

ANNEX 3

Health Systems Network Comments on Policy Assessment – Feedback Table

We would like to express our gratitude for all the valuable and constructive comments we have received from the experts of the network. The following table lists the comments which require action or clarification. We have not included in this list the many positive and encouraging comments. Also not included are minor editorial comments. Some few comments clearly outside the scope of the health systems impact assessment were not included either.

WHO Observatory

5 September 2006

Comment by Network Member	Action taken or clarification
General comments	
Clarifying the title: is the document already the assessment or part of the tool?	Yes, we will clarify the title
The elements of the policy (Social Provision, European Social Fund, and Education Vocational Training and Youth) are unrelated and could be treated separately; combination of the policy is unclear since it falls in the remit of different DGs	The policy assessment is following the policies as stipulated in the Treaty. The three elements are indeed loosely connected. However, some actions under the Social Provision chapter are funded by the European Social Fund.
Who is the recipient, the desk officer or the public health community?	The impact assessment should facilitated communication between the non-health sector and the health sector. Therefore, the text should be comprehensible to both sides. That entails, however, that some issues are explained in more detail than it would be needed for a single audience.

Let the text end with a positive idea supporting the desk officer	Yes, we will follow the suggestion
Introduction	
Shorten the introduction	For the purpose of the review we have included in some detail the background of the document. This can be shortened for the web-version
The mechanism of policy impact on health systems	
More details	We suggest not to expand this section since the document is already quite long. It is difficult to shorten it, since both the desk officer and the public health community need to acquire a conceptual understanding which conveys the message that a) health systems are affected by other policies that are b) not drafted by DG SANCO and c) there were substantial impacts in the past.
Shorten this section	
The policy	
Describing the multifaceted policy may benefit from a table to provide an overview	Yes, we will provide a table.
Is social policy broader than the material covered by this policy assessment?	Social policy in the Member States is certainly broader and will vary between them. However, the draft assessment is confined to the definition of social policy according to the Treaty. The co-ordination of social protection schemes (Directive 1408/71) is not part of the EU social policy.
Case studies on past impacts	
Focus on 2-3 countries to provide more detail	Given the number of countries in the EU and their differences in health systems, impacts
Focusing on 1 case (WT directive)	

	may vary widely. It would be difficult to give reasons for a selection. Since the document's purpose is to support the desk officer assessing a specific proposal, it is questionable if the document needs to include all the details.
The internal market directive has been left out	The internal market directive is not part of the social policy and therefore not included as a case study.
Case study on EWTD clarification on 48/52hrs maximum working time.	Yes, we have clarified this.
The cases are all related to health care in a direct and clear way.	No, they are rather indirect. The directives are neither based on the public health article nor drafted by DG SANCO
Asbestos case applies to all organizations not just to health care.	Yes the Asbestos directives are not exclusively aimed at health care organizations. One aim of developing a tool for health systems impact assessment is to highlight the possible impact on health systems of proposals which do not have an obvious link to health.
Relevance and magnitude of impacts	
Open Method of Coordination: what about the reporting requirements	It remains unclear how reporting requirements can interfere with health system functions and health systems objectives.
OMC effects	As a "soft law" mechanism, the OMC may indeed have effects on Member States. However, the implementation is entirely at the discretion of the Member States.
All impacts or only the larger ones?	We will try to mention the minor impacts. However, the important ones should relate to

	the health systems objectives.
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