

## Consultation Report on the Administrative Burden Prevention and Reduction Program 2022-2027

During the drafting process of the Administrative Burden Prevention and Reduction Program 2022-2027, in addition to the meetings and workshops of the working group, the Office for Strategic Planning held meetings with SIGMA, civil society, business representatives, municipal representatives and development partners, together and apart. In these meetings, everyone gave their contribution to concrete aspects of ABPRP. Some of the comments that should be highlighted, in addition to the specific comments shown in the table below, are the comments of representatives of the European Commission, civil society and development partners.

In the conclusions of the IPA Monitoring Committee, held on March 24, 2022, the representatives of the European Commission have emphasized that they congratulate and invite the Government to continue with the good coordination of the process of reducing the administrative burden, as a good model for other processes. In the comments sent by SIGMA within the framework of public consultations, it is emphasized, among other things, that if the actions foreseen in the Program, especially Measure 2, are implemented successfully, this would be a very big step in improving the quality of the provision of services in Kosovo and would offer the best experiences for reducing the administrative burden, which would ensure that future and similar initiatives would be even more successful. In the comments sent by the International Financial Corporation - IFC, it is emphasized, among other things, that the Program "has been prepared in a very detailed manner, which integrates good international practices and at the same time is prepared taking into account the local context". In the comments sent by the EU Office in Kosovo, it is emphasized, among other things, that the Program "shows the Government's commitment to addressing and implementing this reform with a holistic approach, prioritizing the areas of intervention and the stages of the reform process, which gives a feasible and credible approach to the program".

Commented part	Comment	The commenting party	Comment status: Accepted/Not accepted/Partially accepted	Justification/clarification on the status of the comment
The ZPS will cooperate and coordinate with the Legal Office (henceforth ZL) of the OPM and the line ministries, so that the legal harmonization with the horizontal legislation includes the reduction of the administrative burden as much as possible and in a planned manner, especially in the processes that are closely related by reducing the administrative burden, inspections and general administrative procedures.	<p><i>We request that this part be reformulated because the SPS does not have the competence to coordinate the ministries in terms of legislation, since this belongs to the Legal Office.</i></p> <p><i>To be reformulated as follows: "Legal Office in cooperation with the legal departments of line ministries..."</i></p>	Legal Office/OPM	<b>Accepted</b>	<i>The commented part has nothing to do with responsibility and competence, but this part has been completely removed since the Legal Office/ZKM has planned that in order to reduce the administrative burden in permits, where the change of laws is requested, it will do this through a the 'omnibus' law. The Legal Office has emphasized that the "omnibus" technique can only be used for the same purposes and the harmonization of laws with general administrative procedures and the reduction of the administrative burden do not constitute the same purpose.</i>

<p>As necessary, the SPS helps the institution responsible for the ex post evaluation of the relevant legislation, for the use of MKS. ZL controls and requests that the ex post evaluations also contain the analysis and recommendation for the reduction of the administrative burden and the implementation of the recommendation in the legislation.</p>	<p><i>The new manual for the ex post evaluation of the legislation foresees that the process of coordination of the ex post evaluation of the legislation is done by the Legal Office in the OPM (this process was also done with the previous Guide for the ex post evaluation of the legislation). Until now, the Supervisory Group for Ex Post Evaluation of Legislation has been the body responsible for the coordination of ex post evaluation, while now it will be the Council of Directors of legal departments. Therefore, it should be noted that the responsibility of coordinating and ensuring the quality of ex post evaluations falls on these bodies.</i></p>	<p>Legal Office/OPM</p>	<p><b>Not accepted</b></p>	<p><i>The commented part does not mean responsibility for the ex post evaluation function of the legislation, but the support of the Legal Office, Ministries and other institutions, for the use of the standard costume model, which is the main tool for quantifying the administrative burden.</i></p>
<p>The trainings will be accompanied by guides and practicals prepared by the SPO, so that the trained officials have a tool that they refer to during their daily work, in order to prevent and reduce the administrative burden.</p>	<p><i>It is necessary that this part be further developed in order to include the part of the trainings that are related to the drafting of legislation that does not create an administrative burden. In most cases, the reduction of administrative burden requires legal changes, and trainings for the reduction of administrative burden in the future need to be modeled in such a way as to target officials who participate in the process of drafting legislation, to create techniques new drafting, which do not create a new burden, respectively, that reduce the existing burden. In this context, ZL has the mandate to take care of the continuous improvement of the legislation, including taking care of the techniques and standards of the drafting of the legislation. Therefore, ZL should be responsible for this part within the guide and practicals for such trainings.</i></p>	<p>Legal Office/OPM</p>	<p><b>Accepted</b></p>	<p><i>The comment also has the requested answer. The SPS will coordinate the process and consult with all relevant institutions.</i></p>
<p>The person responsible for the process of reducing the administrative burden at the central level, appointed by decision of the Government, who is responsible for the successful implementation of the Program in a professional sense and for the coordination of all processes related to the implementation of the Program. The responsibilities and duties of the coordinator are determined by the Government's decision;</p>	<p><i>We propose to reformulate: "...is responsible for the coordination of the implementation...", because the implementation is done by the relevant institutions that have responsibility (eg ASHI, MINT, ZKM, etc.), while only coordination can be done by a responsible person. Moreover, a responsible person alone cannot do all the coordination of this process so complex and spread over so many institutions. Therefore, the Legal Office is of the opinion that for this it is necessary to establish a government body composed of the leaders of the administrative structures responsible for the relevant parts of the responsibility, which derive from this Program.</i></p>	<p>Legal Office/OPM</p>	<p><b>Accepted</b></p>	<p><i>It is entirely removed.</i></p>

Action Plan	<i>Digitization of the public administrative service for obtaining a permit for entities dealing with petroleum products or renewable fuels.</i>	MINT	<b>Not accepted</b>	<i>Digitization of permits and licenses is planned in Measure 1 of the Action Plan. Therefore, this service enters into that planning. content_copy share</i>
Action Plan	<i>Digitization of the public administrative service for obtaining a permit for the exercise of professional service activities - Service Contact Point (PVK).</i>	MINT	<b>Not accepted</b>	<i>Digitization of permits and licenses is planned in Measure 1 of the Action Plan. Therefore, this service enters into that planning.</i>
Action Plan	<i>The action plan could benefit from slightly higher level of detail, especially considering that large part of the analysis is already done in the annexes, which contains info about, which legal acts have to be amended and how. E.g. a) simplification activities in objective 1 and 2 should indicate, which laws need to be amended (preceded by which concept documents and followed by amendments to which secondary legislation) and by when. b) Digitalisation activities should indicate the steps like elaboration of specific requirements for IT development, public procurement (if the development is outsourced) as well as development and testing. Specifying these steps in the action plan would help to ensure that the proposed deadlines are indeed realistic and all implementing institutions would be well aware of the steps that need to be taken;</i>	SIGMA	<b>Not accepted</b>	<i>The actions of measures 1 and 2 have identified laws and bylaws in Appendix 1, 2 and 3. All these identified laws and bylaws become part of the Legislative Plan and the Plan of bylaws, within the annual legal planning. As for digitalization, only the final deadline has been set when the service is exposed in E-Kosova and enough time has been left for this, so that the goals are realistic.</i>
Action Plan	<i>SIGMA has suggested some adjustments to the indicator framework in order to focus more on actual gains in cost and duration of individual services. Public perception could also work as indicator, but usually it will take time to change perception (even after the changes have objectively already taken place) and multiple other factor also influence public perception (therefore it might not be the most relevant indicator for a plan of such short timeframe)</i>	SIGMA	<b>Accepted</b>	<i>All perception indicators from the Action Plan have been removed, except for the indicator developed by the Balkan Barometer.</i>
Action Plan	<i>We also noted that currently the plan is not costed. It may be difficult to identify the specific cost for digitalising each individual service, but it would still be useful to indicate the amounts that are available from donors, in order to understand/confirm that funding is foreseen/guaranteed. If</i>	SIGMA	<b>Accepted</b>	<i>The cost is set for each action of the Action Plan.</i>

	<i>funds effectively are not available, then difficult to foresee how digitalisation can be implemented.</i>			
Action Plan	<i>Finally, we would suggest to reconsider the need for including objective 5 (communication and awareness raising) into the plan. If objective 1 and 2 are done well, then this is the best awareness raising that could be done and removing objective 5 would enable to use some of the resources from that objective for successful delivery of objective 1 and 2.</i>	SIGMA	<b>Not accepted</b>	<i>Measure 5 is necessary since, in addition to the aspects of promoting results, it also represents awareness raising in terms of the use of those services that are simplified and digitized.</i>
Action Plan Treguesi: % of relevant concept papers recommending the option that prevents or mitigates the administrative burden	<i>Not a very good indicator, because:</i> - <i>Concept documents are prepared only for draft laws, while administrative burdens are usually effectively created by secondary legislation (i.e. the specific requirements for applications, etc.). This way the target of this indicator could be well reached, but still administrative burdens could be created by secondary legislation;</i> - <i>It is not clear, if this target is for all CDs or only the ones that will have to be prepared for implementing the recommendations (for simplifying procedures (annex 1 and 2)? What are the “relevant” CDs?</i> - <i>Proposed targets indicate that in 50-70% of cases, it is OK that the CD proposed the option that creates administrative burden – can this really be considered as OK?</i> <i>Alternative suggestion for indicator – monitor the average duration of application procedure for the permits and licenses by the ministries, where analysis has already been done (MIET, MAFRD, MESPi, MoH, MIA) and the target should be a reduction in the duration, e.g. by 10% in 2023, more ambitious target in 2024.</i>	SIGMA	<b>Accepted</b>	<i>The indicator has been completely removed. Also, the actions to achieve this indicator are set in the Action Plan of the Strategy for Public Administration Reform. As for the proposed indicator, it was not accepted, because Indicator 1, which identifies savings, also covers duration. This is because, with the Standard Costing Model, time will also be calculated in money.</i>
Action Plan Treguesi: % of public administrative services at the central level, according to Annexes 1 and 2. simplified	<i>Better to have clear numeric targets here, i.e. calculate the number of services in annex 1 and 2 and put 20% of that number as target. Same for 2024. At the moment it is not clear, from which number the % will be calculated – the total number of services provided by these ministries (listed in annex 1 and 2) or the total number of services for which the annex contains recommendations.</i>	SIGMA	<b>Accepted</b>	<i>Numbers for both baseline and targets are set.</i>
Action Plan	<i>What does digitalization mean here – should it cover the entire process (application, review, issuance) or just the application (as is mentioned in the result column on the</i>	SIGMA	<b>Accepted</b>	<i>The digitization of the administrative service means the digitization of the procedure from the stage of the</i>

Treguesi: % of public administrative services according to annexes 1 and 2, digitized	<i>right)? Better to be clear. Public perception as indicator can work, but please note that the perception can be expected to change only after the services have been simplified/digitalized, i.e. there is probably a delay between the improvement of the service and its effect on public perception. Currently all deadlines for simplification are at the end of 2023. Which activities will ensure that perception will improve already in 2023 (when the simplification procedures haven't been completed)!? Solution is to adjust the indicator target or specify the deadlines of activities (to indicate, which services will be simplified in time to enable them to influence the perception already in 2023).</i>			<i>party's application to the stage of issuing the administrative act by the administration or public authority.</i>
Action Plan	<i>Throughout the plan – please consider adding the date, when the activity should start, because this ensures that all institutions are aware of this and it enables to understand the sequencing better.</i>	SIGMA	<b>Not accepted</b>	<i>Action start dates are not indicated in the Action Plan, as the latter is an example of the current Administrative Instruction and Manual for planning strategic documents.</i>
Action Plan  Implementation of recommendations for simplification of public administrative services of MIET	<i>For all similarly formulated activities, it would better/clearer to specify:</i> - <i>By which deadline the concept document for amending the relevant laws will have to be adopted?</i> - <i>By which deadline the relevant law(s) would have to be amended (because most probably this has to be done before amending the secondary legislation), incl. what is the deadline for preparing the draft amendments, when it is submitted to government, when to parliament?</i> - <i>By which deadline the secondary acts will have to be amended;</i> - <i>For clarity's sake, it would be good to specify also, which department/unit within the ministry is actually responsible for CD, draft law, secondary legislation?</i>	SIGMA	<b>Partly accepted</b>	<i>There are no concept documents for the legal acts identified in Appendix 1, 2 and 3, taking into account the detailed analysis that has been done and the administrative cost calculations. However, taking into account that until now the reform has progressed very slowly, then through the Commission for Strategic Planning, a Decision was issued, emphasizing that the Legal Office of the OPM would draft all the legal acts (draft laws and draft by-laws) necessary for the implementation complete analysis in Appendix 1 and 2. Also, regarding the draft laws, the Legal Office has planned the use of the ombibus technique for the draft laws. As for those services (permits and licenses) for which there is no need to change the law, they will be drawn up as soon as possible, at the latest during 2022. As for those by-</i>

				<i>laws that come out after the adoption of the omnibus law, they will be drawn up by the Legal Office after the approval of the omnibus law in the Assembly, indicatively in the second quarter of 2023. However, the Action Plan has only set the deadline when the reform has been implemented, for which, together with the working group, it was concluded that is a real term.</i>
Action Plan  Initiation of digitalization of simplified permits, according to the analysis for digitalization	<i>Two comments: - Currently the activity indicates the deadline for “initiation”, i.e. when the digitalization should start, but there is no deadline for completing the digitalization. This way there is no certainty when the digitalization would end or that it would end in time to reach the indicator targets? It would be better to formulate the activity in a manner, where the final deadline would be clearly provided. - Can this activity really be expected to be implemented without any additional costs (i.e. all IT development will be inhouse and the relevant staff has already been hired)?</i>	SIGMA	<b>Accepted</b>	<i>There is no deadline for the completion of digitization. There is a deadline for achieving the goals we set for digitalization. The goals of digitization are set in such a way that they also reflect the challenges of the reform.</i>
Action Plan  Treguesi: Satisfaction of citizens and businesses with selected public administrative services	<i>Not clear, how this indicator will be calculated or what the target really is? The indicator is about satisfaction and the target is above 30%, does it mean that more than 30% of the applicants are satisfied with these services? It might be better to monitor the actual cost/duration of these selected services (instead of perception). And the target would be accordingly x% lower cost or duration.</i>	SIGMA	<b>Accepted</b>	<i>The previous indicator has been removed and the proposed indicator has been accepted.</i>
Action Plan  Simplification of selected administrative services based on real events	<i>Proposed activities are in general all relevant, but please consider adding 1-2 additional activities to: - Take stock of lessons learned through the simplification/digitalization initiatives of these services; - Adjust training materials/manuals based on these lessons learned; - Plan the simplification and digitalization of the next set of services.</i>	SIGMA	<b>Accepted</b>	<i>Proposed actions have been added.</i>
Action Plan	<i>Here (and for all similar activities below), if you already know, which legal acts have to be amended, then you can</i>	SIGMA	<b>Not accepted</b>	<i>The legal acts identified for this are highlighted in Appendix 3 and will be</i>

Implementation of the recommendation for simplification of registration for the first time (R), extension of registration (V) and change of ownership (P), of vehicles	<i>specify this here as well. It helps to determine, if the deadline is realistic (e.g. if a law has to be amended, a CD adopted even before that, plus amendments to the secondary legislation after amendments of law, then end of 2022 may be overly optimistic).</i>			<i>part of the Plan of by-laws, within the annual legal planning. However, the deadline for the implementation of the simplification has been set taking into account both the procedures and the challenges during the process.</i>
Action Plan  Digitization of public administrative services for the first time registration, extension of registration and change of ownership of vehicles	<i>This activity (and all other similar ones) probably requires some funds, but currently none are indicated. If the activity will be donor funded and the amount of available funds is known, then one option is to indicate this amount in the AP (if the exact cost of development is not known). Secondly, if the digitalization will be outsourced, then it would be better to outline the activities that have to be conducted for digitalization, e.g.: - elaboration of specific requirements; - Public procurement; - Development and testing. Then it is possible to determine, if the deadline is realistic.</i>	SIGMA	<b>Partly accepted</b>	<i>The cost for each action related to digitization is set. However, aspects such as specific requirements, procurement, development and testing have been taken into account when setting the deadline in the Action Plan.</i>
Action Plan  Implementation of the recommendation for simplification of the public administrative service for applying for an identity card for persons aged 16-18	<i>Is this really a separate activity from 2.12? It would probably make sense to simplify and digitalise the issuance of ID card for all age groups at once. Even if you currently have a separate ID card for persons aged 16-18, the first question could be – do you need to keep this separate ID card or instead have the same ID card for all?</i>	SIGMA	<b>Accepted</b>	<i>The highlighted actions have been merged, as they were mistakenly separated.</i>
Action Plan  Increase institutional coordination and capacity building to prevent and reduce administrative burden	<i>Just a random additional idea to motivate/incentivize ABR-related activities (that could be placed under this objective): introduce an annual award that will be given to the authority that reduced admin burdens the most in the past year.</i>	SIGMA	<b>Accepted</b>	<i>The reward will be planned during the budget planning at the end of 2023, when the first successes are proven.</i>
Development of module for administrative burden	<i>Currently the development of the training module and the delivery of trainings (3.15.) have the same deadline. Might be better to bring the deadline for the module a bit forward, because without the module it is not possible to train.</i>	SIGMA	<b>Accepted</b>	<i>The deadlines are reflected in the Action Plan.</i>
Action Plan  Update the guide to the standard costing model and the excel file, according to the Program approach	<i>Simply highlighting that there is nobody responsible.</i>	SIGMA	<b>Accepted</b>	<i>The responsible institution, the Office for Strategic Planning, has been reflected.</i>

Action Plan % of simplified public administrative services at the municipal level	<i>This indicator is formulated very widely. It would be better to focus here also on the cost and duration of the service, as under chapter 2 (and focus on services that will be analysed/simplified).</i>	SIGMA	<b>Accepted</b>	<i>The Action Plan indicator has been changed. Savings after the simplification of municipal services will be calculated in indicator 1 of the general goal.</i>
Action Plan Simplification of public administrative services at the local level	<i>The proposed plan suggests that all municipalities provide a different set of services, and therefore each municipality needs to be analysed separately. Most likely in reality municipalities provide the same services (and most probably even do it quite similarly), therefore it makes no sense not to analyse each municipality individually (as is proposed now), but rather analyse all municipalities together or if that is too ambitious, then focus on services in specific sector, e.g. social, environmental &amp; planning, etc.</i>	SIGMA	<b>Partly accepted</b>	<i>Municipalities issue in most cases the same services, with minor differences from municipality to municipality. However, each of the municipalities has the authority to set payments for the services they provide, both delegated by the central level and for their own. Also, it is quite challenging to implement the central legislation even when it is changed. Therefore, in order to have a greater and visible implementation by the citizens, it is necessary to work with each municipality separately, although from 2023 it is intended to be done with groups of municipalities.</i>
Action Plan Increase communication and raise awareness of administrative burden	<i>Suggest to drop this objective entirely or merge some activities (e.g. consultations with businesses and CSOs) with the activities foreseen under objective 3. When ABR is done well, it communicates the success and raises awareness by itself, therefore no need to print brochures, banners, notebooks and pencils (it will help to save the environment as well, if you do not do these activities). Please re-allocate all resources planned for objective 5 to the delivery of objective 2 and this would be the best awareness raising ever.</i>	SIGMA	<b>Partly accepted</b>	<i>Some of the actions have been merged. While the part of raising awareness is quite necessary, not only for the public but also for the public administration itself. Raising awareness in the right way will make the officials who are responsible for drafting policies always pay attention not to create an administrative burden.</i>
General comment	<i>If one wanted to reduce the length of the programme, some of the guiding questions that are now part of the general methodology could usefully be put into an annex of the programme and then be further elaborated in the foreseen tools to be developed.</i>	EU Office	<b>Accepted</b>	<i>Some of the parts are placed in the appendices.</i>
General comment	<i>As this is a programme and not a sector strategy, it would be important to make explicit the links with the NDS and the PARS and as well the future e-government strategy. Hence, duplications of strategic objectives should be avoided.</i>	EU Office	<b>Partly accepted</b>	<i>The connection of ABPRP with SRAP/E-GOV STRATEGY and SKZH has been made and has appeared in the form of a concept or strategic</i>

	<p><i>while the draft PAR strategy is the main policy framework that should drive the objectives definition under ABR and E-government strategy. At the moment there are only a few general references to these documents, perhaps as they were being drafted at the same time as the programme. However, before finalization, it would be good to add the strategic objective(s) from the NDS that the programme is contributing to, via the PARS, as the programme's sector strategy. Also the specific objective(s) and the indicators from PARS that the ABPRP serves could be reiterated in the ABPR programme.</i></p>			<p><i>approach. It is understood that the implementation of the ABRP will feed into SIGMA's service delivery indicators, which are used in the SRAP, and it is also understood that this will increase the value of the World Bank's indicator of Government effectiveness. Also, it should be noted that it is quite difficult not to have repetition or duplication of objectives, although much has been done to prevent this from happening. However, based on the meetings we have had with the representatives of SIGMA, we have emphasized this challenge, and it has been recommended that, where there is a possibility of repetition or duplication, care should be taken not to set values, results, mandates, etc. , opposite, or contradicting from document to document.</i></p>
<p>General comment</p>	<p><i>Perhaps because this link with the PARS is currently not elaborated, the objectives and indicators- part of the programme remains a bit weak. The action plan lists aims and indicators, however, ideally these aims should be objectives stemming from the sector strategy, the PARS. However, the draft PARS is actually only making a vague reference to "contributing and checking on the implementation" of the ABR programme (The indicator in the draft PARS under specific objective 1 is "Improving service provision through simplification of procedures and legal harmonization"). Therefore, a better definition of strategic objectives need to be set in the draft PAR strategy on how ABR contributes to the fulfilment of the objectives under the section on 'service delivery', as well as a better specification of indicators rather than only "implementing" ABR. The indicators should be accompanied with an indicator passport document, opening up what the indicator measures, the methodology for collecting information on it,</i></p>	<p>EU Office</p>	<p><b>Not accepted</b></p>	<p><i>Every strategic document has goals and indicators. The goals and indicators of ABPRP are quite clear and measurable. As for the indicator for the implementation of the ABPRP used in the SRAP, the same will be removed since the SIGMA indicator for the provision of services is sufficient to cover the pillar of service provision in the SRAP and ABPRP, as a whole within the sector of AP. The passport of indicators has been prepared and is placed in the appendix of the Program. As for the risk assessment, this was done in SKZ and SRAP. The same general challenges (lack of staff, budget, low maturity of technological systems,</i></p>

	<i>etc. There is also no risk assessment framework elaborated on how possible risks might be mitigated.</i>			<i>lack of capacities, etc.) are also valid in ABPRP, therefore it was not deemed necessary to highlight them in the document.</i>
General comment	<i>It could be useful to include a mention or reference to the digital agenda/the eGovernment strategy that are expected to be adopted by the end of 2022/beginning of 2023 as they might impact the implementation of the programme (for example with regard to having in place an electronic identification following eIDAS standards). Of course, once the scope of the e-government strategy is defined, it needs to consider how it will be compatible with the objectives under the ABR programme and what will be the difference in the scope and intervention between the two.</i>	EU Office	<b>Partly accepted</b>	<i>Under the aspect of the strategic approach, the interconnection of the documents has been emphasized. However, as it was also emphasized in the Program, E-GOV Strategy will provide the strategic approach for the technological infrastructure in the public administration. Of course, the objectives of E-GOV Strategy will be in accordance with ABPRP.</i>
General comment	<i>While there is a specification on the political coordination structures (the strategic planning committee), it is not clear which body/institutions will be in charge of the technical level coordination, quality control and implementation structures for this programme (point 7.2. only specifies the tasks but only partially the institutional responsibilities. Reference is made to a government body, which is to evaluate and take care of the implementation of the programme. Could this body already be given a specific name, as the body should be decided and approved through the approval of this programme? A visual overview might support the presentation of information in this part). Apart from the role of the SPO and SPC in the process of political and professional co-ordination, there is no mention of the role (if any!) of MIA as the key ministry responsible for developing and steering for PAR. With regard to the ABR co-ordinator proposed – it is not clear where this position will be stationed (under OPM/SPO?). There is no duration of the programme indicated. It could be for a period of 6 years with the action plans for a period of 2-3 years.</i>	EU Office	<b>Accepted</b>	<i>Part 7.2 clearly provides the responsibilities of the institutions in implementing the ABPRP and also identifies the need for changes in the current guidelines to achieve these planned reforms. The government body has been named according to the recommendation. As for the role of MIA, the role of ASHI in this process has been highlighted. Also, it is emphasized in the Program that the administrative burden process will be placed under the responsibility of the ZPS. The duration of the Program is 2022-2027, while the PV is 2022-2024.</i>
General comment	<i>A short situational analysis could be added, consisting of the main current concrete problems that the programme is aiming to address. Perhaps a few things could be taken from the concept document adopted in March 2020.</i>	EU Office	<b>Not accepted</b>	<i>The analysis of the situation has been highlighted very briefly and in a general way. However, the concept document was not used, since the data in it is old, the recommendations and planning are wrong and its analysis is</i>

				<i>no longer relevant, especially due to the COVID 19 pandemic.</i>
General comment	<i>Gender equality is not addressed in the programme or especially through indicators.</i>	EU Office	<b>Accepted</b>	<i>Gender equality is emphasized in the narrative part of the Program, in the Priorities section.</i>
General comment	<i>There are no indicative estimations of the financial resources (both from partners and from the state budget) for the implementation of the activities in the AP. Budgetary allocations from the state should also be reflected in the annual budget of Kosovo. Based on such an overview, the financial gap should be identified (if any), together with the overview of EU or donor- funded activities and to which amount.</i>	EU Office	<b>Accepted</b>	<i>The cost for each action and the budget allocations are set according to the rules in force.</i>
General comment	<i>Communication and coordination with other stakeholders is well defined in the draft programme. Links with the PAR promotional plan could also be established where possible.</i>	EU Office	<b>Accepted</b>	<i>AB is a process within RAP and whenever this is communicated and promoted, RAP is also communicated and promoted.</i>
Specific comment Metodologjia e Përgjigjshme	<i>It is not clear which public officials will be carrying out the tests of proportionality and who will be taking decisions on the unnecessary elements and procedural steps? How will the method “one in, one out“ be initiated apart from preparing a plan? It is stated that the largest volume of administrative burden cases is created by secondary legal acts, however, further clarification is needed with regard to the tool of consolidation of primary and secondary legislation proposed, perhaps as concrete activities in the Action plan.</i>	EU Office	<b>Partly accepted</b>	<i>It is specified which public officials will use the proportionality test and it is decided who makes the decision on the elements of simplification. A general description of the "one in, one out" method is given, but this is expected to be done with the development of the plan for this method, as stated in the ABPRP. Whereas, the necessary actions for the consolidation of legal acts are placed in the SRAP, in the section for the development and coordination of policies.</i>
Specific comment Standard Cost Model	<i>It is envisaged that the SCM user guide will be updated by the SPO. Information is needed on how it is going to be applied in practice by line ministries and how their capacities on this will be improved, perhaps again as concrete activities in the Action plan.</i>	EU Office	<b>Accepted</b>	<i>This is placed in the part of capacity building and in the AP they took part under the actions for the training of officials, in the OPM and in the Ministry.</i>
Specific comment Digitization	<i>This part should be further elaborated to ascertain that all services are available in both official languages on the eKosovo portal from the start. In addition, a provision could be added as to be aware that needs of minorities,</i>	EU Office	<b>Accepted</b>	<i>It is emphasized that all services should be placed in the two official languages. Also, the aspects related to minorities and vulnerable groups in</i>

	<i>socially disadvantaged groups and handicapped people should also be addressed. Also the links with the digital agenda and the eGovernment strategy of the government should be established, if possible at this stage, as well as with other existing e-platforms in public bodies (not only e-Kosova).</i>			<i>the part of communication and consultation were highlighted..</i>
Specific comment Consultation and communication	<i>The communication part is well elaborated with details, however, further reference could be made to co-ordination with donors, who provide substantial funds supporting the national authorities in implementing the reforms and on the involvement of CSOs, academia and businesses as active players in the policy dialogue and in steering the process of reforms and increasing transparency and accountability.</i>	EU Office	<b>Accepted</b>	<i>A section for coordination with donors has been established within the administrative burden process. Also, special actions for coordination and involvement of donors in the process were highlighted.</i>