Contribution ID: e8b84167-93fc-4ba7-b602-726efaf34a33

Date: 15/04/2021 15:20:51



Shaping the future public sector interoperability policy

Fields marked with * are mandatory.

Introduction



*I want to give input on the following topics

at least 1 choice(s)

- impact assessment for a future interoperability policy (13 questions, approx. 15 min.)
- European Interoperability Framework (EIF) evaluation (13 questions, approx. 10 min.)
- final evaluation of the ISA² programme (9 questions, approx. 10 min.)
- * How familiar are you with digital public services and interoperability?
 - not at all
 - to a limited extent
 - to some extent
 - to a great extent
 - completely

odon't know/no opinion	
About you	
anguage of my contribution	
Bulgarian	
Croatian	
Czech	

Lithuanian

Maltese

Polish

Portuguese

Romanian

Slovak

Slovenian

Spanish

Swedish

*I am giving my contribution as

Academic/research institution

Business association

Company/business organisation

Consumer organisation

Danish

Dutch

English

Estonian

Finnish

French

German

Hungarian

Greek

Irish

Italian

Latvian

EU citizen
Environmental organisation
Non-EU citizen
Non-governmental organisation (NGO)
Public authority
Trade union
Other
*First name
Sara
*Surname
Roda
Email (this won't be published)
sara.roda@cpme.eu
*Organisation name
255 character(s) maximum
CPME - Standing Committee of European Doctors
*Organisation size
Micro (1 to 9 employees)
Small (10 to 49 employees)
Medium (50 to 249 employees)
Large (250 or more)
Transparency register number

Transparency register number

255 character(s) maximum

Check if your organisation is on the <u>transparency register</u>. It's a voluntary database for organisations seeking to influence EU decision-making.

9276943405-41

If your organisation responds without being registered, the Commission will consider its input as that of an individual and will publish it as such.

*Country of origin

Please add your country of origin, or that of your organisation.

Afghanistan	Djibouti	Libya	Saint Martin
Aland Islands	Dominica	Liechtenstein	Saint Pierre and Miquelon
Albania	DominicanRepublic	Lithuania	Saint Vincent and the Grenadines
Algeria	Ecuador	Luxembourg	Samoa
AmericanSamoa	Egypt	Macau	San Marino
Andorra	El Salvador	Madagascar	São Tomé and Príncipe
Angola	EquatorialGuinea	Malawi	Saudi Arabia
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and Barbuda	Eswatini	Mali	Seychelles
Argentina	Ethiopia	Malta	Sierra Leone
Armenia	Falkland Islands	Marshall Islands	Singapore
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	SolomonIslands
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French Polynesia	Micronesia	South Africa
Bangladesh	French Southern and Antarctic Lands	Moldova	South Georgia and the South Sandwich Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan

BelgiumBelizeBeninBermudaBhutan	GermanyGhanaGibraltarGreeceGreenland	MontenegroMontserratMoroccoMozambiqueMyanmar	SpainSri LankaSudanSurinameSvalbard and
BoliviaBonaire SaintEustatius andSaba	GrenadaGuadeloupe	/Burma Namibia Nauru	Jan Mayen Sweden Switzerland
Bosnia and Herzegovina	Guam	Nepal	Syria
BotswanaBouvet IslandBrazilBritish Indian	GuatemalaGuernseyGuineaGuinea-Bissau	NetherlandsNew CaledoniaNew ZealandNicaragua	TaiwanTajikistanTanzaniaThailand
Ocean Territory British Virgin Islands	Guyana	Niger	The Gambia
BruneiBulgaria	HaitiHeard Islandand McDonaldIslands	NigeriaNiue	Timor-LesteTogo
Burkina FasoBurundi	HondurasHong Kong	Norfolk IslandNorthernMariana Islands	TokelauTonga
Cambodia	Hungary	North Korea	Trinidad and Tobago
Cameroon	Iceland	North Macedonia	Tunisia
CanadaCape Verde	IndiaIndonesia	NorwayOman	TurkeyTurkmenistan
Cayman Islands	Iran	Pakistan	Turks and Caicos Islands

Central AfricanRepublic	Iraq	Palau	Tuvalu
Chad	Ireland	Palestine	Uganda
Chile	Isle of Man	Panama	Ukraine
China	Israel	Papua New	United Arab
		Guinea	Emirates
Christmas	Italy	Paraguay	United
Island			Kingdom
Clipperton	Jamaica	Peru	United States
Cocos (Keeling)	Japan	Philippines	United States
Islands			Minor Outlying
			Islands
Colombia	Jersey	Pitcairn Islands	Uruguay
Comoros	Jordan	Poland	US Virgin
			Islands
Congo	Kazakhstan	Portugal	Uzbekistan
Cook Islands	Kenya	Puerto Rico	Vanuatu
Costa Rica	Kiribati	Qatar	Vatican City
Côte d'Ivoire	Kosovo	Réunion	Venezuela
Croatia	Kuwait	Romania	Vietnam
Cuba	Kyrgyzstan	Russia	Wallis and
			Futuna
Curação	Laos	Rwanda	Western
			Sahara
Cyprus	Latvia	Saint	Yemen
		Barthélemy	
Czechia	Lebanon	Saint Helena	Zambia
		Ascension and	
		Tristan da	
		Cunha	
Democratic	Lesotho	Saint Kitts and	Zimbabwe
Republic of the		Nevis	
Congo			
Denmark	Liberia	Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

Impact assessment for a future interoperability policy

In the Communication <u>Shaping Europe's digital future</u>, the Commission has announced that by 2021 'a reinforced **EU governments interoperability strategy** to ensure coordination and common standards for secure and borderless public-sector data flows and services' will be put forward.

This part of the consultation focuses on the future interoperability policy for the EU's public sector. The aim is to gather stakeholders' feedback on the possible **objectives and policy options** for enhancing interoperability in the public sector in the EU, as well as the potential impacts that could arise from the policy options (including economic, social, environmental and fundamental rights impacts). The information collected will feed into the impact assessment on a future interoperability policy.

Policy objectives

IA.1. Should a future interoperability policy of the EU's public sector aim to achieve the following specific objectives?

	not at all	to a limited extent	to some extent	to a great extent	completely	don't know /no opinion
Reduce administrative burdens on businesses and citizens when interacting with public administrations	0	0	0	0	0	0
Act as an enabler for innovative public-private (govtech) cooperation to foster the digitalisation of the public sector	0	0	0	0	•	0
Support and promote the development and use of common standards and specifications for secure and borderless public-sector data flows and services	0	•	0	•	•	0
Introduce a longer-term strategy to enhance commitment to the interoperability of digital public services throughout the EU	0	0	0	©	•	•
Support and promote the development, sharing and re-use of interoperability solutions and specifications by public administrations across the EU	0	0	0	0	•	0
Support and promote the provision of quality, user-centric digital public services on a cross-border and cross-domain basis fostering the interoperability-by-design of policies, data, solutions and services	0	0	©	©	•	0
Foster the availability and exchange of diverse, high-performance digital solutions to guarantee freedom of choice and the ability to change IT modules when necessary, thus contributing to digital sovereignty	0	0	0	0	•	0

IA.2. What other specific objective(s) could a future public sector interoperability policy pursue?

50	00 character(s) maximum	

IA.3. What needs do you have with respect to interoperability in the EU's public sector that should be considered when designing the future public sector interoperability policy?

500 character(s) maximum

The public consultation is very broad and the questions do not allow contextualising interoperability in the healthcare sector. CPME issued a statement which intends to address the major challenges and particularities of interoperability in the healthcare sector, offering few recommendations - please see annex to this response.

Policy options

The future public sector interoperability policy could take different forms. The impact assessment focuses on a set of **four core options** that can be complemented by **three** "add-on" options (see below).

Core options

Option A (baseline) reflects the status quo with **no change to the current EIF**. It will look at the evolution of the policy problems and expected impacts in the absence of a future public sector interoperability policy, but will also take into account ongoing changes such as the transition of some of the implementing actions and governance of the EIF from ISA² to the Digital Europe Programme.

Option B (soft law) looks at possible **revisions of the EIF** and/or new guidelines/recommendations in the form of a Commission Communication, while keeping **compliance voluntary**. The possible revision of the EIF and its implementation strategy may involve:

- ensuring coherence with other EU initiatives;
- restructuring the EIF into a more practical framework, *inter alia* using open-source software;
- enhancing cooperation between public administrations and with the private sector; and
- adopting a new interoperability action plan.

Option C1 (hard law (Regulation) on cooperation) would involve a legislative proposal in the form of a Regulation introducing **shared interoperability governance** building on a cooperation mechanism (e.g. a committee, a joint undertaking or a centre of excellence). It may involve one or more of the following:

- fostering the development of the EU govtech sector;
- facilitating joint investment in interoperability solutions and skills;
- providing technical assistance;
- devising ways to establish public data and interoperability solutions based on common models or repositories of public services; and
- streamlining existing EU interoperability governance for greater coherence.

Option C2 (hard law (Directive) on interoperability requirements) – a Directive could introduce a legal framework with **minimum interoperability requirements** for public administrations and/or require all

Member States to adopt a national interoperability strategy/framework in line with EU norms. The requirements may involve:

- common specifications for public administrations;
- devising ways to establish public data and interoperability solutions based on common models or repositories of public services;
- mandating the development of national interoperability frameworks and strategies aligned with EIF principles and recommendations;
- and ensuring data exchanges and portability.

Add-on options

Add-on option 1 (synergies) entails **supporting the synergies** between the EIF/future public sector interoperability policy and existing/upcoming policies, programmes and initiatives with a focus on funding for public-sector modernisation and digitalisation, e.g. the Digital Europe Programme, Resilience and Recovery Fund, Technical Support Instrument (successor of structural reform support programme) and Horizon Europe.

Add-on option 2 (conditionalities) – **policy conditionalities** could give the interoperability framework a more binding element. In this case, public administrations requesting EU funding and assistance for their efforts to modernise and digitalise their work would have to show that they are taking an interoperability-by-design approach to developing policies, solutions and services.

Add-on option 3 (European Semester) – the European Semester could be used as a tool to **monitor** countries' efforts to implement interoperability and ensure policy coordination. A special category could be added in the European Semester, with a focus on monitoring public administrations' digitalisation and interoperability efforts, and country-specific recommendations could be issued on the basis of their progress.

IA.4. Would the above policy options **help foster interoperability in the public sector** at EU, national, regional and local levels, and support an integrated and coherent approach to interoperability across the EU?

	not at all	to a limited extent	to some extent	to a great extent	completely	don't know /no opinion
Option A: baseline (no change to status quo)	0	0	0	0	0	0
Option B: soft law	0	0	0	0	0	0
Option C1: hard law (Regulation) on cooperation	0	0	0	0	0	0
Option C2: hard law (Directive) on interoperability requirements	0	0	0	0	0	0
Add-on option 1: synergies	0	0	0	0	0	0

Add-on option 2: conditionalities	0	0	0	0	0	0
Add-on option 3: European Semester	0	0	0	0	0	0

IA.5. Will the policy options receive enough support from policymakers and public administrations to be properly implemented?

	not at all	to a limited extent	to some extent	to a great extent	completely	don't know /no opinion
Option A: baseline (no change to status quo)	0	0	0	0	0	0
Option B: soft law	0	0	0	0	0	0
Option C1: hard law (Regulation) on cooperation	0	0	0	0	0	0
Option C2: hard law (Directive) on interoperability requirements	0	0	0	0	0	0
Add-on option 1: synergies	0	0	0	0	0	0
Add-on option 2: conditionalities	0	0	0	0	0	0
Add-on option 3: European Semester	0	0	0	0	0	0

Impacts

IA.6. What impact would **option A (baseline)** have on...? *Use the following scale:* (--) very negative; (-) negative; (0) neutral; (+) positive; or (++) very positive. Select DK/NO if you don't know or have no opinion.

		-	0	+	++	DK /NO
The costs of interacting with public administrations? (Costs could include time and/or effort spent in interacting with public administrations, fees incurred, etc. Negative consequences would mean higher costs and positive consequences would mean lower costs)	0	0	0	0	0	0
The costs of doing business in the EU?	0	0	0	0	0	0
The costs borne by public administrations in providing public services?	0	0	0	0	0	0
The quality of the services provided by public administrations?	0	0	0	0	0	0
Research, development and innovation in the EU?	0	0	0	0	0	0

The free movement of goods, services, capital and workers across Member States? (For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country. Negative consequences would mean limiting free movement and positive consequences would mean facilitating free movement.) Individuals' rights to move freely within the EU? Access to and quality of basic goods and services, particularly for those subject to social exclusion and from disadvantaged backgrounds? (Negative consequences would mean fewer products and services, and positive consequences would mean more.) The green transition in the EU?							
Access to and quality of basic goods and services, particularly for those subject to social exclusion and from disadvantaged backgrounds? (Negative consequences would mean fewer products and services, and positive consequences would mean more.)	across Member States? (For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country. Negative consequences would mean limiting free movement and positive consequences would mean facilitating free	•	0	•	•	•	•
particularly for those subject to social exclusion and from disadvantaged backgrounds? (Negative consequences would mean fewer products and services, and positive consequences would mean more.)	Individuals' rights to move freely within the EU?	0	0	0	0	0	0
The green transition in the EU?	particularly for those subject to social exclusion and from disadvantaged backgrounds? (<i>Negative consequences would mean fewer products and services, and positive consequences</i>	0	0	0	0	0	0
	The green transition in the EU?	0	0	0	0	0	0

IA.7. What impact would **option B (soft law)** have on ...? *Use the following scale:* (--) very negative; (-) negative; (0) neutral; (+) positive; or (++) very positive. Select DK/NO if you don't know or have no opinion.

		-	0	+	++	DK /NO
The costs of interacting with public administrations? (Costs could include time and/or effort spent in interacting with public administrations, fees incurred, etc. Negative consequences would mean higher costs and positive consequences would mean lower costs)	0	0	0	0	0	0
The costs of doing business in the EU?	0	0	0	0	0	0
The costs borne by public administrations in providing public services?	0	0	0	0	0	0
The quality of the services provided by public administrations?	0	0	0	0	0	0
Research, development and innovation in the EU?	0	0	0	0	0	0
The free movement of goods, services, capital and workers across Member States? (<i>For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country. Negative consequences would mean limiting free movement and positive consequences would mean facilitating free movement.)</i>	0	0	0	0	0	0
Individuals' rights to move freely within the EU?	0	0	0	0	0	0
Access to and quality of basic goods and services, particularly for those subject to social exclusion and from disadvantaged backgrounds? (Negative consequences would	0	0	0	0	0	©

mean fewer products and services, and positive consequences would mean more.)							
The green transition in the EU?	0	0	0	0	0	0	

IA.8. What impact would option C1 (hard law (Regulation) on cooperation) have

on ...? Use the following scale: (--) very negative; (-) negative; (0) neutral; (+) positive; or (++) very positive. Select DK/NO if you don't know or have no opinion.

		-	0	+	++	DK /NO
The costs of interacting with public administrations? (Costs could include time and/or effort spent in interacting with public administrations, fees incurred, etc. Negative consequences would mean higher costs and positive consequences would mean lower costs)	0	0	0	0	0	0
The costs of doing business in the EU?	0	0	0	0	0	0
The costs borne by public administrations in providing public services?	0	0	0	0	0	0
The quality of the services provided by public administrations?	0	0	0	0	0	0
Research, development and innovation in the EU?	0	0	0	0	0	0
The free movement of goods, services, capital and workers across Member States? (<i>For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country.</i> Negative consequences would mean limiting free movement and positive consequences would mean facilitating free movement.)	0	0	0	0	0	0
Individuals' rights to move freely within the EU?	0	0	0	0	0	0
Access to and quality of basic goods and services, particularly for those subject to social exclusion and from disadvantaged backgrounds? (Negative consequences would mean fewer products and services, and positive consequences would mean more.)	0	0	0	0	0	0
The green transition in the EU?	0	0	0	0	0	0

IA.9. What impact would option **C2** (hard law (Directive) on interoperability requirements) have on...? Use the following scale: (--) very negative; (-) negative; (0) neutral; (+) positive; or (++) very positive. Select DK/NO if you don't know or have no opinion.

	 -	0	+	++	DK /NO

Access to and quality of basic goods and services, particularly for those subject to social exclusion and from						
and positive consequences would mean facilitating free movement.) Individuals' rights to move freely within the EU?	©	0	0	0	0	0
The free movement of goods, services, capital and workers across Member States? (<i>For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country. Negative consequences would mean limiting free movement</i>	0	0	0	0	©	0
Research, development and innovation in the EU?	0	0	0	0	0	0
The quality of the services provided by public administrations?	0	0	0	0	0	0
The costs borne by public administrations in providing public services?	0	0	0	0	0	0
The costs of doing business in the EU?	0	0	0	0	0	0
could include time and/or effort spent in interacting with public administrations, fees incurred, etc. Negative consequences would mean higher costs and positive consequences would mean lower costs)	•	0	0	0	0	0

IA.10. What impact would **add-on option 1 (synergies)** have on ...? *Use the following scale: (--) very negative; (-) negative; (0) neutral; (+) positive; or (++) very positive. Select DK/NO if you don't know or have no opinion.*

		-	0	+	++	DK /NO
The costs of interacting with public administrations? (Costs could include time and/or effort spent in interacting with public administrations, fees incurred, etc. Negative consequences would mean higher costs and positive consequences would mean lower costs)	0	0	0	0	0	•
The costs of doing business in the EU?	0	0	0	0	0	0
The costs borne by public administrations in providing public services?	0	0	0	0	0	0
The quality of the services provided by public administrations?	0	0	0	0	0	0
Research, development and innovation in the EU?	0	0	0	0	0	0

The free movement of goods, services, capital and workers across Member States? (<i>For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country. Negative consequences would mean limiting free movement and positive consequences would mean facilitating free movement.)</i>	0	©	©	©	©	•
Individuals' rights to move freely within the EU?	0	0	0	0	0	0
Access to and quality of basic goods and services, particularly for those subject to social exclusion and from disadvantaged backgrounds? (<i>Negative consequences would mean fewer products and services, and positive consequences would mean more.</i>)	0	0	0	0	0	0
The green transition in the EU?	0	0	0	0	0	0

IA.11. What impact would **add-on option 2 (conditionalities)** have on ...? *Use the following scale: (--) very negative; (-) negative; (0) neutral; (+) positive; or (++) very positive. Select DK/NO if you don't know or have no opinion.*

		_	0	+	++	DK /NO
The costs of interacting with public administrations? (Costs could include time and/or effort spent in interacting with public administrations, fees incurred, etc. Negative consequences would mean higher costs and positive consequences would mean lower costs)	0	0	0	0	0	0
The costs of doing business in the EU?	0	0	0	0	0	0
The costs borne by public administrations in providing public services?	0	0	0	0	0	0
The quality of the services provided by public administrations?	0	0	0	0	0	0
Research, development and innovation in the EU?	0	0	0	0	0	0
The free movement of goods, services, capital and workers across Member States? (<i>For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country. Negative consequences would mean limiting free movement and positive consequences would mean facilitating free movement.)</i>	0	0	0	0	0	0
Individuals' rights to move freely within the EU?	0	0	0	0	0	0
Access to and quality of basic goods and services, particularly for those subject to social exclusion and from						
	0	0	0	0	0	0

disadvantaged backgrounds? (<i>Negative consequences would mean fewer products and services, and positive consequences would mean more.</i>)						
The green transition in the EU?	0	0	0	0	0	0

IA.12. What impact would add-on option 3 (European Semester) have on ...?

Use the following scale: (--) very negative; (-) negative; (0) neutral; (+) positive; or (++) very positive. Select DK/NO if you don't know or have no opinion.

		_	0	+	++	DK /NO
The costs of interacting with public administrations? (Costs could include time and/or effort spent in interacting with public administrations, fees incurred, etc. Negative consequences would mean higher costs and positive consequences would mean lower costs)	0	0	0	0	0	0
The costs of doing business in the EU?	0	0	0	0	0	0
The costs borne by public administrations in providing public services?	0	0	0	0	0	0
The quality of the services provided by public administrations?	0	0	0	0	0	0
Research, development and innovation in the EU?	0	0	0	0	0	0
The free movement of goods, services, capital and workers across Member States? (For instance, free movement can include selling products or providing services across borders in the EU, or the ability of EU citizens to work in any EU country. Negative consequences would mean limiting free movement and positive consequences would mean facilitating free movement.)	0	0	0	0	0	0
Individuals' rights to move freely within the EU?	0	0	0	0	0	0
Access to and quality of basic goods and services, particularly for those subject to social exclusion and from disadvantaged backgrounds? (Negative consequences would mean fewer products and services, and positive consequences would mean more.)	0	0	0	0	0	0
The green transition in the EU?	0	0	0	0	0	0

IA.13. Please indicate any **other relevant economic, environmental, social or administrative impacts** (not mentioned above) of a future interoperability policy for the EU's public sector:

500 character(s) maximum	

Additional information and submission of answers

*FU.1. Would you be available for a **short follow-up interview** on the topics covered by this survey? By selecting "yes" you accept to be contacted to arrange this interview.

0	Yes	3
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[◎] No

FU.2. Please feel free to attach relevant **documents** in support of any of your replies.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

 $e7cee 103-4bbc-4844-8c45-f50889ea 6af5/CPME_AD_EC_08042021_024_FINAL.CPME_.Statement.Shaping. \\ Healthcare.Sector.Interoperability.pdf$

Thank you for your input – it's much appreciated.

Contact

DIGIT-ISA2-CONSULTATIONS@ec.europa.eu