Open Public Consultation: Revision of the European Interoperability Framework (Research centres / Academic institutions / Standardisation organisation/ Business supplying services to public administrations)

Fields marked with * are mandatory.

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Introduction

In October 2015, the European Commission has launched the work on an Impact Assessment for the revision of the European Interoperability Strategy (EIS) and the European Interoperability Framework (EIF). On the one hand, the EIS aimed to provide guidance and to prioritise actions needed to improve interaction, exchange and cooperation among European public administrations across borders and across sectors for the delivery of European public services. On the other hand, the purpose of the European Interoperability Framework (EIF) was a) to promote and support the delivery of European public services by fostering cross-border and cross-sector interoperability, b) to guide public administrations in their work to provide European public services to businesses and citizens and c) to complement and tie together the various National Interoperability Frameworks (NIFs) at European level.

The general objective is to ensure that a coherent vision on interoperability exists in the EU in relation to interactions between the European public administrations (hereinafter the term "public administrations" will also include organisations acting on their behalf) and between them and citizens and businesses. This can be done through updating and extending the EIF and updating the EIS by reviewing the current Communication "Towards interoperability for European public services", <u>COM</u> (2010) 744.

The review is deemed necessary in order a) to align with the recent policy development, i.e. the Digital Single Market (DSM) policy, the revised Directive on the reuse of Public Sector Information, etc., b) to align with emerging technological trends (cloud computing, big and open data, etc.) and c) to put more focus on the implementation of the EIF rather than the simple alignment with the national approaches on interoperability.

ISA², a programme on "Interoperability solutions and common frameworks for European public administrations, businesses and citizens" adopted on 25 November 2015 (<u>Decision(EU) 2015/2240</u>) will be the principal instrument to implement the EIS and EIF for the next 5 years.

Completing the survey should not take more than 30 minutes.

In case you need any additional information about this Impact Assessment, please do not hesitate to contact DG DIGIT B6 directly by addressing an email to the following address: DIGIT-ISA2-CONSULTATIONS@ec.europa.eu or by post at:

European Commission DG DIGIT Unit B6 - Interoperability solutions for European public administrations (ISA) B-1049 Brussels.

1. Registration

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*What is your nationality?

\bigcirc	Austria	\bigcirc	Belgian	\bigcirc	British	\bigcirc	Bulgarian	\bigcirc	Croatia	\bigcirc	Cypriot
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*Please specify your nationality.

Turkish

*Where do you work?

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\bigcirc	Romani a	0	Slovakia	0	Sloveni a	0	Spain	0	Sweden	0	United Kingdom
\bigcirc	Norway	\bigcirc	Other								

*

Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Strategy and its content.

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know / No opinion

*Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Framework and its content.

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know / No opinion

2. Publication consent

*

Please indicate your preference for the publication of your response on the Commission's website:

- Our of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Please keep my contribution confidential. (it will not be published, but will be used internally within the Commission)

3. Accompanying document

The document accessible <u>here</u> is a draft version of the revised European Interoperability Framework (EIF). While still being under continuous improvement by the Commission Services, it already reflects the results of a targeted consultation with the Member States representatives to ISA programme (the predecessor of ISA²), as well as other inputs.

The EIF is a technical document, mainly addressing recommendations on interoperability, based on an <u>existing framework</u> and as such is herewith consulted with stakeholders. It mainly addresses recommendations on interoperability, the wording and impact of which are assessed through this consultation's questions. You are thus invited to familiarise yourselves with this draft EIF, so as to better understand the context of the questions. You will have the possibility to provide your feedback by answering this consultation's questions as well as through a free comment box available at the end of section 5 of this consultation.

4. Assess the need of revising the EIS and EIF

In December 2010, the Commission adopted the Communication "<u>Towards interoperability for</u> <u>European public services</u>" that included the <u>European Interoperability Strategy</u> (EIS) and <u>European</u> <u>Interoperability Framework</u> (EIF).

Following recent political, legal and technological evolutions, a revision is now necessary so that interoperability is ensured for the public services of the Digital Single Market and that e-barriers do not emerge between the public administrations of the Members States to the detriment of other public administrations, businesses and citizens that need to interact with them.

Questions included in the following sections will focus, on the one hand, on interoperability at Member States' (national) level and, on the other hand, on interoperability at cross-border level.

4.1 Assessment of needs and problems of interoperability

Interoperability has different dimensions, it may concern interactions within public administrations and between public administrations and businesses and citizens, within the **national** borders of an individual Member State or **cross-border**, i.e. when it has to be established between public administrations of different countries or between businesses and public administrations that are not located in the same country.

*Q1. Please select up to 10 major problems that you identify as obstructing the implementation of interoperability <u>at national level</u>.

at most 10 choice(s)

- There is no single legal framework in Member States within the area of interoperability across sectors (legislation in the area of interoperability tends to be sectorial).
- There is a lack of resources available for implementing interoperability in Member States.
- Interoperability is not a priority in the political agenda of Member States.
- There is a lack of a consolidated view on all the existing interoperability national initiatives in Member States.
- The IT budget of Member States is largely affected by the maintenance of legacy systems.
- Interoperability is not perceived as a worthwhile investment in Member States.
- EU funds, i.e. European Structural and Investment Funds (ESIF) that could be used to implement interoperability are not well leveraged by Member States.
- The implementation of interoperability initiatives in Member States is not sufficiently monitored.
- There is a shortage of skills to implement interoperability-related policies and initiatives in Member States.
- There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
- Technological evolution in Member States is largely affected by the maintenance of legacy systems.
- There is a lack of standards to sufficiently ensure interoperability or standards, even if available, are not enough integrated by suppliers in their solutions.
- There is a lack of a national public procurement strategy or guidelines, especially with regards to reference to standards and specifications
- Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in.
- The costs and benefits of interoperability are not assessed when developing national legislation.
- Some of the Member States' policies may contain requirements that are not supported by / adapted to the market (e.g. reference to specific technologies as being the only permissible solutions).
- Other
- Don't know / No opinion

*Q2. Please select up to 10 major problems that you identify as obstructing the implementation of <u>cross-border</u> interoperability.

at most 10 choice(s)

- National interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF (adopted in 2010) since they were adopted before the ones at EU level.
- National interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF, since the latter do not always capture the needs of Member States' public administrations.
- There is a lack of resources available for implementing cross-border interoperability in Member States.
- Cross-border interoperability is not a priority in the political agenda of Member States.
- There is a lack of a consolidated view on all the existing cross-border interoperability initiatives in Member States.
- The IT budget of Member States is largely affected by the maintenance of legacy systems.
- Cross-border interoperability is not perceived as a worthwhile investment in Member States.
- European Structural and Investment Funds (ESIF) that could be used to implement cross-border interoperability are not well leveraged by Member States.
- There is a shortage of skills to implement cross-border interoperability-related policies and initiatives in Member States.
- There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
- Cross-border digital public services available in Member States are not (although it is needed) sufficiently multilingual.
- There is a limited demand from citizens, businesses and/or administrations for digital cross-border public services (e.g. cross-border mobility is low).
- Existing cross-border digital public services available in Member States are not sufficiently known by citizens, businesses and/or public administrations (lack of awareness).
- National portals tend to be fragmented.
- National portals are not sufficiently integrated with EU portals.
- Technological evolution in Member States is largely affected by the maintenance of legacy systems.
- Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in.
- There is a lack of interoperability standards or Member States are using different standards
- Interoperability standards, even when available, are not widely used
- Other
- Don't know / No opinion

*Q3. In your view, what are the main problems, if any, faced by <u>businesses</u> when using digital public services provided by European public administrations, at national or cross-border levels?

- Not all digital public services are exposed for use by the IT systems of businesses, so manual work is still needed
- Different digital public services, exposed for use by the IT systems of businesses, are using different standards (lack of a common approach for standards and specifications at national level)
- There is no one single portal through which businesses can access all digital public services.
- The public services are not all fully digitised. Businesses have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence.
- Published information is not complete, not concise enough, outdated or irrelevant
- Businesses face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- Information is not sufficiently translated in the language of businesses' interest
- Businesses have to submit, although electronically, the same data many times when using different digital services
- Businesses have to use different ways of authenticating themselves for the different digital services they are accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Other
- Don't know / No opinion

*Q4. In your view, what are the main problems, if any, faced by <u>citizens</u> when using digital public services provided by European public administrations, at national or cross-border levels?

- There is no one single portal through which citizens can access all digital public services
- The public services are not all fully digitised. Citizens have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence
- Citizens have no trust that transactions and personal data will be secured
- Citizens face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- Published information is not complete, not concise enough, outdated or irrelevant
- Citizens do not get enough support while using digital public services
- Citizens have to submit, although electronically, their personal data many times when using different digital services
- Citizens have to use different ways of authenticating themselves for the different digital services they are accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Other
- Don't know / No opinion

5. Assess the impact of the EIS/EIF revision

The "revision and extension" of the EIF is part of the Roadmap for the implementation of the Digital Single Market. In parallel, the Commission will propose a strategy, the EIS, to ensure that the EIF recommendations are addressed through concrete actions.

This section of the survey will shape the elements to be included in the revised EIF, assess the complexity of their implementation and identify the type and severity of their impacts. It will also identify the priorities to be tackled by the EIS.

5.1 Assessment of the revision of the EIS

*Q5. Do you agree that the vision for a revised EIS should be that "By 2020, citizens and businesses should benefit from interoperable user-centric digital public services, at national and EU levels, in support to the free movement of goods, persons and services throughout the Union"?

- Yes
- No
- Don't know / No opinion

The EIS should be considered from both the European and national perspectives. The following set of key actions was identified through consultation with the Member States' representatives in the ISA (Interoperability Solutions for European Public Administrations) Committee and with EC officials. Those actions should be assessed to allow for their better prioritisation in the revised EIS to realise the European Union's overall and Member States' individual national interoperability objectives.

Q6. Please indicate the <u>level of importance</u> of each of the following actions with regard to the benefits that they may generate <u>at national level</u> in spite of the potential complexity of implementing any individual one.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*1. Define and implement a governance structure to enable interoperability of digital public services at national level		O	O	O	۲	O
*2. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level		O	O	O	۲	

*3. Put in place optimised organisational structures for delivering integrated (end-to-end) digital public services	O	O	O	©	۲
*4. Develop tools and methods to allow public services to align their business processes, thus resulting to interoperable end-to-end public services	O	O	O	۲	O

*5. Develop and promote monitoring mechanisms to assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses	O	Ô	O	O	۲	O
*6. Ensure users' involvement in the design of national public services	0		0	0	۲	۲

*8. Promote the use of interoperable solutions including those produced by EC programmes in particular by ISA/ISA ² (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks)				۲	O
*9. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)	©	O	۲	O	0

*10. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.		O	O	O	۲	O
*11. Support activities related to security and data protection issues of public services	0	©	©	O	۲	©

*12. Support activities that facilitate the flow of information among national, regional and local administrations and between them and businesses and citizens	O	O	O	O	۲	0
*13. Support activities ensuring that the "digital" dimension is considered when preparing national legislation, the digital impact is properly assessed and proper IT solutions are in place to facilitate decision-making and the national legislative process			O		O	۲

*14. Align with and promote the use of the European Interoperability Reference Architecture (EIRA)	O	O	O	O	۲	O
*15. Enrich and reuse solutions contained in the European Interoperability Cartography (EICart)	O	O	۲	O	©	O
*16. Ensure that data is transferrable between public services without restrictions, with respect to data protection and security rules			۲	۲	٢	0

*Please indicate the reason(s) why you do not consider some actions as important.

All actions are not equally important, sometimes one of them constitutes a direct, or indirect preconditions for others.

*Q7. Are there any additional important action(s) that could better support interoperability <u>at</u> national level?

- Yes
- No
- Oon't know / No opinion

Q8. Please indicate the <u>level of importance</u> of each of the following actions with regard to the benefits that they may generate in the context of <u>cross-border interoperability</u> between EU countries in spite of the potential complexity of implementing any individual one.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*1. Define and promote governance structure/s for the interoperable management of digital public services at European level			O	O	۲	0
*2. Identify, liaise and share governance practices with relevant policies and their governance structures at EU or national level	۲	۲	©	۲	۲	۲

*3. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level	۲		۲		۲	0
*4. Put in place optimised organisational structures for delivering integrated (end-to-end) digital public services	O	O	©	O	۲	©
*5. Develop tools and methods to allow public services to align their business processes, thus resulting to interoperable European public services	۲	۲	۲		۲	۲

*6. Develop and promote monitoring mechanisms to assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses	O	O	O	O	۲	O
*7. Ensure users' involvement in the design of European public services	0	0	©	0	0	۲
*8. Prepare a communication strategy and have it implemented	0	0	O	0	۲	۲

*9. Ensure effective communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness			O	O	۲	
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*10. Promote the use of interoperable solutions, including those produced by EC programmes in particular by ISA/ISA ² (Internal				
Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks)			۲	

*11. Support activities related to the development and operation of Trans European Systems supporting EU policies, including their underlying network infrastructure	O		0		۲	0
*12. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)	©	©	O	O	©	۲
*13. Support activities related to the description, organisation and availability of catalogues of European and national public services	O	O	O	O	۲	O

*14. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.		O	O		۲	O
*15. Support activities related to security and data protection issues of public services	0	©	©	©	۲	©

*16. Support activities that facilitate the flow of information between national, regional and local administrations and between them and businesses and citizens	٢	0	O	0	O	۲
*17. Support activities ensuring that the "digital" dimension is considered when preparing EU legislation, the digital impact is properly assessed and proper IT solutions are in place to facilitate decision and law making			O	O	۲	O

*18. Align with and promote the European Interoperability Reference Architecture (EIRA)			O	۲	۲
*19. Put in place and operate the European Interoperability Cartography (EICart) and feed it with reusable and interoperable solutions from the EC, the Member States' administrations and other sources	0			۲	O
*20. Ensure that data is transferrable between the European public services without restrictions , with respect to data protection and security rules		O	۲	۲	©

*Q9. Are there any additional important action(s) that could better support interoperability <u>at</u> European level?

- Yes
- No
- Don't know / No opinion

5.2 Assessment of the revision of the EIF

The revised and extended EIF will be the enhanced structure to provide guidance to public administrations regarding the definition, design and implementation of public services in the European Union. The EIF will have to be updated to reflect the recent evolution of the EU legislation and digital strategies as well as the emerging technological trends.

This section deals with the collection of input in relation to the importance of the proposed revised recommendations, the complexity of their implementation and impacts that they may produce (costs and benefits).

*Q10. Please select up to 10 areas in which you expect the EIF to contribute the most with regard to the implementation of interoperability in the different Member States as well as in Europe in general.

- at most 10 choice(s)
 - Cost savings
 - Time savings
 - Increased revenue
 - Reduced operational costs
 - Software vendor lock-in avoidance
 - Support innovation
 - Support employment
 - Facilitate reuse, sharing and adoption of future solutions
 - Increase transparency
 - Increase growth and competitiveness
 - Protection of fundamental rights
 - Reduced CO2 emissions
 - Better decision making
 - Advance public and private policy goals
 - Higher satisfaction levels in services for the direct beneficiaries of interoperability solutions
 - Improved compliance for organisations implementing, operating and maintaining interoperability solutions
 - Better data quality
 - Better data availability
 - Improved security
 - Other
 - Don't know/ No opinion

Q11. Please indicate the <u>level of importance</u> of the following recommendations with regard to the benefits they may generate <u>in the different Member States</u> in spite of the potential complexity of implementing any individual one.

The EIF adheres to certain interoperability principles; notably subsidiarity and proportionality, reusability, technological neutrality and adaptability, openness and transparency, user-centricity, inclusion and accessibility, security and privacy, multilingualism, administrative simplification, preservation of information, effectiveness and efficiency.

The EIF will be effective and serve its purpose to boost interoperability at European and national levels, when National Interoperability Frameworks (NIFs) are aligned with it. NIFs could be further tailored and extended to better meet the national context and needs.

The Members States should aim for openness and transparency, reuse and share solutions (including data) which are technologically neutral, easily accessible, secure, multilingual and also cater for proper preservation of exchanged information.

You can access a full description of each recommendation by clicking <u>here</u>.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*1. Data transferability	O	O	0	0	۲	0
*2. User involvement	0	• • •		0	©	۲
*3. Once-only submission of information	0	0	O	0	0	۲
*4. Administrative simplification	0	O	0	0	۲	©
*5. Effectiveness and efficiency	0	O	O	0	۲	O

For the establishment of European Public Services, public administrations should adopt service models that allow the reuse, whenever possible, of existing services and data components (building blocks, preferably loosely coupled with each other) and put in place and maintain the necessary infrastructure.

For this purpose, the EIF proposes a **Conceptual Model** the components of which, and corresponding recommendations, are presented below.

You can access a full description of each recommendation by clicking here.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*6. Base Registries	O	O	0	O	۲	0
*7. Open data	O	O	©	O	۲	0
*8. Service Catalogues	O	O	©	O	۲	0
*9. Security and privacy	O	O	O	O	۲	0

The EIF proposes a **layered interoperability model** and recommends that public administrations should ensure proper "Interoperability governance" of their interoperability activities, also through alignment with the European Interoperability Framework and continuous monitoring. Recommendations stemming from the proposed model are listed below.

You can access a full description of each recommendation by clicking here.

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*10. Standards and specifications	O	O	O	0	۲	0
*11. Open specifications	0	O	0	0	۲	0
*12. Interoperability and public services governance	O	O	O	0	۲	0
*13. Legal interoperability	0	0	O	0	۲	0
*14. Organisational interoperability	O	0	0	0	۲	0
*15. Information interoperability	©	©	O	0	۲	0
*16. Technical interoperability	O	O	O	O	۲	0

Different impacts may result from the implementation of the aforementioned actions. These impacts can be positive (also referred to as "benefits" in the remainder of this questionnaire) or negative (also referred to as "costs" in the remainder of this questionnaire) and can be grouped into the following three categories:

- <u>Economic impacts</u>: changes in costs (compliance cost, increased revenue, reduced operational cost, etc.), changes in time needed to perform an activity (that could often be translated in economic impact), administrative burdens to businesses and citizens, impact on the potential for innovation, competitiveness, technological development, etc.
- <u>Social impacts</u>: impacts on fundamental/human rights, changes in employment levels or job quality, social inclusion, impacts on health, security (including crime and terrorism), education, accessibility to and quality of public services, citizens' participation in decision-making, etc.
- <u>Environmental impacts</u>: positive and negative impacts associated with the changing status of the environment such as climate change, air, water and soil pollution, etc.

Q12. Please indicate, if any, the <u>expected types of benefits</u> resulting from the implementation of the following recommendations.

	Economic (for businesses and/or citizens)	Economic (for public administrations)	Social	Environmental	Other	None	Don't know / No opinion
*1. Data transferability							
*2. User involvement	V						
*3. Once-only submission of information	V						
*4. Administrative simplification	V						
*5. Effectiveness and efficiency							
*6. Base Registries		V					

*7. Open data			V			
*8. Service Catalogues	V	V	V	V		
*9. Security and Privacy		V				
*10. Standards and specifications						
*11. Open specifications			V			
*12. Interoperability and public services governance	V					
*13. Legal interoperability	V	V				
*14. Organisational interoperability		V				
*15. Information interoperability		V	7			

	*16. Technical interoperability		V		V			
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*Q13. In your opinion, would you say that <u>businesses</u> will also benefit from the EIF revision?

- Yes
- No
- Don't know / No opinion

*Q14. In your opinion, would you say that citizens will also benefit from the EIF revision?

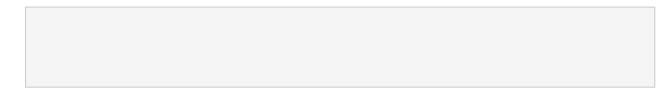
- Yes
- 🔘 No
- Don't know / No opinion

Administrative burdens are the costs to businesses and citizens for complying with the information obligations resulting from government imposed legislation and regulation.

*Q15. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for <u>citizens</u>?

- Fully agree
- Agree
- Neither agree nor disagree
- Disagree
- Fully disagree
- Don't know / No opinion

Please feel free to comment on your answer.



*Q16. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for <u>businesses</u>?

- Fully agree
- Agree
- Neither agree nor disagree
- Disagree
- Fully disagree
- Don't know / No opinion

Please feel free to comment on your answer.

Q17. Please select up to 10 recommendations that should have the highest priority to be implemented within Member States' public administrations in order to better achieve interoperability during the 2017-2020 period.

at most 10 choice(s)

- Solutions and data reusability
- Openness and Transparency
- Technological neutrality and data transferability
- W User centricity (user involvement, once only submission of information...)
- Inclusion and accessibility
- Security and privacy
- Multilingualism
- Once-only submission of information
- Administrative simplification
- Preservation of information
- Effectiveness and efficiency
- Base Registries
- Open data
- Service Catalogues
- Standards and specifications
- Interoperability governance
- Public service governance
- Legal interoperability
- Organisational interoperability
- Information interoperability
- Technical interoperability
- Don't know / No opinion

Q18. As mentioned at the beginning of this consultation, please feel free to express any further comment that you may have on the draft revised EIF text.

6. Subsidiarity

The Impact Assessment also verifies whether EU action in areas beyond its exclusive competence is compatible with the principle of subsidiarity.

As defined in <u>Article 5(3) of the Treaty on European Union</u>, the Union should intervene only if it is able to act more effectively than EU countries at their national or local levels.

*Q19. Do you agree that, with regard to the revisions of the EIS and the EIF, action at EU level provides clear added value compared to action taken at Member State level?

- Yes
- No
- Don't know / No opinion

Contact

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