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Administrative Burden Reduction
through Real-life Events:
Progress Assessment



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Administrative Burden Reduction through Real-life Events: Progress Assessment

ACT NOW -

Supporting the Reform of Public
Administration and the Rule of Law
through Combating Corruption and
Improving the Delivery of Services

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Table of Acronyms

CRA	Civil Registration Agency
TAK	Tax Administration of Kosovo
VRC	Vehicle Registration Certificate
TRC	Tax Residency Certificate
KJC	Kosovo Judicial Council
SCRQ	State Council for the Recognition of Qualifications
LGAP	Law on General Administrative Procedure
MESTI	Ministry of Education, Science, Technology and Innovation
DTEA	Double Taxation Elimination Agreements
MESPI	Ministry of Environment, Spatial Planning and Infrastructure
MIA	Ministry of Internal Affairs
MFAD	Ministry of Foreign Affairs and Diaspora
NARIC	National Academic Recognition Information Center
PPRAB	Administrative Burden Reduction Program 2022-2027
VRC	Vehicle Registration Center
AI	Administrative Instruction
KCCRS	Kosovo Central Criminal Records System

1. Introduction

In response to the need for improving public administration and providing more efficient services for citizens and businesses, the Group for Legal and Political Studies (GLPS) is implementing the EU-funded project entitled "ACT NOW - Supporting Public Administration Reform and Rule of Law through Fighting Corruption and Improving Service Delivery". The second component of this project aims to support reforms in public administration and strengthen the rule of law, with a particular focus on the implementation and monitoring of the Program for Prevention and Reduction of Administrative Burden 2022-2027 (PPRAB). A key activity of the component involves the systematic monitoring and analysis of the implementation of the PPRAB. This initiative aims to simplify administrative procedures, eliminate unnecessary burdens and improve the legal framework to create a more efficient public administration. Through a systemic approach, the project addresses critical reform challenges by leveraging data-driven analysis and promoting the involvement of civil society in decision-making processes.

This report aims to show the progress achieved in the implementation of the PPRAB.¹ The report presents the situation of the reform of the services that are presented in Annex 3 of the PPRAB which are called "real-life events". Through the methodology that has been followed, the report presents systematic data on the implementation of the reforms that are targeted through the PPRAB including completed, ongoing and not completed activities. In addition to measuring the progress achieved in the reform on reduction of the administrative burden in the services known as real-life events, the report also contains the findings and recommendations that shall be implemented to complete the full reform of these services.

This report is divided into several main parts that reflect the progress of reforms in administrative burden reduction through services known as "real-life events". Initially, an overview of real-life events according to the PPRAB program and their role as a pillar of this program is presented, as well as the methodology followed during the drafting of this analysis. **The body part** of the report is dedicated to the analysis of each real-life event separately, where **the service is described for each, the PPRAB recommendations are presented and the status of their implementation is assessed, and supported by summary tables and percentages of implementation.** Lastly, the report closes with the **final findings and recommendations** aimed at addressing the remaining obstacles and completing the reform in these services, with the aim of creating a more efficient, digitalized and accessible administration for citizens.

¹ Program for Prevention and Reduction of Administrative Burden 2022-2027, accessible at <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

2. Real-life events according to PPRAB

In the sense of the PPRAB, real-life events are public services that individuals and businesses receive, including permits, licenses, registrations, certifications, consents, attestations, authorizations, recognitions, etc.² Real-life events, along with e-governance and a user-centered approach, are the main pillars of the PPRAB.

Furthermore, it was intended that the services selected as real-life events also serve as a model for other services that are part of the PPRAB and in which the administrative burden reduction is a must.

The real-life events according to the PPRAB are:³

1. First registration of vehicles
2. Extension of vehicle registration
3. Change of vehicle ownership
4. Criminal record certificate
5. Construction permit - category I
6. Construction permit - category II
7. Recognition of Bachelor studies
8. Recognition of Master's degree
9. Recognition of the PhD degree
10. Application for ID card (including cases of loss/theft, confiscation or damage of ID card) - for persons aged 16 to 18 and over 18 years old
11. Tax Residency Certificate
12. Apostille certificate (stamp)

In the following sections of the report, each service will be discussed separately, while assessing the progress of the administrative burden reduction as foreseen by the PPRAB.

² Ibid. Page 8

³ Program for Prevention and Reduction of Administrative Burden 2022-2027, accessible at <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

3. Methodology

A combined methodology was used to draft the report, including desk research, interviews and questionnaires with institutional representatives, and data from workshops conducted by the project on real-life event topics.

The desk research was conducted to verify the legal basis and compare it with the services that are part of the real-life events as well as relevant documents related to the real-life events.

Further, data were collected by administering questionnaires to each responsible institution. These questionnaires were designed to measure the progress made by each institution based on the implementation of the recommendations addressed to them by the PPRAB. Following the questionnaires, interviews were also conducted with those institutional representatives, in order to further elaborate on the challenges and problems encountered during the reform of services and addressing the recommendations of the PPRAB.

Data through questionnaires and interviews were obtained from the following institutions:

Real-life event	Institution
First registration of vehicle	Civil Registration Agency (CRA) - Directorate for Vehicle Registration
Extension of vehicle registration	CRA-Directorate for Vehicle Registration
Change of vehicle ownership	CRA-Directorate for Vehicle Registration
Criminal record certificate	KJC (Kosovo Judicial Council)
Construction permit - category I	Ministry of Environment, Spatial Planning and Infrastructure (MESPI) - Department of Spatial Planning, Construction and Housing
Construction permit - category II	MESPI- Department of Spatial Planning, Construction and Housing
Recognition of Bachelor studies	Ministry of Education, Science, Technology and Innovation (MESTI)- Division for Recognition/Equivalence and Academic Information
Recognition of Master's studies	MESTI- Division for Recognition/Equivalence and Academic Information
Recognition of PhD studies	MESTI- Division for Recognition/Equivalence and Academic Information
Application for ID card	CRA-Directorate for Document Equipment
Tax Residency Certificate	Tax Administration of Kosovo (TAK)-Department for Information Technology
Apostille certificate (stamp)	Ministry of Foreign Affairs and Diaspora (MFAD) - Department for Consular Affairs

Finally, another source of data used for the drafting of this report are the data collected and findings from workshops held within the Act Now project, for some of the services that are part of real-life events. The workshops were held with the aim of gathering different stakeholders - service providers and beneficiaries, to discuss the problems and challenges of both parties. The workshops were held for the following services: First registration, extension and change of vehicle ownership, Apostille Certificate (stamp), residency certificate, construction permits for category I and II. Participants in the workshops were representatives of institutions, chambers of professions and businesses, NGOs, businesses, citizens, and so forth.

4. Findings from monitoring the implementation of the PPRAB recommendations for real-life events

4.1 First registration of vehicles

4.1.1. Service description

First registration of vehicles is a service required for citizens who register their vehicle for the first time. This procedure includes providing them with registration plates, a certificate of registration, as well as recording the vehicle data in the relevant database of the Civil Registration Agency (CRA) within the MIA, as defined in **Law No. 05/L-132 on Vehicles**⁴.

This process is mandatory for all new or used vehicles that are imported or purchased in the local or foreign market. The Law on Vehicles stipulates that vehicles participating in road traffic must be registered and equipped with a registration certificate and registration plates for vehicle identification.⁵

The procedure for first registration is set out in the **administrative instruction**⁶ which lists the documents that must be submitted by the party. This list includes: the vehicle's origin document, the origin booklet, the customs DUD or customs certificate, the homologation certificate, the certificate confirming the vehicle's technical regularity, the insurance policy, proof of payment for the municipal tax, a valid identification document (such as an ID card, passport or driver's license), a valid driver's license for the relevant category, and the payment slip according to the decision on the determination of fees.⁷ Also, based on the Administrative Instruction⁸, to extend registration, citizens must have previously paid all fines imposed for road traffic offenses.

In the PPRAB 2022-2027⁹, the first registration of vehicles is included as one of the services foreseen to undergo a review for further improvement. The recommendations provided aim to address these elements in such a way as to enable simplification and digitalization, in order to increase efficiency and facilitate access for citizens to this service.

4.1.2 Recommendations of the PPRAB

In order to facilitate the procedure for the first registration of a vehicle and in accordance with the objectives of the PPRAB, these concrete recommendations have been proposed, which aim to amend the AI and the decision on determination of the fees listed below:

4 Law No. 05/L-132 on Vehicles, Article 5; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=20690>

5 Law No. 05/L-132 on Vehicles, Article 39 paragraph 1; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=20690>

6 Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration, Article 6, paragraph 1; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14671>

7 Decision No. 012/20 dated 16.01.2020 on the determination of fees. This decision determines the amount of the fee for registration (€25), certificate provision (€10), license plates (€20), ecological tax (€10), road tax (€40), and municipal tax, which is determined by municipal regulation; <https://mpb.rks-gov.net/Uploads/Documents/Pdf/AL/260/012%20-%20Vendimi%20p%C3%ABr%20Tarifia%2016.01.2020%20shqip%20-%20serbisht.pdf>

8 Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration, Article 3, paragraph 4; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14671>

9 Program for Prevention and Reduction of Administrative Burden 2022-2027; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

Amendment to Article 6, paragraph 1 of Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration:

1. The mandatory information in point 3 (customs DUD or evidence from Customs) must be completed through the electronic system, by producing the relevant document or by connecting the system to the Customs;
2. To harmonize the requirement in point 4 (vehicle homologation certificate) with Law No. 08/L-004 amending and supplementing Law No. 05/L-132 on Vehicles;
3. The documents in point 8 (identification document) should not be requested physically, but the relevant information should be provided through the interconnection of systems or other forms, since they are owned by the same institution;
4. The mandatory information on the driver's license should be deleted from the list of documents, while the use of the vehicle should be allowed only by persons who possess a valid driver's license for the relevant category of vehicle, in accordance with Article 53 of the Law on Vehicles;
5. Article 3, paragraph 4, which conditions the registration of a vehicle with the payment of road traffic fines, should be deleted, while their payment and execution should be handled by the Tax Administration, according to the provisions of the Law on General Administrative Procedure (LGAP).

Amendment to Decision No. 012/20 dated 16.01.2020 on determination of fees:

6. To delete the tax in the amount of €20 set out in point 5.4 of this decision (vehicle registration fee), because it is contrary to the provisions of the LGAP;
7. Payments related to vehicle registration should be made at the end of the process, through a single document, while the forms and methods of payment can be carried out through cash payment, e-banking, or POS.¹⁰

4.13. Implementation of recommendations

To assess the level of implementation of the recommendations under the Program, responsible CRA officials were interviewed, who provided the following information regarding the recommendations:

- 1. Interconnection with the Customs system for the provision of the DUD** -This recommendation **has been implemented** through amendments to AI No. 04/2023 on Vehicle Registration¹¹ and AI No. 12/2024 on supplementing and amending Administrative Instruction (MIA) No. 04/2023 on Vehicle Registration.¹² According to the CRA, information on the fulfillment of customs obligations is provided automatically through the Customs system, without the need for the citizens to physically submit the document.
- 2. Harmonization of the requirement for the ownership certificate (point 4 of Article 6) with the Law on Vehicles** –The recommendation **has been implemented** with the amendment to AI No. 04/2023, which provides that for vehicles from European Union countries, the submission of the ownership certificate by the party is no longer required.
- 3. Elimination of documents held by public institutions** –The recommendation **has been implemented**, no copies of the party's ID card, passport or driver's license are required during the first registration of the vehicle.

¹⁰ Program for Prevention and Reduction of Administrative Burden 2022-2027, page 220; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

¹¹ Administrative Instruction No. 04/2023 on Vehicle Registration, accessible at: <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=75924>

¹² Administrative Instruction No. 12/2024 on supplementing and amending Administrative Instruction (MIA) No. 04/2023 on Vehicle Registration, accessible at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=99967>

4. **Elimination of the requirement to present a driver's license** –The recommendation **has not been implemented**. With AI No. 04/2023 and AI No. 12/2024, the physical presentation of the driver's license document is no longer required in the registration process, but the requirement to have a driver's license presented during the registration process still remains, which is in conflict with the Law on Vehicles. Currently, the owner who does not have a driver's license authorizes the user to register the vehicle, where the owner and the user must appear on the vehicle registration certificate.
5. **Deletion of the requirement for payment of fines as a condition for registration** -This recommendation **has not been implemented**. According to the CRA, the requirement to pay fines is still in effect, as it is stipulated as an obligation in the Law on Road Traffic Regulations.¹³
6. **Removal of the €20 registration fee (point 5.4 of Decision No. 012/20)– Recommendation has not been implemented**. Decision No. 012/20 is still in force and has not undergone any amendments in this regard.
7. **Reorganization of payments and functionalization of POS** -Payments are currently made through post offices on the premises of the CRA. The POS is not functional, although for registration extensions and plate orders there is the possibility of payment through the e-Kosova platform. This recommendation has not been implemented.

4.1.4. Conclusion

Based on the assessments made within the framework of the Program for the Prevention and Reduction of Administrative Burden 2022-2027, the procedure for the first registration of vehicles has been addressed through a series of recommendations aimed at simplifying, harmonizing and digitalizing this service. As a result of these recommendations, substantive changes to the sub-legal framework have been approved through AI No. 04/2023 and AI No. 12/2024.

Out of a total of 7 recommendations given, 3 have been implemented, 1 has been partially implemented, and 3 have not been implemented.

The changes implemented include the electronic interconnection with the Customs system for the provision of the DUD, the removal of the certificate of ownership for vehicles from EU countries, as well as the elimination of several documents that can now be verified through the internal systems of the CRA. The requirement for the physical presentation of a driver's license as part of the registration process has also been revised.

However, some of the recommendations still await implementation, including the reorganization of the payment method, the amendment of the decision on fees, and the removal of mandatory payment of fines.

In this context, despite the progress achieved on some recommendations, full implementation of the recommendations remains partial and requires further legal and administrative reform in order to ensure full compliance with the program's objectives.

¹³ Law No. 08/L-186 on Road Traffic Regulations, Article 89, paragraph 4; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=87975>

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1	Interconnection with the Customs system for the provision of the DUD	Implemented
2	Elimination of the requirement for a certificate of ownership for vehicles from the EU	Implemented
3	Valid document of the Republic of Kosovo containing personal data such as: ID card, passport or driver's license	Implemented
4	Removal of the requirement to present a driver's license during registration	Not implemented
5	Removal of mandatory payment of fines before registration	Not implemented
6	Removing of the €20 registration fee set out in decision no. 012/20 (point 5.4)	Not implemented
7	Reorganization of payments at the end of the process and with a single document; enabling payments through POS/e-banking	Not implemented

Implementation of recommendations

Implementation status	Number of recommendations	Percentage (%)
Implemented	3	42.86%
Not implemented	4	57.14%

4.2. Extension of vehicle registration

4.2.1. Service description

Extension of vehicle registration is one of the types of registration defined in **AI No. 07/2019**¹⁴, and represents the procedure by which a previously registered vehicle renews the validity of its registration, after the expiration of the current registration period. This service ensures that motor vehicles participating in road traffic are technically in order, insured and clearly identified through the relevant documents.

The registration extension procedure requires the submission of several documents, specified in the administrative instruction.¹⁵ The required documents are: vehicle registration certificate (VRC) issued by the vehicle registration center (VRC), certificate confirming the technical regularity of the vehicle (technical inspection), insurance policy, proof of payment for the municipal tax, valid identification document (such as ID card, passport or driver's license), valid driver's license for the relevant category, as well as the payment slip according to the decision on the determination of fees.¹⁶

Based on AI No. 07/2019¹⁷, to extend registration, citizens must have previously paid all fines imposed for road traffic offenses.

4.2.2. Recommendations of the PPRAB

In order to simplify the procedure for extension of vehicle registration and in accordance with the objectives of the program, specific amendments to the AIs and the decision on the fees listed below have been recommended:

¹⁴ Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration, Article 4, paragraph 1.1.3; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14671>

¹⁵ Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration, Article 7, paragraph 1; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14671>

¹⁶ Decision No. 012/20 of 16.01.2020 on determination of fees. This decision determines the amount of the fee for the ecological tax (€10), road tax (€40), and the municipal tax, which is determined by municipal regulation; <https://mpb.rks-gov.net/Uploads/Documents/Pdf/AL/260/012%20-%20Vendimi%20p%20C3%ABr%20Tarifia%2016.01.2020%20shqip%20-%20serbisht.pdf>

¹⁷ Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration, Article 3, paragraph 4; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14671>

Amendment of Article 7, paragraph 1 of AI No. 07/2019 on Vehicle Registration as follows:

1. The VRC is issued only for the first time of registration and does not need to be renewed until there is a change of owner or any change to the vehicle.
2. When extending the vehicle registration, only a technical inspection is required and then vehicle insurance should be carried out. Other requirements and required documents are unnecessary because the same have been requested and are in the possession of the VRC since the first registration.
3. Article 3, paragraph 4 of the Administrative Instruction, which conditions the registration of a vehicle with the payment of fines imposed in road traffic, should be deleted, while the execution of fines should be carried out by the TAK as determined by the LGAP.

Amendment to Decision no. 012/20, dated 16.01.2020 on determination of fees:

4. Payments must be made at the end of the process and before the issuance of the insurance policy with a single document, while the forms and methods can be: through cash payment in post offices, through e-banking, through POS. The request for proof of payment of the tax should be requested by the insurance company.¹⁸

4.2.3. Implementation of recommendations

To assess the level of implementation of these recommendations, CRA officials were interviewed, who provided the following overview:

1. **VRC issuance only for first registration** -The recommendation has not been implemented. According to the CRA, the change was proposed in the concept document and included in the draft law on vehicle registration, but its implementation must await its approval.
2. **Reduction of documents in the extension procedure** -The recommendation has not been implemented. According to the CRA, the change was proposed in the concept document and included in the draft law on vehicle registration, but its implementation must await its approval.
3. **Removal of the requirement for payment of fines as a prerequisite for registration** -The recommendation has not been implemented. The payment of fines is still being requested, as it is a requirement in the Law on Road Traffic Regulations.¹⁹
4. **Reorganization of payments and enabling the use of POS - Recommendation not fully implemented.** Payments are made through post offices located within the CRA facilities, while POS is not functional. Only for renewals and orders of license plates there is the option offered through the e-Kosova platform, but it must be submitted together with other documents.

4.2.4. Conclusion

Of the four recommendations given under the program for facilitating the procedure for extension of vehicle registration, none has been implemented in practice so far. Two of them were proposed within the framework of concept documents and draft laws, which have not yet been approved. The others continue to be in force due to legal regulations. This shows that the service for extension of registration still remains with the same requirements for documents, but with the initiative to change two points through the draft law on vehicle registration.

¹⁸ Program for Prevention and Reduction of Administrative Burden 2022-2027, page 221; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

¹⁹ Law No. 08/L-186 on Road Traffic Regulations, Article 89, paragraph 4 "The owner of the vehicle cannot register or continue the registration of the vehicle, or change the owner, without paying the fines for road traffic violations." <https://gzk.rks-gov.net/ActDetail.aspx?ActID=87975>

Table of recommendations and implementation status

No.	Recommendation	Status
1.	VRC to be issued only for first registration	Not implemented
2.	During extension of registration, only a technical inspection and vehicle insurance shall be required.	Not implemented
3.	Removing the condition for paying fines before registration	Not implemented
4.	Payments should be made at the end of the process and through POS or electronic means	Not implemented

Implementation of recommendations

Implementation status	Number	Percentage
Implemented	0	0%
Not implemented	4	100%

4.3. Change of vehicle ownership

4.3.1. Service description

Change of vehicle ownership is an administrative procedure through which a registered vehicle passes from one owner to a new owner, through sale, donation, inheritance, and involves updating data in the Vehicle Registry maintained by the VRC.²⁰

The documents that the party must submit to carry out the change of ownership are listed in the AI²¹ and include: the registration certificate of the deregistered vehicle of the previous owner; proof of ownership (sales contract, gift contract, inheritance deed, document proving ownership, certified by a notary or by the court, or an order from an enforceable private bailiff); certificate confirming the technical regularity of the vehicle; insurance policy in the name of the new owner; valid identification documents (such as an ID card, passport or driver's license); municipal tax for the new owner; valid driver's license for the relevant category as well as the payment slip according to the decision on determination of fees²².

If the vehicle is transferred to a legal entity, in addition to identification documents, a business certificate and business information are required. While for non-governmental organizations or state institutions, registration is carried out based on the fiscal certificate.²³

In order to improve this procedure, the PPRAB has proposed recommendations aimed at simplifying and eliminating unnecessary documentation in order to facilitate the provision of services for citizens.

4.3.3. Recommendations of the PPRAB

In order to simplify the procedure for **changing vehicle ownership** and in accordance with the objectives of the program, specific changes have been recommended in the AI and in the decision on fees, listed as follows:

Amendment to Article 8, paragraph 1 of AI No. 07/2019 on vehicle registration:

1. The vehicle's deregistration by the previous owner should no longer be carried out by the party, but should be done automatically by the VRC.

20 Law No. 05/l-132 on Vehicles, Article 5; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=20690>

21 Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration, Article 8, paragraph 1; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14671>

22 Decision No. 012/20 of 16.01.2020 on determination of fees for vehicle registration (fee of €20), <https://mpb.rks-gov.net/Uploads/Documents/Pdf/AL/260/012%20-%20Vendimi%20p%C3%ABr%20Tarifia%2016.01.2020%20shqip%20-%20serbisht.pdf>

23 Administrative Instruction (MIA) No. 07/2019 on Vehicle Registration, Article 8, paragraph 1.1.9; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14671>

2. Documents related to the identification data of the vehicle owner (including ID card, passport or driver's license) should not be physically requested from the citizens, as the information can be provided through the interconnection of the CRA system with the Central Civil Status Registry and other relevant public systems.
3. The insurance policy and the certificate of confirmation of technical regularity do not need to be requested again, if they are still valid. In this case, the registration extends with the existing data, while the technical inspection and insurance are renewed when they expire.
4. Driver's license information should no longer be required as a document for the change of ownership, as the use of the vehicle by persons without a valid permit remains prohibited in accordance with Article 53 of the Law on Vehicles.
5. Delete Article 3, paragraph 4 of the Administrative Instruction, which conditions the registration of a vehicle upon the payment of fines for road traffic offenses. Payment and enforcement of fines should be carried out through the Tax Administration of Kosovo (TAK), as defined in the Law on General Administrative Procedure (LGAP).

Amendment to Decision No. 012/20, dated 16.01.2020 on fees:

6. Delete the €20 fee provided for in point 5.4 of the decision, as this fee conflicts with the principle of avoiding double charging for the same service – the vehicle is already registered.
7. The replacement of license plates should be limited to cases where the region of residence of the new owner changes. If the region code remains the same, the existing license plate should be kept to avoid additional costs and procedures.
8. Payments related to the service should be made at the end of the process, through a single document. Payment methods should be diverse and accessible to citizens, including classic payment, through e-banking or through POS devices.²⁴

4.3.3. Implementation of recommendations

To assess the level of implementation of these recommendations, CRA officials were interviewed, who provided the following overview:

1. **The deregistration should be made by the VRC itself.** – the recommendation has been implemented with Administrative Instruction no. 04/2023, but is not yet in effect due to technical delays in updating the system, so this recommendation has been partially implemented.
2. **Owner identification documents should not be physically requested** – the recommendation has been implemented. According to the approved Administrative Instruction no. 07/2023, copies of the identification document from the Party are no longer required.
3. **The technical inspection and insurance policy should extend for as long as they are valid.** – the recommendation has not been implemented. The change was proposed in the concept document and has been included in the draft law on Vehicle Registration. Implementation will be possible after the law is approved.
4. **Removal of the request for driver's license upon change of vehicle ownership** – the recommendation has not been implemented. With AI No. 04/2023 and AI No. 12/2024, the physical presentation of the driver's license document is no longer required in the registration process, but the requirement to have a driver's license during the ownership change process still remains, which is in conflict with the Law on Vehicles. Currently, the owner who does

²⁴ Program for Prevention and Reduction of Administrative Burden 2022-2027, page 222; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

not have a driver's license authorizes the user who registers the vehicle, the owner and the user must appear at the CRA.

5. **Removal of the condition for payment of fines**– the recommendation has not been implemented. According to CRA officials, this requirement continues to be in force due to the obligation set out in the Law on Road Traffic Regulations.²⁵
6. **Deletion of the €20 fee according to decision 012/20**– the recommendation has not been implemented. The decision on fees is still in force and has not been changed.
7. **License plates should only be changed when the region changes.** – the recommendation has not been implemented. Current practice does not make a difference whether the region code is the same or not.
8. **Making payments at the end of the process and enabling alternative forms of payment (POS, e-banking)**– the recommendation has not been fully implemented. Payments are made through post offices located in CRA facilities. Payment is not made through POS, only for renewals and orders of license plates there is an option offered through the e-Kosova platform but must be submitted together with other documents.

4.3.4. Conclusion

Out of a total of eight recommendations to facilitate the procedure for changing vehicle ownership, only two of them have been partially implemented through AI No. 07/2023, but with limitations in practical implementation due to the lack of technical updates. The rest of the recommendations, including the elimination of unnecessary documents, the removal of conditions for fines and fees, as well as improvements in the payment process, remain unimplemented. This shows that despite initial efforts, the implementation of the reforms continues to be slow and requires further legal, technological and organizational advancement.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1	Deregistration should be carried by the CRA itself	Partially implemented
2	Removal of request for identification document	Implemented
3	Reuse of policy and technical certificate within the term	Not implemented
4	Removal of the requirement to register with a valid driver's license	Not implemented
5	Removal of the condition for payment of fines before registration	Not implemented
6	Removal of the €20 registration fee	Not implemented
7	Changing license plates only when changing region	Not implemented
8	Payments at the end of the process and through various methods	Not implemented

Implementation of recommendations

Implementation status	Number	Percentage
Implemented	1	12.5%
Partially implemented	1	12.5%
Not implemented	6	75%

²⁵ Law No. 08/L-186 on Road Traffic Regulations, Article 89, paragraph 4; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=87975>

4.4. Criminal record certificate

4.4.1 Service description

The Criminal Record Certificate is an official document issued by the Kosovo Central Criminal Records System (KCCRS), in accordance with Law No. 08/L-194 on the Kosovo Central Criminal Records System²⁶, Regulation No. 01/2018 on KCCRS²⁷, approved by the KJC. This document serves to prove the criminal status of the individual and is necessary in a number of formal procedures, including applications for employment in the public or private sector, procurement procedures, residence permits abroad, or other judicial and administrative cases when required by legislation.

For a long time, the provision of this service was carried out through a physical process, which required the citizen to appear in court. The party had to submit an identification document and its copy, as well as in some cases a certificate from the local community when the place of residence was different from the place of birth. Also, if the request was not related to employment, the citizen had to pay a fee of 5 euros²⁸ at the court counter and wait for the physical withdrawal of the document.

These requirements, which were not explicitly defined in the basic normative act, but were used as guidelines in administrative practice, have created an unnecessary burden for citizens and have revealed the need for a more modern and simplified approach.

4.4.2 Recommendations of the PPRAB

Within the framework of the program for prevention and reduction of administrative burden 2022-2027, several priority interventions have been identified to simplify this service, as follows:

1. Digitalization and inter-institutional connection: Automatic provision of identification data through linkage between the KJC system and the Civil Registry, avoiding the request for documents from the party;
2. Removal of the local community certificate: Elimination of this document as a requirement, as it is not provided for by regulation and represents an unjustified burden;
3. Electronic issuance and receipt of the certificate: Providing an online certificate for internal use within the territory of Kosovo, avoiding the necessity of physical presence;
4. Removal of the certificate fee: Elimination of the 5 EUR fee when the certificate is requested by the state itself or when there are no additional costs for the administration, in accordance with the principles of the LGAP.

4.4.3 Implementation of recommendations

All of the above recommendations have been addressed through the adoption of the new Regulation No. 19/2024, which replaced the previous Regulation No. 01/2018. With the entry into force of this new act, the following changes have been included:

1. Removing the requirement for physical presentation of identification documents;
2. Removal of the local community certificate as a condition for application;
3. Enabling electronic download of the certificate for internal use;
4. Removal of the 5 EUR fee for issuing the certificate, to avoid unnecessary financial burdens and to respect the principles of administrative proportionality.

²⁶ Article 25 of Law No. 08/L-194 on the Kosovo Central Criminal Records System accessible at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=84234>

²⁷ Regulation No. 01/2018 on the Central Criminal Records System, available at: <https://www.gjyqesori-rks.org/reguloret/?r=M&legId=187>

²⁸ Information on fees (before changes): <https://www.gjyqesori-rks.org/sherbimet-per-qytetare/certifikat-e-kaluar-penale/>

4.4.4. Conclusion

The criminal record certificate service represents a concrete example of the reform in public administration, moving from a traditional, burdensome and disproportionate process to a simplified and digital model. With the adoption of the new regulation and the preparation for its full implementation, more favorable conditions have been created for citizens to have easier and faster access to this official document and without unnecessary costs. This type of service is currently available in e-Kosova, so the criminal record certificate document can be downloaded from this system.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1	Automatic connection with CRA for verification of identification data	Implemented
2	Removal of the requirement for a local community certificate	Implemented
3	Enabling online download of the certificate for internal use	Implemented
4	Removing the €5 fee for the certificate when not justified by administrative costs	Implemented

Summary chart – Implementation of recommendations

Implementation status	Number	Percentage
Implemented	4	100%
Not implemented	0	0%

4.5. Construction permit of category I

4.5.1 Service description

The construction permit for category I buildings is an administrative act issued by the municipality, which enables citizens and investors to build low-risk buildings²⁹, in accordance with the legislation in force. This service is based on the provisions of Article 15 of Law No. 04/L-110³⁰ on Construction, and is further regulated by MESPI AI No. 06/2017³¹, respectively Appendix 2 (Application for Construction Permits Cat I).

The application for this permit is carried out in the municipality and requires the submission of basic documentation that proves the right of ownership, compliance with regulatory plans and fulfillment of construction conditions. Among the documents required are: a copy of the plan and certificate of ownership (not older than six months), proof of payment of property tax, copies of identification documents, information on spatial planning and approved construction conditions. In addition, the geodetic surveying, the conceptual design in physical and digital copies, consents from the relevant public operators (such as KEDS, KUR, PTK), proof of the unification of the parcels if the object includes more than one cadastral parcel, as well as the payment receipt of the municipal tax must be submitted.

The purpose of this service is to ensure that low-risk constructions are carried out in accordance with legal and technical standards, guaranteeing transparency, safety and sustainable urban development.

4.5.2. Recommendations of the PPRAB

In Annex 3 of the PPRAB³², concrete recommendations have been included to improve the process of issuing construction permits for category I, with the aim of simplifying procedures, reducing application

²⁹ Law No. 04/L-110 on Construction, Article 15, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2833>

³⁰ Law No. 04/L-110 on Construction; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2833>

³¹ Administrative Instruction (MESPI) No. 06/2017 on determining the procedures for the preparation and review of requests for construction conditions, construction permits and demolition permits for category I and II of constructions; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14823>

³² Program for Prevention and Reduction of Administrative Burden 2022-2027, page 225; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

times and reducing the documentary burden for citizens and businesses. These recommendations aim to digitize the application process, eliminate documents that can be provided by public institutions themselves and improve the method of payment of taxes and fees.

The recommendations are as follows:

Amend AI MESPI No. 06/2017, respectively articles 12,15 and appendix 2 as follows:

1. The information in points 1, 3, 4, 5 should be provided by the competent authority itself without the need to be proven with documents.
2. Property tax payment should not be mandatory information and the same should be deleted.
3. Consents from public enterprises should be obtained by the public body itself.
4. Provide for the possibility of submitting requests electronically as well as electronic communication in general.
5. To amend municipal regulations on taxes and fees by municipalities in the part related to administrative fees for construction permits and to determine the same in accordance with the LGAP and the Law on the Permits and Licenses System (LPLS).
6. Payments should be made at the end of the process and with a single document, while the forms and methods can be: classic payment, through e-banking, through POS. Payment in installments should continue as an option.

4.5.3. Implementation of recommendations

In order to assess the level of implementation of the recommendations set out in the PPRAB for the construction permit for category I, interviews were conducted with representatives of the MESPI. The following is an assessment of the implementation for each of the recommendations:

1. Provision by the competent authority itself of the information listed in points 1, 3, 4, 5, of Appendix 2 to the AI– the recommendation **has not been implemented**. Neither the Legislative Framework 2025 foresees the amendment of AI No. 06/2017 to enable this change.
2. Removal of the requirement for proof of property tax– the recommendation **has been implemented**. According to the interpretation of the MESPI, this document is not required by either AI No. 06/2017 or the Law on Construction.
3. Obtaining consents from public enterprises by the public body itself– the recommendation **has been implemented**. In 2016, a memorandum of understanding was signed between the MESPI, the public enterprises (KUR, KEDS) and the Municipality of Prishtina to enable the municipal official to obtain consents for construction permits on behalf of the party.
4. Enabling electronic application and communication– the recommendation **has not been implemented**. Steps have been taken through donor-supported projects, but a functional system is still missing.
5. Harmonization of municipal tariffs with LGAP and LPLS– the recommendation **has not been implemented**. The current regulations have not been adapted to the requirements of the primary legislation.
6. Payment at the end of the process and through various forms– the recommendation **has been partially implemented**. Payment is made at the end of the process, usually only physically.

4.5.4. Conclusion

Of the six recommendations identified, none has been implemented through amendments to the relevant sub-legal act. However, two recommendations have been addressed indirectly: the requirement for proof of property tax has never been foreseen by the AI or the Law on Construction but only an “illegal” practice of some municipalities and is therefore considered outdated; while the provision of consents by public enterprises is carried out in practice based on a memorandum of understanding signed in 2016, and not as a result of any regulatory change.

The recommendation for payment at the end of the process has only been partially implemented, as payment is currently made at the end but only in physical form, while other options such as e-banking or POS have not yet been operationalized. The remaining three recommendations, providing information from competent bodies, enabling electronic application and harmonizing municipal tariffs, have not been implemented, although some initial steps have been taken with donor support regarding digitalization.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1.	Provision by the competent authority itself of the information listed in points 1, 3, 4, 5, 11 and 12 of Annex 3 to the AI	Not implemented
2.	Removal of the requirement for proof of property tax	Not implemented (there was no legal basis for it)
3.	Obtaining consents from public enterprises by the public institution itself	Implemented (by agreement)
4.	Enabling electronic application and communication	Not implemented
5.	Harmonization of municipal regulations on taxes and fees with LGAP and LPLS	Not implemented
6.	Payment at the end of the process and with flexible forms	Partially implemented

Implementation of recommendations

Implementation status	Number	Percentage
Implemented	2	33.3%
Not implemented	3	50.0%
Partially implemented	1	16.7%

4.6. Construction permit of category II

4.6.1. Service description

Construction permits for category II are issued to entities planning to construct medium-risk buildings³³, which include more complex structures and with greater impact on the environment and infrastructure. It represents an administrative act issued by the municipality, authorizing the start of construction works for this category. This service is based on the provisions of Article 15 of Law No. 04/L-110³⁴ on Construction and is further regulated through AI MESPI No. 06/2017³⁵, namely Annex 3 (Application for Construction Permit Cat II), which specifies the requirements and procedures for application.

³³ Law No. 04/L-110 on Construction, Article 15; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2833>

³⁴ Law No. 04/L-110 on Construction; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2833>

³⁵ Administrative Instruction (MESPI) No. 06/2017 on determining the procedures for the preparation and review of requests for

The application is carried out at the municipality, which receives the necessary documentation from the party and mediates communication with the institutions responsible for consents and additional acts.

The applicant must submit a copy of the parcel plan and the ownership certificate (not older than 6 months), proof of payment of property tax, identification documents of the owner or co-owners and the investor, as well as a notarized co-investment contract. If it is not included in the documentation of the construction conditions, a certified urban solution agreement must also be submitted. In addition, a geodetic surveying of the parcel with the planned building, the main construction project in triplicate in accordance with the applicable technical standards, as well as additional technical documentation are required, including: a geomechanical study of the site, a study on the organization of the workshop (optional), a dynamic plan of construction and inspection supervision (optional), as well as a study on the physics of construction and energy efficiency measures.

In the meantime, the municipality provides: construction conditions, spatial planning information, consents from public operators, environmental impact consent and fire protection documentation from the competent authority.

If the building is planned to be built on the boundaries of the parcel, notarized consents from the relevant neighbors must be submitted. In cases where the plot is under mortgage, the consent of the mortgagee is required in advance.

The entire procedure aims to guarantee that constructions in this category are developed in accordance with spatial planning, construction legislation and technical standards in force, while preserving urban integrity and the public interest.

4.6.2. Recommendations of the Program for Prevention and Reduction of Administrative Burden 2022-2027

In Annex 3 of the PPRAB³⁶, clear recommendations are included for improving the procedure for issuing construction permits for category II. The recommendations aim to eliminate requests for documents that can be provided internally by public institutions, to enable the full digitalization of the application and communication with the administration, and to rationalize the method of payment of relevant taxes and fees. The recommendations are as follows:

Amend AI MESPI No. 06/2017, respectively Article 12, Article 15 and Annex 3 as follows:

1. The information in points 1, 4, 5, 10, 11 and 12 shall be provided by the competent authority itself without the need to be proven with documents by the applicant.
2. Property tax payment should not be mandatory information and the same should be deleted from application requirements.
3. Consents from public enterprises should be obtained by the public institution itself through internal inter-institutional procedures.
4. Article 12 should be amended to provide for the possibility of submitting the request in electronic form and to enable fully digital communication between the party and the responsible institution.
5. Amend municipal regulations on taxes and fees, in the part related to administrative fees for construction permits, in accordance with the LGAP and the Law on Local Case Services (LLCS).

construction conditions, construction permits and demolition permits for category I and II of constructions; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=14823>

³⁶ Program for Prevention and Reduction of Administrative Burden 2022-2027, page 226; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

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6. Payments should be made at the end of the process and summarized in a single document. Payment methods should be flexible, including classic payment at the counter, through e-banking or POS terminals. Payment in installments should continue as an option.

4.6.3. Implementation of recommendations

In order to assess the level of implementation of the recommendations set out in the Program for Prevention and Reduction of Administrative Burden 2022–2027 for the construction permit service for category II, interviews were conducted with representatives of MESPI. According to the program, it was recommended to amend the Administrative Instruction MESPI No. 06/2017, in Articles 12, 15 and Appendix 3. The assessment for each of the recommendations is presented below:

1. Amendment of the AI for the competent authority to provide the information listed in points 1, 4, 5, 10, 11 and 12– the recommendation has not been implemented. The Legislative Framework 2025 does not foresee the amendment of Administrative Instruction No. 06/2017 to enable this change.
2. Removal of the requirement for proof of property tax– the recommendation has been implemented. This document is not a mandatory requirement under either AI No. 06/2017 or the Law on Construction, but an "illegal" practice of some municipalities.
3. Obtaining consents from public enterprises from the competent authority itself– recommendation implemented. Based on the 2016 agreement between MESPI and public enterprises, municipal officials can obtain consents themselves on behalf of the party.
4. Enabling electronic application and communication– the recommendation has not been implemented. Steps are being taken in this direction with the support of projects such as GIZ, but there is no practical implementation yet.
5. Harmonization of municipal regulations on taxes and fees with LGAP and LPLS– the recommendation has not been implemented. The current regulations have been reinstated and municipalities adapt them themselves, with the consent of the MESPI.
6. Payment at the end of the process and through various forms– the recommendation has been partially implemented. Payment is made at the end of the process, but only physically.

4.6.4. Conclusion

The analysis of the implementation of the recommendations included in the PPRAB for the construction permit service for category II shows a limited level of progress in improving the existing legal and administrative framework. Two of the recommendations, removing the requirement for proof of property tax and obtaining consents from public enterprises, can be considered addressed, as the first was not required by the legislation in force, while the second is based on a 2016 agreement between the MESPI, municipalities and public enterprises.

However, the rest of the recommendations have not found concrete implementation. The Legislative Framework 2025 does not provide for the amendment of AI No. 06/2017, which is essential for the implementation of some of the important recommendations aimed at simplifying procedures. Also, it has not yet been possible to operationalize a system where payments would be made through e-banking, or through POS, but it has been achieved that the payment is made at the end of the process. These shortcomings hinder the advancement towards a more efficient and more accessible administration for citizens.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1.	Amendment of the AI for the provision by the competent authority of the information listed in points 1, 4, 5, 10, 11 and 12	Not implemented
2.	Removal of the requirement for proof of property tax	Implemented (not required)
3.	Obtaining consents from public enterprises from the competent authority itself	Implemented (by agreement)
4.	Enabling electronic application and communication	Not implemented
5.	Harmonization of municipal regulations on taxes and fees with LGAP and LPLS	Not implemented
6.	Payment at the end of the process and through flexible forms	Partially implemented

Implementation of recommendations

Implementation status	Number	Percentage
Implemented	2	33.3%
Not implemented	3	50.0%
Partially implemented	1	16.7%

4.7. Recognition of Bachelor studies

4.7.1. Service description

The Service for the Recognition and/or Equivalence of Higher Education Diplomas obtained outside the Republic of Kosovo aims to ensure the institutional verification of the validity of foreign academic qualifications in the Kosovo education system. This process is regulated by AI (MESTI) No. 12/2018 on the principles and procedures for the recognition of diplomas, degrees and qualifications of higher vocational schools and university degrees obtained abroad³⁷, in accordance with the relevant provisions of Law No. 04/L-037 on Higher Education in the Republic of Kosovo³⁸.

The application for recognition or equivalence is undertaken through the NARIC Center (National Academic Recognition Information Centre) within the MESTI, where the interested party submits a written request together with the relevant documentation. The list of documents includes, among others: the diploma and transcript of records (notarized or certified), a translated summary of the diploma thesis if necessary, the study program and copies of previous diplomas. All documents that are not in the official languages of the Republic of Kosovo must be translated by a court-certified translator.

After the documentation is reviewed by NARIC, the file is passed on for evaluation to the State Council for the Recognition of Qualifications (SCRQ), which takes a decision on recognition or equivalence. If the documentation is incomplete, the party is notified in writing to complete it within 30 days. Otherwise, the file is closed as incomplete and a re-application is required.

In cases where the party applies for a higher level of qualification, all previous qualifications obtained abroad must be acknowledged in advance. Documents submitted for this procedure shall not be returned to the applicant.

³⁷ Administrative Instruction (MASTI) No. 12-2018 principles and procedures for the recognition of diplomas, degrees and qualifications of higher professional schools and university degrees obtained outside the Republic of Kosovo

; <https://masht.rks-gov.net/udhezimi-administrativ-masht-nr-12-2018-parimet-dhe-procedurat-e-njohjes-se-diplomave-gradave-dhe-kualifikimeve-te-shkollave-te-larta-profesionale-dhe-universitare-te-fituara-jashte-republikes-se-k/>

³⁸ Law No. 04/L-037 on Higher Education in the Republic of Kosovo; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2761>

4.7.2. Recommendations of the PPRAB

According to Annex 3 of the PPRAB³⁹, for the service "Recognition of Bachelor studies" the following recommendations are provided for simplifying procedures and reducing the administrative burden for citizens:

Amendment of Article 6, point 1 regarding the required documents and Article 12, point 2.1 regarding the administrative fee according to the following clarifications:

1. Documents under 1 and 2 must be integrated into one document and rendered online through the NARIC Kosovo website;
2. Document 3 must be in accordance with the LGAP and the average cost of the service/procedure must be taken as the basis for determining the amount of the tax;
3. The document under 4 should be deleted as a request because this should be obtained from the CRA by the institution itself, in this case NARIC Kosovo;
4. Document under 5 should be deleted as a request as this is covered by the fact of sending the diploma for review and by the fact of communication between NARIC Kosovo and the NARIC of the respective country;
5. Document under 6 should be a request for the original transcript of grades, which universities usually issue to the candidate up to three original copies upon completion, specifically for the purposes of applying for further studies or for recognition in the relevant country;
6. Document under 7 should be deleted as a requirement because it is covered by submitting other documents, such as diplomas and transcripts of records, and for the level of Bachelor studies, the thesis writing is usually not applied;
7. Document under 9 should also be deleted as a requirement since every applicant who possesses a diploma appendix submits it along with the diploma;
8. The document under 10 should also be deleted as a requirement since it is a condition that is not related to the subject; the applicant can apply for recognition of any level of studies without prejudice to whether he has completed previous studies or not; this is covered by the very fact of the person's registration at the Bachelor's level - if he did not have previous studies or something equivalent, the relevant university would not accept them in the Bachelor's program;
9. The requirement under 15 should be deleted as it is covered by the content of point 13;
10. The request under point 16 should also be deleted, as explained for the document/request under point 10 above.

4.7.3 Implementation of recommendations

To assess the level of implementation of the recommendations set out in the PPRAB, interviews were conducted with officials from MESTI, respectively the NARIC Center. The following is an assessment of the implementation for each of the recommendations:

1. Integrating documents under 1 and 2 into one online form– the recommendation **has been implemented**. Currently, the application is submitted electronically.
2. Determination of the administrative fee in accordance with the LGAP and based on the average cost of the service – the recommendation **has not been implemented**. No change has been made in the method of determining the fee.

³⁹ Program for Prevention and Reduction of Administrative Burden 2022-2027, page 229; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

3. Elimination of the requirement for an identification document if data is obtained from the civil registry system– the recommendation **has not been implemented**. This change was planned to be implemented within the framework of the project with GIZ for the interconnection of the CRA civil registry, but currently remains in force.
4. Removing the requirement for a notarized copy of the diploma if the diploma is verified through the NARIC network – the recommendation has not been implemented.
5. Replacing the notarized copy of the transcript of records with the original copy issued by the university – the recommendation **has not been implemented**.
6. Removing the requirement for a thesis summary in cases where this does not apply to the Bachelor's level - the recommendation **has not been implemented**. Clarification is still required on the program and profile of studies.
7. Removing the requirement for the diploma appendix as a separate document– the recommendation **has not been implemented**. The diploma appendix is required to be submitted to the country where the studies were completed.
8. Eliminating the requirement for proof of a previous degree in cases where it is not relevant to the current application – the recommendation **has not been implemented**, but it has been planned to be removed.
9. Deletion of point (15) when a document is missing, the request will not be accepted, since it is covered by point (13) where the party is notified to complete the file within 30 days - the recommendation **has not been fully implemented**. In the online application it is implemented, but in the physical application point 15 is still applied.
10. Removing the requirement for prior recognition of qualifications in cases where it is not relevant to the current application – the recommendation **has not been implemented**. There is effort to remove this requirement in the future.

4.7.4. Conclusion

The recognition and equivalence of Bachelor studies diplomas, as regulated by the AI and the Law on Higher Education in the Republic of Kosovo, continues to be characterized by an administrative process burdened with numerous requests for documents, some of which are unnecessary or repetitive.

The PPRAB has provided a series of concrete recommendations for the simplification and rationalization of this service, through the elimination of documents that can be obtained through institutional exchange and the adjustment of the administrative fee in accordance with the principles of the LGAP.

However, data from interviews with MESTI officials indicate that most of the recommendations have not been implemented. The process continues to require documents that can be provided by public institutions themselves, as well as requirements that are not directly related to the qualification assessment, thus creating an unnecessary burden on citizens.

The partial implementation of the online application is a positive step, but not sufficient to achieve the goal of complete simplification of the procedure. For this reason, it is recommended that MESTI take concrete steps to fully implement the recommendations set out in the program, including harmonizing practice with applicable legislation and advancing inter-institutional data exchange.

An electronic platform for this purpose is being developed with the support of GIZ, but the problem still remains the legal framework, which needs to be changed and adapted to the electronic system.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1.	Documents under 1 and 2 should be integrated into a single document and be accessible online through the NARIC Kosovo website.	Implemented
2.	Document 3 (pay slip) must be in accordance with the LGAP and be based on the real costs of the service/procedure.	Not implemented
3.	Document 4 (copy of identification document) to be removed as a request and received from the CRA through institutional exchange	Not implemented
4.	Document 5 (certified copy of the diploma) to be removed as a request, based on the physical examination of the diploma and communication with the NARIC of the respective country	Not implemented
5.	Document 6 to be replaced with the request for original transcript of records	Not implemented
6.	Document 7 (thesis summary) should be removed as a requirement because it does not apply to the Bachelor's level.	Not implemented
7.	Document 9 (diploma appendix) should be removed as a request, as it is naturally submitted with the diploma.	Not implemented
8.	Document 10 (diploma of previous education) should be removed as a requirement, since admission to the Bachelor's degree is itself proof of completion of previous education.	Not implemented
9.	The request under point 15 should be removed as it is covered by the notification procedure for completing the documentation.	Partially implemented
10.	The request under point 16 should be dismissed as justified for document no. 10.	Not implemented

Implementation of recommendations

Implementation status	Number	Percentage
Implemented	1	10%
Not implemented	8	80%
Partially implemented	1	10%

4.8. Recognition of Master's degree

4.8.1. Service description

The Recognition and/or Equivalence of Master's Degrees obtained outside the territory of the Republic of Kosovo, aims to guarantee the official and reliable evaluation of foreign academic qualifications in accordance with the standards of higher education in the country. This process is regulated by AI No. 12/2018⁴⁰ issued by MESTI, specifically its Article 6, based on Law No. 04/L-037 on Higher Education.

The application for this service is undertaken at the NARIC Center within the MESTI. The interested party submits a written request together with the relevant documentation that includes: the completed form, the payment slip, certified copies of the diploma and transcript, the relevant study program and, if necessary, a translated summary of the diploma thesis. Copies of previous level diplomas (e.g. Bachelor) are also required, as well as other supporting documents according to the provisions of the relevant instruction.

40 Administrative Instruction (MAST) No. 12-2018 Principles and Procedures for the Recognition of Diplomas, Degrees and Qualifications of Higher Vocational Schools and University Degrees Obtained Outside the Republic of Kosovo; <https://masht.rks-gov.net/udhezimi-administrativ-masht-nr-12-2018-parimet-dhe-procedurat-e-njohjes-se-diplomave-gradave-dhe-kualifikimeve-te-shkollave-te-larta-profesionale-dhe-universitare-te-fituara-jashte-republikes-se-k/>

In cases where the documents are not in one of the official languages of the Republic of Kosovo, they must be translated by a court-certified translator. All documents submitted for this procedure remain in the institution's file and are not returned to the applicant.

After submission, the documentation is reviewed by NARIC and then forwarded to the SCRQ for evaluation. If the documentation is incomplete, the party is notified to complete it within a 30-day period. In case of non-completion, the file is archived as incomplete and the applicant must submit a new application.

For applications at the Master's level, it is required that diplomas from previous levels of studies obtained abroad be previously recognized. In this case, the applicant must attach proof of prior recognition by the competent authorities.

4.8.2. Recommendations of the PPRAB

Based on the proposed recommendations for reduction of the administrative burden for citizens and increasing the efficiency of the procedure for recognizing Master's degree diplomas obtained outside the Republic of Kosovo, the PPRAB⁴¹ has proposed amendments in AI (MESTI) No. 12/2018, respectively in Article 6, point 1 and Article 12, point 2.2.

The recommendations are as follows:

1. The documents mentioned in points 1 (written request) and 2 (application form) should be integrated into a single document and made accessible online through the NARIC Kosovo platform, eliminating the need for a physical application and facilitating access for applicants.
2. The document mentioned in point 3 (pay slip) must be harmonized with the principles of the LGAP, relying on the average cost of the service to determine the tax amount.
3. The document requested in point 4 (copy of identification document) should be removed as a requirement, as identification data can be verified through the CRA system, without the need for the applicant to physically submit the document.
4. The document mentioned in point 5 (notarized copy of the diploma) is considered unnecessary, as NARIC Kosovo can verify the authenticity of the diploma in cooperation with counterpart institutions in the respective country.
5. The document in point 6 (notarized copy of the transcript of records) should be replaced with the request for submission of the original transcript, which is usually issued by universities in several copies and is a standardized document for international applications.
6. The document in point 7 (translated thesis summary) should be removed as a requirement, as its informative value is covered by the main documents such as the diploma and transcript.
7. The document in point 8 (study program) should be removed from the list of requirements, as the relevant information on the content and duration of studies is sufficiently reflected in the transcript of records.
8. The document in point 9 (diploma appendix) should not be requested separately, as every applicant who possesses this document automatically attaches it to the diploma when applying.
9. The document in point 10 (diplomas of previous education) should be removed from the list of requirements. Admission of a candidate to the Master's level implies that they have completed their previous studies, and the registration at this level itself is sufficient evidence to proceed with the review of the application.

⁴¹ Program for Prevention and Reduction of Administrative Burden 2022-2027, page 230; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

10. The request included in point 15 of the AI should be removed, as its content is covered by the provision of point 13, which provides for the procedure for completing the documentation in case it is incomplete.
11. The requirement in point 16 should also be deleted, for the same reasons as in point 10: the applicant has the right to request recognition of a given diploma, regardless of whether the previous diploma is recognized, since the fact of enrollment in an advanced program from a foreign institution counts as proof of fulfillment of the prerequisites.

4.8.3. Implementation of recommendations

In order to assess the level of implementation of the recommendations set out in the PPRAB for the Master's degree recognition service, interviews were conducted with officials from MESTI, respectively the NARIC Kosovo Center. The following is an assessment of the implementation for each of the recommendations:

1. Integrating the written request and application form into a single online document– the recommendation **has been implemented**. The application for recognition of a Master's degree is now completed electronically.
2. Harmonization of the payment slip with the LGAP and its determination according to the real costs of the service– the recommendation **has not been implemented**. There is no change in the method of determining the tax amount.
3. Removal of the requirement for an identification document if the data can be verified through the Civil Registry-CRA– the recommendation **has not been implemented**. For applicants from Kosovo, a connection with CRA is planned within the framework of a project with GIZ, while for applicants from abroad this opportunity is still missing.
4. Removal of the requirement for a notarized copy of the diploma in cases where it can be verified through the NARIC network – the recommendation **has not been implemented**. The requirement for a notarized copy continues to remain in force.
5. Replacing the notarized copy of the transcript with the original version issued by the university – recommendation **not implemented**. Notarized transcript still required.
6. Removing the requirement for a translated thesis summary when the relevant information is included in the basic documents – recommendation **not implemented**. Clear clarification of the program and study profile is required.
7. Removing the requirement for the study program, since the data is contained in the transcript of records or other submitted documents – the recommendation **has not been implemented**. It is planned to be implemented for equivalence.
8. Removal of the requirement to submit the diploma appendix as a separate document– the recommendation has not been implemented. It is not regulated but also depends on the country where the applicant completed their studies.
9. Removing the requirement for documentation of prior education diplomas when they are not relevant to the application– the recommendation **has not been implemented**. However, there is a willingness to remove this requirement in the future.
10. Deletion of point (15) when a document is missing, the request will not be accepted, since it is covered by point (13) where the party is notified to complete the file within 30 days - the recommendation **has not been fully implemented**. In the online application it is implemented, but in the physical application point 15 is still applied.

11. Removal of the requirement for prior recognition of a previous degree if the purpose of the application is only the recognition of a Master's degree - the recommendation **has not been implemented**. The removal of this requirement is still under consideration.

4.8.4. Conclusion

The assessment of the implementation of recommendations for the Master's degree recognition service shows minimal progress. Out of 11 recommendations, only 1 has been fully implemented, 1 partially implemented, while 9 remain unimplemented. Despite the digitalization of the application, most of the requirements such as notarized documents and evidence of previous degrees continue to be required. Also, the fee is not harmonized with the LGAP and verification through the Civil Registry-CRA has not been functionalized. The results show the need for a review of AI (MESTI) no. 12/2018 and greater institutional commitment to simplify the process of recognition and equivalence of Master's degree diplomas obtained abroad.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1	Integrating the written request and application form into a single online document	Implemented
2	Harmonization of the payment slip with the LGAP and its determination according to the real costs of the service	Not implemented
3	Removing the requirement for an identification document if the data can be verified through CRA	Not implemented
4	Removing the requirement for a notarized copy of the diploma when it can be verified online	Not implemented
5	Replacing the notarized copy of the transcript with the original version	Not implemented
6	Removing the requirement for a translated thesis summary if the information is included in the documents	Not implemented
7	Removal of the requirement for the study program, since the data is reflected in the basic documentation	Not implemented
8	Removal of the requirement to submit the diploma supplement as a separate document	Not implemented
9	Removing the requirement for a previous degree when it is not relevant to the application	Not implemented
10	Deletion of point 15 when a document is missing, as it is covered by the completion procedure under point 13	Partially implemented
11	Removal of the requirement for prior recognition of a previous degree for application in Master's level	Not implemented

Implementation of recommendations

Implementation status	Number	Percentage
implemented	1	9.1%
Not implemented	9	81.8%
Partially implemented	1	9.1%

4.9. Recognition of the PhD degree

4.9.1. Service description

The service for the recognition or equivalence of PhD degrees obtained outside the Republic of Kosovo is regulated by AI No. 12/2018⁴², based on Law No. 04/L-037 on Higher Education. This service is provided by the NARIC Center, within the framework of MESTI, and aims to enable the official recognition of advanced academic qualifications in the Kosovo education system.

The interested party must submit a written request for recognition or equivalence, together with the application form, the payment slip for the administrative fee, and a copy of the identification document. The application must also include notarized or certified copies of the PhD diploma and the transcript/certificate of records, as well as the diplomas of the previous levels of study (Bachelor and Master). In case the PhD thesis is drafted in a language that is not official in the Republic of Kosovo, the applicant must submit a translated summary of it (from 3 to 5 pages). The relevant study program for the period followed is also required, as well as the diploma appendix if any.

All documents in a foreign language must be translated into one of the official languages of the Republic of Kosovo by a court-certified translator. Documents submitted for this procedure are not returned to the applicant. If the file is incomplete, NARIC is obliged to notify the applicant in writing and give him/her a deadline of 30 days to complete it. If this is not respected, the file is closed as incomplete and a re-application is required. The SCRQ may request additional documentation, which the party is obliged to submit.

For the recognition of the PhD degree, a condition remains that the Bachelor and Master degrees have been previously recognized, if these were also obtained abroad. Only after fulfilling this condition can the application for the third level of studies be reviewed. This service provides clear standards and reliable mechanisms for the assessment of advanced academic qualifications and their integration into the higher education system in the Republic of Kosovo.

4.9.2. Recommendations of the PPRAB

In order to reduce the administrative burden on citizens and increase the efficiency of the procedure for the recognition of PhD-level diplomas obtained outside the Republic of Kosovo, the PPRAB⁴³ has provided concrete recommendations for amendments to AI (MESTI) No. 12/2018, respectively in Article 6, paragraph 1 and Article 12, paragraph 2.2.

The recommendations are as follows:

1. The documents mentioned in paragraph 1 (written request) and paragraph 2 (application form) should be merged into a single document and online application should be enabled through the NARIC Kosovo electronic platform, avoiding physical presentation and significantly simplifying access for applicants.
2. The payment slip (paragraph 3) should be harmonized with the LGAP, based on the real cost of the procedure for determining the amount of the tax, so that it does not pose a disproportionate burden on applicants.
3. The copy of the identification document (paragraph 4) should be removed as a requirement, as identification data can be provided through inter-institutional communication with the CRA, without the need for physical submission by the applicant.

⁴² Administrative Instruction (MAST) No. 12-2018 Principles and Procedures for the Recognition of Diplomas, Degrees and Qualifications of Higher Vocational and University Degrees Obtained Outside the Republic of Kosovo; <https://masht.rks-gov.net/udhezimi-administrativ-masht-nr-12-2018-parimet-dhe-procedurat-e-njohjes-se-diplomave-gradave-dhe-kualifikimeve-te-shkollave-te-larta-profesionale-dhe-universitare-te-fituara-jashte-republikes-se-k/>

⁴³ Program for the Prevention and Reduction of Administrative Burden 2022-2027, page 231; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

4. A notarized copy of the diploma (paragraph 5) is unnecessary, as its authenticity can be verified through direct communication between NARIC Kosovo and the counterpart institutions in the country where the diploma was issued.
5. The transcript of records (paragraph 6) should only be requested if it exists and in original form. In many cases of PhD studies there are no structured examinations, therefore this requirement should be conditional and not mandatory for everyone.
6. The translated thesis summary (paragraph 7) should be removed from the list of required documents, as the content and conclusions of the thesis are reflected through the basic documents such as the diploma and transcript (if any).
7. The study program (paragraph 8) should not be required, as the relevant information is covered by existing documents and is unnecessary for the evaluation of the PhD degree.
8. The diploma appendix (paragraph 9) should not be requested as a separate document, as applicants who possess this document attach it themselves during the application process.
9. The diploma of previous studies (paragraph 10) should be removed as a requirement, as the candidate's registration in PhD studies at a foreign university proves that he/she has fulfilled the admission criteria, including the Master's degree or equivalent, and it is not necessary to request it separately.
10. The request mentioned in paragraph 15 should be removed, as it is covered by the provisions of paragraph 13 which determine the manner of handling incomplete files.
11. The requirement in paragraph 16 should be removed for the same reasons as in point 10 – the fact that a candidate has been admitted to PhD studies is sufficient evidence of previous qualifications and should not prejudice the right to apply for recognition of this level.

4.9.3. Implementation of recommendations

In order to assess the level of implementation of the recommendations set out in the PPRAB for the PhD level diploma recognition service, interviews were conducted with officials from MESTI, respectively the NARIC Kosovo Center. The following is an assessment of the implementation for each of the recommendations:

1. Integrating the written request and application form into a single online document– the recommendation **has been implemented**. The application for recognition of the PhD degree is now carried out electronically.
2. Harmonization of the payment slip with the LGAP and its determination according to the real costs of the service– the recommendation **has not been implemented**. There is no change in the method of determining the tax amount.
3. Removal of the requirement for an identification document if the data can be verified through the Civil Registry (CRA)– the recommendation **has not been implemented**. For applicants from Kosovo, the connection of systems is foreseen within the framework of a project with GIZ, while for applicants from abroad this cannot be realized.
4. Removal of the requirement for a notarized copy of the diploma when it can be verified through the NARIC network – the recommendation **has not been implemented**. The requirement for a notarized copy remains in force.
5. Replacing the notarized copy of the transcript with the original version issued by the university – recommendation **not implemented**. Notarized transcript still required.
6. Removing the requirement for a translated thesis summary when the relevant information is

included in the basic documents – recommendation **not implemented**. Clear clarification of the program and study profile is required.

7. Removing the requirement for the study program, since the data is contained in the transcript of records or other submitted documents – the recommendation **has not been implemented**. It is planned to be implemented for equivalence.
8. Removal of the requirement to submit the diploma appendix as a separate document– the recommendation **has not been implemented**. The appendix is required, especially in cases where it is not included in the basic documents and this depends on the practices of the country where the studies were conducted.
9. Removing the requirement for documentation of previous degrees when they are not relevant to the application for recognition of PhD – the recommendation **has not been implemented**. However, there is a willingness to remove this requirement in the future.
10. Deletion of point 15, which provides for the rejection of the application in the absence of any document, as it is covered by point 13 for completion within the 30-day deadline – the recommendation **has not been fully implemented**. The online application provides for a deadline for completion, but in the case of a physical application, point 15 still applies.
11. Removal of the requirement for prior recognition of the previous degree when the application concerns only the PhD degree– the recommendation **has not been implemented**. This requirement remains in force, but there is institutional discussion about the possibility of its removal.

4.9.4. Conclusion

The assessment of the implementation of the recommendations for the PhD level diploma recognition service shows a very low level of progress. Out of a total of 11 recommendations submitted in the Program for Prevention and Reduction of Administrative Burden, only 1 has been fully implemented, 1 has been partially implemented, while 9 others remain unimplemented. Despite the digitalization of the application, the vast majority of unnecessary requirements, such as notarized documents or requests for previous diplomas, continue to remain in force. Also, the fee has not yet been harmonized with the LGAP, and the system for verification of data through the Civil Registry has not been functionalized.

This situation highlights the necessity for an immediate review of AI No. 12/2018 and for increased institutional commitment towards simplifying procedures and reducing burden on applicants seeking recognition of PhD degrees obtained abroad.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1	Integrating the written request and application form into a single online document	Implemented
2	Harmonization of the payment slip with the LGAP and its determination according to the real costs of the service	Not implemented
3	Removing the requirement for an identification document if the data can be verified through CRA	Not implemented
4	Removing the requirement for a notarized copy of the diploma when it can be verified online	Not implemented
5	Replacing the notarized copy of the transcript with the original version	Not implemented
6	Removing the requirement for a translated thesis summary if the information is included in the documents	Not implemented

7	Removal of the requirement for the study program, since the data is reflected in the basic documentation	Not implemented
8	Removal of the requirement to submit the diploma supplement as a separate document	Not implemented
9	Removing the requirement for a previous degree when it is not relevant to the application	Not implemented
10	Deletion of point 15 when a document is missing, as it is covered by the completion procedure under point 13	Partially implemented
11	Removal of the requirement for prior recognition of a previous degree for application to the PhD level	Not implemented

Implementation of recommendations

Implementation status	Number	Percentage
Implemented	1	9.1%
Not implemented	9	81.8%
Partially implemented	1	9.1%

4.10. Application for ID Card (including cases of loss/theft, confiscation or damage of ID card) - for persons aged 16 to 18 and over 18 years old)

4.10.1. Service description

Obtaining an identity card is a service provided by the CRA within the MIA for citizens of the Republic of Kosovo who have reached the age of 16, in accordance with Law No. 05/L-015 on Identity Cards⁴⁴ and AI (MIA) No. 05/2018 on Procedures for the Provision of Identity Cards.⁴⁶

This service includes providing an identification document for the first time, as well as in cases of loss, theft, confiscation or damage to the existing ID card. The procedure takes place physically at the Personal Documents Offices (PDO) in the respective municipalities.

For applicants aged 16 to 18, a birth certificate or passport is required, as well as additional documentation in case of loss or confiscation of the ID card (police report or explanatory statement). The parent's ID card or passport is also required, while in cases where the applicant was born outside of Kosovo, a decision on acquiring citizenship is also required. In cases of data inconsistency, the applicant is instructed to correct the data at the Civil Registry Office.

For citizens over 18 years old, the procedure is similar and includes the presentation of a birth certificate for review or passport, a police report in case of loss/theft, and, in appropriate cases, an explanatory statement. In both categories, after reviewing the documents, a payment slip for the relevant fee is issued and the applicant is notified of the method and time of collection of the ID card. The new document can only be collected in person by the applicant, presenting the old ID card (if he/she has it) and the police report in cases of loss.

4.10.2. Recommendations of the PPRAB

Based on Annex 3 of the PPRAB⁴⁷, it is proposed to amend Articles 4 and 5 of AI (MIA) No. 05/2018 on Procedures for the Provision of Identity Cards, in order to reduce the burden on citizens when applying for an identity card:

44 Law No. 05/L-015 on Identity Card, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=11278>

45 The new Law on Identity Cards (Law No. 08/L-267 on Identity Cards) has been approved but is not yet in force because the by-laws for its implementation have not been approved.

46 Administrative Instruction (MIA) No. 05/2018 on procedures for provision of identity cards, <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=17662>

47 Program for Prevention and Reduction of Administrative Burden 2022-2027, page 233; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

Amendment to Article 4 of AI No. 05/2018:

1. The birth certificate should not be requested when the CRA itself issues this document.
2. The police certificate should not be requested by the party, it should be generated by the CRA through communication with the Police database. That is, at the moment the theft/loss is reported to the police, the police records should be generated in the system and received by the CRA.
3. An ID card or passport to prove the parent's identity should not be required because the birth certificate generated earlier by the CRA itself also contains data on the parents' identity.
4. The decision on acquiring citizenship does not have to be requested by the party, because the CRA itself can provide this document through database communication between the relevant institutions.
5. In case of data mismatch, the party should not be required to go to the Civil Status Office to correct the data. The data should be the same as in this office and in the CRA, therefore the CRA should take over this communication (data verification) and not burden the party by going back and forth through different institutions.
6. At the time of collection of the ID card, the party should not be asked for a police report if the reason for applying for the ID card was the loss/theft of the ID card, because this phase has now been replaced by communication of records between the CRA and the Police.

Amendment to Article 5 of AI (MIA) No. 05/2018:

1. The birth certificate should not be requested when the CRA itself issues this document.
2. The police certificate should not be requested from the party, it should be generated by the CRA through communication with the Police database. That is, at the moment the theft/loss is reported to the police, the police records should be generated in the system and received by the CRA.
3. An ID card or passport to prove the parent's identity should not be required because the birth certificate generated earlier by the CRA itself also contains data on the parents' identity.
4. The decision on acquiring citizenship does not have to be requested from the party, because the CRA itself can provide this document through database communication between the relevant institutions.
5. In case of data mismatch, the party should not be required to go to the Civil Status Office to correct the data. The data should be the same as in this office and in the CRA, therefore the CRA should take over this communication (data verification) and not burden the party with circulating through different institutions.
6. At the time of collection of the ID card, the party should not be asked for a police report if the reason for applying for the ID card was the loss/theft of the ID card, because this phase has now been replaced by communication of records between the CRA and the Police.

4.10.3. Implementation of recommendations

To assess the level of implementation of the recommendations included in Annex 3 of the PPRAB, interviews were conducted with CRA officials, who provided clarifications on the changes in the procedure for issuing ID cards, with a focus on Article 4 of AI (MIA) No. 05/2018.

1. **Not requesting a birth certificate when this document is issued by the CRA itself**– the recommendation **has not been implemented**. The birth certificate is still required, even

with the changes brought by AI No. 06/2023⁴⁸, the same is only required to be submitted for inspection but there is no longer any need for the party to submit a copy.

2. **Removal of the requirement for police verification in cases of loss or theft of the document, through electronic data exchange between the CRA and the Police**– the recommendation **has been partially implemented**. Although it is foreseen in the AI (as an alternative method), this procedure is not yet functional in practice due to the lack of digitalization in the Kosovo Police. Until the interconnection of document systems, a physical document is required.
3. **Removing the requirement for a parent's ID card or passport, when the relevant data is found on the birth certificates**– the recommendation **has not been implemented**. In practice, an ID card and passport are still required, although based on AI No. 06/2023⁴⁹, these are requested for viewing only and there is no need for the party to submit a copy of them.
4. **Obtaining the decision on acquiring citizenship through inter-institutional communication, without burdening the party with its hard copy provision** - the recommendation **has not been implemented**. Based on AI No. 06/2023, parents must present proof of their identity, as well as the decision to acquire citizenship for the applicant for viewing or through the electronic system. Therefore, the requirement to send proof of identity and the decision to acquire citizenship, which is brought physically by the party, has not been removed, but there is no need to submit a copy of them.
5. **Regulating data discrepancies without the need for the party to go to the Civil Registry Office themselves**– the recommendation **has not been implemented**. Currently, the party continues to be obliged to appear at the office for data correction, as a functional mechanism for internal coordination between the CRA and the Civil Status Offices is still missing in the AI that is being drafted (based on the new law)⁵⁰ and planned to fix this issue.
6. **Removing the need for a police report at the time of collection of the ID card, when the application occurred due to loss or theft**– the recommendation **has been partially implemented**. Although it is foreseen in the AI (as an alternative method), this procedure is not yet functional in practice due to the lack of digitalization in the Kosovo Police, and until the systems are interconnected, a physical document is required.

4.10.4. Conclusion

Based on the assessment, it results that out of a total of 6 recommendations set out in the PPRAB for this service, 2 have been partially implemented, and 4 have not been implemented. Although positive steps have been taken towards facilitating procedures for providing ID cards, the lack of full digitalization and interconnection of inter-institutional systems continues to remain a concrete obstacle to the full implementation of the recommendations and to the real reduction of the administrative burden for citizens.

48 Administrative Instruction (MIA) No. 06/2023 on procedures for issuing identity cards, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=83321>

49 Administrative Instruction (MPB) No. 06/2023 on procedures for issuing identity cards, articles 4 and 5; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=83321>

50 Law No. 08/l-267 on Identity Card; <https://gzk.rks-gov.net/ActDetail.aspx?ActID=95843>

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1.	Not requesting a birth certificate when the ID card is issued by the CRA itself	Not implemented
2.	Removal of the requirement for police verification in case of loss/theft through electronic exchange with the Police	Partially implemented
3.	Removing the requirement for a parent's ID card/passport when the data is found on the birth certificate	Not implemented
4.	Obtaining the decision to acquire citizenship through inter-institutional communication	Not implemented
5.	Resolving data discrepancies without the need for the party to appear at the Civil Registry Office	Not implemented
6.	Removal of the police report at the moment of collection of the ID card in case of loss/theft	Partially implemented

Implementation of recommendations

Implementation status	Number	Percentage
Partially implemented	2	33.3%
Not implemented	4	66.7%

4.11. Tax Residency Certificate

4.11.1. Service description

The Tax Residency Certificate (TRC) is an official document issued by the Tax Administration of Kosovo (TAK), which proves the tax residency status of a natural or legal person in the Republic of Kosovo. The issuance of this certificate is based on the provisions of the Double Taxation Agreements (DTAs), which Kosovo has signed with other countries, in order to provide tax relief to tax residents.⁵¹

For a long time, the procedure for obtaining this certificate was partially digitalized and accompanied by physical requests. The applicant had to initially complete the request electronically through the TAK website, but then the same had to be printed and physically submitted to the TAK offices. In addition to the request, the citizen was obliged to attach a series of accompanying documents, such as a birth certificate, a copy of the identification document (ID card or passport), and the relevant contract that served as the basis for the request.

Collection of the certificate was also carried out only physically, on a specific date and at the place where the request was submitted. This procedure, which required the presentation of documents that already existed in state systems and unnecessary physical interaction with the institution, was considered an administrative burden. The lack of a clear regulatory basis for some of these requests, as well as the fact that those documents could be provided through inter-institutional liaison, made this service one of the most evident cases for simplification and full digitalization within the framework of efforts to reduce the administrative burden.

4.11.2. Recommendations of the PPRAB

In order to simplify and digitalize the procedure for issuing the Tax Residency Certificate (TRC), the PPRAB in Annex 3⁵², has addressed a number of recommendations aimed at reducing physical steps and increasing service efficiency. These recommendations include:

⁵¹ Double Taxation Agreements (DTA) available at <https://www.atk-ks.org/marrevshjet/marrevshjet-per-eliminimin-e-tatimit-te-dufishite/>

⁵² Program for Prevention and Reduction of Administrative Burden 2022-2027, page 235; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

1. There is no need for amendments to the DTEAs, as they do not define the explicit procedure for applying the TRC, but serve only as a legal basis in the spirit of its articles that require the provision of the certificate.
2. The application must be made fully online through the TAK electronic services platform. When completing the electronic application, there must be an option to upload the contract or document that is the subject of the TRC request.
3. Other documents currently required (points 2 and 3) are considered unnecessary, as the relevant information is already available in the TAK database and can be verified through the CRA records.
4. The process of physically collecting the TRC should be avoided and the certificate should be provided in electronic format (online) to the applicant, the same way the application is made, enabling the document to be downloaded from the TAK electronic platform.

4.11.3. Implementation of recommendations

To assess the level of implementation of these recommendations, the responsible official at TAK was interviewed, who provided the following overview:

1. DTEAs do not need to be changed – recommendation **has been implemented**. From January 2023, the online application for the Tax Residency Certificate (TRC) has been functionalized through the TAK's electronic EDI system, based on the existing legal framework.
2. Online submission of the application (request) for TRC – recommendation **has been implemented**. The TRC is submitted online through the TAK EDI system, where applicants can also attach the relevant documentation (contract) electronically.
3. Removal of unnecessary documents – recommendation **has been implemented**. Exceptionally, when the documentation is incomplete, communication with the applicant is done through the EDI system.
4. Removal of physical collection of the certificate (TRC) – recommendation **has not been implemented**. Currently, the TRC must be physically collected at the counter. TAK has planned that in the future the TRC will be sent electronically to the applicant through the EDI system.

4.11.4. Conclusion

During 2023, the process for issuing the TRC has entered an advanced stage of digitalization, with the possibility of applying and submitting documentation through the electronic EDI system of TAK. Communication with the applicant takes place exclusively electronically, only in cases where the documentation is incomplete or incorrect. However, the delivery of the certificate to the applicant continues to be done physically.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1	The application for TRC should be completed online without physical delivery.	Implemented
2	Uploading the contract electronically to the application	Implemented
3	Removal of unnecessary documents (extract, ID card)	Implemented
4	Sending the certificate (TRC) electronically, without physical collection	Not implemented

Summary chart – Implementation of recommendations

Implementation status	Number	Percentage
Implemented	3	75%
Not implemented	1	25%

4.12. Apostille certificate (stamp)

4.12.1. Service description

The service for issuing an apostille certificate constitutes an administrative procedure that enables the certification of the origin of official documents issued by public institutions of the Republic of Kosovo for international use. This service is implemented in accordance with the provisions of the Convention on the Abolition of the Requirement for Legalization of Foreign Official Documents, dated 5 October 1961, ratified by Law No. 05/L-093⁵³, as well as with **Regulation No. 19/2016 on the Issuance of Apostille Certificates**⁵⁴.

The procedure for issuing an apostille certificate is regulated by Regulation (GRK) No. 19/2016 and includes several steps. Initially, the party submits the request through the standard form, which is completed by the relevant official and signed by the applicant. Then, a payment slip is issued, which is paid by the party and proof of payment is submitted to the MFAD. The request is reviewed within a maximum period of three working days from its submission. The certificate is delivered to the applicant at the counter or, upon request, can be sent by mail with the costs covered by the recipient.⁵⁵ The entire procedure is structured in order to guarantee the verification and authenticity of official documents, as well as compliance with the international principles and standards set out in the 1961 Hague Convention.⁵⁶

4.12.2. Recommendations of the Program for Prevention and Reduction of Administrative Burden 2022-2027

In Annex 3 of the PPRAB⁵⁷, concrete recommendations have been included to improve the process of issuing the apostille certificate, with the aim of simplifying procedures and reducing physical interactions with the administration. These recommendations aim to digitize the application, review fees and enable the provision of the service in a completely electronic manner. The recommendations submitted are as follows:

1. The form (request) for an apostille certificate (stamp) must be accessible online, so the standard single form must be digitized and the parties must complete it online, just as the deadline for submitting the request is set in advance. An option is to merge the two phases into one, setting the deadline and completing the request/form being one process.
2. This would reduce the procedure for both the party and the official responsible for issuing the stamp. The latter would not need to fill out the form for the party at the moment the party applies, this saves time and eliminates queues for applications.
3. Payment should also be made possible online, immediately after completing the standard form, the online payment phase should come. The payment should not be 10 EUR because

⁵³ Law No. 05/L-093 on the Ratification of the Convention on the Abolition of the Requirement for Legalization of Foreign Official Documents (October 5, 1961), <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=12764>

⁵⁴ Regulation (GRK) - No. 19/2016 on the issuance of apostille certificates, <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=15075>

⁵⁵ Regulation (GRK) - No. 19/2016 on the issuance of apostille certificates, Articles 6,7,10.7,14; <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=15075>

⁵⁶ Law No. 05/L-093 on the Ratification of the Convention on the Abolition of the Requirement for Legalization of Foreign Official Documents (October 5, 1961), Articles 2 and 5

⁵⁷ Program for Prevention and Reduction of Administrative Burden 2022-2027, page 236; <https://kryeministri.rks-gov.net/wp-content/uploads/2022/09/ZPS-shtator2022-PPZBA-2022-2027-dhe-PV-2022-2027-Shtojca-1-6-FINAL-ALB.pdf>

it is well above the average cost of the service: an apostille stamp and the procedure for issuing do not cost 10 EUR. This avoids the need to issue a payment slip, make the payment someplace else and the need to bring proof of payment. This means a reduction in procedures for the party and the official responsible for issuing the apostille stamp.

4. The certificate can be collected by the party, his/her relative or an authorized person. That is, only this step in the procedure can be done physically, but this does not cause a queue (waiting) because the party contacts the administration only to collect the apostille certificate (stamp). However, at a later stage there should be the possibility of issuing an E-apostille (Article 3, point 1.10) which is enabled through the Electronic Apostille Program (e-APP). With this, the entire process would be online, both the application and the withdrawal of the apostille stamp in the online form.

4.12.3. Implementation of recommendations

To assess the level of implementation of the recommendations set out in Annex 3 of the program, MFAD officials were interviewed, who provided the following explanations:

1. **Functionalization of the standardized online application form** – the recommendation **has been partially implemented**. The electronic platform serves only to set the deadline for submitting documents, but not for applying. When submitting documents, the physical form is not filled out. This means that the form, although it is a requirement of the regulation, is not filled out in practice.
2. **Combining two steps into a single process (appointment and request submission)** – the recommendation **has been partially implemented**. The party sets an online deadline for submitting documents that need to be stamped without the need to fill out a hard copy form.
3. **Online and automatic payment of the apostille certificate fee** – the recommendation **has not been implemented**. Payment continues to be made through a payment slip issued by the official and requires physical submission of proof of payment.
4. **Collection by mail or by authorized person** – the recommendation **has been implemented**. The apostille certificate can also be withdrawn by authorized persons or sent by mail, without the need for the applicant to physically appear.
5. **Functionalization of the e-apostille system (e-APP)** – the recommendation **has been partially implemented**. The system is functional and certificates are stamped electronically, but only by the relevant MFAD officials. Therefore, the application and collection of the apostille stamp has not yet been digitized for citizens.

4.12.4. Conclusion

Based on the data collected through interviews with responsible officials of the MFAD, it is assessed that the implementation of the recommendations for improving the procedure for issuing apostille certificates is still partial. Of the 5 recommendations included in the PPRAB, only 1 has been fully implemented, while 3 have been partially implemented and 1 has not made any progress.

Despite some practical simplifications, such as eliminating the need to fill out the form at the counter, or even placing the stamp through the platform, the process as a whole does not yet meet the standards of a digitalized service. The application continues to be made only through scheduling an appointment, while the possibility of filling out and submitting the form online is missing. Also, the fee payment continues to be made through a physical payment slip and has not been functionalized electronically, which creates an additional burden for citizens and increases the duration of the procedure.

To ensure full implementation of the recommendations and to meet the goals of the program, it is necessary to take concrete steps towards digitalization of the application and automation of the service through the full functionalization of the e-APP system.

Table of recommendations and implementation status

No.	Recommendation	Implementation status
1	Digitalization of the application form for an apostille certificate in online format	Partially implemented
2	Combining appointment scheduling with request fulfillment into a single process	Partially implemented
3	Enabling online and automatic payment, without a physical payment slip	Not implemented
4	Collection by mail or by authorized person	Implemented
5	Full functionality of the electronic system for e-apostille (e-APP)	Partially implemented

Implementation of recommendations

Implementation status	Number	Percentage
Implemented	1	20%
Partially implemented	3	60%
Not implemented	1	20%

5. Conclusions and recommendations

5.1. Conclusions

After a detailed analysis of each real-life event in Annex 3 of the PPRAB, we can draw these main conclusions that are characteristic of all services:

- **Partial level of reform implementation:** Of the 12 services analyzed, only 1 service (criminal record certificate) has been fully implemented, while the others are either partially implemented, or with a very low level of implementation of the recommendations provided for in the PPRAB.
- **Legal obstacles:** Most of the recommendations given in the PPRAB call for amending legal and sub-legal acts as the first step in reforming the services. As can be seen from the analysis, many of these amendments have not been made. Even in cases where they have been made, they have not always reduced the administrative burden as intended, due to resistance within the institution itself but also to the lack of coordination within the government and potential changes in parliamentary procedures.
- **Limited progress in digitalizing services:** Although the PPRAB includes many recommendations for the digitalization of real-life events, this has not occurred in practice. Apart from the criminal record certificate⁵⁸, other services are still performed physically and their digitalization is very limited⁵⁹.
- **Limited progress in implementing the “ex officio” principle:** This principle is recognized by the LGAP, Article 86, while the PPRAB aimed to implement the same, so that data, information, documents and facts are provided by the public bodies themselves, when such a thing is possible. However, the analysis shows that the “ex officio” principle is almost never applied in practice. Most services are provided by requesting physical documents from the parties, which are already in the possession of the public institutions.
- **Institutional interaction remains limited:** Even in real-life events, it is noticeable that each institution is limited only to its own strict competencies without taking into account the “ex officio” principle according to Article 86 of the LGAP.
- **The phenomenon of requesting documents for “viewing” only:** In the CRA with the amendments made by AI (MIA) no. 06/2023 on the procedures for issuing identity cards, a new practice has been installed that documents are requested only for “viewing” and are not withheld by institutions. Such a practice is again an administrative burden for the party, because the same actions must be taken to provide the relevant documentation.
- **Expensive and inappropriate payment methods:** Although many recommendations have been made for the reduction/elimination of service taxes and their harmonization with the LGAP, this has not happened in practice. Taxes for “real-life event” services continue to exist, causing a financial burden for citizens. On the other hand, the payment method has not been modernized according to the recommendations of the PPRAB. All payments are still made physically by the parties, unable to be made online or through POS.
- **Existence of conditions for the provision of services:** The trend of making the provision of services conditional, especially those related to the registration, renewal and change of vehicle ownership, where these services cannot be provided if the party has any unpaid fines, continues. This phenomenon is quite worrying and has no connection with these types of services and is contrary to the principle of legality and proportionality.

⁵⁸ This service is provided online and is free of charge in the form of an electronic document which is downloaded by the party through the e-Kosova system.

⁵⁹ Some only allow online application, downloading payment slips, scheduling appointments, etc.

Specific findings from workshops held for some of the services as real-life events⁶⁰:

- Registration, extension and change of vehicle owner:

- Renewal of registration and changing ownership is still accompanied by unnecessary bureaucracy and paperwork when receiving this service;
- Primary and secondary legislation is an obstacle to reducing the administrative burden in registering, renewing and changing vehicle ownership;
- There is still a conditionality in the repayment of debts to complete the registration, renewal and change of vehicle owner;
- Lack of digitalization and institutional interaction remain limited;
- The lack of international verification registers such as EUCARIS, INTERPOL, or EUROPOL makes it difficult to verify the origin and legal status of imported vehicles;
- Technical checks and insurance were accompanied by a lot of bureaucracy, including deadlines for the documents that certify these processes;

- Apostille certificate (stamp):

- There is a double document sealing process for documents issued by the court. The same documents are first stamped by the court and then by the MFAD;
- The document requested by the police "proof that the party is not under investigation" has no legal basis with the entry into force of Law No. 08/L-194 on the Central Criminal Records System.
- Apostille stamps for educational documents remain challenging due to the fact that verification by NARIC Kosovo is still done physically;
- Expensive payments and the inability to make those payments through other methods (electronically, through POS) than physically.

- Construction permits for category I and II:

- There is no unified electronic system that would enable the application and performance of other online actions to benefit from this service;
- Urban plans and zoning maps are missing in some of Kosovo's municipalities.
- There are many complex legal procedures, with several procedural stages, which include first approving construction conditions and then issuing construction permits;
- All documents continue to be requested by the parties, without being provided by public bodies (municipalities), even when these documents are already in the possession of public bodies.
- The fees for these services are high, disproportionate, and in violation of the LGAP.

⁶⁰ GLPS with the support of the "ACT NOW" project has held several workshops with providers and beneficiaries of some of the services that are recognized as real-life events. The workshops were held for these services: vehicle registration, apostille stamps, construction permits. These workshops were held with civil society participants, representatives of the OPM and other relevant institutions, service users, chambers and professional associations, businesses and citizens.

5.2. Recommendations

Based on the main findings, service analyses, and workshops held, we provide the following recommendations:

- Prioritize real-life events in the strategic framework of service reform, in order for the initiated reform to be completed and serve as an example for other public administrative services.
- Concrete steps should be taken by the Government and the Assembly to change the legal framework, which appears to be an obstacle to reducing the administrative burden in real-life events.
- Ensure the digitalization of real-life events as soon as possible. Following a comprehensive approach, applying the “ex officio” principle, “digital by default” and avoiding as much as possible the need for the party to provide documents to public bodies when they are in their possession.
- Ensure as soon as possible the implementation of the “ex officio” principle, which means that the collection of data, information and facts is carried out by the public body itself without burdening the party. To enable this, institutions should interact, including electronic communication and data sharing between them, so that processes become as automatic as possible.
- Eliminate practices such as submitting documents for “viewing”, as this causes the same administrative burden that is contrary to Article 86 of the LGAP.
- Review the established fees and adapt them to Article 12⁶¹ of the LGAP.
- Create opportunities as soon as possible for payments of services online, with POS or through other electronic means.
- Eliminate the conditions that exist in legislation and in practice. Imposing conditions for the payment of fines and taxes is a bad practice that, in addition to being unrelated to services, is not proportional within the meaning of Article 55 of the Constitution.

5.3. Specific recommendations emerging from the workshops on real-life events:

- Registration, extension and change of vehicle owner:

- Remove conditions for vehicle registration (such as payment of fines);
- Remove the requirement for extension of registration, except for the obligation for technical inspection and insurance against third parties;
- Changing and not requiring the validity of the document, e.g. the homologation certificate, but only the fact of homologation;
- Consider the possibility of insuring the vehicle for a term shorter than one year;
- Consider the possibility of drafting a separate law on vehicle registration;
- Consider the possibility of accepting individual contracts concluded by the parties themselves and not making them conditional on notarization;
- The ecological tax for electric vehicles should be abolished, while for other vehicles it should be proportional to pollution;

⁶¹ Paragraphs 1 and 2 of Article 12 of the LGAP stipulate “1. For the party, the administrative procedure is free of charge, except in cases where otherwise provided by law. 2. When the fee is provided by law, it cannot be greater than the average cost necessary for the development of the relevant type of administrative procedure”.

- Making vehicle registration conditional on a valid driver's license unjustifiably restricts the right to property, therefore this criterion should be removed.

- Apostille certificate (stamp):

- Establish verification channels between the MFAD and the KJC for suspicious documents, avoiding the need for double stamping. This practice could then be followed by other institutions, especially the CRA and MESTI.
- The Ministry of Justice, as the sponsor of Law No. 08/L-194 on the CCRS, should conduct an information campaign to inform public institutions about these changes provided for by this law.
- Despite the existence of a hierarchy of legal norms, representatives of the Kosovo Police requested that an opinion from the Supreme Court would facilitate this transition.
- Reduce or eliminate fees for apostille stamp services, in accordance with the LGAP.

- Construction permits for category I and II:

- Establish a unified electronic system for building permits that enables online application and development of the procedure. The system should be linked to cadastral registers, zoning maps, and other data necessary for issuing building permits.
- Develop urban plans and zoning maps for municipalities that do not have them yet.
- Simplify and re-engineer administrative procedures for issuing construction permits. Establish a legal basis to reduce the number of procedural stages, e.g. by linking construction conditions and construction permits in a single decision only when the party meets the criteria.
- Improve inter-institutional interaction for document provision by changing the traditional approach of having documents provided by the party.
- Ensure access of municipalities to state registers (e.g. cadastral registers, urban plans and zoning maps, etc.).
- Review the fees for their proportionality and legality by conducting an analysis of the real costs necessary for providing construction permit services.



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Administrative Burden Reduction
through Real-life Events:
Progress Assessment



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