

PROFESSION (specify):					Pharmacist										
Estimation of administrative costs per application for recognition in cases of permanent establishment															
HOME MEMBER STATE (outgoing professionals already registered in their home MS - automatic recognition)															
Current practice*					Number of applications for certificates to outgoing professionals		EPC workflow*								
Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	2012	2013	Online application				Written application				
Number of working hours per application	Average hourly pay (€) ¹						Number of working hours per application	Average hourly pay (€) ¹	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	Costs of personnel	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):
2	25.5	20.4		71.4	25	143					0.0				0.0
HOME MEMBER STATE (outgoing professionals already registered in their home MS - general system)															
Current practice*					Number of applications for certificates to outgoing professionals		EPC workflow*								
Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	2012	2013	Online application				Written application				
Number of working hours per application	Average hourly pay (€) ¹						Number of working hours per application	Average hourly pay (€) ¹	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	Costs of personnel	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):
5	25.5	51.0		178.5	8	24					0.0				0.0
<p>* Current practice includes issuing of necessary certificates for outgoing professionals, answering questions of authorities from other MSs through IMI or other means of administrative cooperation</p>					<p>* EPC workflow includes examination of the completeness of the file, informing the applicant of any missing documents, checking the authenticity and validity of the documents, issuing of any supporting certificates. In cases of justified doubts, - consulting relevant bodies, and/or requesting certified copies from an applicant, answering any questions or providing additional information to the host MS. For more details, please refer to step-by-step document (steps 4-11, and 14).</p> <p>Use of an online procedure will guarantee that a number of steps are automatically done by the IMI, i.e., creation of the EPC file with digital documents, sending acknowledgements of receipt, informing the applicants of the transmission of the file to the host MS.</p> <p>Please make an estimate taking into account the number of "easy" and "complex" cases that are most likely in each scenario (cases where justified doubts arise, there is a need to request for certified copies, contact relevant bodies, answer questions from the host MS) cases.</p>										
HOST MEMBER STATE (incoming professionals - automatic recognition)															
Current practice*					Number of applications for recognition		EPC workflow*								
Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	2012	2013	Online application				Written application				
Number of working hours per application	Average hourly pay (€) ¹						Number of working hours per application	Average hourly pay (€) ¹	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	Costs of personnel	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):
4	25.5	40.8		142.8	356	371					0				0
HOST MEMBER STATE (incoming professionals - general system)															
Current practice*					Number of applications for recognition		EPC workflow*								
Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	2012	2013	Online application				Written application				
Number of working hours per application	Average hourly pay (€) ¹						Number of working hours per application	Average hourly pay (€) ¹	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	Costs of personnel	Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):
8	25.5	81.6	270	555.6	18	20					0				0

<p>* Current practice includes administrative handling of a request for recognition, such as receipt of an application and the accompanying documentation, analysis of the submitted documents, verification, gathering required expertise, any communication with an applicant or authorities from other Member States, elaboration and adoption of an administrative decision regarding recognition or a need for compensation measures, confirming the recognition to an applicant.</p>	<p>* EPC workflow includes examination of EPC request based on the information validated by the home MS, requesting additional information to the home MS via IMI, making an administrative decisions to grant/refuse recognition or impose compensation measures, if relevant. For more details, please refer to step-by-step document (steps 12-19).</p> <p>Use of an online procedure will guarantee that a number of steps are automatically done by the IMI, i.e., informing the applicant of extension of the deadlines, making EPC available to the applicant via online interface.</p> <p>Please make an estimate taking into account the number of "easy" and "complex" cases that are most likely in each scenario (cases where justified doubts arise, there is a need to request for certified copies, etc.).</p>
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Estimation of administrative costs per declaration for temporary provision of services (excluding cases with prior check of qualifications under Art.7(4))

HOME MEMBER STATE (outgoing professionals already registered in their home MS)

Current practice*					Number of applications for certificates to outgoing professionals		EPC workflow*									
							Online application				Written application					
Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	2012	2013	Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):
Number of working hours per application	Average hourly pay (€) ¹						Number of working hours per application	Average hourly pay (€) ¹				Number of working hours per application	Hourly pay (€) ¹			
				0							0					0

***Current practice** includes issuing of necessary certificates for outgoing professionals, answering questions of authorities from other MSs through IMI or other means of administrative cooperation

*** EPC workflow** includes examination of the completeness of the file, informing the applicant of any missing documents, checking the authenticity and validity of the documents, issuing of any supporting certificates, and taking an administrative decision to issue/refuse an EPC. For more details, please refer to step-by-step document (steps 4-9, 16, and 19).

Use of an online procedure will guarantee that a number of steps are automatically done by the IMI, i.e., creation of the EPC file with digital documents, sending acknowledgements of receipt, making the EPC available to the applicant via online interface.

Please make an estimate taking into account the number of "easy" and "complex" cases that are most likely in each scenario (cases where justified doubts arise, there is a need to request for certified copies, contact relevant bodies, answer questions from the host MS) cases.

HOST MEMBER STATE (incoming professionals)

Current practice*					Number of prior declarations		EPC workflow*									
							Online application				Written application					
Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	2012	2013	Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):	Costs of personnel		Other internal costs per application (€)	External costs per application (€)	Total costs per application (€):
Number of working hours per application	Average hourly pay (€) ¹						Number of working hours per application	Average hourly pay (€) ¹				Number of working hours per application	Hourly pay (€) ¹			
				0							0					0

*** Current practice** includes administrative handling of a prior declaration for temporary provision of services, such as checking if the declaration is complete (all supporting documents), registering the file, informing relevant bodies, etc.

*****EPC workflow** does not require any action on the part of the host MS.

¹ Hourly pay: includes the average of the gross salary per hour for a member of staff processing an application

Comment - We are unable to provide costs for any of the processes involving the EPC, because until the implementing acts are drafted we have no clear understanding of how the process is intended to operate and the format in which documents will be presented to us. At this stage all we can say is that the costs using the EPC route will be greater than under the current process to recover costs of the IT development needed to support the EPC route and also for the reasons stated in our response to EC's questionnaire on introducing the EPC. As the regulator for pharmacists and pharmacy technicians the verification of documents and the determination of the route to our register is our responsibility irrespective of the administrative tools that support the application process. We would therefore wish to carry out the same checks and enquiries with the EPC process as we do at present. Also to avoid running the risk of tacit authorisation if the time limit is reached, applications for recognition are likely to be rejected resulting in increased rather than reduced processing times and an increase in administrative burden and costs.