**The Public Consultation Report on the Administrative Burden Prevention and Reduction Program 2025-2028 and its Action Plan 2025-2026**

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| **No.** | **Type of comment** | **Comment** | **Who commented** | **Status of comment** | **Justification** |
| 1 | General | The document has clear objectives for administrative simplification, digitization, and a center-based approach. However, more measurable and time-bound goals would be welcome. | Besnik Vasolli  (Citizen) | Accepted | Addressed in Action Plan 2024-2026. |
| 2 | General | A more detailed explanation of how the Municipalities will be supported and held accountable is necessary. | Besnik Vasolli  (Citizen) | Partly Accepted | Addressed in Action Plan 2024-2026. Municipalities will be incentivised through Municipal Performance, as emphasized in the Programme, the Reduction part. |
| 3 | General | The document identifies gender inequalities in participation but does not provide concrete measures to address them. I propose including specific measures to involve underrepresented/marginalized groups in training and consultations. | Besnik Vasolli  (Citizen) | Accepted | Addressed in Action Plan 2024-2026, Measure 1 and 3. |
| 4 | General | The document could propose concrete solutions for capacity building for legal drafters, as these are currently lacking. | Besnik Vasolli  (Citizen) | Accepted | Addressed in Action Plan 2024-2026, Measure 1. |
| 5 | General | The baseline is missing, and specific indicators for measuring time reductions could be improved. This would enhance the chances of even better implementation of this document | Besnik Vasolli  (Citizen) | Accepted | Addressed in Action Plan 2024-2026, Measure 3. |
| 6 | General | The inclusion of CSOs and business chambers is welcome, but details on how their input will be integrated into new policies would demonstrate a stronger commitment to participatory governance. | Besnik Vasolli  (Citizen) | Accepted | Addressed in Action Plan 2024-2026, Measure 2,3, 4. |
| 7 | General | The training of officials and the planned platform are good initiatives. However, regular assessments of the long-term effectiveness of these trainings should also be foreseen, and it should be evaluated how well these practices are being implemented in daily actions. | Besnik Vasolli  (Citizen) | Accepted | Addressed in Action Plan 2024-2026, Measure 1. |
| 8 | General | Plans for transparent communication and the integration of services into the eKosova platform are welcome. However, activities should also be developed for rural communities or older users who have limited access to IT and are not present on social media. | Besnik Vasolli  (Citizen) | Partly Accepted | Addressed in Action Plan 2024-2026, Measure 3. First, analyses of these groups with limited access will be drafted. |
| 9 | General | I propose adding a section on potential risks (e.g., resistance to change, lack of funding, cyber threats) and a mitigation strategy to ensure smoother implementation. | Besnik Vasolli  (Citizen) | Accepted | Risk Assessment Matrix added as Annex. |
| 10 | Capacity Building | The program aims to strengthen the skills of public officials through focused training, the development of online modules, and the organization of activities such as digital camps and discussion forums. These activities will help enhance competencies for preventing and reducing the administrative burden at both central and local levels, including the use of methodologies like "Design Thinking" and digital applications for analysis and measurement.  Comment**:**   * The capacity-building measure reflect a commitment to the professional empowerment of public officials, integrating innovative methods such as 'Design Thinking' and inclusive activities like digital camps and discussion forums. * It is necessary to measure the impact of the training and ensure the inclusion of all levels of administration to guarantee effectiveness and equity in benefits. | GLPS  (NGO) | Accepted | Addressed in Action Plan 2024-2026, Measure 1. |
| 11 | Prevention | The prevention measure aims to proactively eliminate unnecessary complexity and regulations that may create burdens for citizens and businesses. This is achieved through regular reviews of strategic documents and laws, using checklists for legislation ready for digitalization, and integrating simplification approaches from the early stages of policy design.  Comment:   * The prevention measure provides a structured approach to avoiding administrative burden from the early stages, using practical tools like checklists and simplification approaches, which contributes to the creation of more efficient and digital policies.   It is necessary to ensure that checklists are widely used and implemented by all relevant institutions. Additionally, regular monitoring should be conducted to ensure that new strategic documents and laws meet the standards for preventing burdens, addressing any weaknesses in the process. | GLPS  (NGO) | Accepted | Addressed in Action Plan 2024-2026, Measure 2 and also Implementation part on the Programme. Legal Departments of Ministries added as core structures of legal drafting, as well as Legal Office of OPM, as reviewing structure of legality and constitutionality of legal acts before approval to the Government. |
| 12 | Administrative burden reduction | The reduction includes the simplification and digitalization of public services, by reducing the steps, documents, and costs imposed on citizens and businesses. Activities include eliminating unnecessary procedures, consolidating similar services, and advancing digital systems for public services, with the aim of saving time and costs.  Comment:   * The program identifies resistance from institutions to change, and thus the lack of listing specific services and responsible institutions gives the impression of surrender in the face of this resistance. For this reason, the focus has shifted from reducing the burden on specific services, particularly those related to 'life events' such as birth, marriage, or property registration, to meeting the overall goal of reducing 150 services. This could transform the reduction process from a qualitative, citizen-focused approach into a quantity-oriented approach, risking the true impact of the reform.   It is recommended that the program creates a stronger connection with the achievements and challenges of the previous program, particularly including parts that were not completed. This would enable a clearer focus on addressing specific services that need to undergo the burden reduction process, with the responsible institutions, ensuring continuity in the simplification of services identified in the 2022-2027 program. | GLPS  (NGO) | Accepted | Life events are part of eGOV Strategy 2023-2028, and ABR Process will support this process and feed its indicators. Services identified in Programme 2022-2027 will continue according to implementation Agenda. Already 180 services in central level are analysed and ready to be implemented. |
| 13 | User engagement | To improve awareness among citizens and businesses, the program foresees the organization of information campaigns, public consultations, and the creation of mechanisms to collect user feedback. These activities aim to actively involve users in the reform processes and increase transparency in the implementation of burden-reducing measures.  Comment:  The measure for involving users through public consultations, co-design, and the use of research tools such as surveys and focus groups, etc., is a positive step to ensure that public services address the real needs of citizens and businesses. The use of various techniques such as 'customer journey mapping' and 'mystery shopping' provides a solid foundation for improving the user experience in service delivery. | GLPS  (NGO) | Accepted | Addressed in Action Plan 2024-2026. |
| 14 | Communication and awareness raising | The measure "Communication and Awareness Raising" presents a structured and comprehensive strategy for informing citizens and businesses about the measures and results of reducing administrative burdens. The inclusion of periodic reports, infographics, videos, and messages through social and traditional media provides a solid foundation for transparent and effective communication. The integration of information on digitalized services in eKosova and the visual reporting of statistics in three languages contribute to increased access and public awareness. Additionally, the inclusion of conferences, debates, and partnerships with NGOs and economic chambers helps reach a wider audience and fosters continuous dialogue with key stakeholders.  Comment:   * Although the measure foresees a wide range of informational activities, there is a lack of a clear plan to assess the impact of these activities on raising awareness and engaging citizens and businesses. Furthermore, the participation of citizens and more marginalized communities is not sufficiently emphasized, risking the exclusion of some groups from this process. Additionally, the mechanism for integrating feedback from stakeholders into the reform improvement process is unclear, creating the possibility of limiting the impact of these efforts. | GLPS  (NGO) | Accepted | Addressed in Action Plan 2024-2026, Measure 4. However, the subject is part of Public Administration Reform Strategy. |
| 15 | Implementation and monitoring | To ensure the effective implementation of the program, monitoring and reporting will be continuous through performance indicators and the publication of regular reports. This process will help assess progress and identify challenges in implementing the measures, including the analysis of achieved savings and impact on users.  Comment:   * Point 5 provides a detailed framework for the implementation and oversight of the Program, defining the responsibilities of key institutions such as the First Deputy Prime Minister, SPC, SPO, and DTU. The responsibilities are well distributed, with SPO leading the coordination, monitoring, and reporting process of the Program, and AIS focusing on maintaining the eKosova platform and the digitalization of services. The involvement of municipalities with equal support and the link to the Municipal Performance Grant for Burden Reduction demonstrates a commitment to empowering the local level. * However, despite the clear structure, supporting municipalities based only on institutional readiness creates the risk that municipalities with greater support needs may be left behind, increasing inequalities. Additionally, while a monitoring mechanism through SPC and SPO is included, the measures for addressing a lack of commitment or resistance from some institutions are unclear. The budget impact of 40 million euros presents a challenge, especially considering the lack of a clear plan to cover this financial gap and ensure the sustainability of the Program.   It is recommended to include a measurable mechanism for monitoring and holding institutions accountable that show a lack of engagement, to review the approach for municipalities by balancing readiness with actual need, and to develop a detailed plan for covering budgetary gaps by better utilizing resources from development partners. | GLPS  (NGO) | Partly accepted | Lack of coordination between institution will be mitigated through First Deputy Prime Minister and Strategic Planning Committee, since this resulted to be very successful in the phase 1, 2022-2024.  Financial gap has been improved due to the drafting of a precise Action Plan. Find the explanation in Implementation part.  Local level will be supported equally, as stated in the Programme. |
| 16 | General | The draft ABR programme (2025-2028) confirms the continuous commitment of the government to the reforms in this area. However, the draft is too descriptive following the pattern of an academic paper rather than a programme with clear objectives and priorities.  The document is not in line with the requirements for strategic framework development as per the Rules of Procedures (RoP) of the government. There are descriptions of some processes and tools following international practice, however, those are not linked to clear priorities with specific objectives and measures/activities how to achieve them. The fact that there are no objectives and priorities will not allow for an efficient reporting, evaluation and monitoring of the progress made. | EU Office in Kosovo | Not accepted. | The comment is very general and not defined regarding what needs to be addressed. |
| 17 | Current situation | Under p.2 State of Play – there is no reference to the 2023 Annual progress report of the programme and it is not clear what was achieved/ not achieved or delayed under the different priorities defined under the current ABR programme (2022-2025). There are some gaps and challenges mentioned, however, there are no concrete mitigation measures proposed. It is important to note that an evaluation of the policy implementation should be done through a mid-term review assessment of progress made by now so as to identify the remaining challenges and define priorities and clear objectives for the period ahead. | EU Office in Kosovo | Accepted | Reference added. As for the Progress report of the Programme, it will be drafted and published during Q1 2025. Risk Assessment Matrix, with mitigation measures, added as Annex. |
| 18 | General | There is no risk assessment framework elaborated and no clarity on how the possible risks might impact the successful implementation of the programme. And, there are no references to other major strategic documents such as: NDS/NDP, PARS and its new Action Plan (which is also in public consultations), e-government strategy etc. It is recommended that such links are clearly established in order to ensure synergy and sustainability of results. It would be recommendable to not only refer to documents but also ensure that underlying coordination arrangement for comprehensive implementation and monitoring is ensured. | EU Office in Kosovo | Accepted | Risk Assessment Matrix, with mitigation measures, added as Annex. |
| 19 | General | There is no analysis of the financial resources used by now (both from donors and from state budget) and no indicative estimations for the future needs. This should be reflected in the Action Plan too. The total budgetary allocation for the implementation of the programme is considered to be around 40 MEUR, however, this estimate is quite vague especially taking into consideration that the fiscal gap is proposed to be covered by the implementation of the e-government strategy. Budgetary allocations from the state have to be reflected in the annual state budget and should be easily traceable. | EU Office in Kosovo | Partially accepted | Analyses of financial resources from the Gov side will be analysed on the Progress Report of the Programme, during Q1 2025. Budget for the Action Plan added. Budget and financial gap improved after budgeting Action Plan. |
| 20 | General | The local administration is not substantially covered especially in regard to training and building up capacities; it is not clear how the processes for simplification and digitalisation of e-services will be implemented on local level (how the relevant financial and HR resources will be ensured). | EU Office in Kosovo | Not accepted | Local Administration is very substantially covered. Digitalization of services also in local level are emphasized and part of Objective 4, of eGov Strategy 2023-2027. |
| 21 | Communication and raising awareness | In regard to communication and awareness raising – it is mentioned that periodic comprehensive reports will be produced by the SPO, however, there is no clarity on the timeframe and regularity of these reports. Moreover, it is recommended that citizens’-oriented on-line tools are elaborated, including summaries of main results achieved, services provided etc. in order to allow for increased public awareness and access to information and documents. | EU Office in Kosovo | Partly Accepted | Regularity of Reports added. Online tools elaboration and implementation are part of eGov Strategy 2023-2027 and Public Administration Reform Strategy. |
| 22 | Implementation and monitoring | This part should be further developed by providing additional information on the process of evaluation of progress made. For this purpose, a performance assessment matrix has to be developed with concrete performance indicators with clear baselines and targets. This could be also reflected in the Action Plan and will allow for a more efficient evaluation and monitoring of the results achieved; gaps and delays identified; risks and problems addressed. The involvement of the CSOs, businesses and general public not only in communication and visibility events but also in overall monitoring of the progress made in the implementation of the programme has to be ensured. | EU Office in Kosovo | Partially accepted | Process evaluation of Progress will be part of Progress Report during Q1 2025. Baseline and targets are in Action Plan 2025-2026. CSOs and private sector monitoring is involved – Measure 3 and 4. |
| 23 | General | The AP presents key metrics including user satisfaction, cost savings, the number of simplified services at both central and local levels, and the digitalization of services using the ABR methodology. The AP emphasizes capacity building by prioritizing regular training sessions aiming to equip public officials with the skills and tools necessary for reducing administrative burdens. However, several shortcomings are to be highlighted, with lack of clarity of some indicators and excessive vagueness of activities planned. | EU Office in Kosovo | Accepted | Indicators clarified at the Action Plan 2025-2026. |
| 24 | General | The 2023 Annual progress report of the current ABR program 2022-2027 and its Action Plan 2022-2025 should have been the starting point for the development of the new (revised) Programme and AP. The template of the current AP is recommended to be used also for the new AP since it gives much more clarity in regard to timeline/deadlines for the implementation of activities and financial resources to be used. | EU Office in Kosovo | Accepted | Progress Report will be drafted and published during Q1 2025. However, experience, achievements and challenges so far were registered and used to improve the Programme and entire planning of ABR Process. |
| 25 | General | Several indicators included in the AP could be improved. For example:   * Under Capacity building: Indicator 1 could cover not only number of staff trained but also the impact of the training; Indicator 2 – ratio between T1 and T2 has to be clarified; * Under Prevention – Indicator 1 – “sufficiently address” implies a level of subjectivity. The indicator should be reformulated and measurable. * Under reduction: An indicator on the number of services addressing people with special needs could be added. * On User engagement, communication and awareness – Indicator 1 - not clear if the indicator refers to awareness raising after the service is in place or to consultations with end beneficiaries before designing the service. In case it refers to user engagement measures following the launch of a service, the targets seem low. | EU Office in Kosovo | Accepted | Capacity Building of Trainings Impact Indicator added and Indicator 2 clarified. Indicator 2 under prevention part improved. Indicator for persons with special needs added. Indicator on user engagement, communication and awareness clarified. |
| 26 | General | Many targets are unspecified. Often activity descriptions are vague, affecting the AP's clarity and ambition when comparing to the current AP 2022-2025. To address this, the Government should establish clear, specific, and realistic targets for each activity and identify broad sectors/institutions that will benefit from simplification during the reference period. Vague definitions of activities create potential overlaps, particularly with repeated references to training and roundtables. Where there are overlaps, a consolidation of activities should be applied. Preferably, there should be be a clear definition of the scope and objectives of trainings and workshops. | EU Office in Kosovo | Not accepted | The comment is very general and not defined regarding what needs to be addressed. |
| 27 | Reduction | Detailed plans for key areas of services to be digitalized are missing. Activities such as 3.10 (central-level digitalization) and Activity 3.11 (grant and subsidy procedures digitalization) require further elaboration. We are proposing the following detailed definition of digitalisation areas:   * Digitalization of grant and subsidy procedures in the Ministry of Agriculture and Rural Development. * Digitalization of grant and subsidy procedures in the Ministry of Economy. * Digitalization of grant and subsidy procedures in the Ministry of Finance, Labour, and Transfers. * Digitalization of grant and subsidy procedures in the Ministry of Industry, Entrepreneurships and Trade. | EU Office in Kosovo | Accepted | Activities are divided and specified in Action Plan 2025-2026, Measure 3. |
| 28 | Reduction | Incorporating specific activities will significantly enhance the AP. Our suggestion includes:   * Simplifying the process for paying traffic penalties across Kosovo (key beneficiary: MIA). * Assessing and addressing and simplification of administrative burdens for farmers, especially smaller farmers. * Assessing and addressing and simplification of administrative burdens in the area of foreign direct investments. * Digitalizing notary services and creating system interlinkages between notaries, tax administration, and cadastral offices, contributing to combating informal economies and money laundering. * Continuation of “Baby is born” principle. | EU Office in Kosovo | Accepted | Activities are included in Action Plan 2025-2026, Measure 3. |
| 29 | General | Many activities under the AP are linked to contribute to the achievement of the indicators under the Kosovo Growth Agenda. This could be clearly indicated in the AP. | EU Office in Kosovo | Accepted | Clarified under each relevant Measure and in the Programme narrative. |
| 30 | Action Plan | A lack of detailed cost/budgetary planning and calculation is a significant weakness. Financial allocations for most activities remain undefined, hindering the assessment. The Government should develop a detailed budget for each activity, categorizing costs into capital and operational expenses as per the template requirement. Identify financial gaps and potential origin and modality of external funding sources. | EU Office in Kosovo | Accepted | Cost and budgetary planning and calculation added in Action Plan and in the Programme. |
| 31 | General | Gender equality and inclusiveness of people with special needs are not clearly defined and thus lack clarity. Referring to gender-based disaggregation is not sufficient. The Government should consider to introduce specific, well-defined actions, such as tailored services and training programs, to enhance gender equality and accessibility. Specific activities targeting needs of people with special needs could be considered and included in the AP. | EU Office in Kosovo | Accepted | Activities are added in Action Plan 2025-2026, Measure 3 and 4. |
| 32 | General | It would be good to have a detailed stocktaking in the analysis of the results of the current ABR Programme implementation. What has been achieved, what activities were successfully finished and what not. Also, how funds have been spent so far. This should also help explaining how the defined activities were designed and sequenced. | OECD/SIGMA | Accepted | Progress Report of the Programme 2022-2027, for the period 2022-2024, will be drafted and published during Q1 2025. |
| 33 | General | Correspondingly, currently it is entirely unclear why you decided to have a new Programme and AP, instead of only updating the programme and having a new AP. It would be key to understand the rationale behind. | OECD/SIGMA | Accepted | Programme 2025-2028 is not a “new Programme”. It is update of the current Programme. However, since Gov is updating the current one, there is no sense of titling 2022 -2027 anymore. This is one argument, but the other one is strengthening of such parts as local level, user engagement, linking with eGov Strategy, etc. |
| 34 | General | Given that the ABR is closely connected to several other strategic plans (especially NDS/NDP, PARS, e-Government Strategy) as well as to the new Growth Plan and Reform Agenda, it would be key to have a clear stocktaking of the connections, synergies and how the ABR Programme complements commitments in these other key documents. | OECD/SIGMA | Accepted | Connections added in the Programme and Action Plan 2025-2026, Measure 3. |
| 35 | General | The draft programme currently does not spell out general and specific objectives and corresponding indicators with baselines and targets. Some indicators are presented in the draft AP, but it is unclear how they correspond to objectives (as those are missing) and how the indicators are designed, how they will be measured, how targets are defined and how the baselines were identified. Without clarity on these matters, it is difficult to assess the credibility of the Programme and its AP and how it will be followed up during its implementation. | OECD/SIGMA | Accepted | Short wordings such as “Prevention” or “Reduction” tell the objectives: whatever constitutes burdens for citizens and businesses will be prevented, and effort will be made to reduce burdens through simplification, digitalization, customer care improvements, communication. Therefore, there is no need to write long sentences as objective while we can short them on just one specific and clear word understandable by all. |
| 36 | General | A detailed explanation of how the programme implementation will be managed, how monitoring and reporting is envisaged, how any evaluation is expected and how the co-ordination will harmonise with other co-ordination processes (especially co-ordination of the entire PAR agenda) is also a key element of any sound strategic document, that is currently underdeveloped in the draft. | OECD/SIGMA | Accepted | Programme is linked with NDS, PARS and eGOV Strategy. |
| 37 | General | The draft AP has many continuous/ongoing activities. It would be good that even if this is the case, the annually planned outputs of these are defined. | OECD/SIGMA | Accepted | Outputs defined in Action Plan 2025-2026, Measure 3. |
| 38 | General | The Programme and the activities are not costed yet. Without sufficient costing information the realism and credibility of the Programme also cannot be assessed/ensured. Especially as you envisage substantial donor support, the detailed costing information would also be necessary to learn how much (if any) financial gap you have identified that would call for further donor support allocation and/or having funds from the budget. | OECD/SIGMA | Accepted | Costing is added in Action Plan 2025-2026. |
| 39 | Current status | Some other potential/related challenges, which could be mentioned/addressed with the plan (according to SIGMA report):  Application of once only inconsistent (none of the 4 analysed procedures comply)  No analysis of admin burdens in secondary legislation (based on samples). | OECD/SIGMA | Partly Accepted | Once only Principle is key part of eGOV Strategy, Objective 3 and 4. Therefore, there no need to address that at the ABPR Programme. Secondary legislation, in terms of ABR (service design and digital readiness, is foreseen at the Programme and Action Plan. |
| 40 | Reduction (simplification) | It would be good to provide some info about, which services exactly are going to be simplified according to the approach below (or at least in which areas)? | OECD/SIGMA | Accepted | Services emphasized in Action Plan 2025-2026, Measure 3. |
| 41 | Reduction (simplification) | Two things:  1) In general relevant ways how to reduce burdens are described below. However, these are all related to applying the principles of the LGAP and a rather extensive exercise to harmonise special legislation with LGAP has been recently undertaken by the Kosovo government (with more than 100 laws allegedly harmonised). It would be good to also explain, why the LGAP principles still do not seem to be applied (despite these recent harmonisation exercises) and what would be done differently from the previous exercises to ensure that the below approach will be more successful? Or is the below exercise focusing on a different set of legal acts?  2) And more precisely, the programme should be accompanied by an action plan that describes in detail, what exactly should be done to implement the below measures, by whom, by when, etc? | OECD/SIGMA | Partially accepted | Action Plan 2025-2026 added. |
| 42 | Reduction (simplification 2) | Simply mentioning that this is perhaps not the best example for merger of permits. Does anybody really need a permit to pick mushrooms???? This permit should be removed entirely. | OECD/SIGMA | Accepted | Example removed. |
| 43 | Reduction (digitalization) | In addition to the description below, it would be good, if the programme would provide some info (to the decision-maker as well as to the general public) about, which services are going to be digitalised exactly in the framework of this programme? Or what is the decision-maker giving his/her approval to exactly with the adoption of the programme? | OECD/SIGMA | Accepted | Information added in Action Plan 2025-2026, Measure 3. |
| 44 | Implementation and supervision | It would be great to add a few outcome level indicators here that would be used for monitoring the success of the programme. E.g. on duration of admin procedures, or satisfaction levels, or burdens reduced (if possible). | OECD/SIGMA | Partly accepted | Indicators added in Action Plan 2025-2026. Duration of administrative procedures in not included in this phase. However, it will be one of the key indicators for the phase 2027-2028. |
| 45 | Action Plan: 1 and 2 Indicator – Strategic Goal) | How is this measured? Original measurement or Re-use of existing data from WB Barometer? | OECD/SIGMA | Accepted | Indicator removed and changed. |
| 46 | Action Plan: Measure 1 – Indicator 1. | Number of people trained is basic measurement. Could we think about ‘impact’ as well here? Successfully Passing the training? Certified? | OECD/SIGMA | Accepted | Indicator for impact of training added. |
| 47 | Action Plan: Measure 2 – Indicator 1. | This formulation “sufficiently” is rather vague and not specific on indicator level. | OECD/SIGMA | Accepted | Improved. |
| 48 | Action Plan: Measure 3 – Indicator 1 | In case the life event approach continues. How is this reflected here...procedures/services cancelled? Merged? Integrated into larger event? | OECD/SIGMA | Not accepted | Life events are part of eGov Strategy, as one of the main pillars of service delivery, therefore is not need to repeat them. However, ABR Process will support these processes and feed the indicators. |
| 49 | Actioan Plan: Measure 4 – Indicator 1. | Not focus on the simplification here. It is about implementing ‘engagement measures”. | OECD/SIGMA | Accepted | Improved. |
| 50 | Action Plan; Measure 4. | In general, the activities listed below risk to (a) become a pro-forma exercise if not supported in the same way the ABR is. (b) capacity building, development of methodology, provision of support is needed here in the same way (c) close monitoring will be needed to mentor, coach but also enforce | OECD/SIGMA | Accepted | Support will be provided as needed by SPO as needed. |
| 51 | General | The document provides an overview of all the interventions, activities, practices, and results achieved to date in Kosovo in addressing the administrative burden. However, the presentation and analysis of the problems caused by the administrative burden are either entirely missing or difficult to distinguish amidst the interventions or practices presented in the document. The situation analysis has not identified the sectors, fields, institutions, and social groups that are currently significantly affected by the administrative burden, nor the extent of the impact and the consequences resulting from it. Not only in this section of the document but throughout the entire document, the focus appears to be on the potential benefits, in general terms, that the proposed policy will bring.  However, given the nature of this document, it should highlight the potential changes that this policy aims to bring through a concrete approach and specific changes based on identified problems and gaps.  *Recommendation****:*** *Specific problems should be identified and presented in a minimum number of sectors and services. In the absence of in-depth analyses and research, examples from the literature can be used to support the analysis and the specific problem identified.* | AGE | Partly accepted | Prior sectors are identified in the Programme, however there is no need to identify institutions since a sector might contain more than 2 institutions. Problems caused by ABR are not emphasized, since the same have been emphasized in the Concept Document for ABR, approved in 2020. |
| 52 | General | Priorities: the program has not identified priorities by sectors, fields, or social groups that are disproportionately affected by the administrative burden, which can result in multidimensional consequences. These consequences may lead to high financial and social costs, as well as severe effects on the realization of rights. The lack of prioritization is a direct result of the absence of a situational analysis and problem identification.  Although the logical framework of the Program's Action Plan specifies some activities that outline interventions in certain areas, such as social services, social services themselves are a broad field. It would be reasonable to establish specific priorities within these services.  The document dedicates a considerable amount of attention to technology. While technology is indeed important, it is merely an instrument for achieving the program's goals and objectives. However, as mentioned in other parts of the document, these objectives are not clearly identified, nor is there an analysis of the level of "technology literacy" among technology users. Not all citizens in a given society possess the necessary skills to use technology. Kosovo has a high rate of internet penetration, but this should not be equated with a high level of ease in navigating technology among its users, as these are two different concepts.  *Recommendation*: Clearly define the main specific priorities to be addressed during the period 2025-2027. Link these priorities to the situational analysis once it has been improved, and establish specific, measurable, and realistic indicators and concrete activities. This will make it clear what the proposed program aims to achieve and to what extent.  *Recommendation*: Include in the program the nominally defined research activities required to understand the needs, gaps, and existing barriers in the systems (legal, institutional, instruments, and organizational mechanisms), as well as the tools needed to access systems and services. This should also include an understanding of user difficulties to ensure that investments made through this program are efficient and effective. | AGE | Accepted | Activities added for identification and assessment of services most populated by woman and vulnerable groups - Measure 3 and 4. |
| 53 | General | Gender Equality and Social Inclusion: the program does not contain any reference to gender equality or social inclusion, and neither of these components is part of the situational analysis or the planned future interventions. It can be concluded that the program is "blind" with regard to gender equality and the social impact of the administrative burden.  It is impossible to assess the effects and impacts of the proposed program on gender and social aspects or on vulnerable groups since such an analysis is entirely absent from the document. The administrative burden deepens gender inequalities and increases the vulnerability of specific groups, particularly in accessing social services and in receiving services that are considered innovations — those being implemented for the first time in various socio-economic fields. It also disproportionately impacts small businesses, especially those owned by women, but not exclusively.  Administrative burdens are both a source and a consequence of inequality, leading to unequal outcomes in people's access to fundamental rights. The proposed program provides no clear explanation of how equality and equity will be achieved or what the effects on these groups will be. Neither the narrative part of the document nor the logical framework of the Action Plan mentions the application of gender impact assessments, which is the only tool for identifying inequalities and the unintended effects of policies, particularly for regulatory frameworks, but not limited to them.  *Recommendation*: During the process of improving the analysis, setting priorities, and defining indicators and outcomes, ensure that the gender perspective and social inclusion are taken into account. This includes conducting a gender analysis and a gender impact assessment for the program.  *Recommendation*: Incorporate the implementation of a gender impact assessment and the gender perspective into the activities of the action plan, specifically under objectives 2, 3, and 4. | AGE | Accepted | Activities added for identification and assessment of services most populated by woman and vulnerable groups - Measure 3 and 4. Gender Impact Assessment added to be done for all ABR Process. |
| 54 | Action Plan: Activity proposal | An analysis of certain services provided by the Ministry of Environment and the Commission for Mines and Minerals, including recommendations for reducing the burden and promoting digitalization (in the same format as the two previous analyses). | Democracy Plus (NGO) | Accepted | Activity added in Action Plan 2025-2026, Measure 3. |
| 55 | Action Plan: Activity proposal | One infographic on the implementation of the Action Plan on ABR. | Democracy Plus (NGO) | Accepted | Activity added in Action Plan 2025-2026, Measure 4. |
| 56 | Action Plan: Activity proposal | A regional conference with a focus on businesses pertaining to the ABR. | Democracy Plus (NGO) | Accepted | Activity added in Action Plan 2025-2026, Measure 4. |
| 57 | Action Plan: Activity proposal | Three meetings with representatives from eight beneficiary institutions of the project and representatives of civil society organizations, in the format of a consultative group. | Democracy Plus (NGO) | Accepted | Activity added in Action Plan 2025-2026, Measure 4. |