Towards user-oriented public services in Kosovo

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List of abbreviations

ABPRP	Administrative Burden Prevention and Reduction Programme
ABR	Administrative Burden Reduction
AI	Administrative Instruction
AIS	Agency on Information Society
CAF	Common Assessment Framework
CRA	Civil Registration Agency
DN	Decisions on Numbering
EU	European Union
GAEC	General Authorisations for Electronic Communication
GG	Government Gateway
IARF	Individual Authorisations for Radio Frequencies
ICT	Information and Communication Technology
IMC	Independent Media Commission
IT	Information Technology
KBRA	Kosovo Business Registration Agency
KPI	Key Performing Indicator
LGAP	Law on General Administrative Procedure
MIA	Ministry of Internal Affairs
MTIE	Ministry of Trade, Industry and Entrepreneurship
NDP	National Development Plan
NDS	National Development Strategy
OECD	Organization for Economic Cooperation and Development
OPM	Office of Prime Minister
PARS	Public Administration Reform Strategy
PS	Postal Services
RAEPC	Regulatory Authority for Electronic and Postal Communications
SDGR	Single Digital Gateway Regulation
SPO	Strategic Planning Office
TAK	Kosovo Tax Administration

1. Introduction

In today's rapidly evolving landscape of service design and delivery, organizations and governments worldwide are increasingly recognizing the significance of adopting a user-centric approach. This approach aims to ensure that services are efficiently and effectively designed to meet the diverse needs and expectations of individuals. Within this context, this paper focuses on exploring the concept of user-oriented service design and delivery, with a specific focus on the situation in Kosovo. By examining the best practices and enablers for implementing user-centric services, including legal, strategic and institutional frameworks, as well as the necessary infrastructure, this study aims to provide valuable insights into the current state of service provision in Kosovo and identify areas where improvements can be made.

Section 2 of this paper provides a comprehensive overview of the main developments in service delivery in Kosovo. It delves into the existing legal, strategic, institutional, and infrastructure frameworks that shape the landscape of service provision in the country. By understanding the current context and frameworks, this section establishes a foundation for identifying areas that require attention and improvement.

Building upon this understanding, Section 3 proposes a comprehensive framework for prioritizing government and broader interventions to optimize service design and delivery in Kosovo. Drawing inspiration from best practices observed across Europe and aligning with national legislation and strategic frameworks, this proposed framework revolves around key objectives such as understanding user needs and preferences, simplifying and streamlining service delivery processes, leveraging digitalization, and establishing robust mechanisms for monitoring and reporting. Each objective is accompanied by a set of strategic principles and instruments that can be employed to assess the current state of service provision and identify opportunities for enhancement.

To further illustrate the practical application of this framework, Section 4 assesses several services provided by various entities in Kosovo. Specifically, some of the services offered by the Ministry of Trade, Industry, and Entrepreneurship (MTIE), the Regulatory Authority of Electronic and Postal Communications (RAEPC), and the Municipality of Ferizaj are evaluated. Through this assessment, recommendations are provided to enhance the quality and effectiveness of each institution's service delivery, aligned with the user-centric approach advocated throughout this paper.

In conclusion, this paper emphasizes the critical importance of adopting a user-centric approach in service design and delivery. By placing user needs and preferences at the forefront, streamlining processes, harnessing the power of digitalization, and establishing robust monitoring and reporting mechanisms, Kosovo can make significant advancements in service provision. The proposed framework, aligned with national legislation and strategic frameworks, serves as a valuable roadmap for continuous improvement and the realization of efficient and effective service delivery in Kosovo. By embracing a user-centric mindset and implementing the recommendations outlined in this paper, Kosovo can pave the way for a future where services truly cater to the needs and expectations of its citizens

2. Background

2.1 Main developments

Kosovo's public administration is responsible for delivering approximately 700 public services.[1] However, the process of service roll-out in Kosovo has been characterized by a decentralized approach, leading to significant variations in service design and delivery across different areas.[2]

In recent years, Kosovo has taken important steps towards establishing a well-organized service delivery policy. The amendment of the Law on General Administrative Procedure (LGAP) in 2016 introduced crucial principles and elements, including the once-only principle, fee proportionality, delivery within a reasonable timeframe, and the gratuity principle. Additionally, Kosovo has enacted legislation concerning licenses and permits, services, electronic identification and trust services, cyber security, and data protection.[3]

Furthermore, service delivery has been addressed in several key strategic documents, such as the National Development Strategy (NDS), Public Administration Reforms Strategy (PARS), Administrative Burden Prevention and Reduction Programme (ABPRP), and the forthcoming e-Government Strategy.[4] The establishment of a functional Government Gateway (GG) and the implementation of the e-Kosova platform have contributed to these efforts.

In recent years, Kosovo has taken important steps towards establishing a well-organized service delivery policy. The amendment of the Law on General Administrative Procedure (LGAP) in 2016 introduced crucial principles and elements, including the once-only principle, fee proportionality, delivery within a reasonable timeframe, and the gratuity principle.

However, significant challenges persist. Insufficient institutional coordination within the government hinders the planning and monitoring of service delivery, resulting in a fragmented approach. Quality management tools for guiding service design and delivery, particularly in the context of digitalization, are lack-

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1   The term 'administrative service' refers to all services that are necessary for citizens, businesses and NGOs, such as permits, licenses, registrations, authorizations, consents, certifications, etc. The term does not include subsidies, transfers and tenders. The draft Public Service Catalogue has identified around 700 such services delivered by central and local institutions. The services reviewed by this paper will follow the mentioned Catalogue, when referring to a particular service.
2   OECD SIGMA, 2017, The Principles of Public Administration for EU Candidate and Potential Candidate Countries, Section on Service Delivery, p112.
3   Such legislation consists in:
   1.   Law on General Administrative Procedure: https://gzk.rks-gov.net/ActDetail.aspx?ActID=12559
   2.   Law on License and Permit System: https://gzk.rks-gov.net/ActDetail.aspx?ActID=8967
   3.   Law on Electronic Identification and Trust Services in Electronic Communication: https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=51618
   4.   Law on Cyber Security: https://gzk.rks-gov.net/ActDetail.aspx?ActID=70933
   5.   Law on Data Protection: https://gzk.rks-gov.net/ActDetail.aspx?ActID=18616
4   Please refer to the following links for a detailed account on the mentioned strategic documents:
   1.   NDS/NDP: https://kryeministri.rks-gov.net/blog/strategjia-dhe-plani-kombetar-per-zhvillim-2030/
   2.   PARS: https://kryeministri.rks-gov.net/blog/strategjia-e-reformes-se-administrates-publike-2022-2027/
   3.   ABPRP: https://kryeministri.rks-gov.net/blog/programi-per-parandalimin-dhe-zvogelimin-e-barres-administrative-2022-2027/
   4.   e-Government Strategy: https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41798

ing.[5] The introduction of digital solutions often relies on donor-driven initiatives and lacks a centralized process. Additionally, there is a shortage of digital skills within the public administration, and a comprehensive whole-of-government design enterprise and interoperability framework are either absent or outdated.[6]

2.2 Legal Framework

Law on General Administrative Procedure: It is positive to note that LGAP establishes the 'once only' principle, which reduces the burden on service users by requiring public organs to obtain and reuse necessary documents on their own.[7] The gratuity principle, which stipulates that administrative proceedings should be free of charge, is also an important aspect of fee proportionality.[8] The set deadlines for completing administrative procedures and the rule of silent consent provide a framework for ensuring timely service delivery.[9] The promotion of electronic communication is also encouraged under LGAP.[10]

However, lack of harmonization with special laws and the need for further digitalization efforts present challenges to LGAP's role as an enabler for user-centric service design and delivery. Nonetheless, the ongoing effort to align special laws with LGAP is a positive development that could help mitigate some of these challenges.[11]

Law on Permit and License System[12] regulates procedures and criteria for licensing professional services. It defines four types of permissions: notification, registration, permit, and professional license. Professional licensing is overseen by relevant competent authorities and professional licensing boards. The law includes criteria for granting licenses, recognition of licenses issued abroad, and ensures public accessibility of permission-related information. It adopts the single window principle for streamlined processing. Additionally, the law limits permission fees to the actual cost incurred by the competent authority.

The Law on Electronic Identification and Trust Services in Electronic Transactions[13] establishes the legal framework for electronic identification, authentication, and the use of electronic signatures, seals, and time stamps. It sets conditions for trust service providers, promotes interoperability, and mandates inspection of service providers. The law enforces compliance through punitive measures and ensures accountability in electronic identification processes.

Law on Cyber Security[14] establishes principles, institutions, and measures for ensuring cyber security. It defines roles, responsibilities, and policies for various authorities and entities. The law focuses on organizational, physical, and IT security measures for information systems and networks. It mandates reporting of incidents and prevention/mitigation measures by critical infrastructure and digital service providers. The Cyber Security Agency is designated as the main coordinating body.

Law on Data Protection[15] establishes a framework for processing and protecting personal data. It creates the Agency for Information and Privacy (AIP) to monitor data processing and access to public documents. The law requires consent for data processing and outlines conditions for special categories of personal data. Data subjects have rights to access, rectify, and object to data processing. Data controllers must implement security measures to prevent unauthorized access.

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5 Public Administration Reform Strategy, p24.
6 Draft e-Government Strategy, p13.
7 LGAP, Article 86.
8 Ibid, Article 12.
9 Ibid, Article 98.
10 Ibid, Article 73.
11 At the time of writing this paper, the draft Law No. 08/L-176 Amending Laws on Special Administrative Procedures and their Harmonization with the Law No. 05/L -031 on General Administrative Procedure, has passed first reading in the Assembly.
12 Law no 04/L-202 on Permit and License System: https://gzk.rks-gov.net/ActDetail.aspx?ActID=8967.
13 Law No 08/L-022 on Electronic Identification and Trust Services in Electronic Transactions: https://gzk.rks-gov.net /ActDocument Detail.aspx?ActID=51618.
14 Law 08/L-173 on Cyber Security: https://gzk.rks-gov.net/ActDetail.aspx?ActID=70933.
15 Law 06/L-082 on Data Protection: https://gzk.rks-gov.net/ActDetail.aspx?ActID=18616.

2.3 Strategic Framework

The National Development Strategy and National Development Plan 2030 (NDS/NDP) [16] serve as the primary strategic mechanisms for implementing policies across various sectors. These documents include objectives and measures related to service delivery, with a particular focus on reducing administrative burden and promoting digitalization. They provide a strong foundation for further elaborating on their objectives in sector-specific strategies.

The Public Administration Reform Strategy 2027 (PARS) [17] aims to improve service delivery in Kosovo by aligning objectives with the National Development Strategy, strengthening institutional and legal conditions, standardizing service delivery and quality management, and introducing capacity development measures for public officials. The strategy proposes user participation in service delivery, evaluates service delivery using the Common Assessment Framework, and plans to increase digitized services on the E-Kosova platform.[18]

The Administrative Burden Prevention and Reduction Programme (ABPRP) 2022-27 [19] serves as the primary mechanism for achieving the simplification and digitalization of public services. The principles guiding the Programme align with those of the European Commission E-Government, including the principles of 'once only', personalization, proactive service provision, and digital by default.

The Programme aims to enhance institutional coordination on administrative burden reduction (ABR) while providing capacity development measures for all public officials involved. Additionally, the Programme includes measures to simplify services across a wide range of institutions and to re-engineer certain services through a life-event approach. Furthermore, the Programme plans to digitalize a vast number of services while conducting outreach activities to inform citizens of the available options.

The E-Government Strategy 2023-27 [20] outlines a comprehensive plan for the digitalization of public services over the mid-term. The strategy aims to bolster strategic and operational coordination within the government to support digitalization, as well as to enhance the digital skills of public officials. Moreover, it seeks to establish a whole-of-government enterprise architecture. The strategy also includes measures to strengthen cyber security resilience, while promoting innovation through public-private partnerships.

Interoperability Framework 2013 [21] outlines comprehensive objectives towards enhancing inter-institutional cooperation, information sharing and information reuse. It tries to do so by strengthening the

four basic levels of interoperability: legal, organizational, semantic and technical.

2.4 Institutional Framework

Office of Prime Minister (OPM): through its **Strategic Planning Office (SPO)** is the lead institution in terms of planning, monitoring and evaluation of ABPRP and e-Government Strategy. It also supports and guides line institutions in implementing simplification and digitalization, and ensures they do so by complying with the set principles. Moreover, OPM also is in charge of coordinating the donor activities in the area.

Ministry of Internal Affairs (MIA): is responsible for the overall coordination of the public administration reform, including on service delivery. Its **Agency of Information Society's (AIS)** main functions include

16 National Development Strategy and National Development Plan 2030: https://kryeministri.rks-gov.net/blog/strategjia-dhe-plani-kombetar-per-zhvillim-2030/

17 Public Administration Reform Strategy 2022-27: https://kryeministri.rks-gov.net/en/blog/public-administration-reform-strategy-2022-2027/

18 For a detailed account of the measures briefly described here, please refer to PARS Action Plan: https://kryeministri.rks-gov.net/en/blog/action-plan-2022-2024-for-pars-2022-2027/

19 ABPRP: https://kryeministri.rks-gov.net/blog/programi-per-parandalimin-dhe-zvogelimin-e-barres-administrative-2022-2027/

20 Draft e-Government Strategy 2023-27: https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41798

21 Interoperability Framework 2013: https://mpb.rks-gov.net/ap/desk/inc/media/15ADEA30-72EF-41FD-BD2A-2B41810371E7.pdf.

proposing and coordinating ICT policies, managing IT projects, and promoting information technology development. It focuses on areas such as enhancing ICT infrastructure, expanding internet services, managing data through the State Data Centre, ensuring security and data protection, combating cybercrime, and facilitating access to public information. The Agency also plays a role in training needs identification.

2.5 Infrastructure

State Data Centre: AIS manages the State Data Centre, a shared infrastructure that hosts back-office systems, data storage, and email services for Kosovar institutions. It facilitates cross-institutional information exchange through the Government Gateway. The centre also provides a shared service environment, including the eKosova website and archives, and serves as a test environment for projects under development.

eKosova: offers a centralized online portal that serves as a gateway to numerous services, such as electronic document submission, online payment systems, information repositories, and access to government forms and applications.

Government Gateway (GG): is a service bus component that serves as a central routing point for all Government-to-Government data exchange. The Government Gateway was developed in 2018. It plays a crucial role in ensuring interoperability between various government systems.

3. Towards user-oriented service delivery approach

3.1 Service design and delivery principles

User-focused service design and delivery in countries with advanced public administrations is guided by well-established principles. In the European context, the principles on service delivery are enshrined in the Charter of Fundamental Rights of the European Union (EU)[22], as well as in the Public Administration Principles.[23] The latter outlines the requirement that the public administration is citizen-oriented and the quality and accessibility of public services is ensured. This is then further detailed in the following principles:

- Policy for citizen-oriented state administration is in place and applied.
- Good administration is a key policy objective underpinning the delivery of public service, enacted in legislation and applied consistently in practice.
- Mechanisms for ensuring the quality of public service are in place, and
- The accessibility of public services is ensured.[24]

However, SIGMA has further elaborated on these principles to include:[25]

- User-centricity and responsiveness;
- Legal certainty and predictability;
- Efficiency and timeliness;
- Digital by design;
- Proportionality;
- Equality, impartiality and transparency;
- Confidentiality, and
- Accountability.

More recently, the Organization on Economic Cooperation and Development (OECD) has made a concerted effort to develop a comprehensive and coherent set of principles for service design and delivery[26]. These principles are organized into three pillars:

- **Prioritizing User Needs**: Services should be designed and delivered with a user-centric focus, placing the needs of citizens above the interests of government. It emphasizes the importance of understanding user needs and involving them in the service design process. Clear language, reduced data submission barriers, and readily accessible information are crucial for service accessibility. The use of an omni-channel approach, simplified public services, user-friendly digital identity solutions, and leveraging administrative data for design and assessment are also recommended for effective service delivery.[27]

22 Charter of Fundamental Rights of the European Union, https://eur-lex.europa.eu/legal content/EN/TXT/?uri=CELEX: 12012P/TXT, Article 41, which is directly applicable only to the institutions and civil servants of the EU.
23 OECD, 2017, The Principles of Public Administration for EU Candidate and Potential Candidate Countries, Section on Service Delivery.
24 Ibid, p64.
25 Thijs, N., I. Mackie and M. Krievins (2022), "Service design and delivery in the European Neighbourhood Policy East region: A comparative report on designing and delivering administrative services in Armenia, Azerbaijan, Georgia, Moldova and Ukraine", SIGMA Papers, No. 64, OECD Publishing, Paris, https://doi.org/10.1787/c6debcce-en.
26 OECD (2022), "OECD Good Practice Principles for Public Service Design and Delivery in the Digital Age", OECD Public Governance Policy Papers, No. 23, OECD Publishing, Paris, https://doi.org/10.1787/2ade500b-en.
27 Ibid, p 8.

- **Service Delivery with Impact, at Scale, and with Pace**: this pillar focuses on creating an adaptive and user-centric culture within teams, with autonomy, diverse skills, and access to necessary tools and training. Continuous exploration and experimentation, use of performance data, and regular updates to services based on quantitative and qualitative data are emphasized. Implementation of transparent mechanisms, shared tools, standard processes, and professional networks for knowledge sharing are recommended, along with the availability of data, information, and code for sharing and reuse.

- **Transparency in Service Design and Delivery:** this pillar emphasizes open collaboration, transparency, and the publication of quality standards and performance indicators. It highlights the importance of clear information, security, privacy, avoiding bias, and ensuring universal access to services. It also encourages the identification of a political champion, improvement of digital government skills, establishment of monitoring systems, and equipping public servants with necessary digital skills to drive vision and change in service design and delivery.

In addition, SIGMA proposes a framework to manage service design and delivery reflecting a number of principles as in the mentioned OECD good practice principles. Such a framework revolves around understanding user needs, simplifying and streamlining services, life events, digitalization and monitoring and evaluation.[28]

In Kosovo, LGAP[29] establishes the principles of proportionality; legitimate and reasonable expectations; open administration; non-formality and efficiency, the principle of gratuity as well as other general prin-

> In Kosovo, Law on General Administrative Procedure (LGAP) establishes the principles of proportionality; legitimate and reasonable expectations; open administration; non-formality and efficiency, the principle of gratuity as well as other general principles.

ciples. The ABPRP promotes the principles of once only, personalization, proactive delivery and digital by default.[30] It further goes to establish a number of elements in terms of optimizing services through simplification of mandatory information, payment, documents, waiting time, validity of information and administrative conditionality.[31] Additionally, the e-Government Strategy promotes the principles of digital by design, data driven, interoperability by design, user-driven and inclusive, once only, multi-channel delivery, trust and privacy and open innovation.[32]

3.2 User-oriented framework for service design and delivery in Kosovo

In order to effectively prioritize interventions, it is crucial to establish a comprehensive framework that encompasses both the desired state of service design and delivery, and facilitates the adoption and utiliza-

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28 Thijs, N., I. Mackie and M. Krievins (2022), "Service design and delivery in the European Neighbourhood Policy East region: A comparative report on designing and delivering administrative services in Armenia, Azerbaijan, Georgia, Moldova and Ukraine", SIGMA Papers, No. 64, OECD Publishing, Paris, page 72 https://doi.org/10.1787/c6debcce-en. We have adopted this framework to the Kosovo context when assessing progress in service design and delivery.
29 Law on General Administrative Procedure: https://gzk.rks-gov.net/ActDetail.aspx?ActID=12559.
30 ABPRP, p 7.
31 Ibid, p 9.
32 e-Government Strategy, p 5.

tion of strategic principles, tools, and instruments. It is important for such a framework to be adaptable to local needs and sensitivities, acknowledging the unique context of the specific region. This framework should serve as a guide for establishing benchmarks and implementing interventions to enhance service design and delivery.

We propose that such a framework can be established drawing on best practice, exemplified in the above OECD and EU efforts. To commit to the local context, this framework needs to also properly reflect the national frameworks, focusing mainly in the Law on General Administrative Procedure, Law on Permit and Licence System, Cyber-Security, Data protection, as well as on the strategic framework, focusing mainly on the NDS/P, PARS, ABPRP and e-Government Strategy, which deal directly with the service delivery.

In light of these mechanisms, we propose a framework that strives to achieve the following objectives:

- Gain a comprehensive understanding of user needs and preferences.
- Simplify and streamline public services to enhance accessibility and efficiency.
- Promote digitalization as a means to improve service delivery.
- Establish robust monitoring and evaluation mechanisms to assess progress and effectiveness.

To successfully meet these overarching objectives, it is imperative to implement and utilize long-term key principles, instruments, and arrangements, as detailed below.

Understanding user needs and preferences:[33] Public bodies need to invest effort in understanding the needs, attitudes, interests, and preferences of users. This understanding can be gained through various research mechanisms such as surveys, inter-

views, focus groups, and observation. User feedback mechanisms, including complaints and suggestions, provide valuable insights. Mechanisms to track user satisfaction levels and involve users directly in service design are also important. Paying attention to the needs of disadvantaged groups is crucial for inclusive service design and delivery. Advanced techniques like customer journey maps or life events can be employed to gain a deeper understanding of user experiences.

Key elements to assess the implementation of this objective area in the Kosovo service delivery ecosystem:

- Research: Surveys, interviews, focus groups, etc.
- User feedback: Complaints, suggestions, reactions.
- User satisfaction tracking: Measuring satisfaction levels.
- Co-design methodologies: Customer journey maps, design thinking, etc.
- Use of life events approach, where appropriate.

Simplifying and streamlining administrative processes: [34] Once public institutions understand user needs, they can develop plans to redesign services by simplifying and streamlining administrative processes. The goal is to remove burdens, reduce costs, and provide efficient services. In Kosovo, the ABPRP plays a significant role in simplifying and streamlining services. Introduction of service quality frameworks, including defining service quality standards such as response time, waiting time, and other relevant metrics, is essential.

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33 Thijs, N., I. Mackie and M. Krievins (2022), "Service design and delivery in the European Neighbourhood Policy East region: A comparative report on designing and delivering administrative services in Armenia, Azerbaijan, Georgia, Moldova and Ukraine", SIGMA Papers, No. 64, OECD Publishing, Paris, p 72. https://doi.org/10.1787/c6debcce-en.

34 Ibid. The added elements are a combination of the OECD best practice principles and ABPRP.

Key elements of this principle:

- Implementation of 'once only'.
- Timely delivery of services.
- Gratuity.
- Accessibility.
- User support and information.
- Service quality standards.

Digitalization:[35] Digitalization provides users with convenient access to services and enables multi-channel delivery. Digitalization should be based on a "digital by default" approach, allowing users to access services online. It also opens up possibilities for personalization and proactive service delivery.

Key elements to assess in terms of digitalization:

- Digitalization status, including:
  - Online submission.
  - Online payment.
  - Automatic interoperability.
  - Online processing.
  - Online notification.
  - Digital outputs.

- Functioning of multi-channel delivery: Assessing the channels available for users to access services. There will always be users who need to access services in analogue fashion. Hence a multi-channel delivery system needs to be in place to ensure all are guaranteed access.

Monitoring and evaluation[36]: To enhance service delivery, it is crucial to have a robust monitoring and evaluation framework in place. This framework should include specific Key Performance Indicators (KPIs) to measure progress and achievements. The framework may comprise individual KPIs or comprehensive systems like the PARS. Key elements of monitoring and evaluation:

- Monitoring and evaluation framework: Specific mechanisms, such as KPIs or comprehensive systems, such as strategic document implementation arrangements or regulatory impact assessment measures.
- If monitoring and evaluation is in place, the following dimensions should be investigated:
  - Efficiency and effectiveness of service delivery.
  - User satisfaction, and service quality.3

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35   Ibid. The elements are based on forthcoming report by IFC, developing AS IS and TO BE digitalization maps for 30 services in Kosovo.
36   Ibid. Elements adapted to Kosovo needs.

4. Towards user-oriented services

This section will focus on assessing a select number of services provided by the following institutions:

- Ministry of Trade, Industry, and Entrepreneurship (MTIE), through its Agency on Business Registration (KBRA), in the area of business registration;
- Regulatory Authority of Electronic and Postal Communications (RAEPC), in the area of electronic communications, and
- Municipality of Ferizaj, in the area of civil status.

The assessment will focus on alignment of the relevant legislation with the ABR related principles of the LGAP, focusing on proportionality and gratuity. Moreover, the next sections will also investigate the progress achieved as per the above framework, as well as will offer recommendations for improvement to respective institutions.

4.1 Business registration services

4.1.1 General information on service delivery

MTIE, through KBRA, plays a critical role in providing services related to business registration. This section focuses on the services of **initial registration** and **information amendment** for the following services:

1. Individual Business;
2. General Partnership;
3. Limited Partnership;
4. Limited Liability Company;
5. Joint Stock Company;

6. Branch of a Foreign Business Organization, and
7. Representative Office of a Foreign Business Organization.

Moreover, this section will also cover the **deregistration of individual businesses.**[37]

These services are presented as a group due to the similarity in the procedure of service provision, which involves the same steps and processes. The only distinguishing factor among the services is the required documentation for submission.

The legal foundation for these services is established in the Law 06/L-016 on Business Organizations[38], and further elaborated in the AI (MTI) No 01/2021 on Registration of Business Organizations and AI (MTI) No 01/2020 on Deregistration of Business Organizations.[39] The Law establishes a legal framework defining various types of business organizations eligible to operate in the country. It sets out the registration and deregistration procedures and requirements for each type of organization. The law aims to create a transparent and efficient business environment, ensuring compliance with legal obligations and clarifying the rights and responsibilities of shareholders, representatives, owners, directors, managers, and third parties involved in business activities.

The Law on Business Organization in Kosovo is currently under review. In 2022, the Government of Kosovo (GoK) approved a concept document that serves as a basis for the revision.[40] A working group, consisting of the MTIE and other relevant bodies, is currently in the process of preparing a draft law based on the approved concept document.

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37 Deregistration of other business is not included in the Kosovo Service Catalogue; hence they are not dealt with here.
38 Law on Business Registration: https://gzk.rks-gov.net/ActDetail.aspx?ActID=16426&langid=2.
39 AI on Business Registration: https://gzk.rks-gov.net/ActDetail.aspx?ActID=43416.
40 Concept Document on Business Organizations, 2022, https://kryeministri.rks-gov.net/blog/koncept-dokumenti-per-shoqerite-tregtare/.

Alignment with LGAP[41]

The legislative framework governing the registration of business organizations is broadly in line with the principles established in the LGAP,[42] including the principles of lawfulness and proportionality, non-formality and efficiency (Article 4, 5 & 10 LGAP). The relevant procedures are clearly outlined, including the necessary documentation required for the purposes of registering a business organization. According to the Law on Business Organizations[43], the initial registration as well as any amendments to the existing data in the Registry, are to be made through submission of application at any KBRA Registration Centre, or electronically. KBRA does not have the right to reject initial registration or subsequent amendments, if the application and the necessary documents have been submitted as prescribed by law. The law prescribes rather short deadline, namely two days,[44] within which the business shall be registered by the KBRA, providing for additional time in cases when the application is unclear or incomplete. This is in line with the LGAP timely delivery requirements as established in Article 98.

With respect to the fees to be applied by the KBRA, the Law provides that business organizations will not be required to pay any service fees during initial registration or deregistration,[45] thus reflecting the principle of gratuity as outlined in Article 12 LGAP. Whereas, the Minister is to determine other service fees in a sub-legal, ensuring that the same are determined in accordance with the principle of administrative cost recovery and do not place undue burdens or impediments in registering or amending the registration of Business Organizations.[46] Accordingly, the respective AI provides a fee varying from 0 to 5 Euro for KBRA services.[47]

Service submission requirements and procedure

Interested parties may apply for this service at any of the KBRA offices located in municipalities throughout the country or through an online system.

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41 In this section only areas of LGAP related to Administrative Burden Reduction, as defined by ABPRP, will be assessed.
42 See Law No. 06/L-016 on Business Organizations and the relevant secondary legislation deriving from this law, including amongst others Administrative Instruction No. 01/2021 on the registration of business organizations; Administrative Instruction No. 12/2022 on determination of fees for services provided by the Business Registration Agency
43 See Article 17
44 See Article 17.5
45 See Article 14.2
46 See Article 14. 4
47 Administrative Instruction No. 12/2022 on determination of fees for services provided by the Business Registration Agency

As regards *business registration*, the applicant needs the following documentation to apply at KBRA:

Service	Individual Business	General Partnership	Limited Partnership	Limited Liability Company	Joint Stock Company	Branch of a Foreign Business Organization	Representative Office of a Foreign Business Organization
Required Documents	Application form	Application form	Application form	Application form	Application form	Application form	Application form
	Copy of ID Card	Copy of ID Card	Copy of ID Card	Copy of ID Card	Copy of ID Card	Copy of ID Card	Copy of ID Card
		Agreement of General Partnership	Agreement of Limited Partnership	Statute	Statute	Registration certificate (from country of origin)	Registration certificate (from country of origin)
				Incorporation agreement	Incorporation agreement,	Decision on Opening branch	The decision establishing an office in Kosovo

TABLE 1: Document submission requirements for business registration

On the other hand, in o rder *to amend information in a registered* business, the applicant needs to submit the following documentation: [48]

Service	Individual Business	General Partnership	Limited Partnership	Limited Liability Company	Joint Stock Company	Branch of a Foreign Business Organization	Representative Office of a Foreign Business Organization
Required Documents	Relevant Form	Relevant Form	Relevant Form	Relevant Form	Relevant Form	Relevant Form	Relevant Form
	Copy of ID	Copy of ID (owner, authorised person, proxy)	Copy of ID (owner, authorised person, proxy)	Amended statute	Copy of ID (owner, authorised person, proxy)	Copy of ID (owner, authorised person, proxy)	Copy of ID (owner, authorised person, proxy)
	Payment Slip	The decision for amending data or agreement	Decision to amend data or agreement	Text of amended Statute	Decision on amendment of Statute	Decision to amend data	Decision to amend data
		Text of amended agreement	Text of amended agreement	Copy of ID (owner, authorised person)	Text of amended statute	Text of amended document	Payment Slip
		Original Business Certificate returned or invalid declaration in local newspaper	Original Business Certificate returned or invalid declaration in local newspaper	New owner's ID card copy	New shareholders' ID card copies	Copy of registration certificate	
		Payment Slip	Payment Slip	Original Business Certificate returned or invalid declaration in local newspaper	Original Business Certificate returned or invalid declaration in local newspaper	Personal identification document of the authorized representative or the authorized proxy	
				Payment Slip	Payment Slip	Payment Slip	

TABLE 2: Document submission requirements for change of business information.

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48   Retrieved from: https://gzk.rks-gov.net/ActDetail.aspx?ActID=43416.

Moreover, *to deregister* an individual business, the applicant needs a copy of personal ID card and a confirmation by TAK certifying payment of outstanding tax debts.

Registration services provided by the KBRA are free of charge, while there is a modest fee (0-5EUR) for information amendment services. The entire procedure for these services is completed within two days, and parties have a 30-day window to file a complaint if needed. The output documents generated through these services have an indefinite validity period.

4.1.2 User oriented service delivery in area of business registration

Understanding user needs

For all services covered, KBRA relies solely on user feedback mechanisms to understand user needs and preferences when it comes to delivering the above services. These include a physical complaints box and an online platform for rating user satisfaction.[49] No user satisfaction rating elements are included in the online system. However, it is unclear how this valuable information is used to shape service design and delivery.

One of the few opportunities for users to present their input is through the regular public consultation processes, when legislation is amended. Most recently, a Concept Document on Business Organizations has been produced by MTIE, but only limited feedback was provided by service users. Unfortunately, none of the other instruments of research or feedback from users is used effectively.[50]

Overall, KBRA is at an early stage in terms of utilizing the mechanisms for research, user feedback and user satisfaction tracking. Use of other techniques, such as customer journey mapping or design thinking have not yet been introduced.

Simplification and streamlining

Once only: KBRA has successfully simplified the service process by requiring only a limited number of documents for the above services. As can be seen in Tables 1 and 2, for all applications, copies of ID card are required, as well as documentation produced by the applicant themselves (partnership agreements, statutes, decisions to change data etc). The only document requested, which is delivered by another institution is the TAK certificate. This indicates a relatively high focus on the principle of proportionality, by limiting submission requirements to only the most essential documents needed. The fact that the issued certificates have indefinite validity, further confirms the commitment to the proportionality principle.

However, one aspect that can be improved in achieving compliance with the "once only" principle is the automatic interoperability between KBRA and TAK. Currently, when confirmations are required from TAK, they need to be presented to KBRA by the applicant, in cases when major changes or deregistration is requested. Work is underway to remove this barrier, by allowing the KBRA staff get direct information from TAK systems.[51]

One persistent issue regarding the "once only" principle is the requirement for users to submit original documents despite having already uploaded scanned copies during the online application process. This duplication of effort contradicts the efficiency and convenience that the principle aims to achieve.[52] The approved Concept Document preceding the amendment of the Law on Business Organizations, envisages the need to allow for full digitalization of business registration services, including by addressing the need for applicants to present hard copies at the end of the online process.[53]

The lack of interoperability and the need to resubmit already scanned documents significantly impede the

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49 The user needs to follow this link https://opi.rks-gov.net/ to get to the page where they can express their rating, by checking one of the following: not satisfied, partially satisfied or fully satisfied.
50 Interviews with KBRA officials, May 2023.
51 Ibid. This is also envisaged in the Concept Document on Business Organization, p18.
52 Ibid,
53 Concept Document on Business Organization, 2022: https://kryeministri.rks-gov.net/blog/koncept-dokumenti-per-shoqerite-tregtare/, p20.

effective implementation of the "once only" principle. Hence, KBRA is at an early stage in complying with the once only principle.

Timely delivery: When it comes to timely delivery, the turnaround time is 2 days. The response time to an inquiry by users takes on average a few hours. If the user faces any issues related to the issued certificates, they may file a complaint with the head of KBRA, within 30 days. The services covered here are by and large in line with the timely delivery provisions of the LGAP.

Gratuity: The business registration services are provided free of charge and are fully in line with the gratuity principle. On the other hand, charges of 0.5 to 5EUR are established for the amendment of information, in line with the AI (MTIE) No 12/2022, on Determination of Fees for Services provided by KBRA.[54] Article 1(2) establishes that the fees are set at a minimum necessary level, and not add to the administrative burden. Article 2(1) goes further to explain that such fees are only set based on the types of services provided and not on the turnover or capital of the applying business. It is clear that these provisions aim at providing justification on the set fees, but no explanation is provided on why the same fees do not apply for registration or deregistration, but only in cases of information change.

It can be established that there has been progress in terms of applying the principles of fee proportionality, but the ambiguities surrounding the fees for information amendment hinder the full compliance with the gratuity principle. Nevertheless, such fees are modest, and have been set due to large demand by users (only in 2022, 25 thousand applications for data amendment have been filed).[55]

Overall, there is good progress in complying with the gratuity principle, when it comes to the provision of the listed services.

Accessibility: While the KBRA services partially meet the principle of accessibility by offering services in languages spoken by ethnic minorities, there are no reported mechanisms in place to facilitate access for other disadvantaged groups, such as people with disabilities.

Regarding the gender perspective in service design and delivery, it is worth noting that Article 34 of the Law on Business Organizations sets a requirement for Joint Stock Companies (JSCs) to have a certain percentage of women on their boards. Initially, the law states that 40% of board members should be women, with a goal to increase this percentage to 50% within two years of the law's implementation. This provision aims to promote gender equality and representation in corporate governance. However, it has come to attention that the implementation of this requirement has presented challenges in registering JSCs. As a result, the newly adopted Concept Document foresees that the relevant article is amended, whereby the gender quota is established as non-mandatory.[56]

Overall, there is some progress in terms of complying with accessibility principle.

Service quality standards: KBRA currently does not utilize service quality standards like CAF (Common Assessment Framework) or similar methodologies.[57] There is a lack of published service standards related to waiting time, service delivery time, and other dimensions both on the relevant website and within the premises of the organization in question. This absence of clearly defined service standards can impact transparency and customer expectations.

Overall, KBRA is at an early stage in terms of development and use of service quality standards.

User information and support: Information on the documentation, fees and procedures are published in the KBRA website and the Central Registry on Permits and Licenses portal.[58] The website of KBRA provides

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54   AI on Fees for Services provided by KBRA, 2022: https://gzk.rks-gov.net/ActDetail.aspx?ActID=65566.
55   Interviews with KBRA officials, May 2023.
56   Concept Document on Business Organization, 2022, p25.
57   CAF is suggested under PARS Strategy, under Service Delivery actions.
58   KBRA: https://arbk.rks-gov.net/Page.aspx?id=1,33, Central Registry of Permits and Licenses: https://lejelicenca.rks-gov.net/.

clear and consistent information regarding business registration, aligning with the latest legislation. Users can find concise and user-friendly information on the process of registering a business.

However, it has been observed that the information pertaining to data amendment is not always in line with the relevant AI on BO Registration.[59] This discrepancy suggests a potential inconsistency or outdated information in relation to the specific process of amending data. It is crucial for the website to ensure that all information, including data amendment procedures, is accurate and up to date.

Additionally, while the information presented on the website is concise, clear, and in a user-friendly format, it lacks in providing support information and indicating the date of the last update. Including support information, such as contact details or FAQs, can be helpful for users who may have further questions or need assistance with the registration process. Moreover, indicating the date of the last update allows users to determine the currency of the information and ensures they are accessing the most recent guidelines. [60]

The Central Registry on Permits and Licenses has been found to have incomplete information, as it does not cover all the services related to business registration. Additionally, the portal's navigation is challenging, making it cumbersome for users to locate the relevant information they need. The information on business registration is scattered and lacks effective filtration options[61], which adds to the difficulty of finding specific details.[62]

User support during the time of application, review and issuance is provided through the online system and email. As already indicated the current version of the KBRA website and systems provide video and written manuals for use of online system, while problem-solving support is provided through a list of officials per municipality and contact details. While this information is not easy to find, KBRA is in the process of re-designing their website, also in line with the SDGR requirements.[63]

Overall, KBRA has made some progress in terms of user information and support.

Digitalization

KBRA has made progress in digitalizing its services, with a current ratio of 40% in-person and 60% online submissions. However, financial constraints and technical issues prevent the full exposure of the service on E-Kosova.[64] KBRA reports that all stages of digitalization are operational in the relevant system, expect for automatic interoperability and online payment.

As mentioned, KBRA only requires interoperability with the Tax Administration (TAK) and court systems for verifying information related to business registration, data amendment, or deregistration. Other documents and information can be provided directly by the applicants themselves.

In terms of multi-channel delivery, KBRA is committed to continuing with the online and in person delivery of its services.

Overall, there is some progress in terms of digitalization and multi-channel delivery, related to the listed services.

Monitoring and evaluation

KBRA has not implemented specific mechanisms for monitoring or evaluating its services. No KPIs are defined to monitor progress in terms of service delivery.

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59   See especially information sections where a copy of the business certificate is required, which is not included in the AI.
60   UNU-EGOV, 2023, Comparative Study on the Digitalisation of Public Service Delivery in the Western Balkans (WB), the Eastern Partnership (EaP) and Beyond, P29.
61   For example, to find the business registration information the user needs to filter either by institution, law or activity. The filtration by activity renders business registration services under 'other activities services.
62   One of the main good practice principles put forward by OECD, is that 'users do not need to know the internal structure of public service providers'. Please refer to OECD (2022), "OECD Good Practice Principles for Public Service Design and Delivery in the Digital Age", *OECD Public Governance Policy Papers*, No. 23, OECD Publishing, Paris, https://doi.org/10.1787/2ade500b-en. P8.
63   Interviews with KBRA officials, May 2023.
64   Interviews with KBRA officials, May 2023.

Monitoring is chiefly done as part of the overall work plan of the Agency. Evaluation is only performed when completing regulatory impact assessment, as part of preparation of concept documents preceding law amendments.

KBRA is at an early stage of using monitoring and evaluation for service delivery.

Overview of implementation of service delivery principles and instruments

The following table provides an overview of the current status of implementing the principles and instruments aimed at achieving the primary objectives of user-oriented service delivery in area of business registration:

Service	Research mechanisms	Feedback mechanisms	User satisfaction tracking	Co-design	Once only	Gratuity	Timely delivery	Accessibility	Service quality standards	User information	User Support	Multi-channel delivery	Digitalization status	Monitoring and evaluation
1 Registration of Individual Business (IB)	Red	Orange	Red	Red	Red	Green	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
2 Registration of General Partnership (GP)	Red	Orange	Red	Red	Red	Green	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
3 Registration of Limited Partnership (LP)	Red	Orange	Red	Red	Red	Green	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
4 Registration of Limited Liability Company (LLC)	Red	Orange	Red	Red	Red	Green	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
5 Registration of Joint Stock Company (JSC)	Red	Orange	Red	Red	Red	Green	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
6 Registration of Foreign BO Branch (FBOB)	Red	Orange	Red	Red	Red	Green	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
7 Registration of Foreign Bo Representative Office (FBRO)	Red	Orange	Red	Red	Red	Green	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
8 Change of IB data	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
9 Change of GP data	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
10 Change of LP data	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
11 Change of LLC data	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
12 Change of JSC data	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
13 Change of FBOB data	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
14 Change of FBRO data	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Orange	Orange	Red
15 Close of IB	Red	Orange	Red	Red	Red	Green	Orange	Orange	Red	Orange	Orange	Orange	Orange	Red

Early stage	Red
Some progress	Orange
Good progress	Green

TABLE 3: Business registration current state of play in implementation of principles and instruments on service design and delivery

4.2 Electronic and Postal Communications Services

4.2.1 General information on service delivery

The Regulatory Authority of Electronic and Postal Communications (RAEPC) is responsible for regulating and overseeing the electronic and postal communications sector, ensuring that services provided are of high quality and meet industry standards.

The following services provided from this institution, have been selected to be assessed:

- Individual authorizations for radio frequencies (IARF);
- General authorizations for electronic communication (GAEC);
- Decisions of numbering (DN), and
- Postal services authorizations (PS).

The legal foundation for the provision of individual authorizations for radio frequencies can be found in Law No. 04/L-109 on Electronic Communications, specifically in Chapter III, encompassing Articles 15 to 18. Additionally, Regulation No. 22 on Use of Radio Frequencies also serves as a relevant legal framework.[65]

General authorizations for electronic communication are also established by the above law, as well as Regulation No. 37 on General Authorizations. On the other hand, the legal basis for decisions on numbering is in the Law as well as the Regulation No 50 on the National Plan on Numbering.[66] The postal service authorizations are delivered in line with the Law on 06/L-038 on Postal Services, supported by the Regulation No 41 on Authorizations for Postal Services[67]

The Law on Electronic Communications is under review, whereby the Government adopted a Concept Document on Code of Electronic Communications, which, amongst others, intends to harmonize Kosovo's legislation with the EU Directive on Code of Electronic Communications.[68]

Alignment with LGAP[69]

The legislation regulating the listed services is broadly in line with the LGAP requirements. As regards LGAP requirements on proportionality, the RAEPC Regulations establish a clear list of documents and procedure for obtaining relevant authorizations.[70] When it comes to document validity, most are indefinite, with the exception of the authorizations for radio frequencies and certain numbering decisions (1-4 years).[71] The legal requirements for the once only principle as envisaged by Article 86 of LGAP, are not explicitly established in the legislation.

When it comes to timely delivery as established by LGAP Article 98, deadlines are set in the relevant regulations from 5 to 42 days, which indicates alignment.[72] As regards the possibility of electronic communication as established in Article 73 of LGAP, this is explicitly referred to in the secondary legislation, which also indicates growing levels of alignment.

Finally, with regards to the gratuity principle as established in Article 12 in LGAP, the legal framework clearly determines that no fees are required for the application process for any of the services.[73] Nevertheless, for some of the provisions related to compliance costs, no clear linkage with the LGAP requirements could be established.[74]

65   Law on Electronic Communication: https://gzk.rks-gov.net/ActDetail.aspx?ActID=2851&langid=2, and Regulation No 37 on General Authorizations: http://www.arkep-rks.org/repository/docs/Rregullore%20Nr%2037%20-%20për%20Autorizimet%20e%20Përgjithshme.pdf.
66   Regulation No 50 on the National Plan on Numbering: http://www.arkep-rks.org/?cid=2,30.
67   Law on 06/L-038 on Postal Services: https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=18419.
68   Please refer to Kosovo Concept Document on Code of Electronic Communications, at: https://kryeministri.rks-gov.net/blog/koncept-dokumenti-per-kodin-e-komunikimeve-elektronike/and Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code, at: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1547633333762&uri=CELEX%3A32018L1972.
69   In this section only areas of LGAP related to Administrative Burden Reduction, as defined by ABPRP, will be assessed.
70   Regulation 22, Article 3; Regulation 37, Article 9; Regulation 41, Annex 1; Regulation 50, Annex 5.
71   Regulation 50, Articles 4 and 5; Regulation 22, Article 9.
72   Deadlines for service delivery are set as in the following: Regulation 22, Article 4 (4); Regulation 37, Article 5; Regulation 41, Article 8 and Regulation 50, Article 5(5).
73   Regulation 57, Article 15(1); Regulation 37, Article 4(4); Regulation 41, Article 8(7) and Regulation 50, Article 5.
74   Please refer to section on compliance with the gratuity principle below, for a detailed account.

Service submission requirements and procedure

Individual authorizations for radio frequencies: The service does not currently have an online system for application submission, although digital documents can be sent to RAEPC. To apply for the service, users are required to provide several documents, including:

1. An application form,
2. A request for the use of radio frequencies,
3. A valid business certificate,
4. A license issued by IMC (Independent Media Commission) for radio diffusive services, where applicable, and
5. A license of operation issued by MIA (Ministry of Internal Affairs) for security services, where applicable.

There is no administrative fee for the license. Around 170 such services were delivered in 2021.

The service is processed and delivered within a timeframe of 42 days from the date of application submission. In the event of any concerns or complaints, users have the right to file a formal complaint within 30 days. The issued authorization has a validity period of 1 to 4 years.

General authorizations for electronic communication: Users need to notify RAEPC for their start of activities in electronic communications. Users can enter such notification in the online system.[75] In order to complete the notification, certain documentation is required, including:

1. Relevant notification form,
2. Valid business registration certificate, and
3. Comprehensive information pertaining to the business itself.

No administrative fees are required for this procedure. The procedure can be conducted either online or in

person. If there are no issues in terms of the notification, RAEPC registers the enterprise in the relevant registry, and confirms such registration to the operation within 5 days, without incurring any charges. Furthermore, it is worth noting that the authorization has an indefinite validity period.

Users have the right to file a formal complaint within 30 days from the date of its issuance.

Decisions on Numbering: applications can be submitted through email and in person. In order to apply, the applicant needs to provide the following:

1. Request specifying the reasons for application;
2. Business registration number;
3. Application;
4. Numbering resources requested;

The service is to be delivered in 21 days, while complaints may be filed during 30 days. Around 140 such services have been delivered in 2021.

Authorizations for postal services: the application can only be submitted in person. The following documents are needed to apply for this service:

1. Application;
2. Business registration certificate and information on business;
3. Certificate of fiscal number;
4. Court of law proof that there is no legal obstacles in exercising activities in postal services;
5. Business Plan;
6. Data on work and warehouse premises.

Application fees do not apply, while the service needs to be delivered within 15 days. Any complaints may be filed within 30 days of issuing the license.

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75   http://aplikime.arkep-rks.org/SQ.

4.2.2 User oriented service delivery in electronic communications and postal services

Understanding user needs

Bottom of Form

Except for surveys for GAEC, no other research mechanisms are used to understand the needs and preferences of the users for any of the electronic and postal services.

In order to gain a comprehensive understanding of the users' needs regarding this service, the current approach primarily relies on inspections for IARF. Due to the relatively low number of authorizations issued on an annual basis, the institution relies heavily on in-person interactions during these inspections to gather insights into user requirements. On the other hand, for GAEC, RAEPC reports use of regular surveys to get information on user satisfaction. No other satisfaction or feedback mechanisms are reported for the other services delivered. RAEPC services do not currently feature in the E-Box system, which denies users the opportunity to present their satisfaction ratings. This absence represents a missed opportunity, even though it may be a relatively small one, for users to provide valuable feedback on public services.

The newly adopted Concept Document on Electronic Communications Code seeking to amend the Law on Electronic Communications has undergone public consultations recently, but minimal feedback was provided by the target audience.[76] Nevertheless, before adoption of Regulations, RAEPC ensures consultation with service users, whereby each comment is addressed by RAEPC, including reasoning for accepting or rejection.[77] This is a good source of information on users' needs and preferences which seems to influence to a certain degree service design, especially with regards to fees and charges.

Nevertheless, when it comes to understanding user needs, the listed services are still at an early stage.

Simplification and streamlining

Once only: The requirement of a business registration certificate poses a challenge in implementing the once-only principle, as it necessitates submitting duplicate information. The once only principle is not applied for any of the listed services. Users need to provide information from other institutions (such as KBRA, IMC and MIA) when applying for the services at hand. In terms of the reusability of the information, this is not practiced by RAEPC, for any of the services listed.

The Concept Document on Electronic Communications Code seeks to further consolidate proportional regulatory obligations on economic operators, which will then be reflected in the secondary legislation covering the listed services.[78]

Due to the limited level of digitalization in the listed public services, achieving technical interoperability is challenging. As a result, the current implementation of the once-only principle is not feasible.

Timely delivery: All of the services ensure timely delivery by providing the outputs within 4 to 21 working days, aligning with the requirements of the LGAP. Similarly, the provision for filing complaints within 30 days adheres to LGAP guidelines. As regards, response to user inquiries, it usually does not take more than a day.

Overall, good progress has been made in the area of timely delivery for the listed services.

Gratuity: No administrative fees apply for any of the listed services. Any such fees have been removed in the recent years, indicating growing commitment towards the gratuity principle.

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76 Please refer to the following for a detailed account on the feedback received during the consultation process: https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41683.

77 See for example a consultation report for Regulation No 57 on Annual Payment and Right of Use for Radio Frequencies, which lists all comments received by active enterprises and responses by RAEPC. RAEPC uses this good practice for all secondary legislation it adopts. For a detailed account follow this link: https://www.arkep-rks.org/NewsEvent/9.

78 Concept Document on Code of Electronic Communications, 2023, p31. https://kryeministri.rks-gov.net/blog/koncept-dokumenti-per-kodin-e-komunikimeve-elektronike/.

Nevertheless, the legislation in place, allows for implementation of a fee system as in the following:

Individual Authorizations for Radio Frequencies: Regulation No 57 on Annual Payments for Supervision and Right of Use of Radio Frequencies, which establishes that three kinds of payment are to be implemented:

1. Annual payments for supervision of use of radio frequencies;
2. Annual payments for assigning the right to use for radio frequencies and
3. One off payment.[79]

The Law on Electronic Communication Article 57(2) establishes that such payments are made with the view to ensuring optimal use of radio frequencies.[80] The legislation remains silent when it comes to clarifying if the proceedings from such payments are dedicated also for administrative costs for RAEPC.[81] In 2021, EUR 1,561,272.07 for assignment/use of radio frequencies were levied from undertakings, which use radio frequencies for their own needs (such as security or taxi companies) and EUR 4,057,752.37 were levied on undertakings providing electronic communication such as Kosovo Telecom or IPKO.[82] Such fees were lowered by 30% in 2018 and another 40% in 2022.

General authorizations for electronic communication: Law on Electronic Communication Article 27(1) and the corresponding Regulation 45 on Market Supervision Payment for Electronic Communication and Postal Services, establish that undertakings with an annual turnover of more than EUR 100 thousand, need to provide an annual payment for supervision of electronic communications market. The Law clarifies that the proceeds of such fees will be used to cover the administrative costs for the Authority. EUR 329,438.11 were levied on electronic communication providers as

an annual payment for supervision of electronic communication market in 2021.[83]

Numbering Decisions: Regulation no. 50 on National Plan on Numbering, Article 8 establishes fees per number resources to be issued to electronic communication and network providers. This Regulation stipulates that the Authority will ensure such payments are justified in an objective, transparent, non-discriminatory and proportional manner.[84] EUR 311,347.50 were levied in 2021 in annual payment for numbering resources.

Postal service authorizations: Law on Postal Services, Article 28 establishes the need for postal service providers to pay to authority a fee not exceeding 0.5% of their annual turnover. EUR 44,371.12, were levied from such undertakings in 2021. The Law establishes clearly that the calculation of such fees will be based on the operational costs incurred to the Authority for meeting obligations deriving from the Law.[85]

In general, while no fees are incurred for administrative procedures, there are however substantive fees imposed on undertakings, in cases to cover administrative fees, and in others for granting the right to use of electronic communication resources (frequencies and numbers). While the Authority claims such fees are lowest in the region, and are intended to only cover costs for resources granted and costs incurred in ensuring market supervision, a clear overview on the linkage between fees and incurred costs is still unclear.[86] The intent to transpose the EU Directive on Code of European Electronic Communication, should establish an enhanced basis for imposing charges to undertakings for granting resources and to cover operational costs for the Authority.[87]

Overall, due to the fact that the fees for administrative procedures have been removed, substantive fees re-

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79 Regulation No 57, Article 2.
80 Law on Electronic Communication, Article 57(2).
81 While the Law on Electronic Communication and Regulation No 57, remain silent in clarifying if these particular charges are intended to cover administrative costs for RAEPC, it is clear when it comes to annual payment for General Authorizations for Electronic Communications, as in Article 27 (1), where it states that such fees are to cover administrative costs of the Authority.
82 RAEPC Annual Work Report, p93: https://www.arkep-rks.org/NewsDetails/89/504.
83 Ibid.
84 Regulation no 50 on National Numbering Plan, Article 8.
85 Law on Postal Service, Article 28 (1).
86 Interviews with RAEPC staff, May 2023.
87 Interview with ME official, June 2023.

duced over time and the intent to harmonize with the relevant *acquis,* indicate that RAEPC have been making some progress towards the gratuity principle.

Accessibility: The majority of the direct service users of RAEPC's administrative procedures are legal entities. The organization has focused primarily on providing services in official languages without implementing any additional measures to ensure accessibility.

Nevertheless, given the regulatory nature of the institution, it has established safeguards for economic operators to ensure universal services without discrimination.[88] Furthermore, the newly adopted Concept Document commits to harmonization with the EU Electronic Communications Code, which in turn, promotes access and interconnection, non-discrimination, net neutrality and universal service.[89] Integration of principles on universal services in Kosovo's legislation on electronic communications, including secondary legislation covering authorizations, will have a significant impact on improving accessibility to public services and addressing structural issues related to the digital divide.[90]

Overall, some progress has been achieved in terms of implementation of accessibility mechanisms in delivering the listed services.

Service quality standards: RAEPC currently lacks methodologies to ensure standardized service quality. There has been no efforts to introduction of the Common Assessment Framework (CAF) in the institution's service delivery efforts, as envisioned by the Public Administration Reform Strategy (PARS) and proposed by SIGMA. Consequently, no published standards or guidelines pertaining to waiting time, response time, or other service-related benchmarks have been documented by RAEPC.

Overall, RAEPC is at an early stage of implementation of service quality standards.

User information and support: As regards user information on service delivery, they are usually informed through the RAEPC website, email and in person meetings in the premises of RAEPC. Moreover, the RAEPC services are listed in the Permits and Licenses Registry, where information on application, payment and documents for application are presented.

Unfortunately, when it comes to the quality of the information surrounding services delivered, is not always user friendly and not easy to navigate. The information provided is not well structured and not easy to find. Insufficient information is provided on support if needed when applying for services offered.[91] Nevertheless, the recent upgrade of the RAEPC website is a step in the right direction, whereby the information on services is clearer and easier to navigate.

In contrast, the information on RAEPC services contained in the Permits and Licenses Registry, is clearer, better structured and easier to navigate.[92] Nevertheless, this information is outdated, as some of it is inconsistent with the information included in the legislation covering these services.[93]

When it comes to user support, email, phone calls and in person meetings are used to provide problem solving and support. The use of email to receive digital documents has made the need for in person communication less important in recent years. Given the low levels of digitalization, the utilization of all these instru-

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88   Law on Electronic Communication, Chapter V.

89   Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code. The transposition of this code into Kosovo legislation on electronic communication, will, inter alia, ensure legal measures to counter the effects of the digital divide, and as such also support the overall efforts at simplification and digitalization of public services.

90   e-Government Strategy identifies the unequal digital skills as one of the main problems towards digital transformation at large, but also for roll out of digital services.

91   Refer to Regulation (EU) 2018/1724 of the European Parliament and of the Council of 2 October 2018 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services and amending Regulation (EU) No 1024/2012, where in Article 9, a set of criteria are set on service rights, obligations and rules to be complied with when providing information on a number of services. Although, electronic and postal services are not targeted by this Regulation, it nevertheless is a good instrument to use as best practice when providing information to users.

92   https://lejelicenca.rks-gov.net/Search/Details/1823.

93   Survey and interviews conducted in May 2023. There is inconsistency especially in terms of fee charges for the RAEPC services.

ments indicates a growing commitment towards use of multi-channel user support.[94]

Overall, there is some progress in ensuring information and support to service users.

Digitalization

Of all the services, only GAEC is delivered partially through an online system. Such system allows submission, application review and decision making, as well as printing digital documents and applicant notification.

RAEPC predominantly delivers its administrative services in an in-person manner, with the exception of allowing applicants to submit information and communicate via email.

However, the organization acknowledges the importance of digitalization and has expressed its intention to digitize all mentioned services in the near to medium-term, subject to financial feasibility.[95]

Overall, RAEPC is at an early stage when it comes to digitalization for service delivery.

Monitoring and evaluation

RAEPC has not implemented specific mechanisms for monitoring or evaluating its services. No KPIs are defined to monitor progress in terms of service delivery. Monitoring is chiefly done as part of the overall work plan of the Authority Evaluation is only performed when completing regulatory impact assessment, as part of preparation of concept documents preceding law amendments.

Overview of implementation of service delivery principles and instruments

The following table provides an overview of the current status of implementing the principles and instruments aimed at achieving the primary objectives of user-oriented service delivery in area of electronic communication and postal services:

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94 APBRP promotes an omni-channel to user support services, including chatbots, voice communication, email, social media, SMS and co-browsing (p 21).
95 In recent years RAEPC attempted to implement a digitalization project for the whole institution, but the tendering procedures were not successful.

Service	Research mechanisms	Feedback mechanisms	User satisfaction tracking	Co-design	Once only	Gratuity	Timely delivery	Accessibility	Service quality standards	User information	User Support	Multi-channel delivery	Digitalization status	Monitoring and evaluation
1 Individual authorizations for radio frequencies (IARF)	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Red	Red	Red
2 General authorizations for electronic communication (GAEC)	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Red	Orange	Red
3 Decisions of numbering (DN)	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Red	Red	Red
4 Postal services (PS)	Red	Orange	Red	Red	Red	Orange	Green	Orange	Red	Orange	Orange	Red	Red	Red

Early stage	Red
Some progress	Orange
Good progress	Green

TABLE 4: RAEPC services current state of play in implementation of principles and instruments on service design and delivery

4.3 Civil Status Services (Municipality of Ferizaj)

4.3.1 General information on service delivery

The Municipality of Ferizaj is responsible for delivering a range of public services, including issuing civil status and registration documents, building permits, business licenses, and providing social services to citizens.

This section focuses on the following procedures:

1. Change of personal name;
2. Change of personal name after divorce;
3. Death certificate;
4. Proof of death;
5. Correction of personal name;
6. Late birth registration (over 12 years of age).

The above services are founded on the Law 04/L-003 on Civil Status, which regulates the civil status components and meaning for the citizens, foreign nationals and stateless persons, enjoying permanent or temporary residence. The Law defines the rules for creation, maintenance and change of such elements, including the organization of the civil status service.[96] Moreover, the change of personal names is based on the Law 02/L-118 on Personal Name, which regulates meaning, composition, procedure and manner for determination and use of personal name, as well as conditions for its correction.[97] Moreover, the proof of death service is based on the Law 03/L-007, on Non-Contentious Procedure, which rules of non-contentious proceedings on personal, family, property and other rights and legal interests of individual and legal persons.[98] There is also a range of secondary legislation shaping these services, such as AI 19/2015 on Conditions and Procedures for Personal Name Change and Correction,

96 Law on Civil Status: https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2743.
97 Law on Personal Name: https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2570.
98 Law on Non-Contentious Proceedings: https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2608.

as well as AI 24/2015 on Late Registration in the Civil Status Records.

Alignment with LGAP

The Law on Civil Status regulates the late registration of births outside of health institutions within the territory of Kosovo, with the procedure further detailed in the Administrative Instruction no. 24/2015 on late registration in the civil status registers. The Law also regulates the registration of death, which is detailed in the AI (MIA) no 17/2015 on Registration of Facts of Birth, Marriage and Death. As outlined above, some of the LGAP principles are reflected in the Law on Civil Status, including the right to legal remedies. The possibility of electronic application is not mentioned. The AIs outline a number of criteria for this type of registration, listing the required documents for such purpose. The deadline for processing and verification of application is listed,[99] however the deadline within which the competent authority must make the decision and finalize the registration is not explicitly mentioned, which raises questions as to the compatibility with Article 10 LGAP. While it is not clear if payment of a fee is necessary for this service, the Law provides for a fine ranging from 20 to 50 euro for late registration of births.[100]

The primary legislation governing personal names and their change has been enacted in 2008[101] and 2011[102] respectively, hence does not fully reflect the principles as contained in LGAP. Same goes for the Administrative Instruction outlining the requirements and procedure for the change of name, which came into effect in 2015.[103] The application for a name change must enclose a number of civil status documents, including the ID, birth certificate, extract from the central registry of the civil status, etc, which incur additional burden on the requesting party. This raises questions with regard to application of principles of non-formality and efficiency as outlined in Article 10 of LGAP. Further, the possibility for electronic application or inquiring re-

garding the status of the application is not mentioned. However, parties are provided with the right to appeal to the respective authorities, including judicial ones. Procedural issues, regarding complaints, including the deadlines, are to be carried out in accordance with the Law on Administrative Procedure. [104] Currently, the legal framework appears silent regarding the fees to be paid for this service. Finally, Law on Civil Status provides that administrative issues which are not regulated by the law itself, shall be governed by the provisions of the Law on Administrative Procedure.[105] Same applies for services of correction of personal name and acquiring previous name following divorce.

Service submission requirements and procedure

Change of personal name (including after divorce and name correction): this service allows for change of name or surname. The applicant needs to provide the following documents when applying:

1. Birth extract;
2. Certificate of marriage;
3. ID Card;
4. Archive confirmation;
5. Proof of not being part of criminal proceedings;
6. Proof that the applicant has no criminal past;
7. Certificate proving payment of property tax;
8. Proof from TAK that all taxes are paid;
9. Parent Certificate of residence (if applicant is a juvenile);
10. Parents declaration (if applicant is juvenile).

The application needs to be submitted in person. It takes up to 30 days to receive a decision on name change. There are fees involved for the procedure, while a 30-day window is available to file complaints.

Late registration: this service allows for late registration of birth for persons over 12 years of age, who were

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99   See Article 6.5 of the AI
100   See Article 63.1.1
101   Law No. 02/L-118 on Personal Names
102   Law No. 04/L-003 On Civil Status
103   Administrative Instruction (MIA) NO.19/2015 on the conditions and procedures for personal name change and correction.
104   See Article 7.3 of the Law on Civil Status
105   See Article 64

born in non-public medical institutions, within the territory of Kosovo. To apply, the party needs the following:

1. Parents' birth extracts;
2. Parents' certificate of marriage;
3. Medical report of the child;
4. Identification document;
5. Report on acknowledgment of paternity/maternity; and
6. Personal declaration of parents and witnesses.

The application needs to be submitted in person. It takes up to 45 days to deliver the service, for a fee of 20 EUR. A 30-day window is available to file complaints.

Death certificate: to apply for such a certificate, the surviving members of the family or any other person as stipulated by law, need to provide the following documents to civil registration offices:

1. Copy of ID Card for the declarer;
2. Original medical report certifying death;
3. Copy of ID card for the deceased;
4. Extract from the civil status registry;
5. Marriage certificate if the deceased was married;
6. Death certificate of a dead spouse.

The application is done in person. It takes one day to deliver the service, while a 30-day window is allowed for filing complaints. The service is delivered for a fee of 1 EUR. Nevertheless, if such registration is done later than 30 days of the occurrence of death, a fee of 50-100 EUR is imposed.[106]

Proof of death: this output is required for heritage proceedings. To apply, the applicant requires the following:

7. Birth extracts for alive persons;
8. Death certificate of the person, on whose name the proof of death is applied for;
9. Applicant's ID Card;

10. Document on the property in the name of the deceased;
11. Application form.

The application is done in person. It takes up to 30 days to deliver the output, for a fee of 1 EUR. Complaints may be filed within 30 days.

4.3.2 User oriented service delivery
Understanding user needs

No research mechanisms are utilized for the design or delivery of this service. In addition, when it comes to user feedback, physical complaints boxes are used. An e-box is in use for tracking user satisfaction, nevertheless, similar to above services, it is not clear how the municipality uses this information to enhance service delivery.

In recent years, Ministry of Internal Affairs (MIA) and the Agency for Civil Registration (CRA) have run the process of revising the Law on Civil Status, through adoption of a Concept Document, and through work on designing new Law.[107] Nevertheless, no research measures were undertaken during the preparation of the Concept Document. Both documents underwent public consultation process, with very limited feedback from non-government actors.

No user-centric methodologies such as customer journey mapping or design thinking were undertaken to enhance service delivery for the listed services.

Overall, the above services are at an early stage in terms of understanding user needs and preferences.

Simplification and streamlining

Once only: as can be seen from the list of documents above, currently the burden to users is quite high. It is clear that due to lack of digitalization, there is little

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106   Municipality of Ferizaj, Regulation on Municipal Taxes, 2022: https://kk.rks-gov.net/ferizaj/category/rregulloret/, Article 7.
107   Concept Document on Civil Status: https://kryeministri.rks-gov.net/blog/koncept-dokumenti-per-gjendjen-civile-30-12-2021/ and Draft Law on Civil Status: https://kryeministri.rks-gov.net/blog/koncept-dokumenti-per-gjendjen-civile-30-12-2021/.

room for implementation of a robust interoperability framework. Nevertheless, most of the documents required are in possession by the civil registration office, which has access to the digital civil status registry. This could allow for such offices to retrieve the required information themselves, and thus significantly lower document submission requirements.

In 2022, 2.2 million civil status documents were issued in Kosovo.[108] Of those, 30 percent were issued to individuals, who were applying for other civil status documents.[109] The implementation of the new Law on Civil Status eliminates the obligation for individuals to provide civil status documents that are already held by the civil status offices. Furthermore, in the near future, the CRA is considering extending this policy to remove the requirement of submitting documents held by other public administrations as well.[110]

It is advantageous that the documents issued by civil registration offices have indefinite validity. However, it is worth highlighting that many other institutions, such as educational institutions and banks, often impose a requirement for civil status documents to be no older than 6 months. This practice significantly increases the unnecessary burden on users as well as on the civil status offices, including the Municipality of Ferizaj.

On a positive note, the adopted Concept Document on Civil Status intends to strengthen the digital delivery of the civil status documents, including by clarifying the provisions related to acceptance of the digital copies of such documents.[111] The forthcoming Law will also propose measures to ensure exchange of information with other systems, which will greatly support functionalization of interoperability.

A service which presents a number of issues is the Proof of Death. To initiate this process, applicants are typically requested to submit birth extracts for all surviving family members. However, it is important to note that civil status offices do not possess the ability to verify these lists due to the unavailability of "family tree" information within their civil registries.[112]

Overall, the application of the once only is at an early stage when it comes to the listed services.

Timely delivery: The provision of the listed services requires from 30 to 45 days, which is in line with the LGAP requirements. Also, the time allowed for filing complaints is 30 days, which is also in line with the LGAP. When it comes to time to respond to a user inquiry, this is usually done as soon as possible, but not exceeding one working day.

Overall, the delivery of these services is in line with the LGAP requirements. Hence, the Municipality has made good progress in terms of timely delivery of services.

Gratuity: While the services themselves, including application procedures and document requirements, are designed at the central level through primary and secondary legislation, the specific fees associated with these services are decided at the local level.[113] Article 12 of Law on Local Government Finance, establishes that the Municipality may set administrative fees for administrative services, but such fees should not 'be established at a level that exceeds the cost of providing the concerned service, including costs for labour, materials and equipment usage'.[114] This renders the legal basis for setting administrative fees fully in line with the LGAP requirements on gratuity.

The specific fees for Municipality of Ferizaj administrative fees are set in Municipal Regulation on Municipal Taxes.[115] Although most of these fees are modest, there is a lack of clarity regarding how they were calculated. As a result, these fees may be inconsistent with the gratuity requirements outlined in the Law on Local Government Finance and therefore with LGAP. Nevertheless, it is

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108   GAP Institute, 2023, Ndikimi i digjitalizimit të shërbimeve të gjendjes civile në të hyrat buxhetore të komunave, p23: https://www.institutigap.org/lajme/3057.
109   Interview with CRA Official, June 2023.
110   Ibid,
111   Concept Document on Civil Status, p 35.
112   Written response by Municipality of Ferizaj Official, May 2023.
113   Setting such fees is part of the municipal own competencies as defined by Law on Local Self-Government, while administrative fees are set in Article 12 of Law on Local Government Finances.
114   Law 03/L-049 on Local Government Finance, Article 12.
115   Municipality of Ferizaj, Regulation on Municipal Taxes, 2022, Article 7.

worth mentioning that persons receiving social welfare support, members of war associations and people with disabilities are exempt from such fees.[116]

Overall, the Municipality is at an early stage when it comes to implantation of the gratuity principle.

Accessibility: The Municipality has not reported any specific measures to address barriers faced by disadvantaged groups. However, it is important to note that the services provided are delivered in all official languages, including Cyrillic alphabet, upon request by the users. Moreover, people form disadvantaged groups are exempt from administrative fees, including for people with disabilities.[117]

In an effort to modernize processes, the forthcoming amended Law on Civil Status aims to facilitate the issuance of all civil status documents in a digitalized format. The accompanying concept document acknowledges the challenges that may arise for certain segments of the target audience and proposes the implementation of extensive outreach activities and support to ensure a seamless transition towards digitalized services.[118]

Moreover, with the entry into force of the new Law, the CRA is considering to develop a systematic approach, whereby un-registered individuals are identified and registered through use of mobile teams.[119]

Furthermore, the mentioned concept document also addresses the integration of the gender perspective by regulating the procedure for changing gender data in compliance with the Law on Gender Equality and the Law on Non-Discrimination.[120]

Overall, some progress is noted when it comes to efforts to ensure accessibility for the listed services.

Service quality standards: similar to above services, there are no service quality standards deployed for the listed services. So far, no methodologies on quality standards have been reported, including those based on CAF. Consequently, no published standards exist for the Municipality of Ferizaj.

Overall, use of quality standards is at an early stage when it comes to the listed services.

User information and support: Users can access information on application requirements through in-person assistance and the municipality's official website. The website features a link to a comprehensive list of services offered by the municipality, which includes detailed documentation requirements, fees, legal basis, procedures for filing complaints, and estimated timelines for service delivery.[121] However, it is worth noting that the information provided can be challenging to navigate and locate.

Alternatively, individuals can visit the municipality's premises to obtain clearer and more user-friendly information on application procedures. Nonetheless, this approach requires direct contact with the municipality to acquire the necessary details. Moreover, within the eKosova platform a special section has been inserted for municipal services, but so far it only contains information on services delivered by Prizren and Lipjan municipalities.[122]

In terms of support, users have the option to seek problem-solving information through in-person interactions, phone calls using contact numbers available on the municipality's website, or by sending inquiries via email. The provision of support through multiple channels signifies the municipality's dedication to adopting a multi-channel delivery approach.

Overall, there is some progress when it comes to user information and support for the listed services.

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116 Ibid, Article 8.
117 Ibid.
118 Concept Document on Civil Status, 2022, p36.
119 Interview with CRA Official, June 2023.
120 Ibid, p30. Change of gender data is ensured also in the current legislation, but no clear mechanisms are in place. The forthcoming Law will ensure to create a clear legal basis for establishing the relevant procedures to make possible such acts.
121 https://kk.rks-gov.net/ferizaj/category/sherbime/qendra-per-sherbim-te-qytetareve/.
122 E-Komuna: https://ekosova.rks-gov.net/Service/27.

Digitalization

The listed services currently do not have an online provision. In terms of digitalization, civil status data is stored in both electronic and physical formats within the Primary and Central Civil Service Registry. This registry is accessible to civil service offices. Some civil status documents, including birth certificates, extracts, marriage certificates, and death certificates, are already available on the eKosova platform. Users can retrieve these documents free of charge. However, it is important to note that the initial application procedures for these services still need to be conducted in person.

The new Law on Civil Registration Agency, upon its implementation, will establish the legal validity of electronic documents related to civil status, granting them equal recognition as physical hard copies.[123]

Additionally, under the new Law on Civil Status, the registration of births and deaths will be conducted online. In the near future, medical institutions will be given access to the online systems of the Civil Registration Agency (CRA), allowing them to directly register birth and death information for events occurring within their facilities. In the mid-term, this process will be further improved by establishing interoperability between the CRA systems and the upcoming Health Information System (HIS).[124]

Furthermore, in the mid-term, other civil status procedures will also be made available online through the eKosova platform. This means that individuals will be able to carry out various civil status-related tasks electronically, enhancing the efficiency and accessibility of these processes. Moreover, eKosova platform already features a section on municipal services, eKomuna, which is still at a nascent phase.[125]

The proposed approach for digitizing municipal services involves creating a centralized online system that allows each municipality to have separate access and usage. This system is designed to enhance efficiency and simplify management since most municipalities provide similar sets of services. Additionally, it offers the advantage of aligning services with the requirement for familiarity and consistency, ensuring a unified experience for users.

Overall, the digitalization of the listed services remains at an early stage.

Monitoring and evaluation

Currently, neither MIA nor the Municipality use service specific KPIs, or any monitoring and evaluation mechanisms. The service delivery is usually evaluated to a certain extent through the preparations of the concept documents, which occurs whenever relevant institutions plan to amend legislation. Additionally, CRA has also in its disposal inspection bodies, who are mandated to inspect municipal civil status offices, ensuring proper implementation of the legal basis, as well as ensuring information security. CRA is also considering developing a strategic document, which, amongst others, will also include KPIs related to civil status service delivery.[126]

Nevertheless, overall, the use of monitoring and evaluation for the listed services is at an early stage.

Overview of implementation of service delivery principles and instruments

The following table provides an overview of the current status of implementing the principles and instruments aimed at achieving the primary objectives of user-oriented service delivery in area of civil status services:

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123 Confirmed by CRA, through written response, June 2023.
124 Interview with CRA official, June 2023.
125 Ibid,
126 Interview with CRA official, June 2023.

Service	Understanding users	Feedback mechanisms	User satisfaction tracking	Co-design	Once only	Gratuity	Timely delivery	Accessibility	Service quality standards	User information	User Support	Multi-channel delivery	Digitalization status	Monitoring and evaluation
1 Change of personal name	Red	Orange	Red	Red	Red	Red	Green	Orange	Red	Red	Orange	Red	Red	Red
2 Change of personal name after divorce	Red	Orange	Red	Red	Red	Red	Green	Orange	Red	Red	Orange	Red	Red	Red
3 Proof of death	Red	Orange	Red	Red	Red	Red	Green	Orange	Red	Red	Orange	Red	Red	Red
4 Death certificate	Red	Orange	Red	Red	Red	Red	Green	Orange	Red	Red	Orange	Red	Red	Red
5 Correction of personal name	Red	Orange	Red	Red	Red	Red	Green	Orange	Red	Red	Orange	Red	Red	Red
6 Late registration of birth	Red	Orange	Red	Red	Red	Red	Green	Orange	Red	Red	Orange	Red	Red	Red

Early stage	Red
Some progress	Orange
Good progress	Green

TABLE 5: Civil status services current state of play in implementation of principles and instruments on service design and delivery

A review of the legislation regarding the right to compensation in cases of damage by public authorities in Kosovo

5. Conclusions and recommendations

While there have been notable advancements in certain aspects of service delivery in Kosovo, such as timely delivery and adherence to the gratuity principle, the overall implementation of user-centric principles and instruments is still in its early stages. One area that requires further attention is the understanding of user needs and preferences through research mechanisms and advanced methodologies. By incorporating these practices into the service design and delivery process, institutions can gain valuable insights into user expectations and tailor their services accordingly.

Another important aspect that needs improvement is the consistent application of the once-only principle. This principle aims to minimize the burden on users by ensuring that they only need to provide information once, which can then be shared across different institutions. However, currently, this principle is not widely implemented, even within the same institution, leading to redundant requests for information from users.

Furthermore, the absence of service standards and specific monitoring and evaluation mechanisms poses a challenge to effectively measure and enhance service delivery. Establishing service standards would provide clear benchmarks for quality and performance, enabling institutions to assess their progress and identify areas for improvement. Additionally, implementing robust monitoring and evaluation exercises would allow for ongoing assessment of service design and delivery, facilitating continuous improvement efforts.

To further advance the user-centric approach, it is crucial to prioritize the digitalization of services. While some progress has been made in terms of accessibility and user support, the overall level of digitalization remains low. Expanding the use of digital channels and tools can significantly enhance the accessibility and convenience of services for users. This includes features such as online submission, review, decision-making, payments, and issuance of digital outputs.

By addressing these areas for improvement and implementing the recommendations outlined in the paper, Kosovo can make significant strides towards a more user-oriented service design and delivery ecosystem. Through enhanced user understanding, simplified processes, increased digitalization, and robust monitoring and evaluation mechanisms, the goal of providing efficient and effective services that meet the needs and expectations of individuals can be achieved.

Recommendations in area of business registration

KBRA may further strengthen its user centric approach by considering the following recommendations:

- **Introduce user understanding mechanisms:**

  1. Gradually introduce research and journey mapping in the process of service design and delivery.
  2. Ensure user service rating in the online system.
  3. While upgrading the KBRA website consider integrating a section on user feedback (complaints, suggestions etc).

- **Strengthen the simplification and streamlining through:**

  1. Further clarify the administrative fees set for applying for changes of information, by harmonising with the LGAP principle of gratuity.
  2. Ensure interoperability with TAK, so as to implement once only.
  3. In the revised legislation, remove the need for applicants to present original documents after they have uploaded scanned documents in the online system;

4. Consider gradual introduction of accessibility tools in the online system, such as braille displays, screen readers and magnifiers.
5. Ensure information on the services is clear and user friendly. Maintain updated information on needed documents, procedures and fees.
6. Ensure information on support services is easier accessible in the website.
7. Gradually introduce use of service quality standards, and start publishing them on KBRA website.

- **Further strengthen the digitalization of business registration, through:**

1. Ensure elements of interoperability and online payment are made functional.
2. Together with AIS, expose on eKosova.

- **As regards monitoring and reporting:**

1. Establish service specific KPIs,
2. Establish regular monitoring and evaluation exercises to measure progress in service design and delivery.

Recommendations in area of electronic communications and postal services

RAEPC may further strengthen service delivery by considering the following:

- **Introduce use of user understanding mechanisms:**

1. Gradually introduce research and journey mapping in the process of service design and delivery, including for end-users.
2. Ensure user service rating in RAEPC website and forthcoming online systems.
    3. Integrate a section on user feedback (complaints, suggestions etc) in the RAEPC website.

- **Strengthen the simplification and streamlining through:**

1. Intensify efforts to ensure legal and organizational interoperability with relevant administrative bodies. Such efforts to be ensued by digitalization, whereby technical interoperability is to be ensured.
2. Further clarify the annual payments set for general authorizations and postal services, by harmonising the forthcoming Law on Electronic Communication, with the LGAP gratuity principle. Consider the same for the Law on Postal Services.
3. In the forthcoming Law on Electronic Communication, establish clear basis for payments to cover administrative costs and for granting electronic communication resources, in line with the European Code of Electronic Communication.
4. Ensure information on the services is clear and user friendly. Maintain updated information on needed documents, procedures and fees.
5. Ensure information on support services is easier accessible in the website.
6. Gradually introduce use of service quality standards, and start publishing them on the website.

- **Digitalization:**

1. Start efforts to digitalize the service, with functional features of submission, review, decisions, payments and issuance of digital outputs.
2. Ensure the forthcoming ICT solutions are in line with the AIS requirements, are hosted in the National Data Centre, and are fully integrated in the GG.
3. Ensure technical interoperability with KBRA, MIA and IMC.
4. Consider gradual introduction of accessibility tools in the online system, such as braille displays, screen readers and magnifiers.
5. Expose digitised services in eKosova.

- **Monitoring and evaluation**

1. Establish service specific KPIs,
2. Establish regular monitoring and evaluation exercises to measure progress in service design and delivery.

Recommendations in area of civil status (Municipality of Ferizaj)

MIA and Municipality of Ferizaj may further strengthen service design and delivery, by considering the following:

- **Introduce user understanding mechanisms:**

1. Gradually introduce research and journey mapping in the process of service design and delivery.
2. Ensure user service rating in Municipality of Ferizaj website. Ensure data from eBox is used in efforts to enhance service design and delivery.
3. Integrate a section on user feedback (complaints, suggestions etc) in the municipal website.

- **Strengthen the simplification and streamlining through:**

1. Further clarify the administrative fees set for applying for listed services, by harmonising with the LGAP principle of gratuity.
2. Intensify efforts to ensure legal and organizational interoperability with relevant administrative bodies. Such efforts to be ensued by digitalization, whereby technical interoperability is to follow.
3. Ensure information on the services is clear and user friendly in municipal website. Maintain updated information on needed documents, procedures and fees.
4. Ensure information on support services is easier accessible in the website.
5. Make efforts to increase awareness on the indefinite validity of the civil status documents. This may help in countering the established

practice by other administrative bodies to request civil status documents not older than 6 months.
6. Gradually introduce use of service quality standards, and start publishing them on website.

- **Further strengthen the digitalization of civil status services, through:**

1. Start efforts to digitalize the services, with functional features of submission, review, decisions, payments and issuance of digital outputs.
2. Ensure technical interoperability with HIS;
3. Consider gradual introduction of accessibility tools in the online system, such as braille displays, screen readers and magnifiers.
4. Expose such services in eKosova.

- **As regards monitoring and reporting:**

1. Establish service specific KPIs,
2. Integrate service delivery KPIs in the forthcoming strategic document.
3. Establish regular monitoring and evaluation exercises to measure progress in service design and delivery.