license trainer is issued by MESPI or any licensed operator of the Ministry. The applicant should be spared the additional administrative burden for submitting duplicate documents issued by the Ministry itself.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						Article 18 of the Law on Licenses. This calculation can be done by the project.	4. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether EUR 250 reflects the costs that the authority incurs during the organization of training and licensing.
Ministry of Environment, Spatial Planning and Infrastructure	DA4	Licence for driving examiner	Professional Licence	MESPI - Department of Vehicles	1. Law No. 05/L-064 on Driving License stipulates in Article 36 that the license for driving examiner is issued to the person that shows positive results in licensing exam for examiners and is valid for three (3) years, with the possibility of	1. Amend Article 36 of Law No. 05/L-064 on Driving License so that it foresees that the validity of the license is permanent and not 3 years. 2. Change the practice of requesting a Certificate of driving license trainer when applying for a License.	The relicensing requirement is unnecessary considering the fact that the applicant, following licensing and commencement of activity of driving examiner, during the 3-year period trains hundreds of candidates who then receive a permanent driving license. Therefore, the requirement that he/she undergo the same examinations and administrative procedures every three (3) years is difficult to understand and objectively unnecessary

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					<p>renewal of the license.</p> <p>2. The documents required to apply include the Certificate for driving license trainer, while the law recognizes this only as a criterion.</p> <p>3. Article 31 of Administrative Instruction No. 08/16 on Examiners regulates the appeal procedure, which is not in accordance with the LGAP.</p> <p>4. When applying for this license, the applicant pays for the theoretical and practical exam, as well as</p>	<p>3. Regulate the appeal procedure in accordance with the LGAP.</p> <p>4. Propose to the Ministry that the fee of EUR 100 paid for licensing and relicensing be calculated within the cost of obtaining this license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	<p>considering the three (3) year expertise that he/she acquires following licensing. In case of abolition of the obligation to renew the license and recognition of the permanent validity of the license for driving examiner, the fee of EUR 100 for renewing the candidate's license is avoided.</p> <p>2. The Certificate for driving license trainer is issued by MESPI or any licensed operator of the Ministry. The applicant should be spared the additional administrative burden for submitting duplicate documents issued by the Ministry itself.</p> <p>4. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 100</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					additional fees of EUR 100 for licensing and relicensing each.		reflects the costs that the authority incurs during the organization of training and licensing.
Ministry of Environment, Spatial Planning and Infrastructure	DA5	Licence for theoretical examiner	Professional license	MESPI - Department of Vehicles	<p>1. Law No. 05/L-064 on Driving License stipulates in Article 36 that the License for theoretical examiner is issued to the person who shows positive results in licensing exam for examiners and is valid for three (3) years with the possibility of renewal of the license.</p> <p>2. The documents required to apply include the Certificate for driving license trainer, while the law recognizes this</p>	<p>1. Amend Article 36 of Law No. 05/L-064 on Driving License so as to determine that the validity of the license is permanent and not 3 years.</p> <p>2. Change the practice of requesting a Certificate of driving license trainer when applying for a License.</p> <p>3. Propose to the Ministry that the fee of EUR 100 paid for licensing and relicensing be calculated within the cost of obtaining this license, to ensure compliance with Article 18 of the</p>	<p>1. The relicensing requirement is unnecessary considering the fact that the applicant, following licensing and commencement of activity of theory examiner, during the 3-year period trains hundreds of candidates who then receive a permanent driving license. Therefore, the requirement that he/she undergo the same examinations and administrative procedures every three (3) years is difficult to understand and objectively unnecessary considering the three (3) year expertise that he/she acquires following licensing. In case of abolition of the obligation to renew the license and recognition of the permanent validity of the license for theory examiner, the fee of EUR 100 for renewing the candidate's license is avoided.</p> <p>2. The Certificate for driving</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>only as a criterion.</p> <p>3. When applying for this license, the applicant pays for the theoretical and practical exam, as well as additional fees of EUR 100 for licensing and relicensing each.</p>	<p>Law on Licenses. This calculation can be done by the project.</p>	<p>license trainer is issued by MESPI or any licensed operator of the Ministry. The applicant should be spared the additional administrative burden for submitting duplicate documents issued by the Ministry itself.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 100 reflects the costs that the authority incurs during the organization of training and licensing.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DA6	Authorization for holding trainings and seminars for driving instructors	Permit	MESPI - Department of Vehicles	<p>1. Law No. 05/L-064 on Driving License stipulates in Article 21 that entities authorized by respective Ministry of</p>	<p>1. Amend Articles 21 and 121 of Law No. 05/L-064 on Driving License so that the Authorization for holding trainings and seminars for driving instructors</p>	<p>The authorization to hold trainings and seminars for driving instructor meets all the criteria of the Permit as defined by Article 3, paragraph 1.8, and Article 8 of Law No. 04/L-202 on Permit and License System. Furthermore, since the</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>Transport as provided in Article 121 of this Law shall have the right to train drivers who want to become instructors.</p> <p>2. Law No. 05/L-064 on Driving License and Administrative Instruction No. 21/2017 on holding trainings and seminars in the field of driving license do not define in any Article the validity of this authorization in five (5) years, but in practice this authorization is given with such validity period.</p> <p>3. The appeal procedure is not in accordance with the LGAP.</p>	<p>is renamed to Permit for holding trainings and seminars for driving instructors.</p> <p>2. Amend Articles 21 and 121 of Law No. 05/L-064 on Driving License so that the Authorization for holding trainings and seminars for driving instructor is determined as permanent validity.</p> <p>3. To regulate The appeal procedure in accordance with the LGAP.</p> <p>4. Propose to the Ministry that the fee of EUR 500 paid for obtaining this authorization be calculated within the cost of obtaining this authorization, to ensure compliance with Article 18 of the Law on Licenses. This</p>	<p>applicant has already proved that he meets the criteria for obtaining the authorization, the re-authorization procedure should be abolished. For this purpose, control mechanisms should be developed that ensure that the authorized entity continues to meet the legal criteria for the license it holds. In this form, the administrative and financial burden is lifted from both relevant institutional officials and applicants, namely the fee of EUR 500 is abolished.</p> <p>4. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500 reflects the costs incurred by the authority during the licensing process.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					4. When applying for this authorization, the applicant pays a fee of EUR 500.	calculation can be done by the project.	
Ministry of Environment, Spatial Planning and Infrastructure	DTT1	Licence D for third-party and rented transport abroad (international)	Permit	Ministry of Infrastructure, Department of Road Transport	<p>1. Law No. 04/L-179 on Road Transport stipulates in Article 42 License D for third-party and rented transport abroad.</p> <p>2. Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods and Administrative Instruction No. 02/2015 on Amendment and Supplementation of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods,</p>	<p>1. Amend Law No. 04/L-179 on Road Transport which in Article 42 provides for License D for third-party and rented transport abroad, so that it provides for Permit D transport for third-party and rented transport abroad instead.</p> <p>2. Amend Article 10 of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods, namely Administrative Instruction No. 02/2015 on Amendment and Supplementation of Administrative Instruction No.</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law.</p> <p>2. Abolition of the requirement to pay upon application is made in accordance with Article 18 of Law No. 04/L-202 on Permit and License System.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>determines in Article 10 an application fee of EUR 20.</p> <p>3. When applying for this permit, the applicant pays the fee of EUR 500.</p>	<p>07/2013 on Licensing of Road Transport Operators of Goods, to abolish the fee of EUR 20.</p> <p>3. Propose to the Ministry that the fee of EUR 500 paid for obtaining this license be calculated within the cost of obtaining this license, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	<p>assist with this calculation, as well as with the analysis whether the fee of EUR 500 reflects the costs incurred by the authority during the licensing process.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DTT2	Licence for transport of dangerous goods	Permit	Ministry of Infrastructure, Department of Road Transport	<p>1. Law No. 04/L-183 on Land Transport of Dangerous Goods stipulates in Article 7 the License for Transportation of Dangerous Goods.</p> <p>2. Administrative Instruction No.</p>	<p>1. Amend Law No. 04/L-183 on Land Transport of Dangerous Goods Article 7 which foresees the License for Transport of Dangerous Goods, to foresee instead the Permit for Transport of Dangerous Goods.</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law.</p> <p>2. Abolition of the requirement to pay upon</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>12/2013 on the criteria and procedure for issuance, cancellation and revocation of license for land transport of dangerous goods stipulates in Article 7 that the road transport operator of dangerous goods applying for a license must pay the fee of EUR 50 upon application.</p> <p>3. When applying for this license, the applicant pays the fee of EUR 300</p>	<p>2. Amend Article 7 of Administrative Instruction No. 12/2013 on Criteria and Procedures for Issuance, Suspension and Revocation of the License for Land Transport of Dangerous Goods, which provides that the road transport operator of dangerous goods applying for a license must pay a fee of EUR 50 upon application, so that this requirement is abolished.</p> <p>3. Propose to the Ministry that the fee of EUR 300 paid for obtaining this license be calculated within the cost of obtaining this license, to ensure compliance with Article 18 of the Law on Permits and</p>	<p>application is made in accordance with Article 18 of Law No. 04/L-202 on Permit and License System.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 300 reflects the costs incurred by the authority during the licensing process.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						Licenses. This calculation can be done by the project.	
Ministry of Environment, Spatial Planning and Infrastructure	DTT3	Licence C for transport of goods for own use in international road transport	Permit	Ministry of Infrastructure, Department of Road Transport	<p>1. Law No. 04/L-183 on Land Transport of Dangerous Goods stipulates in Article 7 the License C for transport of goods for own use in international road transport.</p> <p>2. Administrative Instruction No. (MI) 02/2015 on Amendment and Supplementation of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods stipulates in Article 7 that the applicant must pay a fee of EUR 10 upon application.</p>	<p>1. Amend Law No. 04/L-183 on Land Transport of Dangerous Goods Article 7, which foresees License C for transport of goods for own needs in international road transport, in order to foresee instead Permit C for transport of goods for own use in international road transport</p> <p>2. Amend Article 7 of Administrative Instruction No. (MI) 02/2015 on Amendment and Supplementation of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods, to abolish the</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law.</p> <p>2. Abolition of the requirement to pay upon application is made in accordance with Article 18 of Law No. 04/L-202 on Permit and License System.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					3. When applying for this license, the applicant pays the fee of EUR 200.	<p>requirement that the applicant pay the fee of EUR 10 upon application.</p> <p>3. Propose to the Ministry that the fee of EUR 200 paid for obtaining this license be calculated within the cost of obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	whether the fee of EUR 200 reflects the costs incurred by the authority during the licensing process.
Ministry of Environment, Spatial Planning and Infrastructure	DTT4	Licence for terminals	Permit	Ministry of Infrastructure, Department of Road Transport	<p>1. Law No. 04/L-183 on Land Transport of Dangerous Goods foresees in Article 7 the license for terminals.</p> <p>2. Administrative Instruction No. 08/2015 on Licensing of Terminals for Goods foresees</p>	<p>1. Amend Law No. 04/L-183 on Land Transport of Dangerous Goods, which foresees in Article 7 a License for terminals to foresee instead a Permit for terminals.</p> <p>2. Amend Article 8 of Administrative Instruction No. 08/2015 on</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law.</p> <p>2. Abolition of the requirement to pay upon application is made in accordance with Article 18 of</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>in Article 8 the obligation to pay EUR 100 when applying for a license.</p> <p>3. When applying for this license, the applicant pays the fee of EUR 2,000</p>	<p>Licensing of Terminals for Goods, to abolish the obligation to pay EUR 100 when applying for a license.</p> <p>3. Propose to the Ministry that the fee of EUR 2,000 paid for obtaining this license be calculated within the cost for obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	<p>Law No. 04/L-202 on Permit and License System.</p> <p>The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 2,000 reflects the costs incurred by the authority during the licensing process.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DTT5	Certificate of trucks for international transport of goods for own use		Ministry of Infrastructure, Department of Road Transport	<p>1. Article 4 of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods stipulates the obligation to be equipped with a vehicle certificate, as a</p>	<p>1. Amend Article 4 of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods stipulates the obligation to be equipped with a vehicle certificate, as a document</p>	<p>This certificate should not be included in the register of permits and licenses as it is neither of them.</p> <p>This certificate is necessary only for additional trucks used by the company which were not used to fulfil the criterion for obtaining the permit (Directive/Regulation on access to profession</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					document issued by the competent body for each vehicle registered in the name of the road transport operator of goods licensed by the Ministry.  2. Administrative Instruction No. 02/2015 on Amendment and Supplementation of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods stipulates in Article 10 the obligation to pay the fee of EUR 20 to apply for this certificate.	issued by the competent body. This requirement should only apply to trucks which were no certified when the permit was obtained.  2. Amend Article 10 of Administrative Instruction No. 02/2015 on Amendment and Supplementation of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods, in order to abolish the obligation to pay the fee of EUR 20 when applying for this certificate.	1071/2009; 1072/2009 and 1073/2009 on international transport of passengers and goods).  2. Abolition of this certificate would alleviate the administrative burden on businesses by removing the payment of EUR 20 due for each bus every 5 years.
Ministry of Environment, Spatial Planning and Infrastructure	DTT6	Certificate of trucks for international transport of third-party, rented and paid transport of goods		Ministry of Infrastructure, Department of Road Transport	1. Article 4 of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of	1. Amend Article 4 of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods	1. This certificate should not be included in the register of permits and licenses as it is neither of them.  2. This certificate is completely unnecessary. The

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>Goods stipulates the obligation to be equipped with a vehicle certificate, as a document issued by the competent body for each vehicle registered in the name of the road transport operator of goods licensed by the Ministry.</p> <p>2. Administrative Instruction No. 02/2015 on Amendment and Supplementation of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods stipulates in Article 10 the obligation to pay the fee of EUR 20 to apply for this certificate.</p>	<p>stipulates the obligation to be equipped with a vehicle certificate, as a document issued by the competent body. This requirement should only apply to trucks which were no certified when the permit was obtained.</p> <p>2. Amend Article 10 of Administrative Instruction No. 02/2015 on Amendment and Supplementation of Administrative Instruction No. 07/2013 on Licensing of Road Transport Operators of Goods, in order to abolish the obligation to pay the fee of EUR 20 when applying for this certificate.</p>	<p>vehicles are already registered and can be easily identified in the Ministry database. Such a certificate would make sense if a distinction were made between transport conditions. Removing the certificate would greatly ease the administrative burden on businesses thus eliminating unnecessary payment. Furthermore, the same legal basis is used by officials for the issuance of Certificates of trucks for international third-party, rented and paid transport of goods necessary only for additional trucks used by the company which were not used to fulfil the criterion for obtaining the permit (Directive/Regulation on access to profession 1071/2009; 1072/2009 and 1073/2009 on international transport of passengers and goods).</p> <p>3. Abolition of this certificate would alleviate the administrative burden on businesses by removing the payment of EUR 20 due for</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
							each bus every 5 years.
Ministry of Environment, Spatial Planning and Infrastructure	DTT7	License for free transport, access and transit crossing through the territory of Kosovo, etc.	Permit	Ministry of Infrastructure, Department of Road Transport	<p>1. Administrative Instruction No. 06/2015 for issuance of licenses for carrying out regular international road transport of passengers for accessing and transit crossing through the territory of Kosovo stipulates in Articles 16 and 24 the obligation to pay a fee of EUR 50 when applying for a permit.</p> <p>2. Article 9 of Administrative Instruction No. 2/2009 on issuing permits to perform the international</p>	<p>1. Amend Administrative Instruction No. 06/2015 for issuance of licenses for carrying out regular international road transport of passengers for accessing and transit crossing through the territory of Kosovo, so as to abolish the obligation to pay the fee of EUR 50.</p> <p>2. Amend Article 9 of Administrative Instruction No. 2/2009 on issuing permits to perform the international road transport of passengers, access and transit through the territory of Kosovo so that the applicant is not required to submit</p>	<p>1. Abolition of the requirement to pay upon application is made in accordance with Article 18 of Law No. 04/L-202 on Permit and License System.</p> <p>2. Removal of the requirement to submit certified documents upon application such as: License A, B or D for passenger transport issued by MESPI and (ii) Proof of bus capacity, certified by MESPI (logbook, valid technical control, bus security as well as the certificate according to license A, B, D and the bus certificate is recommended because these documents are issued by the Ministry itself. The Ministry must have them available in a database.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>road transport of passengers, access and transit through the territory of Kosovo stipulates that the applicant must submit the following documents:</p> <p>(i) License A, B or D for passenger transport issued by MESPI and (ii) Certificate of capacity of buses, certified by MESPI (logbook, valid technical control, bus security and certificate under license A, B, D and bus certificate).</p> <p>3. When applying for this permit, the applicant pays the fee of EUR 100 - 500</p>	<p>the following documents:</p> <p>(i) License A, B or D for passenger transport issued by MESPI and (ii) Certificate of capacity of buses, certified by MESPI (logbook, valid technical control, bus security and certificate under license A, B, D and the bus certificate</p> <p>3. Propose to the Ministry that the fee of EUR 100 - 500 paid for obtaining this permit be calculated within the cost of obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project</p>	<p>cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 100-500 reflects the costs incurred by the authority during the licensing process.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Ministry of Environment, Spatial Planning and Infrastructure	DTT8	License for free international road transport of passengers	Permit	Ministry of Infrastructure, Department of Road Transport	<p>1. Administrative Instruction No. 06/2015 on the issuance of permits for the performance of regular international road transport of passengers, access and transit through the territory of Kosovo, in Article 16, envisages the obligation to pay a fee of EUR 50 when applying for a permit.</p> <p>2. Administrative Instruction No. 06/2015 on the issuance of permits for transport in the international road traffic of passengers, access and transit through the territory of Kosovo requires the submission</p>	<p>1. Amend Administrative Instruction No. 06/2015 on the issuance of permits for the performance of regular international road transport of passengers, access and transit through the territory of Kosovo, so as to abolish the obligation to pay the fee of EUR 50 when applying.</p> <p>2. Amend Administrative Instruction No. 06/2015 on the issuance of permits for transport in international road traffic of passengers, access and transit through the territory of Kosovo to abolish the requirement for submitting the following</p>	<p>1. Abolition of the requirement to pay a fee upon application is made in accordance with Article 18 of Law 04/L-202 on Permit and License System. Abolition of the requirement to submit notarized documents upon application such as: License A, B, or D; The bus logbook, valid technical control, bus insurance and certificate according to licenses A, B, D, is recommended because these documents are issued by the Ministry itself. The Ministry must have them available in a database.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 100 reflects the costs incurred by the authority during the</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>of the following documents to apply: License A, B, or D; Bus logbook, valid technical control, bus insurance and certificate according to license A, B, D.</p> <p>3. When applying for this permit, the applicant pays a fee of EUR 100.</p>	<p>documents when applying: License A, B or D; Bus logbook, valid technical control, bus insurance and certificate according to license A, B and D.</p> <p>3. Propose to the Ministry that the fee of EUR 100 paid for obtaining this permit be calculated within the cost of obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	<p>licensing procedure.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DTT9	Permit for regular international road transport of passengers to local transport operators	Permit	Ministry of Infrastructure, Department of Road Transport	<p>1. Administrative Instruction No. 06/2015 on the issuance of permits for the performance of regular international road transport of passengers,</p>	<p>1. Amend Administrative Instruction No. 06/2015 on the issuance of permits for the performance of regular international road transport of</p>	<p>1. Abolition of the requirement to pay a fee upon application is made in accordance with Article 18 of Law 04/L-202 on Permit and License System.</p> <p>2. Abolition of the requirement to submit notarized documents upon</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>access and transit through the territory of Kosovo stipulates in Article 16 the obligation to pay a fee of EUR 100 when applying for a permit.</p> <p>2. Administrative Instruction No. 06/2015 for issuance of licenses for carrying out regular international road transport of passengers for accessing and transit crossing through the territory of Kosovo requires the submission of the following documents to apply: License B or D for passenger transport.</p> <p>3. When</p>	<p>passengers, access and transit through the territory of Kosovo, so as to abolish the obligation to pay the fee of EUR 50 when applying.</p> <p>2. Amend Administrative Instruction No. 06/2015 for issuance of licenses for carrying out regular international road transport of passengers for accessing and transit crossing through the territory of Kosovo, which requires the submission of the following documents to apply: License B or D for passenger transport.</p> <p>3. Propose to the Ministry that the fee of EUR 50 - 100 paid for obtaining</p>	<p>application such as: License A, B, or D is recommended because these documents are issued by the Ministry itself. The Ministry must have them available in a database.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 50-100 reflects the costs incurred by the authority during the licensing procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					applying for this permit, the applicant pays the fee of EUR 50 – 100.	this permit be calculated within the cost of obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project	
Ministry of Environment, Spatial Planning and Infrastructure	DTT10	Permit for special transport of passengers	Permit	Ministry of Infrastructure, Department of Land Transport	<p>1. Administrative Instruction No. 09/2013 on the routes network and timetables of interurban passenger transport by bus and AI No. 06/2016 on amendment thereof stipulates in Article 15.2 the obligation for payment of EUR 50 when applying.</p> <p>2. Administrative Instruction No. 09/2013 on the routes network and timetables of interurban</p>	<p>1. Amend Administrative Instruction No. 09/2013 on the routes network and timetables of interurban passenger transport by bus and AI No. 06/2016 on amendment thereof, Article 15.2, and abolish the obligation to pay the fee of EUR 50 when applying.</p> <p>2. Amend Administrative Instruction No. 09/2013 on the routes network and timetables of interurban passenger</p>	<p>1. Abolition of the requirement to pay a fee upon application is made in accordance with Article 18 of Law 04/L-202 on Permit and License System.</p> <p>2. Abolition of the requirement to submit notarized documents upon application such as: License C or D is recommended because these documents are issued by the Ministry itself. The Ministry must have them available in a database.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>passenger transport by bus and AI No. 06/2016 on amendment thereof stipulate that License C or D for passenger transport must be submitted to apply.</p> <p>3. When applying for this permit, the applicant pays the fee of EUR 200 - 600</p>	<p>transport by bus and AI No. 06/2016 on amendment thereof, in order to abolish the requirement to submit License C or D for passenger transport upon application.</p> <p>3. Propose to the Ministry that the fee of EUR 200-600 paid for obtaining this permit be calculated within the cost for obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project</p>	<p>permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 200-600 reflects the costs incurred by the authority during the licensing procedure.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DTT11	Authorization for own use	Notice	Ministry of Infrastructure, Department of Land Transport	<p>1. Law No. 04/L-179 on Road Transport stipulates in Article 35 that this authorization should be obtained by</p>	<p>1. Change the name of this permission from Authorization to Notice.</p> <p>2. Abolish the requirement to pay the fee of EUR 50 upon application.</p>	<p>1. This authorization meets all the requirements to be classified as a Notice according to Article 6 of the Law on Permit and License System.</p> <p>2. Abolition of the payment upon application is</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>companies for carrying out the transport of their own employees.</p> <p>2. To obtain this authorization, the applicant pays a fee of EUR 50.</p>		<p>recommended in accordance with Article 18 of Law No. 04/L-202 on Permit and License System.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DTT12	<p>1. License A - for free transport inside and outside Kosovo.</p> <p>2. License B – for free na dregular international road transport of passengers by bus</p>	Permit	Ministry of Infrastructure, Department of Land Transport	<p>1. License A applies when a company wants to provide transportation for tourists To apply for this license, the applicant should submit the following documents: (i) Business registration certificate in Kosovo for the activity of road transport of passengers and fiscal number certificate; (ii) proof of Professional Competence</p>	<p>1. Amend Law No. 04/L-179 on Road Transport, Article 7, which foresees the license as a necessity for exercising the activity of operators, so that the need for obtaining a permit and not a license is foreseen.</p> <p>2. Amend Administrative Instruction No. 07/2015 2015 on the licensing of road transport operators of passengers by bus to provide for obtaining a permit</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law. The two licenses should be merged as they cover the provision of the same service, but at different periods. In addition, this proposal was made by the Ministry officials.</p> <p>2. Abolition of the requirement to pay upon application is made in accordance with Article 18 of Law 04/L-202 on Permit and License System.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>(CPC) and of trained and certified professional capacity.</p> <p>2. License B is applied when the company wishes to provide services not only on a seasonal basis, but in regular and continuous manner.</p> <p>3. Article 8 of Administrative Instruction No. 07/2015 of road transport operators of passengers by bus stipulates the fee of EUR 50 to be paid when applying for each of the licenses.</p> <p>4. Administrative Instruction No. 07/2015 of road transport</p>	<p>instead of a license, and to merge License A and License B, so as to require only obtaining a Permit for the provision of these services. As exceptions to this general rule would be situations when there are bilateral agreements between countries.</p> <p>3. Amend Administrative Instruction No. 07/2015 on the licensing of road transport operators of passengers by bus, more precisely paragraph 1.1 of Article 8 in order to abolish the obligation for the applicant to pay the fee of EUR 50 when applying.</p> <p>4. Amend Administrative Instruction No. 07/2015 on</p>	<p>3. Abolition of the requirement to submit the following notarized documents when applying: proof of Professional Competence (CPC) and of trained and certified professional capacity is recommended because these documents are issued by the Ministry itself. The Ministry must have them available in a database.</p> <p>4. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 200 reflects the costs incurred by the authority during the licensing procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>operators of passengers by bus stipulates that when applying for licensing, the applicant should submit proof of Professional Competence (CPC) and of trained and certified professional capacity.</p> <p>5. When applying for license A, the applicant pays the fee of EUR 300, while the application fee for license B is EUR 500</p>	<p>licensing of operators of road passenger transport by bus so as to abolish the obligation of the applicant to submit proof of Professional Competence (CPC) and of trained and certified professional capacity.</p> <p>5. Propose to the Ministry that the fee of EUR 300 and EUR 500 paid for obtaining these licenses be calculated within the cost of obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project.</p>	
Ministry of Environment, Spatial Planning and	DTT13	1. License C - means the exercise of the activity of free and regular local road	Permit	Ministry of Infrastructure, Department of Land Transport	1. Law No. 04/L-179 on Road Transport stipulates in	1. Amend Law No. 04/L-179 on Road Transport, Article 7, which foresees the	1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Infrastructure		transport of passengers by bus  2. License D - free and regular local and international road transport of passengers by bus			<p>Article 7 the license as a necessity for exercising the activity of operators.</p> <p>2. License C is applied when the company wishes to provide free and regular local road transport of passengers by bus, while license D is applied when the company wishes to provide free and regular local and international road transport of passengers by bus</p> <p>3. Administrative Instruction No. 07/2015 on the licensing of road transport operators of passengers by bus, in</p>	<p>license as a necessity for exercising the activity of operators, so that the need for obtaining a permit and not a license is foreseen. As exceptions to this general rule would be situations when there are bilateral agreements between countries.</p> <p>2. Amend Administrative Instruction No. 07/2015 on the licensing of road transport operators of passengers by bus, more precisely paragraph 1.1 of Article 8 in order to abolish the obligation for the applicant to pay the fee of EUR 50 when applying, and to merge licensed C and D so that a single permit is required for the</p>	<p>persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law. The two licenses should be merged as they cover the provision of the same service. In addition, this proposal was made by the Ministry officials.</p> <p>2. Abolition of the requirement to pay upon application is made in accordance with Article 18 of Law 04/L-202 on Permit and License System.</p> <p>3. Abolition of the requirement to submit the following notarized documents when applying: proof of Professional Competence (CPC) and of trained and certified professional capacity is recommended because these documents are issued by the Ministry itself. The Ministry must have them available in a database.</p> <p>4. The fee that a competent authority may charge for a</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>paragraph 1.1 of Article 8, obliges the applicant to pay the fee of EUR 50 when applying.</p> <p>4. Administrative Instruction No. 07/2015 on licensing of operators of road passenger transport by bus provides that in the case of licensing, the applicant must submit proof of Professional Competence CPC possesses trained and certified professional capacity for both licenses.</p> <p>5. When applying for this license, the applicant pays the fee of EUR 200, while the application fee</p>	<p>provision of these services.</p> <p>3. Amend Administrative Instruction No. 07/2015 on licensing of operators of road passenger transport by bus so as to abolish the obligation of the applicant to submit proof of Professional Competence (CPC) and of trained and certified professional capacity.</p> <p>4. Propose to the Ministry that the fees of EUR 200 and EUR 1,000 paid for obtaining these licenses be calculated within the cost of obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This</p>	<p>permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 200 and EUR 1,000 reflect the costs incurred by the authority during the licensing procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					of rlicense D is EUR 1,000.	calculation can be done by the project.	
Ministry of Environment, Spatial Planning and Infrastructure	DTT14	License according to categories A, B, C and D for bus stations	Permit	Ministry of Infrastructure, Department of Land Transport	<p>1. Law No.04/L-179 on Road Transport stipulates in Article 37 the license according to categories A, B, C and D for bus stations</p> <p>2. Administrative Instruction No. 08/2013 on licensing of bus stations in Article 6 provides that the license for bus station is issued on the basis of categories and not a general license and the same has a validity of five (5) years. 2. Al No. 08/2013, in Article 5, provides the obligation to pay the amount of</p>	<p>1. Amend Law No. 04/L-179 on Road Transport Article 37, which foresees the license as a necessity for exercising the activity of operators, so that the need for obtaining a permit and not a license is foreseen.</p> <p>2. Amend Article 6 of Administrative Instruction No. 08/2013 so as to allow obtaining a license for two or more categories with one procedure and to determine the validity of the license to be permanent and not five (5) years. In case the subject is initially licensed only for one category, at the</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this law.</p> <p>2. In case of merging the licensing procedure into a single one, the applicant is relieved of the burden of providing the same documents for each category. In case the applicant is licensed only for one category and in the future he wants to be licensed for other categories, he offers only the evidence of fulfillment of the conditions provided by law and does not duplicate documents that are already found in the Ministry and the existence of a category of the license proves their existence. Such a fusion of</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>EUR 100 when applying.</p> <p>3. When applying for this license, the applicant pays the amount of EUR 500 to 3,000</p>	<p>moment he requests the licensing for other categories, it should suffice only to add the necessary documents and not to start the procedure from the beginning.</p> <p>3. Amend Administrative Instruction No. 08/2013 on the licensing of bus stations, in Article 5, in order to abolish the obligation to pay the amount of EUR 100 when applying.</p> <p>4. Propose to the Ministry that the fee of EUR 500 - 3,000 paid for obtaining this license be calculated within the cost of obtaining it, to ensure compliance with Article 18 of</p>	<p>the procedure, in addition to easing the administrative burden of an applicant, also facilitates the work of the responsible officials. Furthermore, since the subject in the licensing case has already proved that it meets the licensing criteria, the re-licensing procedure should be completely abolished. For the same, supervisory mechanisms should be developed to ensure that the licensed entity continues to meet the legal criteria for the license it holds. In this form, the administrative and financial burden is eased to the relevant entity and institutional officials. Abolition of the requirement to pay upon application is made in accordance with Article 18 of Law 04/L-202 on Permit and License System.</p> <p>3. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						the Law on Licenses. This calculation can be done by the project	in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the fee of EUR 500-3,000 reflects the costs incurred by the authority during the licensing procedure.
Ministry of Environment, Spatial Planning and Infrastructure	DTT15	Certificate for buses		Ministry of Infrastructure, Department of Land Transport	<p>1. Article 8 of Law No. 04/L-179 on Road Transport provides the obligation to obtain a bus certificate for all buses after the company is licensed and the buses are registered.</p> <p>2. Administrative Instruction No. 07/2015 on the licensing of road transport operators of passengers by bus, in Article 11, paragraph 5.1, provides the</p>	<p>1. Amend Article 8 of Law No. 04/L-179 on Road Transport which stipulates the obligation to obtain a bus certificate for all buses after the company is licensed and the buses are registered. This requirement should only apply to buses which were no certified when the permit was obtained.</p> <p>2. Amend Administrative Instruction No. 07/2015 on licensing of road transport operators</p>	<p>1. This certificate should not be included in the register of permits and licenses as it is neither of them.</p> <p>2. This certificate is completely unnecessary. The vehicles are already registered and can be easily identified in the Ministry database. Such a certificate would make sense if a distinction were made between transport conditions. Removing the certificate would greatly ease the administrative burden on businesses thus eliminating unnecessary payment. Furthermore, the same legal basis is used by officials for the issuance of Certificates of trucks for international third-party,</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					obligation to pay the fee of EUR 50 when applying for a certificate.	of passengers by bus, in Article 11, paragraph 5.1, so as to abolish the obligation to pay the fee of EUR 50 when applying for a certificate.	rented and paid transport of goods necessary only for additional trucks used by the company which were not used to fulfil the criterion for obtaining the permit (Directive/Regulation on access to profession 1071/2009; 1072/2009 and 1073/2009 on international transport of passengers and goods).  3. Abolition of this certificate would alleviate the administrative burden on businesses by removing the payment of EUR 20 due for each bus every 5 years.
Ministry of Environment, Spatial Planning and Infrastructure	DTT16	Permit for extraordinary transport of goods	Permit	Ministry of Infrastructure, Department of Road Management	1. Administrative Instruction No. 04/2014 on Extraordinary Transport, in Article 9, provides for the validity of the permit for a period of one (1) month.  2. In paragraph 1.1 of Article 7 of Administrative Instruction No.	1. Amend Article 9 of Administrative Instruction No. 04/2014 on Extraordinary Transport, so as to provide for the validity of the permit for extraordinary transport of goods for a period of one (1) year and not for one (1) month.  2. Amend paragraph	1. The short time provided for the validity of this permit, i.e., one (1) month, is considered to be a very great burden for the operator, but also for the responsible official. In order to address the risk, pollution and damage caused by this type of transport, it is proposed to increase the amount paid for this permit and at the same time to increase its validity time.  2. Abolition of the

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>04/2014 for Extraordinary Transport, there is an obligation to pay a fee of EUR 20 when applying for this permit.</p> <p>3. The appeal procedure is not regulated according to the LGAP.</p>	<p>1.1 of Article 7 of Administrative Instruction No. 04/2014 for Extraordinary Transport, so that the fee of EUR 20 is not required for obtaining a permit.</p> <p>3. Regulate the appeal procedure according to the LGAP.</p>	<p>requirement to pay upon application is made in accordance with Article 18 of Law 04/L-202 on Permit and License System.</p>
Ministry of Environment, Spatial Planning and Infrastructure	DA7	Certificate for driving license trainers	Professional license	Ministry of Infrastructure, Department of Vehicles	<p>1. Article 112.3 of Law No. 05/L-064 on Driving License provides the Certificate for trainer in the field of driving license.</p> <p>2. Article 23 of the Administrative Instruction (MI) No. 11/2017 for Trainers in the Field of Driving License provides for obtaining this certificate.</p> <p>3. Decision of</p>	<p>1. Amend Article 112.3 of Law No. 05/L-064 on Driving License which stipulates the Certificate for trainer in the field of driving license, so as to stipulate the Permit of driving license trainer instead.</p> <p>2. Amend Decision of the Minister No. 8325 dated 02.11.2017, which is based on Article 25 of Administrative Instruction No.</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law.</p> <p>2. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>the Minister No. 8325 dated 02.11.2017 which is based on Article 25 Administrative Instruction No. 11/2017 for Trainers in the Field of Driving License determines the following fees for this certificate:</p> <p>In order to apply for the written part of the qualifying exam/re-examination for trainer in the field of driving license – EUR 50</p> <p>In order to apply for the professional exam-re-examination for a trainer in the field of driving license:</p> <p>- Written part – EUR 50</p>	<p>11/2017 for Trainers in the Field of Driving License so as to abolish the requirement to pay a fee of EUR 200 for obtaining the certificate.</p> <p>3. Propose to the Ministry that the fee of EUR 1,500 paid for the performance of this training be calculated within the cost for obtaining it, to ensure compliance with Article 18 of the Law on Licenses. This calculation can be done by the project</p>	<p>assist with this calculation, as well as with the analysis whether the fee of EUR 1,630 reflects the costs incurred by the authority during the licensing procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>- Oral part – EUR 30</p> <p>- Practical part - EUR 100</p> <p>Issuance of the certificate - EUR 200</p> <p>Participation in the basic training for trainers in the field of driving license - EUR 1,150</p> <p>For participation in the training for certified trainer in the field of driving license EUR 50.</p>		
Ministry of Environment, Spatial Planning and Infrastructure	DA8	License for technical control of vehicles	Permit	Ministry of Infrastructure, Department of Vehicles	<p>1. Law No. 05/L-132 on Vehicles in Articles 88 and 91 provides for the need to obtain a License for the operator.</p> <p>2. Article 12 of Administrative Instruction (MI) No.01/2018 on Technical Inspection of Vehicles stipulates a fee</p>	<p>1. Amend Law No. 05/L-132 on Vehicles in Articles 88 and 91 which provide for the need to obtain a License for the operator, so as to determine the need for obtaining a Permit instead of a License.</p> <p>2. Propose to the Ministry that the fee of EUR 3,000</p>	<p>1. Based on Law No. 04/L-202 on Permit and License System, the professional license is issued to natural persons, while the permit is issued to legal persons as in this case. Therefore the proposed amendment is based on Articles 8 and 9 of this Law.</p> <p>2. The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					of EUR 3000 for the line of technical inspection of vehicles up to 3.5 t; a fee of EUR 2000, for the line of technical control of vehicles over 3.5t; and a fee of EUR 300 for the line of technical control of motorcycles	for the line of technical control of vehicles up to 3.5 t; fee of EUR 2,000 for the line of technical control of vehicles over 3.5t; the fee of EUR 300 for the line of technical control of motorcycles that is paid for obtaining this license to be calculated within the cost of obtaining it, to ensure that it is accordance with Article 18 of the Law on Licenses. This calculation can be done by the project	competent authority incurs in administering the permission (Article 18 of the Law on Permit and License System). The project can assist with this calculation, as well as with the analysis whether the total amount reflects the costs incurred by the authority during the licensing process.

### **Simplification of permits and licenses at the Ministry of Health**

In the process of simplifying permits and licenses at the Ministry of Health and harmonizing them with Law 04/L-202 on Permit and License System, a total of 55 permits and licenses were analyzed. This draft report aims to identify, analyze and provide recommendations for the simplification of permits and licenses administered by the Ministry of Health (MoH), the Kosovo Medicines Agency (KMA), and the Chambers of Healthcare Professionals, namely the Kosovo Doctors Chamber (OMK), Chamber of Physiotherapists of Kosovo (OFK), Chamber of Dentists of Kosovo (OMK), Kosovo Chamber of Pharmacists (OFK), and Kosovo Chamber of Nurses (KNC).

The process of inventory and analysis of permits and licenses, completed during the period September - November 2021 has been done in a transparent and comprehensive manner. Initially, all permits and licenses administered by the MoH, KMA, and the Chambers of Health Professionals were identified. At the same time, the legal basis was identified, namely the laws and sub-legal acts, which regulate these permits and licenses. After their identification, in order to understand how they are implemented in practice, numerous meetings and discussions were held with officials of the Ministry and related agencies. During these meetings, relevant forms for all identified permits and licenses were completed, and together with the project team, the collected information was checked. In addition, two focus groups were conducted with representatives of the private sector as well as healthcare professionals to see the impact of permits on their work. In the last phase, based on the information gathered and the legal and economic analysis, recommendations were prepared for the simplification of each permit and license, summarized in this draft report.

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Chamber of Physiotherapists of Kosovo	OFK1-A	Licensing of physiotherapists	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	<ol style="list-style-type: none"> <li>1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation but not this type of permit.</li> <li>2. Some of the documents do not need to be requested from the party.</li> <li>3. The appeal procedure is missing.</li> <li>4. Inappropriate and restricted payment method.</li> <li>5. This Chamber delivers almost all licensing services, as well as other services electronically through its website <a href="https://oftks.org/">https://oftks.org/</a> which is sufficiently user friendly.</li> </ol>	<ol style="list-style-type: none"> <li>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</li> <li>2. Amend Regulation No. 01/2020 on Procedures and Criteria for Membership in OFK, to require only information, to be submitted ex officio, without needing to submit documents such as: Copy of ID card, Notarized Certificate of professional exam or specialist exam, Membership identification card (this card is issued free of charge).</li> <li>3. Amend Regulation No. 01/2020 on Procedures and Criteria for Membership in OFK, which establishes the right to appeal, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint.</li> <li>4. Amend Decision No. 01/2020 on Administrative Fees for OFK services so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</li> <li>6. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</li> <li>7. In cases when the submission of some documents is necessary, not to request a</li> </ol>	<p>Amendment of law No. 04/L-150 on Chambers of Healthcare Professionals is needed to harmonize this Law with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be determined only by law.</p> <p>The amendment of Regulation No. 01/2020 on the Procedures and Criteria for Membership in OFK is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting the procedure ex officio according to the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision No. 01/2020 on administrative fees for OFK services should be made to enable payment at the end to avoid frequency of and loss of time for payment, as well as to lift the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-202</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>notarized copy of them; e.g. 'Notarized certificate of professional exam or specialist exam' required. Notarization is not required as this document is issued by the Ministry of Health itself. This applies to all licenses issued by OFK.</p> <p>8. Fees for licensing (EUR 80) as well as for stamping (EUR 20) are high and may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit). It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance for this).</p>	<p>on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>
Chamber of Physiotherapists of Kosovo	OFK1-B	Relicensing of physiotherapists	License	<p>Commission for Continuing Professional Education (CCPE);</p> <p>License is signed by the Chair of the Licensing Commission and the Chair of the Chamber</p>	Same as license OFK1-A	<p>1. The OFK1-B license should be issued for an indefinite term; The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</p> <p>2. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</p> <p>3. OFK1-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the</p>	<p>There is no need to follow the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System).</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</p> <p>4. Amend Regulation No. 01/2020 on Procedures and Criteria for Membership in OFK, which establishes the right to appeal, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint.</p> <p>5. These changes can be made by amending Regulation No. 01/20120 on Procedures and Criteria for Membership in OFK</p>	
Chamber of Physiotherapists of Kosovo	OFK2	License duplicate (copy of license)	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	This should not be included in the register as it is not a new license	<p>1. Require the submission of only a request with minimum data to make known the fact of loss and damage of the license.</p> <p>2. Other data are or should be in the register of licenses kept by the chamber.</p> <p>3. The duplicate copy should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p>	There is no need and no argument for implementing a procedure and convening the Licensing Commission to decide on an action as simple as the issuance of a duplicate copy, which can easily be ascertained and issued by the professional service of the Chamber.
Kosovo Doctors Chamber (OMK)	OMK1-A	Licensing of Doctor of Medicine (general licensing)	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation, but not this type of permit.	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation No. 01/2020 on Procedures and Criteria for Membership in OFK, to require only information, to be</p>	Amendment of law No. 04/L-150 on Chambers of Healthcare Professionals is needed to harmonize this Law with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be determined only by law. The amendment of Regulation No. 01/2020 on the Procedures and Criteria for Membership in

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					<p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure is missing.</p> <p>4. Inappropriate and restricted payment method.</p>	<p>submitted ex officio, without needing to submit documents such as: Copy of ID card, Notarized Certificate of professional exam or specialist exam. Abolish the requirement for submitting a medical certificate (for retired doctors) because it shows the health condition but not the ability to practice medicine.</p> <p>3. Amend Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for submitting the appeal and deciding on the appeal.</p> <p>4. Amend Decision of OMK No. 02/2020 on Administrative Fees for OMK services so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p> <p>6. In cases when the submission of some documents is necessary, not to request a notarized copy of them; e.g. 'Notarized certificate of professional exam or specialist exam' required. Notarization is not required as this document is issued by the Ministry of</p>	<p>OFK is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting the procedure ex officio according to the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision No. 02/2020 on administrative fees for OMK services should be made to enable payment at the end to avoid frequency of and loss of time for payment, as well as to lift the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-202 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						Health itself. This applies to all licenses issued by OMK.	
Kosovo Doctors Chamber (OMK)	OMK1-B	Licensing of Doctor of Medicine (general licensing)	License	Commission for Continuing Professional Education (CCPE);  License is signed by the Chair of the Licensing Commission and the Chair of the Chamber	Same as OMK1-A license	<p>1. The OMK1-B license should be issued for an indefinite term; The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</p> <p>2. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</p> <p>3. OMK1-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</p> <p>4. Amend Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for submitting the appeal and deciding on the appeal.</p> <p>5. These changes can be made by amending Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians.</p>	There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System). Also, abolish the fee of EUR 40 for relicensing.
Kosov	OMK2-	Licensing	License	Licensing	1. Law No. 04/L-150 on	1. Amend Law No. 04/L-150 on Chambers of	Amendment of law No. 04/L-150 on Chambers

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Doctors Chamber (OMK)	A	of specialists and sub-specialists (specialist licensing)		Commission  License is signed by the Chair of the Commission and the Chair of the Chamber	<p>Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure is missing.</p> <p>4. Inappropriate and restricted payment method.</p>	<p>Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation No. 01/2020 on Procedures and Criteria for Membership in OFK, to require only information, to be submitted ex officio, without needing to submit documents such as: Copy of ID card, Notarized Certificate of professional exam or specialist exam. Abolish the requirement for submitting a medical certificate (for retired doctors) because it shows the health condition but not the ability to practice medicine.</p> <p>3. Amend Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for submitting the appeal and deciding on the appeal.</p> <p>4. Amend Decision of OMK No. 02/2020 on Administrative Fees for OMK services so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p>	<p>of Healthcare Professionals is needed to harmonize this Law with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be determined only by law.</p> <p>The amendment of Regulation No. 01/2020 on the Procedures and Criteria for Membership in OFK is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting the procedure ex officio according to the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision No. 02/2020 on administrative fees for OMK services should be made to enable payment at the end to avoid frequency of and loss of time for payment, as well as to lift the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-202</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						6. In cases when the submission of some documents is necessary, not to request a notarized copy of them; e.g. 'Notarized certificate of professional exam or specialist exam' required. Notarization is not required as this document is issued by the Ministry of Health itself. This applies to all licenses issued by OMK.	on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.
Kosovo Doctor Chamber (OMK)	OMK2-B	Relicensing of specialists and sub-specialists (specialist licensing)	License	Commission for Continuing Professional Education (CCPE);  License is signed by the Chair of the Licensing Commission and the Chair of the Chamber	Same as license OMK2-A	1. The OMK1-A license should be issued for an indefinite term. 2. The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.  2. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.  3. OMK1-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.  4. Amend Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians which establishes the right to	There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System).

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>appeal, the procedure, the body that reviews the appeal and the deadline for submitting the appeal and deciding on the appeal.</p> <p>6. These changes can be made by amending Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians.</p>	
Kosovo Doctors Chamber (OMK)	OMK3	Permit for bio-medical research (including permits for COVID)	License	<p>Ethics Commission;</p> <p>License is signed by the Chair of the Commission Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians</p>	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals does not regulate this type of permit anywhere.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure is missing.</p> <p>4. Inappropriate and restricted payment method.</p> <p>5. The deadline for issuing the license is missing.</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation No. 07/2020 on the Scope and Competencies of the Ethical Commission to require only information, to be submitted ex officio, without needing to submit documents such as: Copies of valid professional licenses of research participants.</p> <p>3. Amend Regulation No. 07/2020 on the Scope and Competencies of the Ethical Commission which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for submitting the appeal and deciding on the appeal.</p> <p>4. Amend Decision No. 02/2020 on Administrative Fees for OMK services so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p>	<p>Amendment of law No. 04/L-150 on Chambers of Healthcare Professionals is needed to harmonize this Law with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be determined only by law.</p> <p>The amendment of Regulation No. 04/2020 on Registration, Licensing, and Relicensing of Physicians is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting the procedure ex officio according to the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision No. 02/2020 on administrative fees for OMK services should be</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>5. Establish the deadline on procedure implementation and decision making for this type of license.</p> <p>6. Fees are very high (EUR 120-480) and may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) Fees should be determined based on the load of work and not according to the subject (natural person or legal person). It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance for this).</p>	<p>made to enable payment at the end to avoid frequency of and loss of time for payment, as well as to lift the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>
Kosovo Doctors Chamber (OMK)	OMK4	License duplicate (license copy)	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	This should not be included in the register as it is not a new license	<p>1. Require only one request with minimum data to make known the fact of loss or damage of the license.</p> <p>2. Other data are or should be in the register of licenses kept by the chamber.</p> <p>3. The duplicate copy should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p>	There is no need and no argument for implementing a procedure and convening the Licensing Commission to decide on an action as simple as the issuance of a duplicate copy, which can easily be ascertained and issued by the professional service of the Chamber.
Chamber of Pharmacists of	OFK1-A	Licensing of pharmacist	License	Licensing Commission;  License is signed by the Chair of the	1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber	1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.	Amendment of law No. 04/L-150 on Chambers of Healthcare Professionals is needed to harmonize this Law with Article 17, paragraph 1, of Law No. 04/L-2020 on Permit and License System, according to which a permit and license

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Kosovo (OFK)				Commission and the Chair of the Chamber	<p>for licensing, relicensing and revocation but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure in the case of licensing is missing, while for relicensing it is not complete.</p> <p>4. Inappropriate and restricted payment method.</p>	<p>2. Amend Regulation No. 08/2019 on Licensing and Relicensing of Pharmacists to require only information, to be submitted ex officio, without needing to submit documents such as: Copy of ID card, Notarized Certificate of professional exam or specialist exam, Membership identification card.</p> <p>3. Amend Regulation No. 08/2019 on Licensing and Relicensing of Pharmacists which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision No. 08/ on Administrative Fees for OFK services so that payment is made at the end of the procedure and is also made through e-banking, POS, etc.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p> <p>6. In cases when the submission of some documents is necessary, not to request a notarized copy of them; e.g. 'Notarized certificate of professional exam or specialist exam' required. Notarization is not required as this document is issued by the Ministry of Health itself. This applies to all licenses issued by OFK.</p>	<p>can be determined only by law.</p> <p>Amendment of Regulation 08/2019 on Licensing and Relicensing of Pharmacists should be made to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting the procedure ex officio according to the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision No. 08/2019 on Administrative Fees for OFK services should be done to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-202 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>

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						8. Licensing fee of EUR 100 may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).	
Chamber of Pharmacists of Kosovo (OFK)	OFK1-B	Relicensing of pharmacists	License	Commission for Continuing Professional Education (CCPE);  License is signed by the Chair of the Licensing Commission and the Chair of the Chamber	Same as license OFK1-A	<p>1. The OFK1-license should be issued for an indefinite term; The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</p> <p>2. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</p> <p>3. OFK1-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</p> <p>4. Amend Regulation No. 08/2019 on Licensing and Relicensing of Pharmacists</p>	There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System).

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						<p>which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>5. These changes can be made by amending Regulation No. 08/2019 on Licensing and Relicensing of Pharmacists.</p> <p>6. Abolish the relicensing fee of EUR 100.</p>	
Chamber of Pharmacists of Kosovo (OFK)	OFK2	Permit for professional scientific research	Permit	Ethical Commission;  Permit is signed by the Chair of the Ethical Commission	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals does not regulate this type of permit anywhere.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure is missing.</p> <p>4. Inappropriate and restricted payment method.</p> <p>5. The deadline for issuing the license is missing.</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation No. 12/2020 on the Scope and Competencies of the Ethical Commission of OFK to require only information, to be submitted ex officio, without needing to submit documents such as: Copies of valid professional licenses of research participants.</p> <p>3. Amend Regulation No. 12/2020 on the Scope and Competencies of the Ethical Commission OFK which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision to supplement the amendment Regulation No. 42 dated 08.08.2019 so that payment is made at the</p>	<p>Amendment of law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of Regulation No. 12/2020 on the Scope and Competencies of the Ethical Commission of OFK is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a named document to a request, such as instead of requesting copies of valid professional licenses of research participants to request personal data is done in order to enable electronic communication, including interconnection of electronic systems</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely</p>

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						<p>end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p> <p>5. Establish the deadline for procedure implementation and decision making for this type of license.</p> <p>6. The fees for this permit are very high (EUR 300-400) and may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) Fees should depend on the load of work for the provision of this service and not on the subject (natural or legal). It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance for this).</p>	<p>missing.</p> <p>Amendment of the decision to supplement the amendment of regulation No. 42 dated 08.08.2019 should be made to enable the payment at the end to avoid the frequency and loss of time for payment and on the other hand not to limit only one form of proof to prove the payment.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-202 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>
Chamber of Pharmacists of Kosovo (OFK)	OFK3	License duplicate (license copy)	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	This license should not be included in the register as it is not a new license	<p>1. Require only one request with minimum data to make known the fact of loss or damage of the license.</p> <p>2. Other data are or should be in the register of licenses kept by the chamber.</p> <p>3. The duplicate copy should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p>	There is no need and no argument for implementing a procedure and convening the Licensing Commission to decide on an action as simple as the issuance of a duplicate copy, which can easily be ascertained and issued by the professional service of the Chamber.
Cham	OSK1-	General	Licence	Licensing	1. Law No. 04/L-150 on	1. Amend Law No. 04/L-150 on Chambers of	Amendment of law No. 04/L-150 on Chambers

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Ministry of Health of Kosovo (OSK)	A	licensing (of doctors of stomatology)		Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	<p>Chambers of Healthcare Professionals Article 9 paragraph 1.3 regulates only the competence of the chamber for licensing, relicensing and revocation but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure in the case of licensing is missing.</p> <p>4. Inappropriate and restricted payment method.</p>	<p>Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists to require only information, to be submitted ex officio, without needing to submit documents such as: copy of ID card, notarized certificate of professional exam or exam for specialists, membership card with which is evidenced by membership.</p> <p>3. Amend Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision on administrative fees for OSK services (12/2019) so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof paying payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p> <p>6. Licensing fee of EUR 100 may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee</p>	<p>of Healthcare Professionals is needed to harmonize this Law with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be determined only by law.</p> <p>Amendment of Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists must be done to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation is needed to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision No. 08/2019 on Administrative Fees for OFK services should be done to enable payment in the end to avoid frequency of and loss of time for payment, as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-202 on Permit and License System and should not exceed the amount required to cover the cost</p>

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						that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).	that the competent authority incurs in administering the permission.
Chamber of Dentists of Kosovo (OSK)	OSK1-B	General relicensing (of doctors of stomatology)	License	Commission for Continuing Professional Education (CCPE) valorizes the credit points, the Licensing Commission is responsible for approval;  License is signed by the Chair of the Commission and the Chair of the Chamber	Same as license OSK1-A	<ol style="list-style-type: none"> <li>1. The OSK1-B license should be issued for an indefinite term.</li> <li>2. The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</li> <li>3. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</li> <li>4. OSK1-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</li> <li>5. Amend Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists which establishes the right to appeal, the procedure, the body that reviews</li> </ol>	There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System).

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>6. These changes can be made by amending Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists.</p> <p>7. Abolish relicensing fee (EUR 100).</p>	
Chamber of Dentists of Kosovo (OSK)	OSK2-A	Specialist licensing (of specialists of stomatology)	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure in the case of licensing is missing.</p> <p>4. Inappropriate and restricted payment method.</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists, to require only information, to be submitted ex officio, without needing to submit documents such as: copy of ID card, notarized certificate of professional exam or exam for specialists. Abolish the requirement for a medical certificate (for retired doctors) because it shows the health condition but not the ability to practice medicine.</p> <p>3. Amend Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision on Administrative Fees for OSK Services (12/2019) so that payment</p>	<p>Amendment of law No. 04/L-150 on Chambers of Healthcare Professionals is needed to harmonize this Law with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be determined only by law.</p> <p>Amendment of Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists must be done to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a named document to a request such as instead of a copy of the identity card requiring personal data is done in order to enable electronic communication including the interconnection of electronic systems</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p> <p>6. Licensing fee of EUR 100 may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p>	<p>The Decision on Administrative Fees in OSK (12/2019) should be amended to enable the payment in the end to avoid the frequency of and loss of time for payment, as well as to abolish the restriction to only one of form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>
Chamber of Dentists of Kosovo (OSK)	OSK2-B	Specialist relicensing (of specialists of stomatology)	License	<p>Commission for Continuing Professional Education (CCPE) valorizes the credit points, the Licensing Commission is responsible for approval;</p> <p>License is signed by the Chair of the Licensing Commission and</p>	Same as license OSK1-A	<p>1. The OSK2-license should be issued for an indefinite term.</p> <p>2. The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</p> <p>3. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</p> <p>4. OSK1-A license does not need to be changed if 100 credit points are reached; in</p>	<p>There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-2020 on Permit and License System).</p>

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				the Chair of the Chamber		<p>this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</p> <p>5. Amend Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists, which establishes the right to appeal, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint.</p> <p>6. These changes can be made by amending Regulation No. 12/2019 on Registration, Licensing, and Relicensing of Dentists.</p> <p>7. Abolish the relicensing fee (EUR 100).</p>	
Chamber of Dentists of Kosovo (OSK)	OSK3	Permit for scientific bio-medical research	Permit	Ethical Commission;  Permit is signed by the Chair of the Ethical Commission	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals does not regulate this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure is missing.</p> <p>4. Inappropriate and restricted payment method.</p> <p>5. The deadline for issuing the license is missing</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation No. 12/2019 (OSK) on the Scope and Competencies of the Ethical Commission, to require only information, to be submitted ex officio, without needing to submit documents such as: Copies of valid professional licenses of research participants, Applicant's work license.</p> <p>3. Amend Regulation No. 12/2019 (OSK) on the Scope and Competencies of the Ethical</p>	<p>Amendment of Law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of Regulation No. 12/2019 (OSK) on the Scope and Competencies of the Ethical Commission is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as</p>

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						<p>Commission which establishes the right to appeal, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision on Administrative Fees in OSK (12/2019) so that the payment is made at the end of the procedure and is also done through e-banking, POS etc. Accept any proof of payment.</p> <p>5. Establish the deadline for procedure implementation and decision making for this type of license.</p> <p>6. The fees for this permit are very high (EUR 100-400) and may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) Fees should be determined depending on the load of work for the provision of this service and not according to the subject (natural or legal). It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance for this).</p>	<p>requesting personal data instead of a copies of valid professional licenses of research participants is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision OSK (12/2019) should be done to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>
Chamber of Dentists of	OSK4	License duplicate (license copy)	Licence	Licensing Commission;  License is signed	This license should not be included in the register as it is not a new license	1. Require only a request with minimum data to make known the fact of loss or damage of the license.	There is no need and no argument for implementing a procedure and convening the Licensing Commission to decide on an action as simple as the issuance of a duplicate copy,

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Kosovo (OSK)				by the Chair of the Commission and the Chair of the Chamber		<p>2. Other data are or should be in the register of licenses kept by the chamber.</p> <p>3. The duplicate copy should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p>	which can easily be ascertained and issued by the professional service of the Chamber.
Kosovo Chamber of Nurses (OIK)	OIK1-A	Licensing with secondary school	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure in the case of licensing is missing.</p> <p>4. The method of payment is more convenient but still restricted.</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation to require only information, to be submitted ex officio, without needing to submit documents such as: Scanned ID card, Birth Certificate or Marriage Certificate (for married women) not older than 6-months.</p> <p>3. Amend Regulation which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision on Administrative Fees in OIK so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p>	<p>Amendment of law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of the Regulation is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision on Administrative Fees for OIK services should be done to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish</p>

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							<p>the restriction of only one form of payment proof accepted.</p> <p>The license register is necessary especially for tracking the relicensing time but also in case of loss or damage of a license to duplicate it.</p>
Kosovo Chamber of Nurses (OIK)	OIK1-B	Relicensing with secondary school	License	<p>Licensing Commission;</p> <p>License is signed by the Chair of the Licensing Commission and the Chair of the Chamber</p>	Same as license OIK1-A	<ol style="list-style-type: none"> <li>1. The OIK1-A license should be issued for an indefinite term.</li> <li>2. The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</li> <li>3. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</li> <li>4. OIK1-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</li> <li>5. Amend the Regulation which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</li> </ol>	<p>There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System).</p>

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						6. These changes can be made by amending the relevant Regulation.	
Kosovo Chamber of Nurses (OIK)	OIK2-A	Licensing with college	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure in the case of licensing is missing.</p> <p>4. The method of payment is more convenient but still restricted.</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend Regulation to require only information, to be submitted ex officio, without needing to submit documents such as: Scanning ID card, Birth Certificate or Marriage Certificate (for married women) not older than 6-months.</p> <p>3. Amend the Regulation which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision on Administrative Fees in OIK so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p> <p>6. The licensing fee is EUR 60 (compared to the high school licensing which is EUR 20)</p>	<p>Amendment of law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of the Regulation is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision on Administrative Fees for OIK Services should be done to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-202 on Permit and License System and should not</p>

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						and may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) Fees should vary according to the load of work for the provision of this service and not according to the education of the applicant. It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance for this).	exceed the amount required to cover the cost that the competent authority incurs in administering the permission.
Kosovo Chamber of Nurses (OIK)	OIK2-B	Relicensing with college	License	Licensing Commission;  License is signed by the Chair of the Licensing Commission and the Chair of the Chamber	Same as license OIK2-A	<ol style="list-style-type: none"> <li>1. The OIK2-B license should be issued for an indefinite term.</li> <li>2. The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</li> <li>3. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</li> <li>4. OIK2-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional</li> </ol>	There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System).

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						<p>qualifications have been maintained.</p> <p>5. Amend the Regulation which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>6. These changes can be made by amending the Regulation.</p>	
Kosovo Chamber of Nurses (OIK)	OIK3-A	Licensing with Bachelor	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation, but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure in the case of licensing is missing.</p> <p>4. The method of payment is more convenient but still restricted.</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend the Regulation to require only information, to be submitted ex officio, without needing to submit documents such as: Scanning ID card, Certificate of Examination at the Ministry of Health, Birth Extract or Marriage Certificate (for married women) not older than 6 months.</p> <p>3. Amend the Regulation which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision on Administrative Fees for OIK Services so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any</p>	<p>Amendment of law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of the Regulation is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a named document to a request such as instead of a copy of the identity card requiring personal data is done in order to enable electronic communication including the interconnection of electronic systems</p> <p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Decision on Administrative Fees for OIK Services should be done to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish</p>

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						<p>proof of payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p> <p>6. The licensing fee is EUR 60 (compared to the high school licensing which is EUR 20) and may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) Fees should vary according to the load of work for the provision of this service and not according to the education of the applicant. It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance for this).</p>	<p>the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>
Kosovo Chamber of Nurses (OIK)	OIK3-B	Relicensing with Bachelor	Licence	Licensing Commission;  License is signed by the Chair of the Licensing Commission and the Chair of the Chamber	Same as license OIK3-A	<p>1. The OIK3-A license should be issued for an indefinite term.</p> <p>2. The 5-year term can be maintained but only for the purpose of valorization of 100 credit points for holding a basic license.</p> <p>3. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</p>	There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-2020 on Permit and License System).

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>4. OIK3-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</p> <p>5. Amend the Regulation which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>6. These changes can be made by amending the Regulation.</p>	
Kosovo Chamber of Nurses (OIK)	OIK4-A	Licensing of clinical psychologists	Licence	Licensing Commission; License is signed by the Chair of the Commission and the Chair of the Chamber	<p>1. Law No. 04/L-150 on Chambers of Healthcare Professionals, Article 9, paragraph 1.3, regulates only the competence of the chamber for licensing, relicensing and revocation but not this type of permit.</p> <p>2. Some of the documents do not need to be requested from the party.</p> <p>3. The appeal procedure in the case of licensing is missing.</p> <p>4. The method of payment is more convenient but still</p>	<p>1. Amend Law No. 04/L-150 on Chambers of Healthcare Professionals, listing in an annex all professional licenses issued by the chambers.</p> <p>2. Amend the Regulation to require only information, to be submitted ex officio, without needing to submit documents such as: Scanning ID card, Certificate of Examination at the Ministry of Health, Birth Extract or Marriage Certificate (for married women) not older than 6 months.</p> <p>3. Amend the Regulation which establishes the right to appeal, the procedure, the body</p>	<p>Amendment of law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of Regulation is needed to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a named document to a request such as instead of a copy of the identity card requiring personal data is done in order to enable electronic communication including the interconnection of electronic systems</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					restricted.	<p>that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>4. Amend Decision on Administrative Fees for OIK Services so that payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof of payment.</p> <p>5. The license should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</p> <p>6. The licensing fee is EUR 60 (compared to the high school licensing which is EUR 20) and may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) Fees should be determined depending on the load of work for the provision of this service and not according to the education of the applicant. It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance for this).</p>	<p>Further, the amendment of the regulation should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of the Decision on Administrative Fees for OIK Services should be done to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The fee and any other payment should be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System and should not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.</p>
Kosovo Chamber of	OIK4-B	Relicensing of clinical psychologists	License	Licensing Commission;  License is signed	Same as license OIK4-A	<p>1. The OIK4-A license should be issued for an indefinite term.</p> <p>2. The 5-year term can be maintained but only for the purpose of valorization of 100</p>	There is no need to implement the procedure as in the case of licensing for the first time since the whole purpose of relicensing is to ascertain the requirements for holding a professional

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Nurses (OIK)				by the Chair of the Licensing Commission and the Chair of the Chamber		<p>credit points for holding a basic license.</p> <p>3. The only documents that can be requested are those that prove the achievement of 100 points, all other documents do not need to be required because they exist and were provided during the first licensing process.</p> <p>4. OIK4-A license does not need to be changed if 100 credit points are reached; in this case it suffices to update the data in the license register. If 100 credit points are not reached, the first license can be revoked, and the examination process can be continued to prove that the professional qualifications have been maintained.</p> <p>5. Amend the Regulation which establishes the right to appeal, the procedure, the body that reviews the appeal and the deadline for filing a complaint and deciding on the complaint.</p> <p>6. These changes can be made by amending the Regulation No. 12/2019.</p>	license (Article 10, par.3.5) and maintaining professional qualifications through continuing education (Article 13 of Law No. 04/L-202 on Permit and License System).
Kosovo Chamber of Nurses (OIK)	OIK5	Free licensing and relicensing for categories of war veterans,	/	/	/	This should not be included in the register and should not be treated as licensing	This is not licensing, but only exemption from payment of other licenses issued by the OIK

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
		veterans, martyrs, war invalids, civilian victims and their families					
Kosovo Chamber of Nurses (OIK)	OIK6	License duplicate (license copy)	License	Licensing Commission;  License is signed by the Chair of the Commission and the Chair of the Chamber	This should not be included in the register as it is not a new license	<ol style="list-style-type: none"> <li>1. Require only a request with minimum data to make known the fact of loss or damage of the license.</li> <li>2. Other data are or should be in the register of licenses kept by the chamber.</li> <li>3. The duplicate copy should be signed by the Chair of the Chamber or by a Chamber official authorized for this purpose.</li> </ol>	There is no need and no argument for implementing a procedure and convening the Licensing Commission to decide on an action as simple as the issuance of a duplicate copy, which can easily be ascertained and issued by the professional service of the Chamber.
Division for Licensing and Accreditation of Health care Institutions	DLAIS H1	License for general hospital	Permit	Board for Licensing of Private Healthcare Institutions;  License is signed by the Minister and the Chair of the Board	<ol style="list-style-type: none"> <li>1. Law No. 04/L-125 on Health in Article 42 provides only for the obligation to be licensed to commence work but does not stipulate this type of license specifically;</li> <li>2. Sub-legal acts that regulate this license, in addition to not having a clear legal basis, do not regulate it specifically;</li> <li>3. The license is issued for a period of 5 years which is determined by sub-legal act and</li> </ol>	<ol style="list-style-type: none"> <li>1. Amend Law No. 04/L-125 on Health, listing in an annex all permits for which the Ministry of Health is competent.</li> <li>2. Amend Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions, to require only information, to be submitted ex officio, without needing to submit documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel;</li> <li>3. Amend Administrative Instruction No. 08/2014 on the procedures for licensing</li> </ol>	Amendment of Law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law. Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions should be done to harmonize with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed;</p> <p>4. Some of the documents do not need to be requested from the party.</p> <p>5. The right to appeal is regulated by a sub-legal act and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate, and payment is not refunded if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. Decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license is issued to a natural person for engaging in a profession that poses a medium</p>	<p>private healthcare institutions, in order to grant this permit for an indefinite term, abolishing the validity period and the need for relicensing;</p> <p>4. Amend Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions which establishes the rules for eligibility of complaints, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LGAP.</p> <p>5. Amend administrative Instruction No. 08/2014 Procedures for licensing private healthcare institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof of payment. In case the issuance of this permit is refused, all payments made by the party should be refunded.</p> <p>6. Create/complete the license register with all the elements contained by the license.</p> <p>7. The permit must be signed by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LGAP.</p> <p>8. Transfer the decision-making responsibility from the board to a</p>	<p>order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions should be made to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit/responsible official is an obligation under the LGAP because the substantive competence for this permit has been given to the MoH and therefore there is no need to create such boards;</p> <p>Submission of a sworn statement by the party proving fulfilment of the requirements for</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the requirements for premises, personnel and medical equipment is done by an evaluation commission appointed by the minister;</p> <p>11. There are no rules concerning suspension, revocation and transfer of this permit;</p>	<p>unit/responsible official within the MoH as defined by the LGAP.</p> <p>9. Change the category of permit from license to permit.</p> <p>10. The evaluation of the fulfillment of the requirements for premises, personnel and medical equipment is done through the completion of a sworn statement without the need of visits by the evaluation commission.</p> <p>11. The rules of Law No. 04/L-202 on Permit and License System apply vis-a-vis suspension, revocation and transfer of this permit.</p> <p>12. The fee for issuing a permit is EUR 4,000 (EUR 1,500 for relicensing) and there is an additional application fee of EUR 1,000; these fees may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that the competent authority may charge for a permit will not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p> <p>13. The fee for adding new hospital activity is also very high and needs to be reconsidered.</p>	<p>premises, personnel and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons: first, not to delay the procedure and waste time and money for both the party and institution; second, the evaluation does not guarantee that these conditions are met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Division for Licensing and Accreditation of Health care Institutions	DLAIS H2	License for specialized hospital	Permit	Board for Licensing of Private Healthcare Institutions;  License is signed by the Minister and the Chair of the Board	<p>1. Law No. 04/L-125 on Health in Article 42 provides only for the obligation to be licensed to commence work, but it does not provide for this type of license specifically.</p> <p>2. Sub-legal acts that regulate this license, in addition to not having a clear legal basis, do not regulate it specifically.</p> <p>3. The license is issued for a period of 5 years which is determined by sub-legal act and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed.</p> <p>4. Some of the documents do not need to be requested from the party.</p> <p>5. The right to appeal is regulated by a sub-legal act and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p>	<p>1. Amend Law No. 04/L-125 on Health, listing in an annex all permits for which the Ministry of Health is competent.</p> <p>2. Amend Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions, to require only information, to be submitted ex officio, without needing to submit documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel.</p> <p>3. Amend Administrative Instruction No. 08/2014 on the procedures for licensing private healthcare institutions, so that this permit is issued for an indefinite term, abolishing the validity period and the need for relicensing;</p> <p>4. Amend Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions which establishes the rules for eligibility of complaints, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LGAP.</p> <p>5. Amend Administrative Instruction No. 08/2014 Procedures for licensing private healthcare institutions in order for payment</p>	<p>Amendment of Law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions should be done to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions should be made to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>6. The method of payment is inappropriate, and payment is not refunded if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. Decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license is issued to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the requirements for premises, personnel and medical equipment is done through an evaluation commission appointed by the minister.</p> <p>11. There are no rules concerning suspension, revocation and transfer of this permit.</p>	<p>to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof of payment. In case the issuance of this permit is refused, all payments made by the party should be refunded.</p> <p>6. Create/complete the license register with all the elements contained in the license.</p> <p>7. The permit should be signed by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LGAP.</p> <p>8. Transfer decision-making responsibility from the board to a unit/responsible official within the MoH as defined by the LGAP.</p> <p>9. Change the category of permit from license to permit.</p> <p>10. The evaluation of the fulfillment of the conditions of premises, personnel and the medical equipment should be done through the completion of a sworn statement without the need of visits by the evaluation commission.</p> <p>11. The rules of Law No. 04/L-202 on Permit and License System apply vis-a-vis suspension, revocation and transfer of this permit.</p>	<p>payment proof accepted.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making responsibility to the unit/responsible official is an obligation under the LGAP because the substantive competence for this permit has been given to the MoH and therefore there is no need to create such boards.</p> <p>Submission of a sworn statement by the party proving fulfilment of the requirements for premises, personnel and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons: first, not to delay the procedure and waste time and money for both the party and institution; second, the evaluation does not guarantee that these conditions are met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>12. The fee for issuing a permit is EUR 3,000 (and EUR 1,500 for relicensing) and there is an additional application fee of EUR 1,000; these fees may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p> <p>13. The fee for adding new hospital activity is also very high and needs to be reconsidered.</p>	
Division for Licensing and Accreditation of Health care Institutions	DLAIS H3	License for single activity ambulance (specialist ambulance )	Permit	Board for Licensing of Private Healthcare Institutions;  License is signed by the Minister and the Chair of the Board	<p>1. Law No. 04/L-125 on Health in Article 42 provides only for the obligation to be licensed to commence work, but it does not provide for this type of license specifically.</p> <p>2. Sub-legal acts that regulate this license, in addition to not having a clear legal basis, do not regulate it specifically.</p> <p>3. The license is issued for a period of 5 years which is determined by sub-legal act and</p>	<p>1. Amend Law No. 04/L-125 on Health, listing in an annex all permits for which the Ministry of Health is competent.</p> <p>2. Amend Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions, to require only information, to be submitted ex officio, without needing to submit documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel</p> <p>3. Amend Administrative Instruction No. 08/2014 on the procedures for licensing</p>	<p>Amendment of law No. 04/L-125 on Health is needed to harmonize this Law with Article 17, paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions should be done to harmonize with Article 16 of Law No. 04/L-202 on Permit and License System, but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as requesting personal data</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed.</p> <p>4. Some of the documents do not need to be requested from the party.</p> <p>5. The right to appeal is regulated by a sub-legal act and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate, and payment is not refunded if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. Decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license is issued to a natural person for engaging in a profession that poses a medium</p>	<p>private healthcare institutions and to grant this permit to the unfortunate by deleting the validity period and the need for relicensing;</p> <p>4. Amend Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions which establishes the rules for eligibility of complaints, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LGAP.</p> <p>5. Amend Administrative Instruction No. 08/2014 Procedures for licensing private healthcare institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof of payment. In case the issuance of this permit is refused, all payments made by the party will be returned.</p> <p>6. Create/complete the license register with all the elements contained in the license.</p> <p>7. The permit should be signed by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LGAP.</p> <p>8. Transfer decision-making responsibility from the board to a unit/responsible official</p>	<p>instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions should be made to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit/responsible official is an obligation under the LGAP because the substantive competence for this permit has been given to the MoH and therefore there is no need to create such boards;</p> <p>Submission of a sworn statement by the party</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister.</p> <p>11. There are no rules concerning suspension, revocation and transfer of this permit.</p>	<p>within the MoH as defined by the LGAP.</p> <p>9. Change the category of permit from license to permit.</p> <p>10. The evaluation of the fulfillment of the requirements for premises, personnel and medical equipment should be done through the completion of a sworn statement without the need for visits by the evaluation commission.</p> <p>11. The rules of Law No. 04/L-202 on Permit and License System apply vis-a-vis suspension, revocation and transfer of this permit.</p> <p>12. The fee for issuing a permit is EUR 600 (and EUR 200 for relicensing) and there is an additional fee of EUR 200 for application; these fees may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p>	<p>proving fulfilment of the requirements for premises, personnel and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons: first, not to delay the procedure and waste time and money for both the party and institution; second, the evaluation does not guarantee that these conditions are met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p>
Division for	DLAIS H4	License for ambulance	Permit	Board for Licensing of	1. Law No. 04/L-125 on Health in Article 42 provides only the	1. Amend Law No. 04/L-125 on Health and in an annex to list all permits for which the	Amendment of law No. 04/L-125 on Health is needed to harmonize this Law with Article 17,

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Licensing and Accreditation of Health care Institutions		s with two activities		Private Healthcare Institutions;  License is signed by the Minister and the Chair of the Board	<p>obligation to be licensed to start work but nowhere does it provide for this type of license specifically;</p> <p>2. Sub-legal acts that regulate this license, in addition to not having a clear legal basis, do not regulate it specifically;</p> <p>3. The license is issued for a period of 5 years which is determined by sub-legal act and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed;</p> <p>4. Some of the documents do not need to be requested from the party.</p> <p>5. The right to appeal is regulated by a sub-legal act and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate, and no payment</p>	<p>Ministry of Health is competent.</p> <p>2. Amend Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions, to require only information, to be submitted ex officio, without needing to submit documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel.</p> <p>3. Amend Administrative Instruction No. 08/2014 on the procedures for licensing private healthcare institutions, to grant this permit for an indefinite term, abolishing the validity period and the need for relicensing.</p> <p>4. Amend Administrative Instruction No. 08/2014 Procedures for licensing of private healthcare institutions which establishes the rules for eligibility of complaints, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LGAP.</p> <p>5. Amend Administrative Instruction No. 08/2014 Procedures for licensing private healthcare institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof of payment. In case the</p>	<p>paragraph, 1 of Law No. 04/L-202 on Permit and License System, according to which a permit and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for Licensing of Private Healthcare Institutions should be done to harmonize with Article 16 of Law No. 04/L-202 on Permit and License System but also to ensure compliance with the principle of conducting ex officio procedures under the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems. Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private healthcare institutions should be made to regulate the right to and procedure of appeal which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for Licensing of Private Healthcare Institutions should be made to enable payment in the end to avoid frequency of and loss of time for payment as well as to abolish the restriction of only one form of payment proof accepted.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate</p>

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					<p>will be refunded if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license is issued to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules concerning suspension, revocation and transfer of this permit;</p>	<p>issuance of this permit is refused, all payments made by the party will be returned.</p> <p>6. Create/complete the license register with all the elements contained in the license.</p> <p>7. The permit should be signed by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LGAP.</p> <p>8. Transfer decision-making responsibility from the board to a unit/responsible official within the MoH as defined by the LGAP.</p> <p>9. Change the category of permit from license to permit.</p> <p>10. The evaluation of the fulfillment of the requirements for premises, personnel and medical equipment should be done through the completion of a sworn statement without the need for visits by the evaluation commission.</p> <p>11. The rules of Law No. 04/L-202 on Permit and License System apply vis-a-vis suspension, revocation and transfer of this permit.</p> <p>12. The fee for issuing a permit is EUR 800 (and EUR 400 for relicensing) and there is an</p>	<p>the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit/responsible official is an obligation under the LGAP because the substantive competence for this permit has been given to the MoH and therefore there is no need to create such boards;</p> <p>Submission of a sworn statement by the party proving fulfilment of the requirements for premises, personnel and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons: first, not to delay the procedure and waste time and money for both the party and institution; second, the evaluation does not guarantee that these conditions are met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						additional fee of EUR 400 for application; these fees may not be in accordance with Article 18 of Law No. 04/L-2020 on Permit and License System (The fee that a competent authority may charge for a permission shall not exceed the amount required to cover the cost that the competent authority incurs in administering the permission). It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).	
Division for Licensing and Accreditation of Health Institutions	DLAIS H3	Ambulance license with one activity (specialist ambulance)	Permit	Licensing Board of Private Health Care Institutions;  The license is signed by: the Minister and the Chairman of the Board	<p>1. Law no. 04 / L-125 on Health in article 42 foresees only the obligation to be licensed to start work but nowhere doesn't foresee for this type of license specifically;</p> <p>2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same</p> <p>3. The license is issued for a period of 5 years which is determined by the law and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed;</p> <p>4. Some of the documents do</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where only informations are required and the same have to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel;</p> <p>3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this licence without deadline by deleting the validity period and the need for relicensing;</p> <p>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which are</p>	<p>Amendment of law no. 04 / L-125 on Health has to harmonize this law with article 17, paragraph 1 of Law no. 04 / L-202 on the system of permits and licenses according to which a permit and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of permits and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>not need to be requested from the parties.</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is lacking completely</p> <p>6. The method of payment is inconvenient and non-returnable.</p> <p>7. The register of licenses is lacking or incomplete.</p> <p>8. Manner of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for suspension, revocation and transfer of this licence;</p>	<p>established the rules for the admissibility of the complaint, the procedure, the body reviewing the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions for way how the payment is made at the end of the procedure and is also made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party will be returned/returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains</p> <p>7. The signing of the licence to be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA;</p> <p>8. To change the way of decision making by the board in a unit / responsible official within the MoH as defined by the LPPA;</p> <p>9. To change the category of licence from license to licence;</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. For the rules for suspension, revocation</p>	<p>complaint which is completely lacking.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove . The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible officer, is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving an affidavit by a party for fulfilling the conditions for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment that will be made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						and transfer of this licence to apply to those that are defined in Law no. 04 / L-202 on the system of licences. 12. The fee for issuing a licence is 600 euros (for relicensing 200 euros) and there is an additional fee for application of 200 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences.(The fee that the competent authority may charge for a licence shall not exceed the necessary amount to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).	
Division for Division for Licensing and Accreditation of Health care Institutions	DLAIS H4	License for ambulance with two activities	Permit	Licensing Board of Private Health Care Institutions;  The license is signed by: the Minister and the Chairman of the Board	1. Law no. 04 / L-125 on Health in article 42 provides only the obligations to be licensed so they can start with work but nowhere does it provide the type of license specifically; 2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same; 3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done for the same procedure as for licensing	1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent. 2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where the only information is required and the same has to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel; 3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this licence without deadline by deleting the validity period and the need for relicensing;	Amendment of law no. 04 / L-125 on Health has to be in harmonized with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a permit and license can be defined only by law. Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of permits and licenses but also on the principles of conducting the procedure ex officio according to the LPPA. The change from a registered (named) document to a request, for example requesting personal data instead of a copy of the identity card, in order to enable electronic communication, including the interconnection of electronic systems.

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>must be followed;</p> <p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely lacking.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for</p>	<p>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which is established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party shall be returned.</p> <p>6. To create / complete the license register with all the elements that the license contains.</p> <p>7. The signing of the licence to be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA;</p> <p>8. To change the way of decision making from the board in one unit / one responsible official within the MoH as defined by the LPPA;</p> <p>9. To change the category of permit from license to permit;</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through</p>	<p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely lacking. Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / to a responsible officer is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving a sworn statement by a party to meet the requirements for space, medical staff and equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and wasting time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					suspension, revocation and transfer of this licence;	<p>the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. For the rules for suspension, revocation and transfer of this licence, to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. The fee for issuing a licence is 800 euros (for relicensing 400 euros) and there is an additional fee for application of 400 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of permits and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p>	regular and occasional inspections and not at the beginning of the procedure.
Division for Licensing and Accreditation of Health care Institutions	DLAIS H5	License for Polyclinic	Permit	<p>Licensing Board of Private Health Care Institutions;</p> <p>The license is signed by: the Minister and the Chairman of the Board</p>	<p>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work but nowhere does it provide this type of license specifically;</p> <p>2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same;</p> <p>3. The license is issued for a period of 5 years which is</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions, where only informations are required and the same to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel;</p> <p>3. To amend the Administrative Instruction</p>	<p>Amendment of law no. 04 / L-125 on Health has to be harmonized with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a licence and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a named document to a request such as instead</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>determined by bylaw and after the expiration of this term the relicensing must be done with same procedure as for licensing must be followed;</p> <p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done</p>	<p>No. 08/2014 on the procedures for licensing private health institutions and to grant this licence without deadline by deleting the validity period and the need for relicensing;</p> <p>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which are established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party will be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains</p> <p>7. The signing of the licence has to be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA;</p> <p>8. To change the way of decision making from the board to one unit /or the responsible official within the MoH as defined by the LPPA;</p> <p>9. To change the category of licence from</p>	<p>of a copy of the identity card requiring personal data is done in order to enable electronic communication including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible officer is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>through an evaluation commission appointed by the minister;</p> <p>11. The rules for suspension, revocation and transfer of this licence are missing;</p>	<p>license to permit;</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. The fee for issuing a licence is 1,000 euros (for relicensing 500 euros) and there is an additional fee for application of 600 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of permits and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p> <p>13. The fee for adding new activity in the polyclinic is also high and should be reconsidered.</p>	<p>the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p>
Division for Licensing and Accreditation	DLAIS H6	License for family medicine center	Permit	<p>Licensing Board of Private Health Care Institutions;</p> <p>The license is signed by: the</p>	<p>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work but nowhere does provide this type of license specifically;</p> <p>2. Bylaws that regulate this</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions, where only informations</p>	<p>Amendment of law no. 04 / L-125 on Health has to be harmonized with article 17, paragraph 1 of Law no. 04 / L-202 on the system of permits and licenses according to which one permit and one license can be defined only by law.</p> <p>Amendment of Administrative Instruction No.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
of Health care Institutions				Minister and the Chairman of the Board	<p>license, except that they do not have a clear legal basis, also nowhere specifically regulate the same;</p> <p>3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done with the same procedure as for licensing;</p> <p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely lacking.</p> <p>6. The method of payment is inappropriate and payments will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. Manner of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a</p>	<p>are required and the same are to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel;</p> <p>3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this licence without deadline by deleting the validity period and the need for relicensing;</p> <p>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which are established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payments to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party shall be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains</p> <p>7. The signing of the licence to be done by the head of the unit, respectively the</p>	<p>08/2014 Procedures for licensing of private health institutions should be harmonized with Article 16 of Law no. 04 / L-202 on the system of permits and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered (named) document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely lacking.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible officer is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>profession that poses a medium or high risk to public health.</p> <p>10. The evaluation for the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for suspension, revocation and transfer of this licence;</p>	<p>responsible official in the MoH appointed in accordance with the LPPA;</p> <p>8. To change the way of decision making from the board to one unit /one responsible official within the MoH as defined by the LPPA;</p> <p>9. To change the category of permit from license to permit;</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment shall be done through the completion of an affidavit without the need to make visits by the evaluation commission;</p>	<p>boards;</p> <p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p>
Division for Licensing and Accreditation of Health care Institutions	DLAIS H7	Licence for Laboratory	Permit	<p>Licensing Board of Private Health Care Institutions;</p> <p>The license is signed by: the Minister and the Chairman of the Board</p>	<p>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work but nowhere does it provide for this type of license specifically;</p> <p>2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same;</p> <p>3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed;</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where only information is required and the same to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel;</p> <p>3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this licence without deadline by deleting the validity period and the need for relicensing;</p> <p>4. To amend the Administrative Instruction</p>	<p>Amendment of law no. 04 / L-125 on Health is needed to harmonize this law with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a licence and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered/named document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems. Further, the amendment of the Administrative</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. Manner of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment are done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for suspension, revocation and</p>	<p>No. 08/2014 Procedures for licensing private health institutions on which are established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party to be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains.</p> <p>7. The signing of the licence to be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA;</p> <p>8. To change the way of decision making from the board to one unit /or one responsible official within the MoH as defined by the LPPA;</p> <p>9. To change the category of permit from license to permit;</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through the completion of an affidavit without the need to make visits by the evaluation</p>	<p>Instruction No. 08/2014 on Procedures for licensing private health institutions should be made to regulate the right and procedure of the complaint which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible official is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					transfer of this licence;	<p>commission;</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. The fee for issuing a licence is 1,000 euros (for relicensing 400 euros) and there is an additional fee for application of 200 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p>	the beginning of the procedure.
Division for Licensing and Accreditation of Health care Institutions	DLAIS H8	License for radiology cabinet	Permit	<p>Licensing Board of Private Health Care Institutions;</p> <p>The license is signed by: the Minister and the Chairman of the Board</p>	<p>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work, but nowhere does it provide this type of license specifically;</p> <p>2. The bylaws that regulate this license, except that they do not have a clear legal basis, do not regulate it in the same way in a certain way;</p> <p>3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where only information is required and the same to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel;</p> <p>3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this</p>	<p>Amendment of law no. 04 / L-125 on Health has to be harmonized with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a permit and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of permit and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered/named document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>relicensing must be done following same procedure as for licensing;</p> <p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. Manner of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the</p>	<p>licence to the without deadline by deleting the validity period and the need for relicensing;</p> <p>4. To amend the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions in which are established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party shall be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains.</p> <p>7. The signing of the licence to be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA;</p> <p>8. To change the way of decision making from the board to one unit / responsible official within the MoH as defined by the LPPA;</p> <p>9. To change the category of licence from permit to licence;</p>	<p>electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment. The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible official is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards; Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>minister;</p> <p>11. There are no rules for suspension, revocation and transfer of this licence;</p> <p>12. Administrative Instruction No. 03/2007 The application of ionizing and non-ionizing rays in health is based on the Law on Private Health Activities which has been repealed by Law no. 04 / L-125 on Health.</p>	<p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. To repeal the Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health and to approve the new Administrative Instruction that regulates this permission based on law no. 04 / L-125 on Health.</p> <p>13. The fee for issuing a licence is 1,000 euros (for relicensing 400 euros) and there is an additional fee for application of 200 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p>	<p>regular and occasional inspections and not at the beginning of the procedure.</p> <p>Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health really without legal basis, therefore the same should be repealed, a new administrative instruction is drafted.</p>
Division for Licensing and	DLAIS H9	License for Radiology-Dentistry cabinet	Permit	Licensing Board of Private Health Care Institutions;	<p>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work, but nowhere does it</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction</p>	<p>Amendment of law no. 04 / L-125 on Health is needed to harmonize this law with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Accreditation of Health care Institutions				The license is signed by: the Minister and the Chairman of the Board	<p>provide this type of license specifically;</p> <p>2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same;</p> <p>3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed;</p> <p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p>	<p>No. 08/2014 Procedures for licensing of private health institutions, where only information are required and the same are provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, professional licenses for health personnel;</p> <p>3. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions and this licence to be given without deadline by deleting the validity period and the need for relicensing;</p> <p>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which is established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LGAP</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party will be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains</p>	<p>licence and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely missing.</p> <p>Amending the Administrative Instruction No. 08/2014 on Procedures for licensing private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible officer is an obligation under the LGAP because the substantive competence for</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for suspension, revocation and transfer of this licence;</p> <p>12. Administrative Instruction No. 03/2007 The application of ionizing and non-ionizing rays in health is based on the Law on Private Health Activities which has been repealed by Law no. 04 / L-125 on Health.</p>	<p>7. The signing of the licence to be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA;</p> <p>8. To change the way of decision making by the board in a unit / responsible official within the MoH as defined by the LPPA;9. Te ndryshohet kategoria e lejimi nga licence ne leje;</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. To repeal the Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health and to approve the new Administrative Instruction that regulates this permission based on law no. 04 / L-125 on Health.</p> <p>13. The fee for issuing a licence is 800 euros (for relicensing 300 euros) and there is an additional fee for application of 200 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount</p>	<p>this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p> <p>Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health really without legal basis, therefore the same should be repealed, a new administrative instruction is drafted.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).	
Division for Licensing and Accreditation of Health care Institutions	DLAIS H10	License for ultrasound cabinet	Permit	Licensing Board of Private Health Care Institutions;  The license is signed by: the Minister and the Chairman of the Board	<ol style="list-style-type: none"> <li>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work but nowhere does it provide for this type of license specifically;</li> <li>2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same;</li> <li>3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed;</li> <li>4. Some of the documents do not need to be requested from the parties</li> <li>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</li> </ol>	<ol style="list-style-type: none"> <li>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</li> <li>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where only information is required and the same to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, Professional licenses for health personnel.</li> <li>3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this licence to the without deadline by deleting the validity period and the need for relicensing;</li> <li>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which is established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</li> <li>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private</li> </ol>	<p>Amendment of law no. 04 / L-125 on Health is needed to harmonize this law with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a licence and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for suspension, revocation and transfer of this licence;</p> <p>12. Administrative Instruction No. 03/2007 The application of ionizing and non-ionizing rays in health is based on the Law on Private Health Activities which has been repealed by Law no. 04 / L-125 on Health.</p>	<p>health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party will be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains</p> <p>7. The signing of the licence should be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA.</p> <p>8. To change the way of decision-making by the board in a unit / responsible official within the MoH as defined by the LPPA.</p> <p>9. To change the category of permission from license to licence.</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment should be done by filling in an affidavit without the need to make visits by the evaluation commission.</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. To repeal the Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health and to approve the new Administrative Instruction that regulates this permission based on law no.</p>	<p>payen.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible officer is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p> <p>Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health really without legal basis, therefore the same should be repealed, a new administrative instruction is drafted</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						04 / L-125 on Health. 12. The fee for issuing a licence is 600 euros (for relicensing 200 euros) and there is an additional fee for application of 200 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).	
Division for Licensing and Accreditation of Health care Institutions	DLAIS H11	Cabinet license for computed tomography	Permit	Licensing Board of Private Health Care Institutions;  The license is signed by: the Minister and the Chairman of the Board	1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work but nowhere does it provide for this type of license specifically; 2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same; 3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed; 4. Some of the documents do	1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent. 2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where only the information is required and the same to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Business registration certificate, Professional licenses for health personnel. 3. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions and this licence to be given without deadline by deleting the validity period and the need for relicensing; 4. To amend the Administrative Instruction	Amendment of law no. 04 / L-125 on Health is needed to harmonize this law with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a licence and license can be defined only by law. Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be harmonized with Article 16 of Law no. 04 / L-202 on the system of permits and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems. Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private

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					<p>not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for suspension, revocation and transfer of this licence;</p>	<p>No. 08/2014 Procedures for licensing private health institutions in which are established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>6. To create / complete the license register with all the elements that the licence contains.</p> <p>7. The signing of the licence should be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA.</p> <p>8. To change the way of decision-making by from the board in one unit / one responsible official within the MoH as defined by the LPPA.</p> <p>9. To change the category of permission from license to permit.</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. To repeal the Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health and to approve the</p>	<p>health institutions should be harmonized with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered/named document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further more the amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health ,have to be done to regulate the right and the complain procedure which lacks completely.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible officer is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment</p>

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					<p>12. Administrative Instruction No. 03/2007 The application of ionizing and non-ionizing rays in health is based on the Law on Private Health Activities which has been repealed by Law no. 04 / L-125 on Health.</p>	<p>new Administrative Instruction that regulates this permission based on law no. 04 / L-125 on Health.</p> <p>13. The fee for issuing a licence is 1500 euros (for relicensing 700 euros) and there is an additional fee for application of 200 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p>	<p>made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p> <p>Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health really without legal basis, therefore the same should be repealed, a new administrative instruction is drafted.</p>
Division for Licensing and Accreditation of Health care Institutions	DLAIS H12	License for magnetic resonance cabinet	Permit	<p>Licensing Board of Private Health Care Institutions;</p> <p>The license is signed by: the Minister and the Chairman of the Board</p>	<p>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work but nowhere does it provide for this type of license specifically;</p> <p>2. Bylaws that regulate this license, except that they do not have a clear legal basis, also nowhere specifically regulate the same;</p> <p>3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done for which the same procedure as</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where only information is required and the same to be provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, Professional licenses for health personnel.</p> <p>3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this licence to the without deadline by deleting the validity period and the need for</p>	<p>Amendment of law no. 04 / L-125 on Health is needed to harmonize this law with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a licence and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p>

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					<p>for licensing must be followed;</p> <p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for</p>	<p>relicensing;</p> <p>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which is established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party will be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains</p> <p>7. The signing of the licence should be done by the head of the unit, respectively the responsible official in the MoH appointed in accordance with the LPPA.</p> <p>8. To change the way of decision-making by the board in a unit / responsible official within the MoH as defined by the LPPA.</p> <p>9. To change the category of permission from license to licence.</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through</p>	<p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely missing.</p> <p>Amendment of Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible officer is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p> <p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>suspension, revocation and transfer of this licence;</p> <p>12. Administrative Instruction No. 03/2007 The application of ionizing and non-ionizing rays in health is based on the Law on Private Health Activities which has been repealed by Law no. 04 / L-125 on Health.</p>	<p>the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. To repeal the Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health and to approve the new Administrative Instruction that regulates this permission based on law no. 04 / L-125 on Health</p> <p>13. The fee for issuing a licence is 1500 euros (for relicensing 700 euros) and there is an additional fee for application of 200 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).</p>	<p>regular and occasional inspections and not at the beginning of the procedure.</p> <p>Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health really without legal basis, therefore the same should be repealed, a new administrative instruction is drafted.</p>
Division for Licensing and Accreditation of	DLAIS H13	License for coronarography and angiography cabinet	Permit	<p>Licensing Board of Private Health Care Institutions;</p> <p>The license is signed by: the Minister and the</p>	<p>1. Law no. 04 / L-125 on Health in article 42 provides only the obligation to be licensed to start work but nowhere does it provide for this type of license specifically;</p> <p>2. Bylaws that regulate this</p>	<p>1. To amend law no. 04 / L-125 on Health and in an annex to list all licences for which the Ministry of Health is competent.</p> <p>2. To change the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions, where only information is required and the same to be</p>	<p>Amendment of law no. 04 / L-125 on Health is needed to harmonized with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a licence and license can be defined only by law.</p> <p>Amendment of Administrative Instruction No. 08/2014 Procedures for licensing of private</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Health care Institutions				Chairman of the Board	<p>license, except that they do not have a clear legal basis, also nowhere specifically regulate the same;</p> <p>3. The license is issued for a period of 5 years which is determined by bylaw and after the expiration of this term the relicensing must be done, for which the same procedure as for licensing must be followed;</p> <p>4. Some of the documents do not need to be requested from the parties</p> <p>5. The right to appeal is regulated by a bylaw and the deadline for filing a complaint is shorter than defined by the LGAP while the deadline for decision-making on the complaint is completely absent.</p> <p>6. The method of payment is inappropriate and payment will not be returned if the license is denied.</p> <p>7. The register of licenses is missing or incomplete.</p> <p>8. The way of decision making through a licensing board is unnecessary.</p> <p>9. The designation is incorrect as a license which refers to a natural person for engaging in a</p>	<p>provided ex officio and not documents such as: Identification documentation for the founder, director and health personnel, Certificate of business registration, Professional licenses for health personnel.</p> <p>3. To amend the Administrative Instruction No. 08/2014 on the procedures for licensing private health institutions and to grant this licence to the without deadline by deleting the validity period and the need for relicensing;</p> <p>4. To amend the Administrative Instruction No. 08/2014 Procedures for licensing of private health institutions in which is established the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with LPPA.</p> <p>5. To amend the Administrative Instruction No. 08/2014 Procedures for licensing private health institutions in order for payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party will be returned.</p> <p>6. To create / complete the license register with all the elements that the licence contains</p> <p>7. The signing of the licence should be done by the head of the unit, respectively the</p>	<p>health institutions should be done to harmonize with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LGAP. The change from a registered document to a request, such as requesting personal data instead of a copy of the identity card, is done in order to enable electronic communication, including the interconnection of electronic systems.</p> <p>Further, the amendment of the Administrative Instruction No. 08/2014 on Procedures for licensing of private health institutions should be made to regulate the right and procedure of the complaint which is completely missing.</p> <p>Amending the Administrative Instruction No. 08/2014 on Procedures for licensing private health institutions should be made to enable payment in the end to avoid frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making to the unit / responsible official is an obligation under the LGAP because the substantive competence for this licence has been given to the MoH and therefore there is no need to create such boards;</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>profession that poses a medium or high risk to public health.</p> <p>10. The evaluation of the fulfillment of the conditions of the space, the personnel and the medical equipment is done through an evaluation commission appointed by the minister;</p> <p>11. There are no rules for suspension, revocation and transfer of this licence;</p> <p>12. Administrative Instruction No. 03/2007 The application of ionizing and non-ionizing rays in health is based on the Law on Private Health Activities which is repealed by Law no. 04 / L-125 on Health.</p>	<p>responsible official in the MoH appointed in accordance with the LPPA.</p> <p>8. To change the way of decision-making by the board in a unit / responsible official within the MoH as defined by the LPPA.</p> <p>9. To change the category of permission from license to licence.</p> <p>10. The evaluation of the fulfillment of the conditions for the space, the personnel and the medical equipment to be done through the completion of an affidavit without the need to make visits by the evaluation commission;</p> <p>11. The rules for suspension, revocation and transfer of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p> <p>12. To repeal the Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health and to approve the new Administrative Instruction that regulates this permission based on law no. 04 / L-125 on Health.</p> <p>13. The fee for issuing a licence is 1500 euros (for relicensing 700 euros) and there is an additional fee for application of 500 euros; these taxes may not be in accordance with Article 18 of Law no. 04 / L-2020 on the system of licences and licenses (The fee that the competent authority may charge for a licence shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the</p>	<p>Giving an affidavit by a party to meet the requirements for space, staff and medical equipment is more reasonable than an assessment by an evaluation commission for several reasons, the first not to delay the procedure and waste time and money for both the party and institution, the second assessment made however does not guarantee that these conditions can be met from the first days, therefore this control should be done through regular and occasional inspections and not at the beginning of the procedure.</p> <p>Administrative Instruction No. 03/2007 Application of ionizing and non-ionizing rays in health really without legal basis, therefore the same should be repealed, a new administrative instruction is drafted.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						licence.) It is recommended to calculate the costs incurred to provide this service (the World Bank can provide assistance with this).	
Department of Strategic Health Development	DZHSS H1	Temporary work licence for foreign doctors	License	Licensing Board of Private Health Care Institutions;  The license is signed by: the Minister and the Chairman of the Board	<ol style="list-style-type: none"> <li>1. Law no. 04 / L-125 on Health in article 71 paragraph 3 provides the obligation to be licensed according to the bylaw approved by the Government. This law nowhere specifically provides for this type of license specifically;</li> <li>2. Administrative Instruction no. 06/2012 on Temporary Licensing of non-Kosovar civic health professionals is old and has no clear legal basis;</li> <li>3. The license is issued for a period of 6 months but also shorter when the term is shorter for a residence licence which is determined by bylaw and after the expiration of this term the relicensing must be done for which the same procedure as for licensing must be followed;</li> <li>4. Some of the documents do not need to be requested from the parties</li> <li>5. There are no rules for the right to appeal;</li> <li>6. The method of payment is inappropriate and payment will not be returned if the license is</li> </ol>	<ol style="list-style-type: none"> <li>1. To amend law no. 04 / L-125 on Health to regulate this license or to refer to Article 12 of Law no. 04 / L-202 on the system of licences and licenses.</li> <li>2. To draft and approve the bylaw according to article 71 paragraph 3 of Law no. 04 / L-125 on Health</li> <li>3. This type of license to be granted indefinitely.</li> <li>4. The bylaw for licensing of foreign national doctors to regulate only the requests where only the information is required according to paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses.</li> <li>5. By bylaw to establish rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LPPA.</li> <li>6. The bylaw to enable the payment to be made at the end of the procedure and to be made through e-banking, POS, etc. Accept any proof proving payment. In case the issuance of this licence is refused, all payments made by the party will be returned.</li> <li>7. To create / complete the license register with all the elements that the licence contains</li> </ol>	Amendment of law no. 04 / L-125 on Health is needed to harmonize this law with article 17, paragraph 1 of Law no. 04 / L-202 on the system of licences and licenses according to which a licence and license can be defined only by law. The drafting and approval of the bylaw must be done in order to fulfill the legal requirement defined in paragraph 3 of article 71 of law no. 04 / L-125 on Health. The same must contain the information according to paragraph 12 of Law no. 04 / L-202 on the system of licences and licenses in order to harmonize with Article 16 of Law no. 04 / L-202 on the system of licences and licenses but also on the principle of conducting the procedure ex officio according to the LPPA. The bylaw should regulate the right and the procedure of the complaint which is completely missing as well as to define rules to enable the payment in the end to avoid the frequency and loss of time for payment and on the other hand not to limit only one form of evidence to prove payment. The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies. The restriction of the submission of the request by the legal entity only is without any argument. Rules for suspension and revocation are

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>denied.</p> <p>7. The register of licenses is lacking or incomplete.</p> <p>8. The request is made by the legal person for the foreign citizen and not by the natural person requesting the licence</p> <p>9. The designation is incorrect as a licence which refers to a natural person for engaging in a profession that poses a medium or high risk to public health.</p> <p>10. There are no rules for the suspension and revocation of this license.</p>	<p>8. The request to be allowed for the natural person in this case by the doctor with foreign citizenship;</p> <p>9. To change the category of licence from licence to professional permit.</p> <p>10. The rules for suspension, revocation of this licence to apply those defined in Law no. 04 / L-202 on the system of licences and licenses.</p>	necessary even as a reference to Law no. 04 / L-202 on the system of licences and licenses.
Kosovo Medicines Agency	AKPP M1	License for pharmaceutical retailers (pharmacies) of medicinal products and medical devices	Permit	<p>Licensing Department of the KMA;</p> <p>Licence is signed by the Director and the CEO of KMA</p>	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 14 paragraph 1.2, but it does not regulate the criteria and the procedure for issuing such permit, specifying that it be regulated by sub-legal act;</p> <p>2. The license is issued for a period of 5 years which is determined by sub-legal act and after the expiration of this term the relicensing must be done following the same procedure as for licensing;</p> <p>3. Some of the documents do not need to be requested from</p>	<p>1. Amend Law No 04/L-190 on Medicinal Products and Medical Devices to establish the conditions and criteria for this type of permission;</p> <p>2. Amend Administrative Instruction (MoH) No. 11/2015 on Retailers for medicinal products and medical devices to foresee the granting of this permit for an indefinite term, abolishing the validity period and the need for relicensing;</p> <p>3. Amend Administrative Instruction (MoH) No. 11/2015 on Retailers for medicinal products and medical devices, to require only information to be provided ex officio, without the need to submit documents such as: Business Certificate and information on business issued with code of activity for retail circulation of pharmaceutical products,</p>	<p>Amendment of Law No. 04/L-190 on Medicinal Products and Medical Devices is needed to harmonize it with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System according to which a permit and license can be defined only by law, including the main conditions and criteria.</p> <p>The only reason why re-licensing should be done is the payment therefore the need for re-licensing is unjustifiable and an unnecessary burden for applicants.</p> <p>Amendment of Administrative Instruction (MoH) No.11 / 2015 on Retailers for medicinal products and medical devices is needed so that it contains the information according to paragraph 12 of Law No. 04/L-202 on Permit and License System and is in aligned with Article 16 of Law No. 04/L-202 on Permit and License</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permit, which is contrary to Article 12 of the LGAP.</p> <p>6. Payment for this license can be made in installments for each year, while if the installment is not paid, the license is revoked;</p> <p>7. The license register is missing or incomplete.</p> <p>8. The designation is incorrect as a license is issued to natural persons for engaging in a profession that poses a medium or high risk to public health.</p> <p>9. The evaluation of the fulfillment of some criteria is done in the field by senior officials of KMA; this is an obligatory phase of the procedure and is paid;</p> <p>10. The rules for revocation and transfer of this permit are missing.</p>	<p>Professional license of pharmacist, Work license of other professional staff;</p> <p>4. Amend Law No 04/L-190 on Medicinal Products and Medical Devices establishing the rules for complaint eligibility, the procedure, the body that reviews the complaint, and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP;</p> <p>5. Amend Law No 04/L-190 on Medicinal Products and Medical Devices to abolish all service fees, while licensing fees should be set in accordance with Article 12 of the LGAP and Article 18 of Law No. 04/L-202 on Permit and License System (The fee that the competent authority may charge for a permit shall not exceed the amount necessary to cover the costs incurred by the competent authority to administer the permit). Allow payment at the end of the procedure including through e-banking, POS, etc. Accept any proof of payment. In case the issuance of this permit is refused, all payments made by the party should be refunded;</p> <p>6. Create/complete the register of licenses with all the elements contained in the license;</p> <p>7. Change the way of decision-making for this license and delegate responsibility to the professional employee as provided for in Article 26 of the LGAP. This license should be signed by the head of the unit, respectively</p>	<p>System, as well as to ensure compliance with the principle of conducting the procedure ex officio according to the LGAP.</p> <p>Amendment of Law No. 04/L-190 on Medicinal Products and Medical Devices is needed is needed to regulate the right to and the procedure of complaint, which is completely missing</p> <p>Amendment of Law No. 04/L-190 on Medicinal Products and Medical Devices is needed should abolish all service fees while license fees should be determined according to Article 12 of the LGAP, as well as set rules to enable payment at the end to avoid frequency and loss of time for payment and abolishing, on the other hand, the restriction of only form of payment proof accepted.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making competencies is a legal requirement of the LGAP, including the signing of the license.</p> <p>Revocation rules are necessary, even if only as a reference to Law No. 04/L-202 on Permit and License System.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>the responsible official of the KMA appointed in accordance with the LGAP;</p> <p>9. Change the category of permission from license to permit;</p> <p>10. Allow evaluation of the fulfillment of the conditions and criteria by completing a sworn statement without the need of visits from senior officials of the KMA;</p> <p>11. The rules defined in Law No. 04/L-202 on Permit and License System apply vis-a-vis revocation and transfer of this permit.</p>	
Kosovo Medicines Agency	AKPP M2	License for pharmaceutical wholesalers (warehouses) of medicinal products and medical devices	Permit	<p>Licensing Department of the KMA;</p> <p>Licence is signed by the Director and the CEO of KMA</p>	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 14 paragraph 1.2, but it does not regulate the criteria and the procedure for issuing such permit, specifying that it be regulated by sub-legal act;</p> <p>2. The license is issued for a period of 5 years which is determined by sub-legal act and after the expiration of this term the relicensing must be done following the same procedure as for licensing;</p> <p>3. Some of the documents do not need to be requested from the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p>	<p>1. Amend Law No 04/L-190 on Medicinal Products and Medical Devices to establish the conditions and criteria for this type of permission;</p> <p>2. Amend Administrative Instruction (MoH) No. 11/2015 on Retailers for medicinal products and medical devices to foresee the granting of this permit for an indefinite term, abolishing the validity period and the need for relicensing;</p> <p>3. Amend Administrative Instruction (MoH) No. 11/2015 on Retailers for medicinal products and medical devices, to require only information to be provided ex officio, without the need to submit documents such as: Business Certificate and information on business issued with code of activity for retail circulation of pharmaceutical products, Professional license of pharmacist, Work license of other professional staff;</p> <p>4. Amend Law No 04/L-190 on Medicinal Products and Medical Devices establishing</p>	<p>Amendment of Law No. 04/L-190 on Medicinal Products and Medical Devices is needed to harmonize it with Article 17, paragraph 1, of Law No. 04/L-202 on Permit and License System according to which a permit and license can be defined only by law, including the main conditions and criteria.</p> <p>The only reason why re-licensing should be done is the payment therefore the need for re-licensing is unjustifiable and an unnecessary burden for applicants.</p> <p>Amendment of Administrative Instruction (MoH) No.11 / 2015 on Retailers for medicinal products and medical devices is needed so that it contains the information according to paragraph 12 of Law No. 04/L-202 on Permit and License System and is in aligned with Article 16 of Law No. 04/L-202 on Permit and License System, as well as to ensure compliance with the principle of conducting the procedure ex officio according to the LGAP.</p> <p>Amendment of Law No. 04/L-190 on Medicinal</p>

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					<p>5. The law envisages service fees for this type of permit, which is contrary to Article 12 of the LGAP.</p> <p>6. Payment for this license can be made in installments for each year, while if the installment is not paid, the license is revoked;</p> <p>7. The license register is missing or incomplete.</p> <p>8. The designation is incorrect as a license is issued to natural persons for engaging in a profession that poses a medium or high risk to public health.</p> <p>9. The evaluation of the fulfillment of some criteria is done in the field by senior officials of KMA; this is an obligatory phase of the procedure and is paid;</p> <p>10. The rules for revocation and transfer of this permit are missing.</p>	<p>the rules for complaint eligibility, the procedure, the body that reviews the complaint, and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP;</p> <p>5. Amend Law No 04/L-190 on Medicinal Products and Medical Devices to abolish all service fees, while licensing fees should be set in accordance with Article 12 of the LGAP. Allow payment at the end of the procedure including through e-banking, POS, etc. Accept any proof of payment. In case the issuance of this permit is refused, all payments made by the party should be refunded;</p> <p>6. Create/complete the register of licenses with all the elements contained in the license;</p> <p>7. Change the way of decision-making for this license and delegate responsibility to the professional employee as provided for in Article 26 of the LGAP. This license should be signed by the head of the unit, respectively the responsible official of the KMA appointed in accordance with the LGAP;</p> <p>9. Change the category of permission from license to permit;</p> <p>10. Allow evaluation of the fulfillment of the conditions and criteria by completing a sworn statement without the need of visits from senior officials of the KMA;</p> <p>11. The rules defined in Law No. 04/L-202 on Permit and License System apply vis-a-vis</p>	<p>Products and Medical Devices is needed is needed to regulate the right to and the procedure of complaint, which is completely missing</p> <p>Amendment of Law No. 04/L-190 on Medicinal Products and Medical Devices is needed should abolish all service fees while license fees should be determined according to Article 12 of the LGAP, as well as set rules to enable payment at the end to avoid frequency and loss of time for payment and abolishing, on the other hand, the restriction of only form of payment proof accepted.</p> <p>The register of licenses is necessary especially in case of loss or damage of a license to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>Delegation of decision-making competencies is a legal requirement of the LGAP, including the signing of the license.</p> <p>Revocation rules are necessary, even if only as a reference to Law No. 04/L-202 on Permit and License System.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						revocation and transfer of this permit.	
Kosovo Medicines Agency	AKPP M3	License for the import of medicinal products	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 12 but not with a specific name;</p> <p>2. The license is issued for a period of 3 months with the possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license.</p> <p>3. There is no need for some of the documents to be requested from the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>6. In addition to service fees, a fee of 1% of the imported products' invoice value is envisaged;</p> <p>7. The Registry for Licenses is missing or is incomplete.</p> <p>8. The designation as a license which refers to a natural person</p>	<p>1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, listing in an annex all prerequisite permits or licences needed to obtain an import license, along with the conditions and criteria for obtaining those permits/licenses</p> <p>2. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing;</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>4. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which</p>	<p>The amendment of Law 04/L-190 on Medicinal Products and Medical Devices is needed in order to harmonize this law with Article 17, paragraph 1 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit and license can be defined only by law, including the main conditions and criteria. No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>The amendment of the Administrative Instruction No.13/2013 on Wholesalers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law no. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of the Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on</p>

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					for engaging in a profession that poses a medium or high risk to public health is improper. 9. The rules for revocation and transfer of this permit are missing.	establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP. 5. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded. 6. Remove the tariff at the amount of 1% of the imported products. 7. Establish/complete the Registry for Licenses with all the elements that the license contains. 8. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP; 9. Change the permission category from license to permit; 10. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.	the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported products shall be done because the same has no legal basis and no justification is provided as to why it should be paid. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.
Kosovo	AKPP M5	License for the import	Permit	KMA Licensing Department;	1. Law No. 04/L-190 on Medicinal Products and Medical	1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, listing in an	The amendment of Law 04/L-190 on Medicinal Products and Medical Devices is needed in order

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
Medicines Agency		of refurbished equipment		The license is signed by: KMA Director and Chief Executive	<p>Devices mentions this type of permit in Article 12 but not with a specific name;</p> <p>2. The license is issued for a period of 3 months with the possibility of extension for another 3 months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license.</p> <p>3. Some of the documents are not necessary to be requested from the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>6. In addition to service fees, a fee of 1% of the invoice value of imported products is envisaged;</p> <p>7. The register of licenses is missing or is incomplete.</p> <p>8. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>9. The rules for revocation and</p>	<p>annex all prerequisite permits or licences needed to obtain an import license, along with the conditions and criteria for obtaining those permits/licenses;</p> <p>2. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing;</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>4. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for</p>	<p>to harmonize this law with Article 17, paragraph 1 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit and license can be defined only by law, including the main conditions and criteria. No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>The amendment of the Administrative Instruction No.13/2013 on Wholesalers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law no. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					transfer of this permit are missing.	<p>filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>5. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>6. Remove the tariff at the amount of 1% of the imported products.</p> <p>7. Establish/complete the Registry for Licenses with all the elements that the license contains.</p> <p>8. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>9. Change the permission category from license to permit;</p> <p>10. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	<p>products shall be done because the same has no legal basis and no justification is provided as to why it should be paid. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>
Kosovo Medicines Agency	AKPP M6	License for the import of parallel products (not	Permit	KMA Licensing Department;  The license is signed by: KMA	1. Law No. 04/L-190 on Medicinal Products and Medical Devices mentions this type of permit in Article 12 but not with a specific name;	1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, listing in an annex all prerequisite permits or licences needed to obtain an import license, along with the conditions and criteria for obtaining	The amendment of Law 04/L-190 on Medicinal Products and Medical Devices is needed in order to harmonize this law with Article 17, paragraph 1 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit and

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
y		registered in Kosovo)		Director and Chief Executive	<p>2. The license is issued for a period of 3 months with the possibility of extension for another 3 months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license.</p> <p>3. Some of the documents are not necessary to be requested from the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>6. In addition to service fees, a fee of 1% of the invoice value of the imported products is envisaged;</p> <p>7. The register of licenses is missing or is incomplete.</p> <p>8. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>9. The rules for revocation and transfer of this permit are missing.</p>	<p>those permits/licenses</p> <p>2. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing; 3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>4. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>5. Amend the Law 04/L-190 on Medicinal</p>	<p>license can be defined only by law, including the main conditions and criteria. No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>The amendment of the Administrative Instruction No.13/2013 on Wholesalers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law no. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported products shall be done because the same has no legal basis and no justification is provided as to why it should be paid.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>6. Remove the tariff at the amount of 1% of the imported products.</p> <p>7. Establish/complete the Registry for Licenses with all the elements that the license contains.</p> <p>8. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>9. Change the permission category from license to permit;</p> <p>10. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	<p>The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>
Kosovo Medicines Agency	AKPP M7	License for import of narcotic medicinal products	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	1. The license is issued for a period of 3 months with the possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in	1. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing; 2. Amend the Law	No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.  Amendment of Administrative Instruction No. 06/2014, Determination of the List of Medicinal Products and Borderline Products, should be

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>order to be equipped this license.</p> <p>2. Some of the documents are not necessary to be requested from the party.</p> <p>3. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>4. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>5. In addition to service fees, a fee of 1% of the imported products invoice value is envisaged;</p> <p>6. The Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The rules for revocation and transfer of this permit are missing.</p>	<p>04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>4. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by</p>	<p>done in order that it contains the information according to paragraph 12 of Law No. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP.</p> <p>Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP.</p> <p>Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported products shall be done because the same has no legal basis and no justification is provided as to why it should be paid.</p> <p>The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP.</p> <p>The rules for revocation are necessary, even as a</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>the party should be refunded.</p> <p>5. Remove the tariff at the amount of 1% of the imported products.</p> <p>6. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>7. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>8. Change the permission category from license to permit;</p> <p>9. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	reference to Law No. 04/L-202 on Permit and License System.
Kosovo Medicines Agency	AKPP M8	License for import of radiopharmaceuticals	Permit	<p>KMA Licensing Department;</p> <p>The license is signed by: KMA Director and Chief Executive</p>	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 12 but not with a specific name;</p> <p>2. The license is issued for a period of 3 months with the possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license.</p> <p>3. Some of the documents are not necessary to be requested</p>	<p>1. 1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, listing in an annex all prerequisite permits or licences needed to obtain an import license, along with the conditions and criteria for obtaining those permits/licenses</p> <p>2. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing;</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of</p>	<p>The amendment of Law 04/L-190 on Medicinal Products and Medical Devices is needed in order to harmonize this law with Article 17, paragraph 1 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit and license can be defined only by law, including the main conditions and criteria. No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>The amendment of the Administrative Instruction No.13/2013 on Wholesalers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>from the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>6. In addition to service fees, a fee of 1% of the imported products invoice value is envisaged;</p> <p>7. The register of licenses is missing or is incomplete.</p> <p>8. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>9. The rules for revocation and transfer of this permit are missing.</p>	<p>medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>4. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>5. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>6. Remove the tariff at the amount of 1% of the imported products.</p>	<p>Law no. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported products shall be done because the same has no legal basis and no justification is provided as to why it should be paid. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. Delegation of the decision-making competency, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>7. Establish/complete the Registry for Licenses with all the elements that the license contains.</p> <p>8. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>9. Change the permission category from license to permit;</p> <p>10. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	
Kosovo Medicines Agency	AKPP M9	License for import of denatured alcohol	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 12 but not with a specific name;</p> <p>2. The license is issued for a period of 3 months with the possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license.</p> <p>3. Some of the documents are not necessary to be requested from the party.</p> <p>4. The right to appeal is not fully regulated and is not in</p>	<p>1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, listing in an annex all prerequisite permits or licences needed to obtain an import license, along with the conditions and criteria for obtaining those permits/licenses;</p> <p>2. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing;</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information</p>	<p>The amendment of Law 04/L-190 on Medicinal Products and Medical Devices is needed in order to harmonize this law with Article 17, paragraph 1 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit and license can be defined only by law, including the main conditions and criteria. No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>The amendment of the Administrative Instruction No.13/2013 on Wholesalers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law no. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>6. In addition to service fees, a fee of 1% of the invoice for imported products is envisaged;</p> <p>7. The Registry of Licenses is missing or is incomplete.</p> <p>8. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>9. The rules for revocation and transfer of this permit are missing.</p>	<p>would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>4. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>5. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>6. Remove the tariff at the amount of 1% of the imported products.</p> <p>7. Establish/complete the Registry for Licenses with all the elements that the license contains.</p>	<p>also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported products shall be done because the same has no legal basis and no justification is provided as to why it should be paid. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						8. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP; 9. Change the permission category from license to permit; 10. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.	
Kosovo Medicines Agency	AKPP M10	License for import of precursors	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	1. The license is issued for a period of 3 months with the possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license. 2. Some of the documents are not necessary to be requested from the party. 3. The right to appeal is not fully regulated and is not in accordance with the LGAP. 4. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP. 5. In addition to service fees, a fee of 1% of the imported products invoice value is	1. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing; 2. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or	No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be restricted in time. Amendment of Administrative Instruction No. 06/2014, Determination of the List of Medicinal Products and Borderline Products, should be done in order that it contains the information according to paragraph 12 of Law No. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP.

## ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>envisaged; 6. The Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The rules for revocation and transfer of this permit are missing.</p>	<p>import license issued by the KMA, and should meet the GMP standards;</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>4. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>5. Remove the tariff at the amount of 1% of the imported products.</p> <p>6. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>7. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>8. Change the permission category from license to permit;</p> <p>9. Apply the rules on the revocation and</p>	<p>Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported products shall be done because the same has no legal basis and no justification is provided as to why it should be paid.</p> <p>The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies.</p> <p>The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP.</p> <p>The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>

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						transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.	
Kosovo Medicines Agency	AKPP M11	License for import of psychotropics	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	<p>1. The license is issued for a period of 3 months with the possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license.</p> <p>2. Some of the documents are not necessary to be requested from the party.</p> <p>3. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>4. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>5. In addition to service fees, a fee of 1% of the imported products invoice value is envisaged;</p> <p>6. The Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The rules for revocation and</p>	<p>1. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing;</p> <p>2. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p>	<p>No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>Amendment of Administrative Instruction No. 06/2014, Determination of the List of Medicinal Products and Borderline Products, should be done in order that it contains the information according to paragraph 12 of Law No. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP.</p> <p>Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP.</p> <p>Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The removal of the 1% tariff for the imported products shall be done because the same has no legal basis and no justification is provided as to why it should be paid.</p>

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					transfer of this permit are missing.	<p>4. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>5. Remove the tariff at the amount of 1% of the imported products.</p> <p>6. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>7. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>8. Change the permission category from license to permit;</p> <p>9. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.
Kosovo Medicines Agency	AKPP M12	License for import of raw material - active substance	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 12 but not with a specific name;</p> <p>2. The license is issued for a period of 3 months with the</p>	<p>1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, listing in an annex all prerequisite permits or licences needed to obtain an import license, along with the conditions and criteria for obtaining those permits/licenses;</p> <p>2. Amend Administrative Instruction No.</p>	The amendment of Law 04/L-190 on Medicinal Products and Medical Devices is needed in order to harmonize this law with Article 17, paragraph 1 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit and license can be defined only by law, including the main conditions and criteria.

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					<p>possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in order to be equipped this license.</p> <p>3. There is no need for some of the documents to be requested from the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>6. The Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The rules for revocation and transfer of this permit are missing.</p>	<p>06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and the need for relicensing; 3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>4. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>5. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in</p>	<p>No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>The amendment of the Administrative Instruction No.13/2013 on Wholesalers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law no. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making</p>

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						<p>accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>6. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>7. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>8. Change the permission category from license to permit;</p> <p>9. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	<p>competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>
Kosovo Medicines Agency	AKPP M13	License for import of raw material - auxiliary substance	Permit	<p>KMA Licensing Department;</p> <p>The license is signed by: KMA Director and Chief Executive</p>	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 12 but not with a specific name;</p> <p>2. The license is issued for a period of 3 months with the possibility of extension for 3 additional months (maximum 6 months). After the elapse of this period, a new application should be filed from the beginning in</p>	<p>1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, listing in an annex all prerequisite permits or licences needed to obtain an import license, along with the conditions and criteria for obtaining those permits/licenses;</p> <p>2. Amend Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations and this permit to be given for an indefinite period by removing the validity period and</p>	<p>The amendment of Law 04/L-190 on Medicinal Products and Medical Devices is needed in order to harmonize this law with Article 17, paragraph 1 of Law No. 04/L-202 on Permit and License System, which stipulates that a permit and license can be defined only by law, including the main conditions and criteria. No reason has been provided as to why the license term is 3 + 3 months, therefore there is no need for this type of license to be timely restricted.</p> <p>The amendment of the Administrative</p>

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					<p>order to be equipped this license.</p> <p>3. There is no need for some of the documents to be requested from the party.</p> <p>4. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>5. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>6. The Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The rules for revocation and transfer of this permit are missing.</p>	<p>the need for relicensing; 3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices and the Administrative Instruction No. 06/2014 on determining the list of medicinal products and borderline products which require import and export authorizations, where only the information would be required and the same should be provided ex officio and not require documents such as: Copy of marketing authorization certificate, circulation license (retail or wholesale), business license issued by the competent authority, marketing authorization for medicinal products issued by the KMA, import authorization possessed by the importer and issued by the KMA or import license issued by the KMA, and should meet the GMP standards;</p> <p>4. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>5. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of</p>	<p>Instruction No.13/2013 on Wholesalers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law no. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>

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						<p>the permit is rejected, all payments made by the party should be refunded.</p> <p>6. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>7. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>8. Change the permission category from license to permit;</p> <p>9. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	
Kosovo Medicines Agency	AKPP M14	License for the production of medicinal products	Permit	KMA Licensing Department; The license is signed by: KMA Director and Chief Executive	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices refers to this type of permission in Article 10 as an authorization for production;</p> <p>2. The license is issued for a period of 5 years which is determined by a sub normative act and after the expiration of this period the relicensing must be done for which the same procedure as for licensing must be followed;</p> <p>3. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>4. The law envisages service fees</p>	<p>1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices in order to issue this permit for an indefinite period of time by deleting the validity period and the need for relicensing;</p> <p>2. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>3. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The</p>	<p>Payment is the only reason why re-licensing is done. Therefore the need for re-licensing is unjustifiable and an unnecessary burden for the party.</p> <p>Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of</p>

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					<p>for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>5. Payment for this license can be made in installments for each year, while if the installment is not paid, the license is revoked;</p> <p>6. Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The rules for revocation and transfer of this permit are missing.</p>	<p>payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>4. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>5. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>6. Change the permission category from license to permit;</p> <p>7. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	<p>proof in order to prove the payment. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>
Kosovo Medicines Agency	AKPP M15	License for galenic laboratory	Permit	<p>KMA Licensing Department;</p> <p>The license is signed by: KMA Director and Chief Executive</p>	<p>1. Law No. 04/L-190 on Medicinal Products and Medical Devices mentions this type of permission in Article 10 as an authorization for production;</p> <p>2. The license is issued for a period of 5 years which is determined by a sub normative act and after the expiration of this period the relicensing must be done for which the same procedure as for licensing must</p>	<p>1. Amend the Law 04/L-190 on Medicinal Products and Medical Devices in order to issue this permit for an indefinite period of time by deleting the validity period and the need for relicensing;</p> <p>2. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the</p>	<p>Payment is the only reason why re-licensing is done. Therefore the need for re-licensing is unjustifiable and an unnecessary burden for the party.</p> <p>Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be</p>

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					<p>be followed;</p> <p>3. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>4. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>5. Payment for this license can be made in installments for each year, while if the installment is not paid, the license is revoked;</p> <p>6. Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The evaluation of the fulfillment of several criteria is done in the field by the senior officials of the KMA, and this is an obligatory phase of the procedure</p> <p>9. The rules for revocation and transfer of this permit are missing.</p>	<p>complaint in accordance with the LGAP.</p> <p>3. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>4. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>5. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP;</p> <p>6. Change the permission category from license to permit.</p> <p>7. The assessment of compliance with the conditions and criteria to be done by completing an affidavit without senior KMA officials having the need to make a visit.</p> <p>8. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	<p>determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>
Kosovo Medici	AKPP M16	License for operation with	Permit	KMA Licensing Department;	1. The license is issued for a period of 5 years, and after the expiration of this period the	1. This permit should be issued for an indefinite period of time in which case the validity period and the need for relicensing	Payment is the only reason why re-licensing is done. Therefore the need for re-licensing is unjustifiable and an unnecessary burden for the

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Health Agency		narcotics		The license is signed by: KMA Director and Chief Executive	<p>1. Relicensing must be done for which the same procedure as for licensing must be followed;</p> <p>2. There is no need for some of the documents to be requested from the party.</p> <p>3. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>4. The law envisages service fees for this type of permission, which is contrary to Article 12 of the LGAP.</p> <p>5. Payment for this license can be made in installments for each year, while if the installment is not paid, the license is revoked;</p> <p>6. Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The evaluation of the fulfillment of several criteria is done in the field by the senior officials of the KMA. This is a mandatory phase of the procedure and is charged for;</p> <p>9. The rules for revocation and transfer of this permit are missing.</p>	<p>1. The license should be deleted;</p> <p>2. Amend the Administrative Instruction (MoH) No.11/2015 - Retailers for Medicinal Products and Medical Devices, where only the information would be required, and the same should be provided ex officio, rather than documents such as: Copy of work license (as wholesaler, retailer, or health institution), Copy of the work license of the responsible person, Copy of the identity card of the director and the responsible person, Certificate from the court regarding the criminal statute (for the director and the responsible person, original or notarized, not older than 6 months),</p> <p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>4. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>5. Establish/complete the Registry of</p>	<p>party.</p> <p>The amendment of the Administrative Instruction (MoH) No.11/2015 on Retailers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law No. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a</p>

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Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						<p>Licenses with all the elements contained by the license.</p> <p>6. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP.</p> <p>7. Change the permission category from license to permit.</p> <p>8. The assessment of compliance with the conditions and criteria to be done by completing an affidavit without senior KMA officials having the need to make a visit.</p> <p>9. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.</p>	reference to Law No. 04/L-202 on Permit and License System.
Kosovo Medicines Agency	AKPP M17	License for operation with precursors	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	<p>1. The license is issued for a period of 1 year, and after the elapse of this period the relicensing must be done for which the same procedure as for licensing must be followed;</p> <p>2. There is no need for some of the documents to be requested from the party.</p> <p>3. The right to appeal is not fully regulated and is not in accordance with the LGAP.</p> <p>4. The law envisages service fees for this type of permission, which is contrary to Article 12 of</p>	<p>1. This permit should be issued for an indefinite period of time in which case the validity period and the need for relicensing should be deleted;</p> <p>2. Amend the Administrative Instruction (MoH) No.11/2015 - Retailers for Medicinal products and Medical Devices, where only the information would be required, and the same would be provided ex officio, rather than ask for documents such as: Court certificate for the criminal statute (for director and responsible person, original or notarized, not older than 6 months), copy of the identity card of the director and the responsible person.</p>	<p>Payment is the only reason why re-licensing is done. Therefore the need for re-licensing is unjustifiable and an unnecessary burden for the party.</p> <p>The amendment of the Administrative Instruction (MoH) No.11/2015 on Retailers for Medicinal Products and Medical Devices should be made in order that it contains the information provided in paragraph 12 of the Law No. 04/L-202 on Permit and License System, in order to harmonize it with Article 16 of Law No. 04/L-202 on Permit and License System but also with the principle of conducting an ex officio procedure based on the LGAP. Amendment of Law 04/L-190 on Medicinal</p>

ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
					<p>the LGAP.</p> <p>5. Payment for this license can be made in installments for each year, while if the installment is not paid, the license is revoked;</p> <p>6. Registry of Licenses is missing or is incomplete.</p> <p>7. The designation as a license which refers to a natural person for engaging in a profession that poses a medium or high risk to public health is improper.</p> <p>8. The evaluation of the fulfillment of several criteria is done in the field by the senior officials of the KMA. This is a mandatory phase of the procedure and is charged for;</p> <p>9. The rules for revocation and transfer of this permit are missing.</p>	<p>3. Amend the Law 04/L-190 on Medicinal Products and Medical Devices, which establishes the rules for the admissibility of the complaint, the procedure, the body that reviews the complaint and the deadline for filing a complaint and deciding on the complaint in accordance with the LGAP.</p> <p>4. Amend the Law 04/L-190 on Medicinal products and Medical Devices and remove all taxes for services and impose tariffs in accordance with Article 12 of the LGAP. The payment should be made at the end of the procedure and should also be done through e-banking, POS, etc. Accept any proof which confirms payment. In case the issuance of the permit is rejected, all payments made by the party should be refunded.</p> <p>5. Establish/complete the Registry of Licenses with all the elements contained by the license.</p> <p>6. Change the decision-making for this license and delegate the responsibility to the professional employee as provided in Article 26 of the LGAP. License signing should be made by the Head of the Unit, respectively the KMA responsible officer, appointed in accordance with the LGAP.</p> <p>7. Change the permission category from license to permit.</p> <p>8. The assessment of compliance with the conditions and criteria to be done by completing an affidavit without senior KMA officials having the need to make a visit.</p>	<p>Products and Medical Devices should be made in order to regulate the right and appeals procedure which is missing. The amendment of Law 04/L-190 on Medicinal Products and Medical Devices should remove all taxes for services while the license fees should be determined pursuant to Article 12 of the LGAP. Additionally, it should envisage rules to enable the payment in the end, in order to avoid frequency and time loss for payment, and on the other hand not to envisage only one form of proof in order to prove the payment. The Registry of Licenses is necessary especially in case of loss or damage of a license in order to duplicate the same, but also to enable communication and exchange of information with other public bodies. The delegation of the decision-making competence, including the signing of a license, is a legal requirement based on the LGAP. The rules for revocation are necessary, even as a reference to Law No. 04/L-202 on Permit and License System.</p>

ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

Ministry	Ref. No.	Name of permission	Type of permission	Responsible authority	Findings	Recommendations	Rationale
						9. Apply the rules on the revocation and transfer of this permit as provided by Law No. 04/L-202 on Permit and License System.	
Kosovo Medicines Agency	AKPP M18	License for import of medicinal products for individual therapy	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	This license (permit) has no legal basis	Change the form of permission from 'license' to 'registration'	It is something excessive and unreasonable for the medicinal products of individual consumption to go through a standard licensing procedure. This type of license is single use license and does not apply for other cases.
Kosovo Medicines Agency	AKPP M19	License for export of medicinal products	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	This license (permit) contains no expressive legal basis in Law No. 04/L-190 for Medicinal Products and Medical Devices, whereas for its issuance are required documents which have already been issued by the KMA, such as. Marketing authorization, CPP Certificate (Certificate of Pharmaceutical Product), and manufacturing or import license.	Change the form of permission from 'license' to 'registration'.	This type of permission categorized as 'license' has no meaning and effect in protecting the public interest because it has already been achieved through three types of licenses which are issued by the KMA. The KMA may require for the exported medicinal products to be registered without having the need to be provided with a license.
Kosovo Medicines Agency	AKPP M20	License for the export of medical devices	Permit	KMA Licensing Department;  The license is signed by: KMA Director and Chief Executive	This license (permit) has no expressive legal basis in Law No. 04/L-190 for Medicinal Products and Medical Devices, whereas for its issuance are required documents which have already been issued by the KMA, such as proof of import of the device, if the device is not a domestic product.	Change the form of permission from 'license' to 'registration'.	This type of permission which has been categorized as 'license' has no meaning and effect in protecting the public interest because it has already been achieved through three types of licenses which are issued by the KMA. The KMA may require for the exported medicinal products to be registered without having the need to be provided with a license.

ADMINISTRATIVE BURDEN PREVENTION AND REDUCTION PROGRAMME

## Annex 3: Analysis to simplify selected public administrative services based on life events

Service	Mandatory information / necessary documents / provided by the party / other public authorities	Administrative payments / conditionalities	Findings	Recommendations	Reasoning
First vehicle registration	<p><b>Legal basis:</b> <i>Administrative Instruction (MIA) NO. 07/2019 on registration of motor vehicles, Article 6, paragraph 1.</i></p> <ol style="list-style-type: none"> <li>Document of origin of the vehicle, vehicle registration document from the country of origin [Party].</li> <li>If the party does not have the original document of the motor vehicle (vehicle registration document from the country of origin) may submit a photocopy of a document or other document certified by a notary from the relevant state containing sufficient information about the vehicle, as well as a police certificate of loss together with a certificate of the anti-crime unit [Party].</li> <li>Customs SCD or customs certificate. In case the SCD (single customs document) is paid on behalf of a car dealership or a company licensed by KBRA (Kosovo Business Registration Agency) for the sale of a vehicle registered in KBRA MTI for this activity, the vehicle owner should also present original proof of sale from a car dealership or company licensed for sale. Therefore, an officer of the VRC (Vehicle Registration Center) is obliged to review the list of car dealerships or companies licensed</li> </ol>	<p><b>Legal basis:</b> <i>Decision No. 012/20 of 16 January 2020. years on setting tariffs</i> (example vehicle)</p> <ul style="list-style-type: none"> <li>€ 25 for vehicle registration [item 5.4].</li> <li>€ 10 equipping with certificate [item 5.11].</li> <li>€ 20 equipping with license plates [item 5.12].</li> <li>€ 10 for environmental tax [item 6.1.1].</li> <li>€ 40 for toll [item 6.2.1].</li> </ul>	<ol style="list-style-type: none"> <li>The request in item 3 should be verified through the Kosovo Customs document of the system provided by the party.</li> <li>The document in item 4 is in conflict with Law no. 08 / L-004 on Amendments to Law no. 05 / L-132 on vehicles.</li> <li>The document required in item 8 is: identity card, passport or driver's license submitted by the party.</li> <li>Mandatory information from item 11 for possession of a valid driver's license is contrary to the Law on Vehicles, but also to the right of ownership.</li> <li>Registration fees in item 5.4, in the amount of 20 €, are unreasonable and contrary to LGAP</li> <li>Payment of taxes is made only in the classical way and form: for the municipal tax in the municipality, and for other taxes in the VRC.</li> <li>Payment of fines is an unreasonable condition and has nothing to do with the vehicle registration process. This request</li> </ol>	<p><b>Amend the Article 6, paragraph 1 of the Administrative Instruction (MIA) NO. 07/2019 on the registration of motor vehicles as follows:</b></p> <ol style="list-style-type: none"> <li>The mandatory information referred to in item 3 may be completed through an electronic system by drafting a document or connecting the system to Customs.</li> <li>The request from item 4 should be harmonized with the Law no. 08 / L-004 on Amendments to Law no. 05 / L-132 on vehicles.</li> <li>The documents referred to in item 8 should not be requested, but the information from them should be submitted through the interconnection of the system or in other forms, as possessed by the same public body.</li> <li>Mandatory information for the driver's license is deleted, while the use of</li> </ol>	<ol style="list-style-type: none"> <li>Recommendations given for amendments to the Administrative Instruction (MIA) no. 07/2019 on the registration of motor vehicles is done in order to delete some of the mandatory data because they do not protect the public interest. It is advisable to make other changes so that information held by the body or other public bodies should not be provided by the party (principle only once according to Article 86, paragraph 3 of the LGAP).</li> <li></li> <li>Some of the recommendations for amending Decision No. 012/20 of 16 January 2020. on the determination of</li> </ol>

	<p>for sale that are registered by the KARB within the MTI or through the online system [Party].</p> <ol style="list-style-type: none"> <li>4. Certificate of approval of a motor vehicle, except in cases where the motor vehicle is exempt from the approval procedure [Party].</li> <li>5. Certificate of attestation of technical conformity of the vehicle, which may not be older than thirty (30) days from the date of issue [Party].</li> <li>6. The insurance policy must not be older than five (5) days from the date of issue and proof of payment the insurance policy must not be older than five (5) days from the date of issue and proof of payment [Party].</li> <li>7. Municipal vehicle tax, except for categories that are exempt from the tax in accordance with the legislation in force [Party].</li> <li>8. Valid document of the Republic of Kosovo containing personal data such as: identity card, passport or driver's license [Party].</li> <li>9. Foreign nationals who have a temporary or permanent residence permit may register their vehicles with regular registration plates, in cases where they meet customs obligations. The deadline for vehicle registration is related to the expiration of the residence permit;</li> <li>10. Data of vehicle owners are obtained by linking from the Central Civil Status Register (for natural persons); and from TAK (for legal entities);</li> <li>11. Valid driver's license for relevant categories, natural persons, except for exempt categories according to Article 3, paragraph 3 of this Administrative Instruction.</li> </ol>	<ul style="list-style-type: none"> <li>• € 10 for municipal tax (determined by municipal regulations) .</li> <li>• Payment of fines in road traffic is a condition for vehicle registration, <b>Article 3, paragraph 4 of AI no. 07/2019 on registration of motor vehicles.</b></li> </ul>	<p>and proof of payment must be submitted by the party.</p>	<p>vehicles is performed only by persons who have a valid driver's license for the category of vehicle used (as in Article 53 of the Law on Vehicles).</p> <ol style="list-style-type: none"> <li>5. Delete Article 3, paragraph 4, which conditions the registration of vehicles with the payment of fines imposed in road traffic, while the execution of fines is performed by TAK according to LGAP.</li> </ol> <p><i>Amend the Decision No. 012/20 of 16 January 2020 on setting tariffs</i></p> <ol style="list-style-type: none"> <li>6. Delete the fee in the amount of 20 € determined in item 5.4 of this decision because it is in conflict with the LGAP.</li> <li>7. Payments must be made at the end of the process and in one document, and forms and methods can be: in the classic way, via e-banking, via POS, etc.</li> </ol>	<p>tariffs are unjustified and in conflict with Article 12 of the LGAP.</p> <ol style="list-style-type: none"> <li>4. The removal of conditions such as the payment of fines is justified by the fact that the registration process has nothing to do with the payment of fines, while for this process there is now an effective legal solution under the LGAP for this issue. The proposal to make a payment at the end of the process is recommended to be done in order to reduce the high frequency that the party has by paying separately but also in the classic way without the possibility of payment in other ways, via e-banking, POS, etc.</li> </ol>
<p>Continuation of vehicle registration</p>	<p><i>Legal basis:</i> <b>Administrative Instruction (MIA) NO. 07/2019 on registration of motor vehicles, Article 7, paragraph 1.</b></p> <ol style="list-style-type: none"> <li>1. VRD issued by VRC [Party].</li> </ol>	<p><i>Legal basis:</i> <b>Decision No. 012/20 of 16 January</b></p>	<ol style="list-style-type: none"> <li>1. The VRC must be physically presented by the party even though the VRA has or must have this information. There are some sections in the VRC hat were</li> </ol>	<p><b>Amendment to Article 7, paragraph 1 of the Administrative Instruction (MIA) NO. 07/2019 on the registration of motor vehicles as follows:</b></p>	<ol style="list-style-type: none"> <li>1. Registration is a type of permit, so as such it is done only once, which is proven by a certificate. The certificate does not need to be changed until the</li> </ol>

	<ol style="list-style-type: none"> <li>2. Certificate of attestation of technical conformity of the vehicle, which may not be older than thirty (30) days from the date of issue [<b>Party</b>].</li> <li>3. The insurance policy must not be older than five (5) days from the date of issue and proof of payment [<b>Party</b>].</li> <li>4. Valid document of the owner of the vehicle containing personal data, identity card, passport of the Republic of Kosovo or driver's license [<b>Party</b>].</li> <li>5. Valid driving license applicable for the appropriate category (natural persons), except for the categories that are exempt according to Article 3, paragraph 3 of this Administrative Instruction [<b>Party</b>].</li> <li>6. Municipal vehicle tax, except for exempt categories in accordance with applicable law [<b>Party</b>].</li> <li>7. For a motor vehicle registered on behalf of a legal entity, the owner should submit a photocopy of the business certificate, business information and a valid identification document, ID card, passport or driver's license [<b>Party</b>].</li> <li>8. The request for registration of a motor vehicle may be submitted by an authorized person, certified by a notary or court, who has a copy of the identification document, driver's license for natural persons, while the legal entity requires a copy of the certificate and business information [<b>Party</b>].</li> <li>9. Requests for renewal of vehicle registration may also be submitted by family members of the vehicle owner, by submitting a copy of the identification document, ID card, passport, driver's license valid to the vehicle owner [<b>Party</b>].</li> </ol>	<p style="text-align: center;"><i><b>2020 on setting tariffs</b></i> (example vehicle)</p> <ul style="list-style-type: none"> <li>• € 10 for environmental tax [<b>item 6.1.1</b>].</li> <li>• € 40 for toll [<b>item 6.2.1</b>].</li> <li>• 10 euros for municipal tax (determined by municipal regulations)</li> <li>• Payment of fines in road traffic is a condition for vehicle registration, <b>Article 3, paragraph 4 of AI no. 07/2019 on the registration of motor vehicles.</b></li> </ul>	<p>stamped and signed by the VRA staff during the resumption.</p> <ol style="list-style-type: none"> <li>2. Requests 4 to 9 are exemption for parties, some of whom are in the possession of authorities or other public bodies while some are unnecessary.</li> <li>3. Payments are made only in the classical way and form, for the municipal tax in the municipality, while for other taxes in the VRA.</li> <li>4. Payment of fines is an unreasonable condition and has nothing to do with the vehicle registration process. This request and proof of payment must be submitted by the party.</li> </ol>	<ol style="list-style-type: none"> <li>1. The VRC should be issued only for the first registration and does not need to be renewed until the change of owner or any change in the vehicle.</li> <li>2. During the continuation of vehicle registration, only technical checks should be performed, followed by insurance according to items 2 and 3. Other conditions and required documents are unnecessary.</li> <li>3. Delete Article 3, paragraph 4, which conditions the registration of vehicles with the payment of fines imposed in road traffic, while the execution of fines is performed by TAK according to LGAP.</li> </ol> <p style="text-align: center;"><i><b>Amendment to Decision No. 012/20 of 16 January 2020 on setting tariffs</b></i></p> <ol style="list-style-type: none"> <li>4. Payments must be made at the end of the process and before the insurance policy is issued with one document, and the forms and methods can be: in the classic way, via e-banking, via POS. The request for proof of tax payment is requested by the insurance company.</li> </ol>	<p>criteria or facts for its issuance change.</p> <ol style="list-style-type: none"> <li>2. Mandatory and reasonable information that must be performed in certain periods (1 year) are technical controls (to protect the general interest) and insurance. It is assumed that information 4 to 9 in this approach is completed during registration, so it is unnecessary. During the police control, VRC + evidence of vehicle control + insurance policy is presented (stickers that are placed on vehicle plates have recently started to be used).</li> <li>3. In order to reduce the high frequency that the party has by paying separately but also in the classic way without the possibility of paying in other ways via e-banking, POS, etc., the remaining payments can be made by forcing the insurance company to issue an insurance policy. "The insurance company is certified by public authorities, so the transfer of this authorization is not a problem)</li> <li>4. Elimination of conditions such as payment of fines is justified by the fact that the process of continuing registration has nothing to do with the payment of fines, while for this process there are now effective</li> </ol>
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<p><b>Change of vehicle ownership</b></p>	<p><b>Legal basis:</b> <i>Administrative Instruction (MIA) NO. 07/2019 on registration of motor vehicles, Article 8, paragraph 1.;</i></p> <ol style="list-style-type: none"> <li>1. Deregistration of the VRC of the previous owner [Party].</li> <li>2. Proof of ownership (contract of sale, contract in case of gift, inheritance deed, document proving ownership, certified by a notary or court or executive order of a private executor) [Party].</li> <li>3. When buying a motor vehicle in companies licensed by the relevant authorities to buy and sell a motor vehicle the following is required [Party].</li> <li>4. Purchase contract certified by a notary or court, for vehicles registered on behalf of the car dealership [Party].</li> <li>5. Insurance policy on the name of the new owner [Party].</li> <li>6. Certificate confirming the technical conformity of the vehicle, which must not be older than thirty (30) days from the date of issue [Party].</li> <li>7. Valid RKS identification document of the owner of the motor vehicle, identity card, passport or driver's license. Data are obtained from the Central Civil Registry [Party].</li> <li>8. Driver's license valid for the appropriate category, for natural persons, except for the categories that are exempt according to Article 52 of the Law on Vehicles [Party].</li> <li>9. A vehicle owned by a legal entity is registered on the basis of a business certificate, the owner must submit a photocopy of the certificate and business information as well as a valid RKS identification document (identity card, passport or driver's license). While for non-governmental organizations or state</li> </ol>	<p><b>Legal basis:</b> <i>Decision No. 012/20 of 16 January 2020 on setting tariffs</i> (example vehicle)</p> <ul style="list-style-type: none"> <li>• € 25 for vehicle registration (from the beginning) [item 5.4].</li> <li>• € 10 for equipping with certificate [item 5.11]</li> <li>• € 20 for equipping with license plates [item 5.12]</li> <li>• € 10 for environmental tax [item 6.1.1]</li> <li>• € 40 for toll, [item 6.2.1]</li> <li>• 10 euros for municipal tax (determined by municipal)</li> </ul>	<ol style="list-style-type: none"> <li>1. The deregistration process referred to in item 1 shall be performed by the party (buyer). License plates are also handed over during the notification.</li> <li>2. The insurance policy and the certificate referred to in items 5 and 7 must be provided by the party (buyer) as from the beginning.</li> <li>3. Item 7 requires a document such as: identity card, passport or driver's license submitted by the party.</li> <li>4. The obligatory data from item 8 for possessing a valid driver's license is in contradiction with the law on vehicles, but also the right of ownership.</li> <li>5. Mandatory information in item 9 is in public registers (KARB and ACR) at the request of the party.</li> <li>6. The registration fees in item 5.4, in the amount of € 20 are unreasonable and contrary to the LGAP.</li> <li>7. Payment of plates in the amount of 20 € according to item 5.12 in contradiction with LGAP.</li> <li>8. Payment of taxes is made only in the classical way and form, for the municipal tax in the municipality, while for other taxes in the VRA.</li> <li>9. Payment of fines is an unreasonable condition and has nothing to do with the vehicle registration process. This request and proof of payment must be submitted by the party.</li> </ol>	<p><b>Amend of Article 8, paragraph 1 of the Administrative Instruction (MIA) NO. 07/2019 on the registration of motor vehicles as follows:</b></p> <ol style="list-style-type: none"> <li>1. De-registration should be done by the VRA itself, not the party.</li> <li>2. The documents referred to in item 7 should not be required, but the information from them should be provided through the interconnection of the system or in other forms held by the same public body.</li> <li>3. The insurance policy and technical inspections do not need to be re-requested, but continue for the remaining period, while the registration is continued according to the above proposal.</li> <li>4. Mandatory information in item 8 for driving licenses to be deleted, while the use of vehicles is performed only by persons who have a valid driver's license for the vehicle category (as in Article 53 of the Law on Vehicles).</li> <li>5. Delete Article 3, paragraph 4, which conditions the registration of vehicles with the payment of fines imposed in road traffic, while the execution of fines is performed by TAK according to LGAP.</li> </ol>	<p>legal solutions under the LGAP for this issue.</p> <ol style="list-style-type: none"> <li>1. Recommendations given for amendments to the Administrative Instruction (MIA) no. 07/2019 on the registration of motor vehicles were made in order to delete some of the mandatory information because they do not protect the public interest. It is recommended that other changes be made so that information held by the authority or other public authorities does not have to be provided by the party (principle only once according to the LGAP).</li> <li>2. Recommendations for amending Decision No. 012/20 of 16 January 2020 on the determination of tariffs are justified because some of them are unjustified and in conflict with Article 12 of the LGAP.</li> <li>3. Elimination of conditionality such as payment of fines is justified by the fact that the process of changing the owner has nothing to do with paying the fine, while for this process there</li> </ol>
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	<p>institutions, registration is done according to the fiscal certificate. Data are obtained by TAK and KARB [Party].</p> <p>10. For the change of ownership for motor vehicles of state institutions, a certificate of the institution for the transfer of ownership to another institution is required [Party].</p> <p>11. For motor vehicles sold at public tenders, a certificate of sale of the relevant institution should be submitted. However, in the case of a third party purchase, a sales contract should be provided [Party].</p> <p>12. Municipal fee on the name of the new owner [Party].</p>	<p>regulations)</p> <ul style="list-style-type: none"> <li>• Payment of fines in road traffic is a condition for vehicle registration, <b>Article 3, paragraph 4 of AI no. 07/2019 on the registration of motor vehicles</b></li> </ul>		<p><b>Amendment to Decision No. 012/20 of 16 January 2020 on setting tariffs</b></p> <p>6. Delete the fee in the amount of 20 € determined in item 5.4 of this decision because it is contrary to the LGAP since the vehicle is registered once.</p> <p>7. Plates should be changed only when the buyer has a place of residence that differs from the seller in terms of region, but not when the region is the same.</p> <p>8. Payments must be made at the end of the process and in one document, and forms and methods can be: in the classic way, via e-banking, via POS</p>	<p>is now an effective legal solution under the LGAP for this issue.</p> <p>4. It is recommended that the payment proposal be made at the end of the process in order to reduce the high frequency that the party has by paying separately but also in the classic way without the possibility of payment in other ways via e-banking, POS, etc.</p>
<p><b>Confirmation of criminal record<sup>1</sup></b></p>	<p><i>Legal basis:</i> <b>Regulation no. 0112018 on the Central Criminal Records System of Kosovo.</b></p> <p><i>The following information appears on the KJC website, but is not listed anywhere in the above Regulation)</i></p> <p>1. When you appear in court, you must have one of these three valid documents with you</p> <p>a) ID card and its copy b) driver's license and its copy c) passport and its copy [Party].</p>	<p><i>Legal basis:</i> <b>Regulation no. 0112018 on the Central Criminal Records System of Kosovo, Article 19.</b></p> <p>(These tariffs are published on the KJC website)</p> <ul style="list-style-type: none"> <li>• If you are applyin</li> </ul>	<p>1. The requirements in items 1 and 2 of the request of the parties, although they are in the possession of public bodies and they are not the requirements of Regulation no. 0112018 on the Central Criminal Records System of Kosovo.</p> <p>2. The requirements of item 3 are contrary to paragraph 1 of Article 17 because it provides that the certificate can be obtained in any first instance court or branch of the court throughout the territory of the Republic of Kosovo,</p>	<p>1. <b>Amend the Regulation no. 0112018 on the Central Criminal Records System of Kosovo</b> in order to enable a mechanism for cooperation between the KJC and the ACR, the information required in items 1 and 2 shall be provided automatically by connecting the electronic civil status system to the CCRSK.</p>	<p>1. <b>Amend the Regulation no. 0112018 on the Central Criminal Records System of Kosovo</b> is proposed so that the information and documents available to the public body / bodies be provided by the public body itself, and not by the party (Article 86, paragraph 3 of the ZOAP),</p>

<sup>1</sup> Regulation no. 01/2018 on the central system of criminal evidence refers to the new system of criminal evidence, which is being established by the KJC, this system in terms of issuing certificates has not yet started to be implemented and the same is expected to start to be implemented at the end of 2022. With the start of the implementation of the CCES, the name of the service will be replaced with the Certificate of criminal status, which will be issued in a unified form in the courts of the country, through E-Kosova.

	<p>2. If you submit a request through the website, you can<sup>2</sup> upload one of the above documents directly from the website as part of the request [Party].</p> <p>3. If you live in a city other than your home country, you must take a local community certificate from your current place of residence with you to court. [Stranka].</p>	<p>g for employment, the certificate is issued free of charge.</p> <ul style="list-style-type: none"> <li>If you apply for other reasons, the certificate costs five (5) euros.</li> <li>Payment is made at the court payment counter.</li> </ul>	<p>regardless of residence or domicile of the person seeking such certification.</p> <p>3. Although the application may be submitted electronically, the withdrawal of the certificate must be performed physically by the party.</p> <p>4. Payment of the tariff based on the purpose of using the certificate is not argued.</p>	<p>2. Delete from the KJC website and do not ask for information in item 3.</p> <p>3. Where a physical certificate of civil status is required by law, it may be downloaded from the system without the need for a party to go and obtain it physically (similar to civil status certificates) in addition to those certificates for purposes outside Kosovo.</p> <p>4. Delete the payment because it is unjustified and contrary to the LGAP.</p>	<p>where in the case of excerpts from court records it is very possible because interface of two electronic systems is required.</p> <p>2. Information submitted without a legal basis is without a legal basis and should be deleted.</p> <p>3. Enabling the certificate device electronically is a convenience for the parties and saves time and money.</p> <p>4. The logic of determining the payment according to the purpose of using the certificate (for applying for employment purposes is free while for other purposes with payment) is unjustified and contrary to the LGAP.</p>
<p><b>Construction permit - I category</b></p>	<p><i>Legal basis: Administrative Instruction MESP no. 06/2017 on determining the procedures for preparation and consideration of requests for construction conditions, construction permits and demolition permits for categories I and II construction, Article 15, Annex 3.</i></p> <p>1. Copy of the plan and Certificate of ownership of the owner / owner of the plot</p>	<p><i>Legal basis: Administrative Instruction of the MESP no. 02/2018 on administrative fees for construction permits, demolition permits and</i></p>	<p>1. The application for a building permit must be physically submitted by the party</p> <p>2. The document required in paragraph 1 shall in practice be provided by the Party</p> <p>3. Certificate of payment of property tax is a mandatory condition that must be met.</p> <p>4. The documents referred to in item 3, although available to state</p>	<p><i>MESP Administrative Instruction no. 06/2017 on determining the procedures for preparation and consideration of requests for construction conditions, building permits and demolition permits for categories I and II construction to be amended as follows,</i></p> <p><i>Article 15 Annex 2 on the following items:</i></p>	<p>1. Amendment of the Administrative Instruction of the MESP no. 06/2017 on establishing procedures for preparation and consideration of applications for construction conditions, building</p>

	<p>(s) (proof of property not older than 6 months in the original format or photocopied and certified. Copies of the cadastral parcel plan must be harmonized with cadastral vectors [<b>Single point of contact</b>].</p> <ol style="list-style-type: none"> <li>2. Certificate of property tax of the owner / owner of the plot(s) and the investor [<b>Party</b>].</li> <li>3. Image of the identification document of the owner / owner of the plot(s) and the investor [<b>Party</b>].</li> <li>4. Plan information. (from regulatory plans, UDP, MDP-optional [<b>Party</b>].</li> <li>5. Approved construction conditions [<b>Party</b>].</li> <li>6. Geodetic survey with a building positioned in the state coordination system of Kosovo Ref. 01. (From a licensed surveying company) [<b>Party</b>].</li> <li>7. Preliminary design in 3 printed and one digital copy [<b>Party</b>].</li> <li>8. Consents of public companies (KEDS, RWC “Prishtina”, PTK, etc.) [<b>Party</b>].</li> <li>9. If the building is located on two or more cadastral parcels, they should be previously merged [<b>Party</b>].</li> <li>10. Confirmation of payment of municipal tax [<b>Party</b>].</li> </ol>	<p><i>tariffs for infrastructure regulation, Article 4, paragraph 1.</i></p> <ul style="list-style-type: none"> <li>• Administrative fee determined by each municipality by its act.</li> <li>• For example, the Municipality of Prishtina has an administrative fee for category II of € 6.50 / m<sup>2</sup> where it is € 3.85 / m<sup>2</sup> for reviewing applications and € 2.65 / m<sup>2</sup> for administrative supervision.</li> <li>• Tariff for the</li> </ul>	<p>authorities, shall be requested by the party.</p> <ol style="list-style-type: none"> <li>5. Conditions for construction are requested by the party, while they are approved by the public authority</li> <li>6. Consents in item 8 issued by public companies (KEDS, RWC, PTK, etc.) must be provided by the party (in practice they condition the parties by paying the debt if the party owes them)</li> <li>7. Very high and unjustified payment of the fee and in contradiction with LGAP and ZPPN.</li> </ol>	<ol style="list-style-type: none"> <li>1. The information referred to in items 1, 3, 4, 5 shall be submitted by the competent authority itself without the need to prove it with documents.</li> <li>2. Payment of property tax should not be mandatory information and should be deleted.</li> <li>3. The consent of public companies is given by the public body itself</li> </ol> <p><b>Article 12 should be amended as follows:</b></p> <ol style="list-style-type: none"> <li>4. It envisages the possibility of submitting requests electronically as well as electronic communication in general.</li> </ol> <p><b>Amend the municipal regulations on fees and tariffs</b> from municipalities in the part related to administrative fees for construction permits and it is determined in accordance with the LGAP and ZPPN. Payments must be made at the end of the process and with one document, and the forms and methods can be: in the classic way, via e-banking, via POS. Installment payments must still exist.</p>	<p>permits and demolition permits for categories I and II construction should be performed in order to provide information and documents available to the public authority (s) should be provided by the public authority, and not the party (Article 86, paragraph 3 of the LGAP), further this instruction should be amended to allow the submission of requests electronically in order to facilitate communication between the party in general.</p> <ol style="list-style-type: none"> <li>2. Conditionality of the payment of property tax arbitrarily restricts a fundamental right such as the right to construction. The collection of property tax must be carried out efficiently in accordance with the rules of the LGAP and there is no need to impose such conditions.</li> <li>3. Recommendations for amending municipal regulations for determining administrative fees and tariffs are justified because</li> </ol>
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		<p>impact of increasing the density of infrastructure (eg the case of Pristina € 4.30 / m2 for areas up to 450 m2).</p> <ul style="list-style-type: none"> <li>• Payment can also be made in installments</li> <li>• Payments are made physically through the bank</li> </ul>			<p>some of them are unjustified and contrary to Article 12 of the LGAP and ZPPN.</p> <p>4. It is recommended that the payment proposal be made at the end of the process in order to reduce the high frequency that the party has by paying separately but also in the classic way without the possibility of payment in other ways via e-banking, POS, etc.</p>
<p><b>Construction permit - II category</b></p>	<p><i>Legal basis: Administrative Instruction of the MESP no. 06/2017 on establishing procedures for preparation and consideration of requests for construction conditions, construction permits and demolition permits for categories I and II construction, Article 15, Annex 2</i></p> <p>1. Copy of the plan and Certificate of ownership of the owner(s) of the plot(s) (proof of property not older than 6 months in original format or photocopied and certified. Copies of the cadastral parcel</p>	<p><i>Legal basis: Administrative Instruction of the MESP no. 02/2018 on administrative fees for construction permits, demolition permits and tariffs for infrastructure regulation,</i></p>	<p>1. The application for a construction permit must be physically submitted by the party</p> <p>2. Documents which, according to the Administrative Instruction, are determined to be offered by One Stop Shop, are in practice provided by the party</p> <p>3. Certificate of payment of property tax is a mandatory condition that must be met.</p> <p>4. The documents referred to in item 4, although available to state</p>	<p><i>Amendment to the Administrative Instruction of the MESP no. 06/2017 on determining the procedures for preparation and consideration of requests for construction conditions, construction permits and demolition permits for categories I and II construction to be amended as follows,</i></p> <p><i>Article 15 Annex 3 on the following items:</i></p>	<p>1. Amendment of the Administrative Instruction of the MESP no. 06/2017 on establishing procedures for preparation and consideration of applications for construction conditions, building permits and demolition permits for categories I and II construction should be performed in order to</p>

	<p>plan must be harmonized with cadastral vectors) [<b>Single point of contact</b>].</p> <ol style="list-style-type: none"> <li>2. Application fee [<b>Party</b>].</li> <li>3. Certificate of property tax of the owner / co-owner of the plot / s and the investor [<b>Party</b>].</li> <li>4. Photocopy of the identification document of the owner / co-owner of the plot/s and the investor [<b>Party</b>].</li> <li>5. Construction conditions and plan information previously issued by DUNMM - copy [<b>Single point of contact</b>].</li> <li>6. Notarized contract / owner's contract with the investor for the investment [<b>Party</b>].</li> <li>7. Agreement on urban settlement certified by a notary (when this document does not have the conditions of construction) [<b>Party</b>].</li> <li>8. Geodetic survey with buildings / buildings positioned in the state coordination system Kosovo Ref.01 (From a licensed surveying company) [<b>Party</b>].</li> <li>9. Main design with all phases in 3 copies, in accordance with applicable regulations for technical standards [<b>Party</b>].</li> <li>10. Consents of public companies (KEDS, UR "Pristina", Termokos, PTK, etc.) [<b>Single point of contact</b>].</li> <li>11. Consent for environmental impact assessment [<b>Single point of contact</b>].</li> <li>12. Study and consent for fire protection (this document is issued by the Ministry of Interior) [<b>Single point of contact</b>].</li> <li>13. Geomechanical study of land and pit security - (project of the licensed company to be submitted in strong connection) [<b>Party</b>].</li> <li>14. Study organization of the workshop (licensed-optional company) [<b>Party</b>].</li> <li>15. Dynamic construction plan and inspection (by the licensed-option company) [<b>Party</b>].</li> <li>16. Construction Physics Development and implementation of energy efficiency measures - (by the licensed company) [<b>Party</b>].</li> </ol>	<p><b>Article 4, paragraph 1.</b></p> <ul style="list-style-type: none"> <li>• Administrative fee determined by each municipality by its act.</li> <li>• For example, the Municipality of Prishtina has an administrative fee for category I of € 6.50 / m2, where € 3.85 / m2 is for reviewing applications and € 2.65 / m2 for administrative supervision.</li> <li>• Tariff for the impact of increasing the density of infrastructure (eg the case of Prishtina € 10.70 / m2 for.</li> <li>• Payment can also be made in installments</li> <li>• Payments are made by party, in bank</li> </ul>	<p>authorities, shall be requested by the party.</p> <ol style="list-style-type: none"> <li>5. Conditions for construction are requested by the party, while they are approved by the public authority</li> <li>6. Approvals in item 10 issued by public companies (KEDS, RWC, PTK, etc.) must be provided by the party (in practice they condition the parties by paying the debt if the party owes them)</li> <li>7. Very high and unjustified payment of taxes and in contradiction with LGAP and LCP</li> </ol>	<ol style="list-style-type: none"> <li>1. The information referred to in items 1, 4, 5, 10, 11, 12 shall be provided by the competent authority without the need to prove it by documents.</li> <li>2. Payment of property tax should not be mandatory information and should be deleted.</li> <li>3. The consent of public companies is given by the public body itself.</li> </ol> <p><b>Article 12 to be amended:</b></p> <ol style="list-style-type: none"> <li>4. It envisages the possibility of submitting requests electronically as well as electronic communication in general.</li> </ol> <p><b>Amend the municipal regulations on taxes and fees</b> from municipalities in the part related to administrative fees for construction permits and it is determined in accordance with the LGAP and LCP.</p> <p>Payments must be made at the end of the process and with one document, and the forms and methods can be: in the classic way, via e-banking, via POS. Installment payments must still exist.</p>	<p>provide information and documents available to the public authority(s) should be provided by the public authority, and not the party (Article 86, paragraph 3 of the LGAP), further this instruction should be amended to allow the submission of requests electronically in order to facilitate communication between the party in general.</p> <ol style="list-style-type: none"> <li>2. Conditionality of the payment of property tax arbitrarily restricts a fundamental right such as the right to build. The collection of property tax must be carried out efficiently in accordance with the rules of the LGAP and there is no need to impose such conditions.</li> <li>3. Recommendations for amending municipal regulations for determining administrative fees and tariffs are justified because some of them are unjustified and contrary to Article 12 of the LGAP and LCP.</li> <li>4. It is recommended that the payment proposal be made at the end of the process in order to reduce the high frequency that the party has by paying separately but also in the classic way without the</li> </ol>
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	<ol style="list-style-type: none"> <li>17. Consents certified by the neighbors in case the construction of a facility on the border of the plot is planned <b>[Party]</b>.</li> <li>18. If any cadastral parcel is mortgaged, the consent of the pledgee must be obtained in advance <b>[Party]</b>.</li> <li>19. Dimensions of the building and calculations of the content for tax calculation <b>[Party]</b>.</li> <li>20. Pictures of the location (including the plot and surrounding buildings up to 50m in diameter) <b>[Party]</b>.</li> <li>21. For buildings in public, state, university, municipal, religious, etc., obtain the consent of the competent authority <b>[Party]</b>.</li> <li>22. In the case of building complexes and phased construction, documentation on permits and decisions on density and tariffs for facilities constructed in earlier phases must be provided <b>[Party]</b>.</li> <li>23. Confirmation of payment of municipal tax <b>[Party]</b>.</li> </ol>				<p>possibility of payment in other ways via e-banking, POS, etc.</p>
<p><b>Recogniti on of basic studies (Bachelor )</b></p>	<p><b>Legal basis:</b> <i>Administrative Instruction (MEST) no. 12/2018: Principles and procedures for recognition of diplomas, degrees and qualifications of higher professional and university titles acquired outside the Republic of Kosovo, Article 6.:</i></p> <ol style="list-style-type: none"> <li>1. A written request for recognition / equivalence of a diploma, received at NARIC and registered in the archives of the MEST <b>[Party]</b>.</li> <li>2. Completed form received from NARIC <b>[Party]</b>.</li> <li>3. Payment slip <b>[Party]</b>.</li> <li>4. Copy of identification document <b>[Party]</b></li> <li>5. Certified copy of diploma <b>[Party]</b>.</li> <li>6. Certified copy or notarized transcript / certificate of assessment <b>[Party]</b>.</li> <li>7. Translated summary of the paper - thesis (between 3-5 pages when the paper is in the unofficial language of the Republic of Kosovo <b>[Party]</b>.</li> </ol>	<p><b>Legal basis:</b> <i>Administrative Instruction (MEST) no. 12/2018: Principles and procedures for recognition of diplomas, degrees and qualifications of higher professional and university titles acquired outside the Republic of Kosovo, Article 12, item 2.1:</i></p> <ul style="list-style-type: none"> <li>• 30 euros - Higher vocational schools and</li> </ul>	<ol style="list-style-type: none"> <li>1. The information under 1 and 2 must be one document and as a request to be submitted online through the NARIC Kosovo website;</li> <li>2. Information / request 3 (administrative fee) in the amount of 30 euros is higher than the average cost required to conduct the relevant type of procedure and is contrary to the LGAP (Article 12 of the LGAP);</li> <li>3. Information 4 is also in conflict with the LGAP as it should be covered by the communication of databases of public institutions, so there is no need to provide them to the party;</li> <li>4. Information / requirement 5 is not required for notarization when it is necessary to look at the diploma in the original. Moreover, the diploma is verified even after the communication of the NARIC of Kosovo with the NARIC of the relevant country;</li> </ol>	<p><b>Amendment of Article 6, item 1 in relation to the required documents and Article 12, item 2.1. in connection with the administrative fee according to the following clarifications:</b></p> <ol style="list-style-type: none"> <li>1. Documents 1 and 2 must be integrated into one document and be online through the NARIC Kosovo website;</li> <li>2. Document 3 must be in accordance with the LGAP and be based on the average cost of the service / procedure for determining the amount of the fee;</li> <li>3. The document under 4 should be deleted as a request because it must be obtained from the ACR by the institution itself, in this case NARIC Kosovo;</li> <li>4. The document under 5 should be deleted as a request as it is covered</li> </ol>	<ol style="list-style-type: none"> <li>1. Recommendations given for amending AI no. 12/2018, ie Article 6, item 1 and Article 12, item 2.3. in relation to administrative costs are made in order to facilitate the procedure for the party and reduce the administrative burden.</li> <li>2. Most of the required documents can be eliminated in the procedure because in some cases they can be a) made online (eg application and form), b) integrated (documents 1 and 2), b) deleted because the authorities have to submit them to each other through internal communication and c are unnecessary) are because</li> </ol>

<p>8. Program of studies for the years when the studies were completed [Party].</p> <p>9. Diploma Annex (AD) (in cases of application) [Party].</p> <p>10. Certified copy of the original study diploma for one level of previous education [Party].</p> <p>11. If the documents (or one of them) referred to in item 1, Article 5, are not in some of the official languages of the Republic of Kosovo or in English, they should be translated into one of the official languages by a certified translator in the Republic of Kosovo [Party].</p> <p>12. Submitted documentation for recognition are not returned to the applicant;</p> <p>13. If the documentation submitted by the party is incomplete, NARIC should notify the party in writing within 30 days of the completion of the dossier, otherwise if the documentation is not completed within the prescribed time, the dossier will be archived as incomplete, and the party is obliged to resubmit the request for recognition / equivalence;</p> <p>14. The DSP may decide to return the file to the NARIC Center, for the necessary supplementation of the documentation according to this AI. If additional documents are required, the party is obliged to bring the necessary documents;</p> <p>15. In the absence of any documents required under Article 6, item 1, it will not accept a request for recognition by NARIC.</p> <p>16. In case a party applies for recognition / equivalence of a high qualification, he / she should first apply for recognition / equivalence of qualifications, diploma of previous studies obtained outside the Republic of Kosovo (Bachelor and Master). In case the party's qualification is recognized to the foreigner, he / she should bring proof [Party].</p>	<p><i>Bachelor level / basic studies</i></p>	<p>5. Information / request 6 also does not need to be verified, in this case the original transcript of grades issued by the relevant school / university must be submitted;</p> <p>6. Information / condition 7 is unnecessary because a diploma and a certificate of grades are sufficient. Also, paperwork is not applicable to undergraduate studies (Bachelor);</p> <p>7. Information / request 9 (diploma attachment) is submitted automatically at the moment when the diploma is sent for inspection, and a copy is submitted with the attachment;</p> <p>8. Information / requirement 10 is unnecessary because in this case the previous studies of the applicant are not important. This issue ended with the fact of admission of candidates to the University where he attended undergraduate studies (Bachelor);</p> <p>9. Request under 15 is unnecessary because it is covered by request under 13;</p> <p>10. The condition under 16 is unnecessary because it is a question of the applicant which level of study or diploma he wants to recognize in Kosovo. Also, this should not apply when it comes to the recognition of undergraduate studies (Bachelor) because previous studies are those of high school. Also, the confirmation / accuracy of previous studies is covered by the fact of admission of candidates to basic studies;</p>	<p>by the fact of sending the diploma for inspection and the fact of communication of NARIC of Kosovo with NARIC of the relevant country;</p> <p>5. The document under 6 must be a request for an original transcript of the grades that Universities usually issue to the candidate up to 3 original copies upon completion, precisely for the purpose of applying for further studies at other universities or for recognition in the relevant country;</p> <p>6. The document under 7 should be deleted as a condition because it is covered by the submission of other documents or evidence (such as diplomas and transcripts), and for the level of undergraduate studies, thesis writing is usually not applied;</p> <p>7. The document under 9 should also be deleted as a condition because each applicant who has a diploma attachment submits it with the diploma;</p> <p>8. The document under 10 should also be deleted as a condition because it is conditional and not related to the subject; The applicant may apply for recognition of any level of study regardless of whether he has completed previous studies or not; This is covered by the very fact that a person enrolls at the Bachelor level, as if there is no previous study or something similar, the appropriate University would not admit him to the Bachelor studies;</p> <p>9. The request under 15 must be deleted after it is covered by item 13;</p>	<p>they do not protect the public interest and their provision by the party does not add any greater truth or added value to the applicant's file.</p> <p>3. Also, the procedure as such is contrary to the principle of "only once", so the party must visit the public administration several times until the file is completed.</p> <p>4. Then, the request for certification of diplomas and certificates of grades should be eliminated as steps in the procedure because they are certified in another way, e.g. through the contact of the NARIC of Kosovo with the NARIC of the relevant country. Also, the certificate of grades has the original and as such is submitted in the original offered by the University where the party completed its studies.</p> <p>5. Then the administrative fee in the amount of 30 euros is higher than the average cost of carrying out the procedure provided by the LGAP.</p>
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				10. The request under item 16 should also be deleted as explained for the document / request under 10 above;	
<b>Recognition of Master diploma</b>	<p><b>Legal basis:</b> <i>Administrative Instruction (MEST) no. 12/2018: Principles and procedures for recognition of diplomas, degrees and qualifications of higher professional and university titles acquired outside the Republic of Kosovo, Article 6.:</i></p> <ol style="list-style-type: none"> <li>1. A written request for recognition / equivalence of a diploma, received at NARIC and registered in the archives of the MEST [Party].</li> <li>2. Completed form received from NARIC [Party].</li> <li>3. Payment slip [Party].</li> <li>4. Copy of identification document [Party]</li> <li>5. Certified copy of diploma [Party].</li> <li>6. Certified copy or notarized transcript / certificate of assessment [Party].</li> <li>7. Translated summary of the paper - thesis (between 3-5 pages when the paper is in the unofficial language of the Republic of Kosovo [Party].</li> <li>8. Program of studies for the years when the studies were completed [Party].</li> <li>9. Diploma Annex (AD) (in cases of application) [Party].</li> <li>10. Certified copy of the original study diploma for one level of previous education [Party].</li> <li>11. If the documents (or one of them) referred to in item 1, Article 5, are not in some of the official languages of the Republic of Kosovo or in English, they should be translated into one of the official languages by a certified translator in the Republic of Kosovo [Party].</li> <li>12. Submitted documentation for recognition are not returned to the applicant;</li> <li>13. If the documentation submitted by the party is incomplete, NARIC should notify the party in writing within 30 days of the completion of the dossier, otherwise if the</li> </ol>	<p><b>Legal basis:</b> <i>Administrative Instruction (MEST) no. 12/2018: Principles and procedures for recognition of diplomas, degrees and qualifications of higher professional and university titles acquired outside the Republic of Kosovo, Article 12, item 2.2.</i></p> <ul style="list-style-type: none"> <li>• 50 euros – Master</li> </ul>	<ol style="list-style-type: none"> <li>1. The information under 1 and 2 must be one document and as a request to be submitted online through the NARIC Kosovo website;</li> <li>2. Information / request 3 (administrative fee) in the amount of 50 euros is higher than the average cost required to conduct the relevant type of procedure and is contrary to the LGAP (Article 12 of the LGAP);</li> <li>3. Information 4 is also in conflict with the LGAP as it should be covered by the communication of databases of public institutions, so there is no need to provide them to the party;</li> <li>4. Information / requirement 5 is not required for notarization when it is necessary to look at the diploma in the original. Moreover, the diploma is verified even after the communication of the NARIC of Kosovo with the NARIC of the relevant country;</li> <li>5. Information / request 6 also does not need to be verified, in this case the original transcript of grades issued by the relevant school / university must be submitted;</li> <li>6. Information / condition 7 is unnecessary because a diploma and a certificate of grades are sufficient. Also, paperwork is not applicable to undergraduate studies (Bachelor);</li> <li>7. Information / request 9 (diploma attachment) is submitted automatically at the moment when the diploma is sent for inspection, and a copy is submitted with the attachment;</li> <li>8. Information / requirement 10 is unnecessary because in this case the previous studies of the applicant are not important. This issue ended with</li> </ol>	<p><b>Amendment of Article 6, item 1 in relation to the required documents and Article 12, item 2.2. in connection with the administrative fee according to the following explanation:</b></p> <ol style="list-style-type: none"> <li>1. Documents 1 and 2 must be integrated into one document and be online through the NARIC Kosovo website;</li> <li>2. Document 3 must be in accordance with the LGAP and be based on the average cost of the service / procedure for determining the amount of the fee;</li> <li>3. The document under 4 should be deleted as a request because it must be obtained from the ACR by the institution itself, in this case NARIC Kosovo;</li> <li>4. The document under 5 should be deleted as a request as it is covered by the fact of sending the diploma for inspection and the fact of communication of NARIC of Kosovo with NARIC of the relevant country;</li> <li>5. The document under 6 must be a request for an original transcript of the grades that Universities usually issue to the candidate up to 3 original copies upon completion, precisely for the purpose of applying for further studies at other universities;</li> <li>6. The document under 7 should be deleted as a condition because it is covered by the submission of other documents or evidence (such as</li> </ol>	<ol style="list-style-type: none"> <li>1. Recommendations given for amending AI no. 12/2018, ie Article 6, item 1 and Article 12, item 2.3. in relation to administrative costs are made in order to facilitate the procedure for the party and reduce the administrative burden.</li> <li>2. Most of the required documents can be eliminated in the procedure because in some cases they can be a) made online (eg application and form), b) integrated (documents 1 and 2), b) deleted because the authorities have to submit them to each other through internal communication and c are unnecessary) are because they do not protect the public interest and their provision by the party does not add any greater truth or added value to the applicant's file.</li> <li>3. Also, the procedure as such is contrary to the principle of "only once", so the party must visit the public administration several times until the file is completed.</li> <li>4. Then, the request for certification of diplomas and certificates of grades should be eliminated as steps in the procedure</li> </ol>

	<p>documentation is not completed within the prescribed time, the dossier will be archived as incomplete, and the party is obliged to resubmit the request for recognition / equivalence;</p> <p><b>14.</b> The DSP may decide to return the file to the NARIC Center, for the necessary supplementation of the documentation according to this AI. If additional documents are required, the party is obliged to bring the necessary documents;</p> <p><b>15.</b> In the absence of any documents required under Article 6, item 1, it will not accept a request for recognition by NARIC.</p> <p><b>1.</b> In case a party applies for recognition / equivalence of a high qualification, he / she should first apply for recognition / equivalence of qualifications, diploma of previous studies obtained outside the Republic of Kosovo (Bachelor and Master). In case the party's qualification is recognized to the foreigner, he / she should bring proof [Party].</p>		<p>the fact of admission of candidates to the University where he attended undergraduate studies (Bachelor);</p> <p><b>9.</b> Request under 15 is unnecessary because it is covered by request under 13;</p> <p><b>1.</b> The condition under 16 is unnecessary because it is a question of the applicant which level of study or diploma he wants to recognize in Kosovo. Also, this should not apply when it comes to the recognition of undergraduate studies (Bachelor) because previous studies are those of high school. Also, the confirmation / accuracy of previous studies is covered by the fact of admission of candidates to basic studies;</p>	<p>diplomas and transcripts of grades);</p> <p><b>7.</b> The document under 8 should also be deleted as a condition because it covers transcript of grades.</p> <p><b>8.</b> The document under 9 should also be deleted as a condition because each applicant who has a diploma attachment submits it with the diploma;</p> <p><b>9.</b> The document under 10 should also be deleted as a condition because it is conditional and not related to the subject; The applicant may apply for recognition of any level of study regardless of whether he has completed previous studies or not; This is covered by the very fact that a person enrolls at the Master level, as if there is no previous study or something similar, the appropriate University would not admit him to the Master studies;</p> <p><b>10.</b> The request under 15 must be deleted after it is covered by item 13;</p> <p><b>1.</b> The request under item 16 should also be deleted as explained for the document / request under 10 above;</p>	<p>because they are certified in another way, e.g. through the contact of the NARIC of Kosovo with the NARIC of the relevant country. Also, the certificate of grades has the original and as such is submitted in the original offered by the University where the party completed its studies.</p> <p><b>1.</b> Then the administrative fee in the amount of 50 euros is higher than the average cost of carrying out the procedure provided by the LGAP.</p>
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<p><b>Recognition of PhD degrees</b></p>	<p><i>Legal basis:</i> <b>Administrative Instruction (MEST) no. 12/2018: Principles and procedures for recognition of diplomas, degrees and qualifications of higher professional and university titles acquired outside the Republic of Kosovo, Article 6.:</b></p> <ol style="list-style-type: none"> <li>1. A written request for recognition / equivalence of a diploma, received at NARIC and registered in the archives of the MEST [Party].</li> <li>2. Completed form received from NARIC [Party].</li> <li>3. Payment slip [Party].</li> <li>4. Copy of identification document [Party]</li> <li>5. Certified copy of diploma [Party].</li> <li>6. Certified copy or notarized transcript / certificate of assessment [Party].</li> <li>7. Translated summary of the paper - thesis (between 3-5 pages when the paper is in the unofficial language of the Republic of Kosovo [Party].</li> <li>8. Program of studies for the years when the studies were completed [Party].</li> <li>9. Diploma Annex (AD) (in cases of application) [Party].</li> <li>10. Certified copy of the original study diploma for one level of previous education [Party].</li> <li>11. If the documents (or one of them) referred to in item 1, Article 5, are not in some of the official languages of the Republic of Kosovo or in English, they should be translated into one of the official languages by a certified translator in the Republic of Kosovo [Party].</li> <li>12. Submitted documentation for recognition are not returned to the applicant;</li> <li>13. If the documentation submitted by the party is incomplete, NARIC should notify the party in writing within 30 days of the completion of the dossier, otherwise if the documentation is not completed within the prescribed time, the dossier will be archived as incomplete, and the party is obliged to</li> </ol>	<p><i>Legal basis:</i> <b>Administrative Instruction (MEST) no. 12/2018: Principles and procedures for recognition of diplomas, degrees and qualifications of higher professional and university titles acquired outside the Republic of Kosovo, Article 12, item 2.3:</b></p> <ul style="list-style-type: none"> <li>• 70 euros – PhD</li> </ul>	<ol style="list-style-type: none"> <li>1. Documents under 1 and 2 may be a document and as a request to be submitted online through the NARIC Kosovo website;</li> <li>2. Document 3 (administrative fee) in the amount of 70 euros is higher than the average cost required to conduct the relevant type of procedure (Article 12 ZOAP);</li> <li>3. Document 4 is in conflict with the ZOAP as it should be covered by the communication of databases of public institutions, so there is no need to submit it by the party;</li> <li>4. Document 5 is not required for certification when it is necessary to view the diploma in the original. Moreover, the authenticity of the diploma is ensured even after the communication of the NARIC of Kosovo with the NARIC of the relevant country;</li> <li>5. Document 6 also does not need to be certified, in this case the original transcript of grades issued by the relevant school / university where the applicant studied must be submitted;</li> <li>6. Document 7 is unnecessary because a diploma and a certificate of grades are sufficient;</li> <li>7. Document 8 is also unnecessary because a diploma and a certificate of grades are sufficient to demonstrate the program;</li> <li>8. Document 9 (diploma attachment) is submitted automatically when sending the diploma for inspection, and a copy is attached to the attachment;</li> <li>9. Document 10 is unnecessary because in this case the candidate's previous studies are not relevant. This issue is exhausted by the fact of admission of candidates to the University where he obtained his degree (doctorate);</li> </ol>	<p><b>Amendment of Article 6, item 1 in relation to the required documents and Article 12, item 2.2. in connection with the administrative fee according to the following explanations:</b></p> <ol style="list-style-type: none"> <li>1. Documents 1 and 2 must be integrated into one document and be online through the NARIC Kosovo website;</li> <li>2. Document 3 must be in accordance with the LGAP and be based on the average cost of the service / procedure for determining the amount of the fee;</li> <li>3. The document under 4 should be deleted as a request because it must be obtained from the ACR by the institution itself, in this case NARIC Kosovo;</li> <li>4. The document under 5 should be deleted as a request as it is covered by the fact of sending the diploma for inspection and the fact of communication of NARIC of Kosovo with NARIC of the relevant country;</li> <li>5. The document under 6 should be a condition for the original transcript of grades in case it exists because many universities / programs do not have doctoral exams. Also, in cases where it is, this must be the original certificate of grades as in the case of a master's degree;</li> <li>6. The document under 7 should be deleted as a condition because it is unnecessary and covered by the submission of the rest of the documents / evidence (such as diplomas and transcripts of</li> </ol>	<ol style="list-style-type: none"> <li>1. Recommendations given for amending AI no. 12/2018, ie Article 6, item 1 and Article 12, item 2.3. in relation to administrative costs are made in order to facilitate the procedure for the party and reduce the administrative burden.</li> <li>2. Most of the required documents can be eliminated in the procedure because in some cases they can be a) made online (eg application and form), b) integrated (documents 1 and 2), b) deleted because the authorities have to submit them to each other through internal communication and c are unnecessary) are because they do not protect the public interest and their provision by the party does not add any greater truth or added value to the applicant's file.</li> <li>3. Also, the procedure as such is contrary to the principle of "only once", so the party must visit the public administration several times until the file is completed.</li> <li>4. Then, the request for certification of diplomas and certificates of grades should be eliminated as steps in the procedure because they are certified in another way, e.g. through the contact of the NARIC of Kosovo with</li> </ol>
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	<p>resubmit the request for recognition / equivalence;</p> <p><b>14.</b> The DSP may decide to return the file to the NARIC Center, for the necessary supplementation of the documentation according to this AI. If additional documents are required, the party is obliged to bring the necessary documents;</p> <p><b>15.</b> In the absence of any documents required under Article 6, item 1, it will not accept a request for recognition by NARIC.</p> <p><b>1.</b> In case a party applies for recognition / equivalence of a high qualification, he / she should first apply for recognition / equivalence of qualifications, diploma of previous studies obtained outside the Republic of Kosovo (Bachelor and Master). In case the party's qualification is recognized to the foreigner, he / she should bring proof [<b>Party</b>].</p>		<p><b>10.</b> Request under 15 is unnecessary because it is covered by request under 13;</p> <p><b>11.</b> Request under the age of 16 is unnecessary because it is a question of the candidate who wants to recognize the level of study or diploma in Kosovo. If the recognition of a diploma or doctorate is sufficient for the needs of the candidate, there is no reason to apply in advance for the recognition of a master's degree;</p>	<p>grades - when they exist in doctoral studies);</p> <p><b>7.</b> The document under 8 should also be deleted as a condition as it includes a transcript of grades;</p> <p><b>8.</b> The document under 9 should also be deleted as a condition because each applicant who has a diploma attachment submits it with the diploma;</p> <p><b>9.</b> The document under 10 should also be deleted as a condition because it is conditional and not related to the subject; The applicant may apply for recognition of any level of study regardless of whether he has completed previous studies or not; This is covered by the fact that a person enrolls in Master's studies, as if he / she does not have previous studies or something similar, the appropriate University would not accept him / her for Master's studies;</p> <p><b>10.</b> The request under 15 must be deleted after it is covered by item 13;</p> <p><b>11.</b> The request under item 16 should also be deleted as explained for the document / request under 10 above;</p>	<p>the NARIC of the relevant country. Also, the certificate of grades has the original and as such is submitted (in cases when the same exists for PhD studies) because in the original offered by the University where the party completed its studies.</p> <p><b>1.</b> Then the administrative fee in the amount of 70 euros is higher than the average cost of carrying out the procedure provided by the LGAP.</p>
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<p><b>Application for ID card (including case of loss / theft, confiscation or damage of ID card) - for persons aged 16 to 18 and over 18 years old</b></p>	<p><i>Legal basis: Administrative Instruction (MIA) no. 05/2018 on the procedure for obtaining the identity card, Article 4: for persons aged 16 to 18 years old</i></p>	<p>The administrative fee is not registered in the AI</p>	<ol style="list-style-type: none"> <li>1. Birth certificate is necessary even though the CRA issues it itself. The CRA may generate excerpt data itself after the party submits it to the administration;</li> <li>2. Police confirmation in case of loss or theft of ID card is required, but this must be provided by CAR through database communication between CRA and Police. When a party reports a case to the Police, the records submitted to the Police should automatically generate a report to the CRA;</li> <li>3. The birth certificate generated according to item 1 above also shows data for the party's parents. The CRA may also generate information about the parent or parents of the party at the time of the party's application.</li> <li>4. The decision on acquisition of citizenship may be provided by the CRA through the communication of data in the system;</li> <li>5. In case of discrepancies in the data, the CRA itself in communication with the Civil Status Office should correct them, there is no need for the party to go to the registry office to correct them;</li> <li>6. At the time of withdrawal of the ID card, the police report should not be requested again as this step has been exhausted earlier and should be provided by the CRA itself;</li> </ol>	<p><i>Amendment to Article 4 of the Administrative Instruction (MIA) no. 05/2018 on the procedure for obtaining the ID card according to the following explanations:</i></p>	<ol style="list-style-type: none"> <li>1. Recommendations given for amending AI no. 05/2018, ie Article 4, were made in order to facilitate the procedure for the Party and reduce the administrative burden.</li> <li>2. In this context, the recommendation not to request a birth certificate is related to the fact that the CRA issues this document itself and that a Party should not be required to issue a document issued by the institution itself.</li> <li>3. The recommendation to eliminate the requirement for the physical submission of a police report by a Party relates to the communication of databases between the two institutions through an interoperability platform. Also, walking the Party through several institutions to complete the documents is contrary to the principle of "only once" and LGAP, according to which the institution should not ask the Party for information provided in public administration and provided through the communication database of institutions.</li> <li>4. Also, the recommendation that the Party should not go to the Civil Status Office and CRA to correct the data refers to the communication between the two bodies for the</li> </ol>
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documents: 1) Previous ID card (if he had one) and 2) Police report in case of loss / theft of ID card after applying. [**Party**].

be requested from the party if the reason for applying for the ID card is loss / theft of the ID card because this phase has already been replaced by communication of records between CRA and Police;

exchange of information that the relationship between the Party and the administration should be within the principle of "only once".

	<p><b>Legal Basis: Administrative Instruction (MIA) no. 05/2018 on procedures for obtaining the identity card, Article 5: for persons over 18 years old</b></p> <ol style="list-style-type: none"> <li>1. Present the original extract for review, and submit a copy of it; OR the passport and submitting it, if none of the data have changed [<b>The party</b>].</li> <li>2. Original or notarized copy of the original police report/ confirmation in case of loss, or theft of the identity card. If the report is in a foreign language, it shall be translated into the official languages of Kosovo [<b>The party</b>].</li> <li>3. If the identity card has been confiscated abroad or inside the country, it is required the report on such confiscation. If the report is in foreign language, than it should be translated in one of the official languages. If there is no report, than the applicant should provide additional-clarifying statement [<b>The party</b>].</li> <li>4. If there are data discrepancies between the extract presented by the applicant and the data generated by system when entering the personal number of the applicant upon application, the applicant must go to the Civil Status Office to correct the data [<b>The party</b>].</li> </ol>	<p>There is no Administrative Tax in the AI.</p>	<ol style="list-style-type: none"> <li>1. The birth extract is requested, although issued by the CRA itself. The CRA can generate birth extract data upon the party presenting before the administration;</li> <li>2. Police confirmation in case of ID card loss or theft is necessary; however the CRA should secure this through database communication between CRA and Police. Once the party has filed the case with the police, the data given to the police should automatically generate a report to the CRA;</li> <li>3. The birth extract generated according to point 1 above, also shows data on the parents of the party. CRA may also generate data of the party's parent or parents at the time of the party's application.</li> <li>4. The decision on citizenship can be obtained by the CRA through data communication within the system;</li> <li>5. In case of data discrepancies, the CRA itself, in communication with the Civil Status Office, should correct such data, there is no need for the party to go to the Civil Status Office to correct them;</li> </ol>	<ol style="list-style-type: none"> <li>1. Amendment of Article 5 of the Administrative Instruction (MIA) no. 05/2018 on procedures for obtaining the identity card as per the following clarifications:</li> <li>2. The birth extract should not be required, as CRA itself issues that document;</li> <li>3. The Police confirmation should not be requested from the party, as the same should be generated by CRA through communication with the Police database; i.e. once the loss/theft has been reported to the police, the police data should be generated in the system and be obtained by CRA.</li> <li>4. The Identity Card or Passport should not be required to prove the identity of the parent because the birth certificate previously generated by the CRA itself contains data on the identity of the parents;</li> <li>5. Decision on citizenship should not be requested from the party, as CRA itself can secure this document through database</li> </ol>	<ol style="list-style-type: none"> <li>1. Recommendations for amending AI no. 05/2018, namely Article 5, are done for the purpose of facilitating the procedure for the party and reducing administrative burden.</li> <li>2. In this context, the recommendation not to request the birth certificate is related to the fact that the CRA itself issues this document and a document that is issued by the institution itself should not be requested from the party.</li> <li>3. The recommendation for eliminating the request of the party physically submitting the police report is related to the communication of databases between the two institutions through the interoperability platform. Also, the movement of the party to several institutions</li> </ol>
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	<p>5. The payment form is printed, which the applicant is not obliged to submit to the DOC as evidence (except for cases with expedited and medical procedures) [<b>The party</b>].</p> <p>6. The applicant obtains the evidence of application and is informed by the DOC official about the time and manner of withdrawing the ID card [<b>The party</b>].</p> <p>7. The identity card shall be withdrawn by the applicant in person, who shall provide the following document: 1) Prior identity card, (if possessed) and 2) Police report in case of loss/theft of identity card after application [<b>The party</b>].</p>		<p>6. The police report should not be requested again upon withdrawal of the ID card, as this step has been exhausted earlier and should be secured by the CRA itself;</p>	<p>6. communication of relevant institutions;</p> <p>7. In case of data discrepancies, the party should also not be asked to go to the Civil Status Office for data correction. The data must be the same in this office as in the CRA, therefore the CRA must take over this communication (data verification) and not burden the party with going to different institutions;</p> <p>8. Upon withdrawal of the ID card, the police report should not be requested from the party, if the reason for applying for the ID card was loss/theft of the ID card, as this phase has already been replaced by the communication between the CRA and the Police;</p>	<p>4. to complete the documentation is contrary to the "once only" principle and LGAP, according to which institutions should not request from the party information that are part of public administration and are provided through communication of the institutions' databases.</p> <p>5. Also, the recommendation that the party should not go to the Civil Status Office and CRA for data correction is related to the communication between</p> <p>6. the two bodies on exchanging data and that the relationship between the party and the administration should be within the "once only" principle.</p>
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<p><b>Equipping with a fiscal number for an individual</b></p>	<p><i>Legal basis: Administrative Instruction no. 01/2012 to supplement the Administrative Instruction no. 01/2010 and no. 15/2010 on registration of taxpayers Article 6, item 7:</i>  <i>Any individual who wishes or is required to file a tax return should apply for and obtain a fiscal number from the TAK, prior to filing the return. An individual should provide the TAK with his personal identification number in order to obtain a fiscal number.</i></p> <p><i>Required documents and application procedure (mandatory information)</i></p> <ol style="list-style-type: none"> <li>1. Fiscal Number Application [Party].</li> <li>2. Copy of identity card [Party].</li> <li>3. Physically submitted to the Taxpayer Service and Education Office in the region to which belongs [Party].</li> <li>4. Withdrawal of certificate with fiscal number [Party].</li> </ol>	<p>Ne postoji</p>	<ol style="list-style-type: none"> <li>1. Mandatory information under 1 - Application for fiscal number is online on the TAK website, to be completed online (part A) - however, it must be printed in order to be physically submitted;</li> <li>2. Mandatory data under 2 - a copy of the ID card should not be requested because the Party is obliged to enter data in the application, such as personal number, surname, place of birth, father name, mother name, citizenship, address, date of birth. All of these are duplicates because they must be requested either through an ID card or through an application as data that can then be verified by the TAK.</li> <li>3. Mandatory information under 3 - physical submission of the application should be replaced by online submission of the request / application for the fiscal number;</li> <li>4. Mandatory information under 4 - withdrawal of the certificate with the fiscal number must be done online; thus being eliminated as a step in the process;</li> </ol>	<p><b>Amendment to Article 6, item 7 of Administrative Instruction no. 01/2012 to supplement the Administrative Instruction no. 01/2010 and no. 15/2010 on the registration of taxpayers, as follows:</b></p> <ol style="list-style-type: none"> <li>1. Mandatory information under 1 - the online application should be able to be sent online to the TAK. Therefore, through the TAK website, through the "send" it should be possible to apply for a fiscal number regardless of the location of the Party. Also, a certificate with a fiscal number must be accepted online by TAK;</li> <li>2. Mandatory information under 2 - ID number via a copy of the ID card - delete as a request because the ID number is sent via the application along with other data. This can be confirmed by the TAK through the exchange of data with the Civil Registration Agency (CRA);</li> <li>3. Mandatory information under 3 - the application that should be physically submitted to the Taxpayer Service and Education Office should be removed as a condition because the application must be submitted online;</li> <li>4. Mandatory information under 4 - should also be removed because the withdrawal of the fiscal number certificate must be online (accepted online);</li> </ol>	<ol style="list-style-type: none"> <li>1. Recommendation for amendment of Administrative Instruction no. 01/2012 to supplement the Administrative Instruction no. 01/2010 and no. 15/2010 on the registration of taxpayers is done in order to facilitate the application process and obtain a fiscal number because the mandatory data with the application does not protect the public interest and does not add truth or accuracy of data in the application.</li> <li>2. The application for the fiscal number that is online on the TAK website, in addition to filling in online, should also be possible to send online to the TAK. This is due to the elimination of administrative burdens through digitalization.</li> <li>3. The identification number (which is expected to be proven through a copy of the ID card) is unnecessary because the relevant number is given only in the appropriate application and TAK has the possibility of verification through data exchange with CRA. Also, the document cannot be sent to a foreigner who has</li> </ol>
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					<p>a public administration (state) but is not available to all institutions due to poor communication between their databases. Also, the request for that is in contradiction with the Law on General Administrative Procedure (LGAP).</p> <p>3. 4. The third step in the procedure (the one of physical submission) is eliminated due to sending the request online, and the fourth step (the one from obtaining the fiscal number) is also eliminated because its receipt must be online, as well as the application. Physical application and obtaining a number and physical (probably within one day) is contrary to the principle of "only once" in the relationship between citizens and public administration.</p>
<b>Tax certificate of residence</b>	<p><i>Legal basis: Double Taxation Agreements (DTA) with relevant countries</i></p> <p><i>Required documentation and application procedure:</i></p> <ol style="list-style-type: none"> <li>1. Application - Request for Tax Residence Certificate (TRS) [Party].</li> <li>2. Birth certificate [Pala].</li> <li>3. Copy of passport, or copy of identity card [Party].</li> <li>4. Contract [Party].</li> <li>5. Withdrawal of the TRS [Party].</li> </ol>	Does not exist	<ol style="list-style-type: none"> <li>1. Application - Request for Tax Residence Certificate (TRS) is online on the TAK website, filled in online, but the records are not kept and must be printed in order to be physically submitted to the TAK archive in the Central Directorate;</li> <li>2. It is not necessary to submit the birth extract because the party is obliged to enter the personal and fiscal number in the TRS application. This is sufficient data to generate other data contained in the birth extract, but which in this case are also unnecessary;</li> </ol>	<ol style="list-style-type: none"> <li>1. DTA should not be changed because explicit requirements (TRS application procedure) are not described in DTA. The latter serves only as a basis in the spirit of the items for which TAK requires TRS equipment.</li> <li>2. The TRS application (request) should be able to be submitted online. So, to digitize the service through the TAK website (part of the electronic services). When filling out the application, at the end there should be the possibility</li> </ol>	<ol style="list-style-type: none"> <li>1. Recommendations were given in the framework of eliminating unnecessary steps in the procedure, in order to reduce the administrative burden on citizens. Also, in the context of digitalization of services as a goal of the Government in the context of providing high quality administrative services.</li> <li>2. The party's repeated contact with the administration is contrary</li> </ol>

			<ol style="list-style-type: none"> <li>3. A copy of the passport or ID card is again unnecessary because the necessary information is given only through the TRS application. Also, a copy of the passport or ID card should not be requested by the state administration institution of the party, but the TAK should provide it (if necessary) from the CRA database through data communication between the institutions. Also, the requirement to submit a document by a party that has a state administration is contrary to the LGAP;</li> <li>4. The contract is OK to be requested, but it must be submitted "by posting" online in the application that is filled out as a request for TRS. Therefore, the request for the TRS (application) must be submitted online and part of the application must be able to "place" the contract in the same place.</li> <li>5. The TRS is physically withdrawn (accepted) from the party on a certain day and time at the same place where the request was submitted, but the party must obtain it online - in the same way - as applied;</li> </ol>	<p>of loading the contract - which is the subject of the TRS request;</p> <ol style="list-style-type: none"> <li>3. Other documents (under 2 and 3) are unnecessary because they have already been submitted to the TAK, and the AI can also obtain them from the registry book (to be provided with CRA data).</li> <li>4. The withdrawal should also be eliminated as a step in the procedure as the TRS must be accepted by the party online - as applied for.</li> </ol>	<p>to the principle of service provision "once only" (once only principle). Also, the obligation to submit documents that can be obtained within the state administration through the communication of databases between institutions is contrary to the LGAP;</p>
<b>Apostille certificate</b>	<p><b>Legal Basis: Regulation (NRC) - no. 19/2016 on the issuance of the apostille certificate:</b></p> <ol style="list-style-type: none"> <li>1. Assignment of online appointment (name, surname, personal number) [<b>The Party</b>].</li> <li>2. Application / form for apostille certificate (stamp) - completed by the official who issues the apostille stamp, signed by [<b>The Party</b>].</li> <li>3. Payment according to the receipt given by the official issuing the apostille stamp (apostille fee) 10 euros [<b>The Party</b>].</li> <li>4. Submission of proof of payment [<b>The Party</b>].</li> <li>5. Review the request as soon as possible, no longer than three (3) days from the moment of submitting the request;</li> </ol>	<p><i>Legal basis: Regulation (QRK) - no. 19/2016 on the issuance of the apostille certificate</i></p> <p><i>Article 14 (Tariffs for apostille services)</i></p>	<ol style="list-style-type: none"> <li>1. Regulation 19/2016 does not specify the manner of setting the date for submitting the application for an apostille certificate (stamp), but on the website of the MFAD there is a way of setting the date for the apostille stamp online, giving the name, surname and personal number.</li> <li>2. The unique and standardized apostille stamp application form is not online. According to Article 7, point 2.8 of Regulation 19/2016, the form is completed by the official responsible for issuing the apostille stamp and is signed by the party. The form requires filling in the data in seven (7) places</li> </ol>	<ol style="list-style-type: none"> <li>1. The form (request) for an apostille certificate (stamp) must be online, so the unique standard form must be digitized and the parties must complete it online, the same as the deadline for submitting the application. Option is also to merge the two phases into one, scheduling and completing the application / form to be a process.</li> <li>2. This would reduce the procedure by both the party and the official responsible for issuing the seal. The latter would not need to fill out the form for the party at the time the party applies, this saves</li> </ol>	<ol style="list-style-type: none"> <li>1. The form has no reason not to be online. This is in accordance with the LGAP, Article 73 - Form and content of the request;</li> <li>2. The apostille fee of 10 euros is contrary to the LGAP, the principle of non-payment of the procedure which stipulates that for the party, the administrative procedure is free of charge unless otherwise provided by a special law (LGAP, Article 12). The apostille fee is not determined by special law.</li> </ol>

	<p><b>6.</b> Withdrawal of apostille certificate (stamp) - Party; (can also be sent by mail, costs are covered by the recipient);</p>		<p>that the official receives from the applying party.</p> <p><b>3.</b> The party receives the receipt in the amount of 10 euros which it pays to one of the licensed payment institutions, on behalf of the BRK, which as evidence, the party must return to the place of application for an apostille stamp;</p> <p><b>4.</b> The official responsible for issuing the apostille stamp begins the review of the process which should be completed as soon as possible, but not longer than three (3) days.</p> <p><b>5.</b> The regulation does not specify how the party is notified when to file for withdrawal of the apostille stamp;</p> <p><b>6.</b> Withdrawal of the apostille certificate (stamp) from the party, a relative, or from an authorized person (if the party has not requested to receive it by mail).</p>	<p>time and eliminates the queues for application;</p> <p><b>3.</b> Payment should also be possible online, immediately after completing the standard form, the online payment phase should follow. The fee should not be 10 euros because it is well above the average cost of the service, an apostille stamp and the procedure for issuing it do not cost 10 euros. This avoids the need to issue a receipt, make the payment in another country and the need to bring proof of payment. This means reducing the procedures for the party and the official responsible for issuing the apostille stamp;</p> <p><b>4.</b> Withdrawal of the certificate can be done by the party, his / her relative or by an authorized person. i.e. only this step in the procedure can be done physically, but this does not cause queue (waiting) because the party contacts the administration only to withdraw the apostille certificate (stamp). However, at a later stage there should be the possibility of issuing the E-apostille (Article 3, point 1.10) which is made possible through the Electronic Apostille Program (e-APP). With this the whole process would be online, both the application and the withdrawal of the apostille stamp in the online form.</p>	<p><b>3.</b> Notice of issue (eventually stamp rejection) must be made by appropriate means, in accordance with the LGAP (General Notice Rules) and the party must appear only once in the administration to withdraw the apostille stamp. This is in line with the "only once" principle that applies when withdrawing an apostille stamp from a party. However, at a later stage, MFAD must establish the e-APP system (electronic system for apostille) and the apostille stamp must be online (e-apostille) which means that the apostille stamp has been issued in electronic format accompanied by electronic signature.</p>
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## **Annex 4: Guiding questions for prevention and reduction of administrative burden**

The guiding questions highlighted below, serve for the guidance of public officials involved in the drafting of public policies, to prevent or reduce the administrative burden during the drafting and control of public policies.

The application of the principles highlighted in the 'Principles' part of the Program, during the identification of the public interest, is done in detail in the proposal for simplifying the information of the mandatory selection principles in the Action Plan, which can be used as examples for analysis and the simplification of other mandatory information, connecting to real events. Also, during the identification of the interest, the guiding questions of the publication and in the identification of those administrative procedures, their identification has advanced in quality, but otherwise they have remained in the old form.

Below are highlighted some of the guiding questions, which help the public official for the selection of elements for simplification.

### **Guiding questions in *EX ANTE* process - prevention**

For the analysis of **the new legislation** recommended in the concept document, which contains mandatory information, the guiding questions must be taken into account (as well as the questions that apply to *ex post*), in order **to prevent** the administrative burden.

- How do other countries regulate the same administrative solution for obtaining mandatory information?
- What documents are required in other countries in order to obtain the same mandatory information?
- How valid is the same mandatory information in another country?

### **Guiding questions in *EX POST* process - reduction**

For **mandatory information** as a whole, the following guiding questions must be asked:

- Is the mandatory information necessary to ensure the protection of the intended general interest?
- Is the mandatory information suitable to ensure the intended protection of the general interest?
- Can the protection of general interest be achieved with a different, less restrictive information?
- Can mandatory information be replaced/removed?

For **the required documents** for the completion of the procedure for obtaining mandatory information, the following guiding questions must be asked:

- Is the required document necessary to prove the compliance with the mandatory information?
- Is the required document suitable to prove the compliance with the mandatory information?
- Can the compliance of mandatory information be proved in other ways that are less restrictive and friendly to the party?

For enabling the effective implementation of the above-mentioned principles, there is a need to determine the **current readiness of the public administration**, which must be covered with the following guiding questions:

- Is information or document in possession from the competent body or from another public body?
- Can information or documents be obtained from another public body and how?
- Can information or documents be obtained through electronic communication and if so, what are the methods?
- What is the cost of obtaining this information or document from the public administration?

As above, also for **the redesigning of the procedures**, in order to reduce the administrative and procedural efficiency, the following guiding questions should be clarified:

- Is the procedural step necessary to ensure the protection of the intended general interest?
- Is the procedural step suitable to ensure the protection of the intended general interest?
- Can the goal be met in another existing process?
- Can the step be removed or merged with another existing step?

The following example is **simple, typical and very frequent, which is constantly repeated** and applies both in the *ex-ante* and *ex post case*.



Figure 3 Example of administrative simplification in a legal provision

# PASSPORT OF INDICATORS

## Program for Prevention and Reduction of Administrative Burden 2022-2027

**General purpose: Prevention and reduction of administrative burden**

<b>Indicator 1</b>	Cumulative savings of citizens and businesses after reducing the administrative burden	
<b>Description of the indicator</b>	The indicator gives the value of savings after administrative simplification, but also after digitalization. The achievement of this indicator is measured by the Standard Costing Model, based on the elements highlighted in the narrative part of the Program.	
<b>Data source</b>	The annual report on the implementation of the Program and the measurements after the entry into force of the legal acts aimed at simplification or after the digitization of the relevant services (which will be part of the report).	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator after the entry into force of the legal acts aimed at administrative simplification. So, the basic value is determined in the old form of the service, then after the changes made in the legal acts, the results are measured. As highlighted in the Program, the elements for simplification are the documents, information, payments, administrative conditions, validity, etc., which after simplification are calculated and cost savings are derived. It should be noted that this general measurement will include the savings from the implementation of all measures of the Program Action Plan.	
<b>Baseline value and year</b>	The baseline value of this indicator is set as 0, despite the fact that some of the measures according to Annex 1 of the Program have been implemented by the Legal Office of the OPM with the support of the IFC during 2022, which has resulted in savings for citizens and businesses. However, in the first annual report of the implementation of this AP, those results will also be taken into account.	Year 2021
<b>Targets and years</b>	> 1 mil. €	Year 2023
	> 6 mil. €	Year 2024
<b>Indicator 2</b>	Licenses and permits for businesses	
<b>Description of the indicator</b>	The indicator covers only a part of public administrative services, as part of the Action Plan, specifically only permits, showing the	

	perception of the business environment in the country. The indicator has the highest value of 5, which means that businesses think that there is no burden at all, while the lowest value is 1, which means that there is a lot of burden.	
<b>Data source</b>	Ballani's Barometer – Opinion of businesses	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The indicator is measured by taking regular interviews with Kosovo businesses. The questions concern numerous obstacles such as the number of procedures, data, papers, expenses, document accessibility, legal complexity, bribery, lack of digitization, etc.	
<b>Baseline value and year</b>	2.7	Year 2022
<b>Targets and years</b>	3	Year 2023
	>3	Year 2024

**Measure 1: Simplification and digitization of administrative services at the central level**

<b>Indicator 1</b>	Number of administrative services, simplified	
<b>Description of the indicator</b>	The indicator covers the administrative services or permits covered by annex 1 and 2 of the Program. Also, this indicator also covers the services that are expected to be analyzed and be annexes of this Program. After their completion, analyzes will cover about 450 administrative services, respectively permits which are provided by the central level.	
<b>Data source</b>	Annual report on the implementation of the Program	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done after the entry into force of the legal acts aimed at administrative simplification, in annex 1 and 2 of this Program, as well as other similar annexes in the future. So, the indicator measures the institutional performance - or the calculation of simplified services. Meanwhile, savings in time and money will be calculated for the measurement of indicator 1 of the overall goal. As highlighted in the Program, the elements for simplification are documents, information, payments, administrative conditions, validity, etc. Also, it should be noted that simplification also means the complete elimination of a mandatory information and merging with another. So, any of the elements that are identified as necessary to simplify the service, represent simplification. 44 is the baseline value for 2022, while for 2023 it is intended that this value be raised to 150, while in 2024 to 250.	
<b>Baseline value and year</b>	44	Year 2022

<b>Targets and years</b>	150	Year 2023
	250	Year 2024
<b>Indicator 2</b>	Number of administrative services, digitized	
<b>Description of the indicator</b>	The indicator covers administrative services or permits covered by annexes 1 and 2 hereof. Also, this indicator also covers the services that are expected to be analyzed and be annexes of this Program. After their completion, analyzes will cover about 450 administrative services, respectively permits provided by the central level, the digitization of which will be part of the measurement of the achievement of this indicator.	
<b>Data source</b>	The E-Kosova Platform or other electronic platforms and the Annual Report on the implementation of the Program	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done through the publication of digitized services on the E-Kosova platform or on any other electronic platform of institutions at the central level. It should be emphasized that digitalization of a service means from the application to waiting for a response from the public administration. In 2023, it is intended that E-Kosova will be enriched with over 50 such services, while in 2024, this number will increase to over 150.	
<b>Baseline value and year</b>	0	Year 2022
<b>Targets and years</b>	>50	Year 2023
	>150	Year 2024
<b>Indicator 3</b>	Social schemes in MFLT, digitized	
<b>Description of the indicator</b>	The indicator includes the digitization of all social schemes within the framework of the MFLT.	
<b>Data source</b>	E-Kosova Platform and Program Implementation Report	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done through the publication of digitized social schemes on the E-Kosova platform.	
<b>Baseline value and year</b>	2	Year 2022
<b>Targets and years</b>	12	Year 2023
	28	Year 2024
<b>Indicator 4</b>	The percentage of businesses that use electronic invoices in relation to businesses that have a legal obligation.	
<b>Description of the indicator</b>	The indicator proves the inclusiveness of businesses in issuing electronic invoices. The electronic invoice system provides tools and interfaces for taxpayers to send, receive and approve invoices online, sign invoices digitally within the tax system and from external accounting systems, allowing TAK officials (and other relevant institutions) to view these invoices and use them for further operations and analysis.	
<b>Data source</b>	Annual work reports of TAK!	
<b>Frequency</b>	First quarter of 2024 and 2025.	

<b>Methodology</b>	The measurement of the indicator is done by disclosing ready information in the TAK information system.	
<b>Baseline value and year</b>	0	Year 2022
<b>Targets and years</b>	30%	Year 2023
	90%	Year 2024
<b>Indicator 5</b>	The number of businesses fiscalized through the cash management software platform compared to previous years	
<b>Description of the indicator</b>	The indicator proves the comprehensiveness of businesses in the use of equipment with software systems for managing cash sales. Through this platform, it will be possible for fiscalization to become an integral part of the effective approach of Compliance Risk Management in TAK. In addition, the expectations are that it will affect the increasing of revenues and the improvement of the behavior of taxpayers towards compliance.	
<b>Data source</b>	Annual work reports of TAK.	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done by disclosing ready information in the TAK information system.	
<b>Baseline value and year</b>	0	Year 2022
<b>Targets and years</b>	>8000	Year 2023
	>15000	Year 2024
<b>Indicator 6</b>	The number of TAK administrative services integrated in E-Kosova, compared to previous years	
<b>Description of the indicator</b>	The indicator counts the administrative services of TAK which are redirected to the E-Kosova platform, saving taxpayers' time for receiving the relevant services.	
<b>Data source</b>	E-Kosova Platform, TAK Reports and Program Implementation Report.	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is based on the number of services fully digitized and redirected to the e-Kosova services portal.	
<b>Baseline value and year</b>	0	Year 2022
<b>Targets and years</b>	5	Year 2023
	15	Year 2024

## Measure 2: Simplifying selected administrative services based on real events

<b>Indicator 1</b>	Reducing the time required to complete the application procedure for selected services individually
<b>Description of the indicator</b>	The indicator covers administrative services or services selected in annex 3 of the Program. The indicator shows the time saved for the

	completion of the procedure after the simplification and digitization of the administrative service.	
<b>Data source</b>	Annual report on the implementation of the Program for 2023 and the E-Kosova Platform.	
<b>Frequency</b>	The end of 2023 (or the first quarter of 2024).	
<b>Methodology</b>	The measurement of the indicator takes place after the entry into force of the legal acts aimed at administrative simplification (2023 target) and digitalization of administrative services (2024 target). By eliminating unnecessary information, documents and payments and in violation of the law, the saving in procedural time will be measured after the implementation of the legal recommendations given in annex 3. The measurements will be made with the Standard Costing Model.	
<b>Baseline value and year</b>	The baseline value of this indicator will be determined during the first six months of the Action Plan, during the year 2022.	Year 2022
<b>Targets and years</b>	20%	Year 2023
	40%	Year 2024

### Measure 3: Increasing institutional coordination and building capacities for prevention and reduction of administrative burden

<b>Indicator 1</b>	Number of public officials trained for administrative burden	
<b>Description of the indicator</b>	The indicator proves the increase of capacities for administrative burden at the central and local level.	
<b>Data source</b>	The annual report of the implementation of the Program and the annual report of KIPA	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done with participants in trainings at KIPA, with the new administrative burden module.	
<b>Baseline value and year</b>	0	Year 2022
<b>Targets and years</b>	>200	Year 2023
	>400	Year 2024
<b>Indicator 2</b>	All line ministries, relevant executive agencies and municipalities have designated the person responsible for administrative burden	
<b>Description of the indicator</b>	The indicator proves the coordination and commitment to the coordination of the administrative burden process at the central and local level.	
<b>Data source</b>	Annual report on the implementation of the Program (list of responsible persons as an annex)	
<b>Frequency</b>	The first six months	
<b>Methodology</b>	The measurement of the indicator is done with participants in joint meetings for the coordination of the administrative burden process.	
<b>Baseline value and year</b>	NO (Q2 2022)	Year 2022

<b>Targets and years</b>	YES (Q3 2022)	Year 2022
	/	

#### Measure 4: Simplification of administrative services at the local level

<b>Indicator 1</b>	The number of municipalities whose services have been simplified	
<b>Description of the indicator</b>	The indicator proves the comprehensive involvement of municipalities in the administrative burden process. By the end of 2022, four municipalities are involved in the process, while in 2023 this number is expected to increase by five more.	
<b>Data source</b>	Annual report on the implementation of the Program.	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done through analyzes carried out for each municipality and their approval by the Municipal Assemblies. While the results of their implementation, enter in the first indicator of the general purpose.	
<b>Baseline value and year</b>	2	Year 2022
<b>Targets and years</b>	6	Year 2023
	10	Year 2024

#### Measure 5: Increase communication and raise awareness of administrative burden

<b>Indicator 1</b>	% of respondents from citizens and businesses who have knowledge and are satisfied with the progress of the process of reducing the administrative burden	
<b>Description of the indicator</b>	The indicator proves the inclusiveness of businesses and citizens in the process of administrative burden, through the consultation of the reform and in the communication of the results.	
<b>Data source</b>	Annual report on the implementation of the Program.	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done through a survey for businesses and citizens, which will be carried out in different ways, either electronically through the E-Kosova platform and completing the survey during the application, or physically through gatherings and meetings held with citizens, civil society and business representatives. For this, at least 100 citizens and at least 100 businesses (or their representatives) will be surveyed.	
<b>Baseline value and year</b>	The baseline value of this indicator will be determined during the first six months of the Action Plan, during the year 2022.	Year 2022
	>30%	Year 2023

<b>Targets and years</b>	>50%	Year 2024
<b>Indicator 2</b>	% of respondents in the public administration who have knowledge of the administrative burden and its effects	
<b>Description of the indicator</b>	The indicator proves the inclusiveness and awareness raising of public officials in the administrative burden process.	
<b>Data source</b>	Annual report on the implementation of the Program.	
<b>Frequency</b>	Every year	
<b>Methodology</b>	The measurement of the indicator is done through different ways, highlighting the electronic survey sent through ASI. Also, as it was emphasized in the narrative part of the training, all the officials who will be trained for administrative burden, will be subjected to the survey, after the end of the training.	
<b>Baseline value and year</b>	The baseline value of this indicator will be determined during the first six months of the Action Plan, during the year 2022.	Year 2022
<b>Targets and years</b>	>50%	Year 2023
	>70%	Year 2024

## Risk Management Assessment

The proposed risk analysis system focuses exclusively on those actions or set of actions, planned within Measures under ABPR Programme, with negative consequences on the overall impact of the administrative burden reduction.

	Measure	RISK	Impact	Risk mitigation modality
1.	Simplification and digitalisation of administrative services in central level	Capacities of the leading organisations	Medium to high	Strengthen capacities of Strategic Planning Office, Legal Office and Agency for Information Society
		Weak coordination and insufficient policy planning capacities in line institutions		Raise awareness at decision-makers level through Strategic Planning Committee
2.	Simplification of selected administrative services based on life event approach	Insufficient engagement of line institutions	Low	Specific trainings for administrative burden prevention and reduction
		Lack of awareness for life event approach		Raise awareness at decision-makers level through Strategic Planning Committee
3.	Increasing institutional coordination and raising capacities for prevention and reduction of administrative burden	Weak capacities in line institutions to apply administrative burden methodology for prevention and reduction	Low to Medium	Specific trainings for administrative burden prevention and reduction, including methodology and developing specific manuals for using of methodology
		Lack of capacities in line institutions for using of Standard Cost Model		Specific trainings for administrative burden prevention and reduction, including Standard Cost Model and developing specific manuals for using of SCM
4.	Simplification of administrative services at the local level	Lack of capacities in municipalities for planning and coordinating with central level	High	Specific trainings for administrative burden prevention and reduction for officials of municipalities
		Administrative resistance for changing behavioural practice and compliance on Law on General Administrative Procedure		Increase awareness for burdens for citizens and businesses to municipality officials
5.	Increasing communication and raising awareness on administrative burden	Lack of will of parties to participate on Program communication and awareness activities	Low	Raise awareness at decision-makers (Mayors) level through Ministry for Local Government Administration
				Better administrative coordination of consultation and communication with all parties