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Open Public Consultation: Revision of the European Interoperability Framework (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", COM (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.

1. Registration

*Surname:

Brevik

	ress:										
rbr@d:	lfi.no										
hat is ve	our natio	nalitv?									
Austn	_	Belgian	0	British	(Bulgaria	n	0	Croat	tia	Cyprio
Cze	ch ©	Danish		Dutch	(Estoniar	1	0	Finni	sh	French
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Polis	sh O	Portuguese	0	Romania n	(Slovak		0	Slove an	eni	Spanis
Swe	dis O	Other									
here do	you live	?									
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Den k	mar 🔘	Estonia	0	Finland	0	France	0	Gerr y	nan	0	Greece
Hun	gar 🔘	Iceland	0	Ireland	0	Italy	0	Latv	ia	0	Liechtenstei
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Rom	nani 🔘	Slovakia		Sloveni a	0	Spain	0	Swe	den	0	United Kingdom
Nor	vay 🔘	Other									

*What is your function in your administration?

Answering on behalf of the agency

Regional / sub-national
National
European
Don't know / No opinion
*Have you already replied to any targeted consultation related to the revisions of the EIS/EIF in the course of 2015 (e.g. workshops, interviews, online surveys)?
Yes
O No
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 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:
• Under the name given: 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.

Anonymously: I consent to publication of all information in my contribution and I declare that

Please keep my contribution confidential. (it will not be published, but will be used

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internally within the Commission)

*At which level of government does your organisation/administration work?

Municipal / local

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

The questions related to this section have been addressed during the targeted consultations which took place in the course of 2015, with regards to the revision of the EIS/EIF (e.g. workshops, interviews, online surveys).

In December 2010, the Commission adopted the Communication "<u>Towards interoperability for European public services</u>" that included the <u>European Interoperability Strategy</u> (EIS) and <u>European 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 at Member States level

The following set of questions will address interoperability at Member State level, i.e. across national public administration's entities of different levels and sectors.

*Q1. To what extent is interoperability among your country's public administration's entities considered as a political priority?

- High priority
- Medium priority
- Low, or not at all a priority
- Don't know/ No opinion

*Q2. What are the main priorities in relation to interoperability among your country's public administration's entities?

The most recent government white paper has five overarching priorities:

- User-centricity
- Innovation and productivity
- Digital participation and competencies
- Effective digitalisation of the public sector
- Privacy and information security

Please note that in answering these questions we are taking into account the entirity of the Norwegian public sector. We have, in other words, assessed the impact of a revised EIF on the public sector as a whole and not just on Difi.

*Q3. Are the priorities mentioned in the previous question (Q2) formalised in a specific strategy?

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

*Please specify which official document you are referring to.

Meld. St. 27 (2015-2016). Digital agenda for Norge. https://www.regjeringen.no/no/dokumenter/meld.-st.-27-20152016/id2483795/

	Please select up to 10 major problems identified in your administration as obstructing the ementation of interoperability among your country's public administration's entities.
-	ost 10 choice(s)
	There is no single legal framework in my country within the area of interoperability across sectors (legislation in the area of interoperability tends to be sectorial).
V	There is a lack of resources available for implementing interoperability in my country.
V	Interoperability is not a priority in the political agenda of my country.
✓	There is a lack of a consolidated view on all the existing interoperability initiatives in my country.
	The IT budget of my country is largely affected by the maintenance of legacy systems.
	Interoperability is not perceived as a worthwhile investment in my country.
	EU funds, i.e. European Structural and Investment Funds (ESIF) that could be used to implement interoperability are not well leveraged by my country.
V	The implementation of interoperability initiatives in my country is not sufficiently monitored.
✓	There is a shortage of skills to implement interoperability-related policies and initiatives in my country.
V	There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
	Technological evolution in my country 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
V	Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in in my country.
V	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

*Q5. In relation to interoperability among public administration's entities, which of the following areas have been addressed by your administration?

- Semantic interoperability (i.e. how the meaning and syntax of information should be addressed)
- Information availability and usage (i.e. where and which information is available and what can be done with this information)
- Trust and Privacy (i.e. how information can be accessed and exchanged in a secure and trustworthy way)
- Catalogue of service (i.e. consolidated list of available services)
- Catalogue of ICT standards and interoperability specifications to guide public procurers,
- Interoperability architecture (i.e. architecture that puts together and structures all aspects of a public service from legal to organisational, information-related and technical)
- Expertise support and methodologies (i.e. how to create and maintain the aforementioned architecture)
- National legislation referring to/linked with ICT (i.e. performing a systematic and well defined ICT implications' assessment with the involvement of legal and ICT experts)
- Interoperability awareness (i.e. awareness and recognition of interoperability as a cornerstone for building public services)
- Sharing best practices and supporting communities by using collaborative platform(s).
- Other
- Don't know / No opinion

*Please further detail the initiative(s) that address "semantic interoperability" in your administration.

Various initiatives related to information management, including collaborative effort in SKATE, and SERES in The Brønnøysund Register Centre.

*Please further detail the initiative(s) that address "information availability and usage" in your administration.

- Common data catalog for public sector re-use
- National portal for open data (particularly important for private sector re-use)
- Developing new common e-transparency solution for the public sector (primarily correspondence, documents)

*Please further detail the initiative(s) that address "trust and privacy" in your administration.

Guidance material on information security. Various trust and privacy initiatives related to $\ensuremath{\mathsf{ID-porten}}$.

*Please further detail the initiative(s) that address "catalogue of ICT standards and interoperability specifications to guide public procurers" in your administration.

Standardisation processes, including Standardisation Council and Reference Catalogue.

*Please further detail the initiative(s) that address "interoperability awareness" in your administration.

Increased focus on joint solutions through SKATE, with updated strategy and action plan.

4.2 Assessment of needs and problems at cross-border level

The following set of questions will address the **cross-border dimension of interoperability**, 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.

- *Q6. To what extent is cross-border interoperability considered as a political priority in your country?
 - High priority
 - Medium priority
 - Low, or not at all a priority
 - Don't know / No opinion
- *Q7. What are the main priorities in relation to cross-border interoperability in your country?

Norway is part of the Single Digital Market. Priorities include procurement, \mbox{eID} , and information sharing within the justice sector

- *Q8. Are priorities mentioned in the previous question formalised in a specific strategy?
 - Yes
 - O No
 - Don't know / No opinion

	*Please sp	ecify which	official	document	you ar	e referring	to.
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Digital agenda for Norge. See Q3.

*Q9. What are the main problems, if any, faced by your administration while implementing these aforementioned priorities?

The high-level business case - currently it is dominated by a individual agency point of view.

	Please select up to 10 major problems identified in your administration as obstructing the ementation of interoperability with other countries.
at mo	ost 10 choice(s)
	Our 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.
V	Our 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 our public administrations.
	There is a lack of resources available for implementing cross-border interoperability in my country.
V	Cross-border interoperability is not a priority in the political agenda of my country.
V	There is a lack of a consolidated view on all the existing cross-border interoperability initiatives in my country.
	The IT budget of my country is largely affected by the maintenance of legacy systems.
√	Cross-border interoperability is not perceived as a worthwhile investment in my country.
	European Structural and Investment Funds (ESIF) that could be used to implement cross-border interoperability are not well leveraged by my country.
	There is a shortage of skills to implement cross-border interoperability policies and initiatives in my country.
	There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
V	Cross-border digital public services available in my country are not (although it is needed) sufficiently multilingual.
V	There is a limited demand from our national citizens, businesses and/or administrations for digital cross-border public services (e.g. cross-border mobility is low).
V	Existing cross-border digital public services available in my country are not sufficiently known by citizens, businesses and/or public administrations (lack of awareness).
V	Our national portals tend to be fragmented.
V	Our national portals are not sufficiently integrated with EU portals.
	Technological evolution in my country is largely affected by the maintenance of legacy systems.
V	Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in in my country.
	There is a lack of interoperability standards or different countries are using different standards.
	Interoperability standards, even when available, are not widely used.
	Other
	Don't know / No opinion

*

Please describe the other problem(s) identified as obstructing the implementation of interoperability between your administration and other countries.

The absence of technical solutions is currently the main obstacle for implementation. Likewise the absence of formats for exchange (e.g. of data) is an important problem. Norway not being member of the EU also is an hindrance. Legislation could also be considered an obstacle, as it is not made for digitalisation and particularly not cross-border digitalisation.

Q11. In you view, do y	ou see any additional problems that may obstruct the implementation of	of
interoperability betw	een your administration and other countries?	

N/A			

*Q12. In relation to cross-border interoperability, which of the following areas have been addressed by your administration?

- Semantic interoperability (i.e. how the meaning and syntax of information should be addressed)
- Information availability and usage (i.e. where and which information is available and what can be done with this information)
- Trust and Privacy (i.e. how information can be accessed and exchanged in a secure and trustworthy way)
- Catalogue of service (i.e. consolidated list of available services)
- Catalogue of ICT standards and interoperability specifications to guide public procurers
- Interoperability architecture (i.e. architecture that puts together and structures all aspects of a cross-border public service from legal to organisational, information-related and technical)
- Expertise support and methodologies (i.e. how to create and maintain the aforementioned architecture)
- ☑ Cross-border legislation referring to/linked with ICT (i.e. performing a systematic and well defined ICT implications' assessment with the involvement of legal and ICT experts)
- Interoperability awareness (i.e. awareness and recognition of interoperability as a cornerstone for building cross-border public services)
- Sharing best practices and supporting communities by using collaborative platform(s).
- Other
- Don't know / No opinion

*Please further detail the initiative(s) that address "se	emantic interoperability" in	your
administration.		

- SERES.National information management project (including "once only")
- *Please further detail the initiative(s) that address "information availability and usage" in your administration.
 - Exposing national open data catalog to European data catalog (EDP)eSense (procurement)
- *Please further detail the initiative(s) that address "trust and privacy" in your administration.
 - Development of ID-porten og eIDAS node
 - Participation in eIDAS expert group.
- *Please further detail the initiative(s) that address "catalogue of ICT standards and interoperability specifications to guide public procurers" in your administration.

The Reference Catalogue includes European (EU) standards.

*Please further detail the initiative(s) that address "cross-border legislation referring to/linked with ICT" in your administration.

Adoption of eIDAS into Norwegian Law.

*Please further detail the initiative(s) that address "interoperability awareness" in your administration.

National coordination and information network towards CEF.

4.3 Assessment of needs and problems related to the EIF

Today, there is a common understanding among Member States on the basic requirements to achieve interoperability, based on the "European Interoperability Framework" launched by the Commission in 2010. According to the <u>Digital Single Market Strategy for Europe</u>, it is now time to update and extend this framework.

As mentioned in the <u>Report on the State of Play of Interoperability 2</u>014, the average alignment between EU Member States' national interoperability frameworks and the EIF stood at 74% in 2014. However, the overall average of NIF Implementation and Monitoring for 2014 was significantly lower (28%).

*Q13. In your opinion, what are the main problems, if any, faced by your administration while implementing the EIF?

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Strong silo governance, many system-specific arrangements.
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Based on the <u>Report on the State of Play of Interoperability 2014</u>, certain issues have been identified as impeding the implementation of the EIF at national level.

*Q14. Please select up to 5 major problems identified by your administration as impeding the implementation of the EIF.

Implementation of the EIF.
at most 5 choice(s)
Technical aspects and rules are specified in some legislation in my country, resulting in difficulties to stay in line with technological innovations.
Lack of central interoperability governance and coordination at national level.
There are IT budget cuts in the public administrations of my country.
Legislation does not take interoperability into account.
Lack of a monitoring process for interoperability projects.
Lack of engagement from stakeholders.
The effort needed for NIF implementation and monitoring is too significant for my country.
Public entities in my country generally do not have sufficient IT resources.
Skills/competencies improvement is needed in my country for the development of interoperability solutions.
Multilingualism (whenever needed) is a key challenge in my country.
Legacy technology is a barrier to the implementation of the EIF in my country.
Silo mentality is a barrier to the implementation of the EIF in my country.

Different ways of working among IT people is a barrier to the implementation of the EIF in my

Benefits from the use of common interoperability solutions are not always precisely assessed.

Lack of public procurement strategy and guidelines on the use of standards

country.

Don't know / No opinion

Please	e feel free to comment on your answer.
*0.5	
requ	Are the principles, recommendations, conceptual models and interoperability irements contained in the EIF considered when a new ICT project is launched in your inistration?
0	Yes
•	Partially
0	No
	Don't know / No opinion
inter	se explain the reason(s) why these principles, recommendations, conceptual models and operability requirements are only partially considered when a new ICT project is launched our administration.
No	orwegian practice is aligned with many of the principles in the EIF.

5. Assess the impact of the EIS/EIF revision

5.1 Assessment of the revision of the EIS

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/difficulty of their implementation and identify the type and severity of their impacts. It will also identify the priorities to be tackled by the EIS.

k	Q16. 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"?

0	Vac
	1 50

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..

Q17. Please indicate the <u>level of importance</u> of each of the following actions with regard to the benefits that they may generate <u>in your country</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		•	•	•	•	•
*2. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level		•	•	•	•	•

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

*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		•		•	•	•
*6. Ensure users' involvement in the design of national public services	•	©	•	©	•	•

*7. Ensure effective communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness	•	•		•	•	•
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*8. Promote the use of interoperable solutions including those produced by EC programmes in particular by ISA/ISA² (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks)				•	
*9. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)	•		©	•	•

*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.	•	•		•	©	•
*11. Support activities related to security and data protection issues of public services	©	•	•	©	•	©

*12. Support activities that facilitate the flow of information among national, regional and local administrations and between them and businesses and citizens			•	•
*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	•		•	

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

*Please indicate the reason(s) why some actions are not considered as important by your administration.

We regard EIRA/EICart as important, but not compared with the impact of some of the other issues mentioned in the list above.

- *Q18. Are there any additional important action(s) that could better support interoperability at national level?
 - Yes
 - No
 - Don't know / No opinion

Q19. 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 your country and other EU Member States 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	•	•	•	•	•	•
*2. Identify, liaise and share governance practices with relevant policies and their governance structures at EU or national level	©	•	•	•	•	•

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

*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	•	•		•	•	•
*7. Ensure users' involvement in the design of European public services	•	•	•	•	•	•
*8. Prepare a communication strategy and have it implemented	•	©	©	•	0	•

*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)			•	

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

*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.	•	©	•	•	©	•
*15. Support activities related to security and data protection issues of public services	©	©	©	©	•	•

*16. Support activities that facilitate the flow of information between national, regional and local administrations and between them and businesses and citizens	•	•	•		•	•
*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		©	•	©	•	•

*18. Define, maintain and promote the European Interoperability Reference Architecture (EIRA)	•	•	•	•	•	•
*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	•	•		•		•

*20. Ensure that						
data is transferrable						
between the						
European public	0	0	0	0	•	0
services without						
restrictions, with respect to data						
protection and						
security rules						

*Q20. Are there any additional important action(s) that could better support interoperability at <u>Eu</u> ropean level as part of the EIS?

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

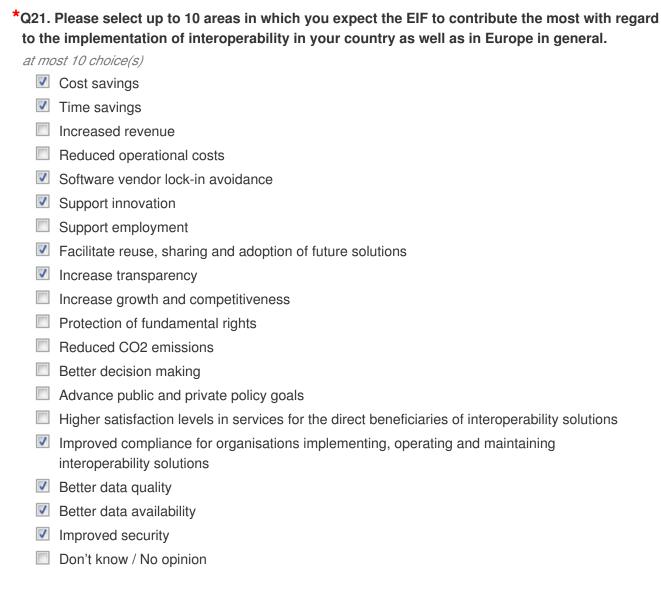
*Please further detail the proposed additional action(s).

Implementation of the above mentioned points do not take into account that Norway is a member of the EEA and not a full EU member. This has consequences for our ability to influence policy processes.

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).



Q22. Please indicate the <u>level of importance</u> of the following recommendations with regard to the benefits they may generate in your country 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	0	0	0	0	•	0
*2. User involvement	0	0	0	0	•	0
*3. Once-only submission of information	0	0	0	0	•	0
*4. Administrative simplification	0	0	0	0	•	0
*5. Effectiveness and efficiency	©	0	0	0	•	0

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.

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

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.

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

Q23. Please indicate, if any, the <u>expected types of benefits</u> resulting from the implementation of the following recommendations.

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

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

*6. Base Registries	V	V	V	V		
*7. Open data	V	V	V	V		
*8. Service Catalogues		V				
*9. Security and privacy	V		V			
*10. Standards and specifications	V		V			
*11. Open specifications	V		V	V		
*12. Interoperability and public services governance	V		V			
*13. Legal interoperability	V	V	V	V		
*14. Organisational interoperability	V	V	V	V		

*15. Information interoperability	V	V	V			
*16. Technical interoperability	V	V	V	V		

Q24. Please indicate the <u>level of complexity</u> to implement the following recommendations within your administration.

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

	Very easy	Easy	Neither easy nor complex	Complex	Very complex	Don't know / No opinion
*1. Data transferability	0	0	•	0	0	0
*2. User involvement	0	0	•	0	0	0
*3. Once-only submission of information	0	0	0	0	•	0
*4. Administrative simplification	0	0	©	0	•	0
*5. Effectiveness and efficiency	0	0	0	•	0	0
*6. Base Registries	0	•	0	0	0	0

*7. Open data	0	0	•	0	0	0
*8. Service Catalogues	0	0	•	0	0	0
*9. Security and privacy	0	0	0	•	0	0
*10. Standards and specifications	0	0	0	•	0	0
*11. Open specifications	0	0	0	•	0	0
*12. Interoperability and public services governance	0	0	•	0	•	0
*13. Legal interoperability	0	0	0	0	•	0
*14. Organisational interoperability	0	0	0	0	•	0
*15. Information interoperability	0	0	0	•	0	0
*16. Technical interoperability	0	0	•	0	0	0

*Please indicate the reason(s) that make(s) some recommendations complex to implement.

Heavy legal processes, lack of coordination at the highest level (government), silo mentality. Achieving legal interoperability involves harmonizing conflicting interests. That is a resource intensive task, and the process should be aimed at the areas where the assumed benefits are the greatest. It is clearly more of a low-hanging fruit to achieve interoperability cross-border, where legislation to a large extent is harmonized through EU directives and regulation.

Q25. Please indicate, if any, the <u>foreseen types of costs</u> to implement the following recommendations within your administration.

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

	Economic	Social	Environmental	Other cost	None	Don't know / No opinion
*1. Data transferability	V					
*2. User involvement					V	
*3. Once-only submission of information					V	
*4. Administrative simplification					V	
*5. Effectiveness and efficiency		V				
*6. Base Registries					V	
*7. Open data					V	
*8. Service Catalogues					V	
*9. Security and privacy	V	V				
*10. Standards and specifications	V					
*11. Open specifications	V					

*12. Interoperability and public services governance			V	
*13. Legal interoperability	V			
*14. Organisational interoperability			V	
*15. Information interoperability			V	
*16. Technical interoperability			V	

*Please indicate the reason(s) why the implementation of some recommendations will not incur any cost.

The benefits generally are greater than the costs. Here, we interpret "costs" as long-term costs as there likely will be some short-term expenditure linked to implementing the above mentioned recommendations.

Q26. In your opinion, how would you rate the overall cost of implementing the proposed recommendations within your administration?

Please rate each recommendation from 1 to 5 (1 being the least costly and 5 the most costly).

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

	1 (least costly)	2	3	4	5 (most costly)	Don't know / No opinion
*1. Data transferability	0	0	0	•	0	0
*2. User involvement	0	•	0	0	0	0
*3. Once-only submission of information	0	0	0	©	•	0
*4. Administrative simplification	0	0	0	©	•	0
*5. Effectiveness and efficiency	0	0	0	•	0	0
*6. Base Registries	0	0	•	0	0	0
*7. Open data	0	0	•	0	0	0
*8. Service Catalogues	0	•	©	0	0	0
*9. Security and privacy	0	©	©	•	0	0
*10. Standards and specifications	0	0	•	©	0	0
*11. Open specifications	0	0	•	0	0	0
*12. Interoperability and public services governance	0	0	0	•	0	0
*13. Legal interoperability	0	©	©	•	0	0
*14. Organisational interoperability	0	0	0	•	0	0
*15. Information interoperability	0	0	•	0	0	0
*16. Technical interoperability	0	0	•	0	0	0

The	e use of a specific technology can sometimes result in some limitations or restrictions.
	In your view, are there any technological constraints that may hinder the implementation of forementioned recommendations within your administration?
0	Yes
	No
	Don't know / No opinion

Please feel free to comment on your answer.

Q28. What is the <u>current level of implementation</u> of each of the following recommendations as well as your <u>future plans in relation to their implementation</u> within your administration?

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

	Already implemented	Partially implemented	Will be implemented	Will not be implemented	Don't know / No opinion
*1. Data transferability	•	•	•	0	0
*2. User involvement	0	•	0	0	©
*3. Once-only submission of information	0	•	0	0	0
*4. Administrative simplification	0	•	0	0	0
*5. Effectiveness and efficiency	0	•	0	©	0

*6. Base Registries	•	0	0	0	0
*7. Open data	0	•	©	0	0
*8. Service Catalogues	0	©	©	0	•
*9. Security and privacy	•	•	•	•	0
*10. Standards and specifications	•	•	•	•	0
*11. Open specifications	•	•	•	•	•
*12. Interoperability and public services governance	•	•	•	•	•
*13. Legal interoperability	0	©	•	0	0
*14. Organisational interoperability	•	•	•	•	0

*15. Information interoperability	0	•	0	0	•
*16. Technical interoperability	0	•	0	0	0

*

Please specify to which technological constraints you are referring.

Specifically we refer to:
- Legacy systems
- Costs of replacing existing systems

- *Q29. In your opinion, would you say that <u>citizens</u> will also benefit from the EIF revision?
 - Yes
 - No
 - Don't know / No opinion
- *Q30. In your opinion, would you say that businesses will also benefit from the EIF revision?
 - Yes
 - O 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.

will contribute to reducing administrative burden for citizens?
Fully agree
Agree
Neither agree nor disagree
Disagree
Fully disagree
Don't know / No opinion
Please feel free to comment on your answer.
EIF aims at both cross-sector and cross-border interoperability. Given the challengens of cross-sector legal harmonization, perhaps it would be wise to give priority to the aras where legislation has been or is being harmonized
across the EU, i.e. focus on cross-border interoperability.
*Q32. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for businesses? © Fully agree
Agree
Neither agree nor disagree
Disagree
Fully disagree
Don't know / No opinion
Please feel free to comment on your answer.

*Q31. In your opinion, to what extent do you agree that the aforementioned recommendations

-	emented within your administration in order to better achieve interoperability during the -2020 period.
at mo	nst 10 choice(s)
V	Solutions and data reusability
	Openness and Transparency
V	Technological neutrality and data transferability
V	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
V	Effectiveness and efficiency
	Base Registries
	Open data
	Service Catalogues
	Standards and specifications
	Interoperability governance
V	Public service governance
V	Legal interoperability
V	Organisational interoperability
V	Information interoperability
	Technical interoperability
	Don't know / No opinion
	as mentioned at the beginning of this consultation, please feel free to express any further ment that you may have on the draft revised EIF text.
6. Sı	ubsidiarity

Q33. Taking into account existing constraints (e.g. technological, human and financial resources,

skills), please select up to 10 recommendations that will have the highest priority to be

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)</u> of the <u>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.

*Q35. Do you agree that, with regard to the revision 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
- *Please explain the main differentiating benefit(s) of an EU action compared to an action taken at Member States level.

One framework instead of many makes it easier to ensure interoperability cross-border. It will also be easier for vendors to allign to one framework rather than many.

Contact

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