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COMMISSION OF THE EUROPEAN COMMUNITIES

Brussels, 6.11.2008  
SEC(2008) 2743

**COMMISSION STAFF WORKING DOCUMENT**

**Implementation of the Internal Market Information System (IMI): report on the  
Professional Qualifications Directive pilot project**

*Accompanying document to the*

COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT,  
THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE  
COMMITTEE OF THE REGIONS

Delivering the benefits of the single market through enhanced administrative cooperation

Progress report on the Internal Market Information System (IMI)

{COM(2008) 703 final}

## 1. INTRODUCTION

### 1.1. Background

The Internal Market Information System (IMI) is an electronic information exchange network developed by the European Commission in close cooperation with the 27 EU Member States and the 3 European Economic Area (EEA) States.<sup>1</sup> IMI sets out to support day-to-day administrative cooperation between public administrations in the internal market.<sup>2</sup>

IMI currently supports a pilot project for the administrative cooperation provisions of the new Professional Qualifications Directive.<sup>3</sup> A second IMI pilot project in support of the mutual assistance obligations of the Services Directive will be launched in January 2009.<sup>4</sup>

### 1.2. Aim of the report

This report accompanies the Commission Communication on *"Delivering the benefits of the single market through enhanced administrative cooperation"*. It provides a detailed picture of progress in the implementation of IMI, looking at two dimensions: the development of the IMI system and its roll-out during the Professional Qualifications Directive pilot project. As such it forms the basis of the conclusions and action points presented in the Communication.

The pilot project aims to assess whether IMI is fit for the purpose of supporting cross border administrative cooperation. A conscious decision was taken to deliver IMI in a progressive manner. Thus, an initial basic software package was delivered at an early stage to allow the first pilot project to be run. Feedback from the pilot will inform future releases of IMI and allow for continuous improvements.

The pilot project also sets out to give Member States the opportunity to test the appropriate organisational structures to support a larger-scale use of IMI in future. Facts and figures in this report are based on an evaluation of the project carried out in cooperation with national administrations in July 2008.

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<sup>1</sup> The term "Member States" in this report is used to refer to the 27 EU Member States and the 3 EFTA countries participating in the EEA, i.e. Norway, Iceland and Liechtenstein.

<sup>2</sup> For more detailed information in all EU languages, see: [http://ec.europa.eu/internal\\_market/imi-net/index.html](http://ec.europa.eu/internal_market/imi-net/index.html)

<sup>3</sup> Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, OJ L 2005/255 p.22. (Art 8, 50 and 56 in particular)

<sup>4</sup> Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market, OJ L 2006/376 p. 36. (Art 28-36 in particular)

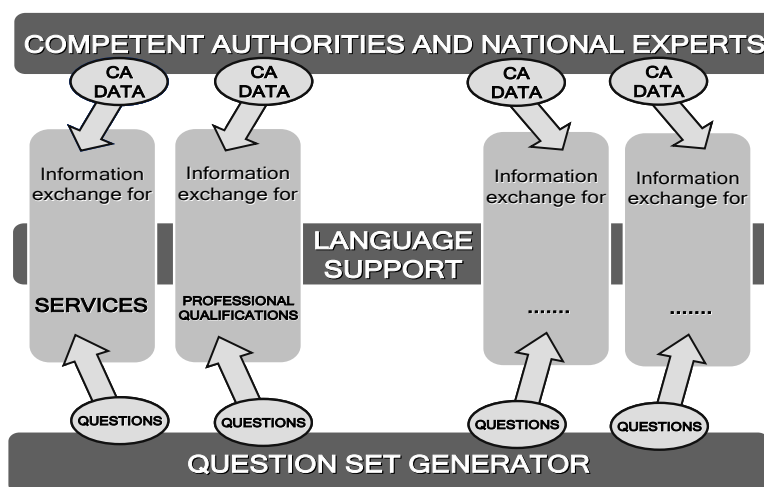
## 2. PROGRESS ON SYSTEM DEVELOPMENT

### 2.1. Approach taken

#### 2.1.1. Software design

The principle of IMI is to build a single information system which can potentially support the administrative cooperation requirements of many different community acts. The IMI architecture is modular. Certain functionality provided in IMI will be the same for all legislative areas and the relevant modules can be re-used. Additional functionality will sometimes be needed to meet the information exchange requirements of specific legislative acts and in such cases additional modules will need to be designed and programmed.

Figure 1 - IMI Modular Architecture



In order to allow for the piloting and continuous improvement of the software, the IMI system is being developed in a progressive manner, as outlined below:

- (1) release basic version of the application to support a pilot project on the Professional Qualifications Directive
- (2) release enhanced version of the IMI application in support of a fully operational system for the Professional Qualifications Directive
- (3) deliver a version containing the tools so that IMI can support additional legislative areas (first step will be to add the Services Directive)
- (4) design and programme additional workflows specific to the Services Directive

The first version of the IMI application is in production. The second version has been programmed and is currently being tested before going into production. The third version is being programmed and is planned to go into production in January 2009. Once this version is available, it will technically be possible to add new legislative areas to IMI without any additional programming. The requirements for the additional workflows specific to the services directive are currently being analysed in close cooperation with Member States.

### 2.1.2. Governance

Member States are closely involved in the development of IMI. Two committees oversee its overall deployment: the Pan-European eGovernment Services Committee is responsible for the release of IDABC funding based on recommendations issued by the Internal Market Advisory Committee.

Since March 2006 Member States and the Commission have been working together intensively in order to agree on the detailed requirements for the system. Regular meetings take place with Member State committees and working groups in order to determine how best to support each specific piece of legislation in IMI. National experts are therefore able to provide regular input and feedback, thus shaping each step in the process.

This course of action is in itself an example of the principle of shared responsibility that underpins the renewed partnership approach between the Commission and Member States needed to deliver the full benefits of the internal market.<sup>5</sup>

## 2.2. Delivery to date

Despite initial delays due to difficulties in the performance level of the application, the first version of the IMI application was delivered to allow the launch of the Professional Qualifications Directive pilot project on time.

This first version contains all the basic building blocks necessary to support information exchanges between competent authorities across the EEA. This includes:

- Repository which can store the contact details and search criteria for relevant competent authorities throughout the EEA
- Multilingual search facility to identify partner authorities in other Member States without prior knowledge of their administrative structure
- List of predefined questions and answers (based on the specific piece of legislation) available in all official EU languages to help authorities communicate with each other
- Transparent set of procedures on how to deal with requests, agreed by all Member States
- Request management tool to monitor progress and identify potential problems with specific information requests
- In addition, a number of support elements are included:
- Language management tool to allow European Commission to manage the translation of screen information into all official EU languages

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<sup>5</sup> See: Communication from the Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions, "A single market for 21st century Europe", COM (2007) 725

- Access to online IMI training system in all EU languages to help users familiarise themselves with the application
- IMI website in all EU languages acting as a gateway to the application (IMI Production and IMI Training System) and containing the relevant system documentation

### **2.3. Outlook**

The enhanced version of the IMI application needed to support a fully operational system for the Professional Qualifications Directive is currently undergoing testing and will be released in the autumn of 2008. It includes a number of additional functions requested by Member States (such as the possibility to print requests) and the use of online machine translation for certain language pairs. Other improvements identified by IMI users, such as the introduction of a more sophisticated competent authority search tool, will be incorporated in future releases.

Analysis and design is complete and programming is well advanced to ensure that IMI is able to support additional legislative areas. A number of new features will be introduced, including most notably a so-called "question set generator". This tool will allow the online creation of new question sets based on the provisions of a specific piece of legislation without any additional programming intervention. It is planned for delivery in time for the launch of the Services Directive pilot project in the beginning of 2009.

Analysis is underway to ensure that IMI can support the specific requirements of the Services Directive, which requires specific additional workflows such as case-by-case derogations and the alert mechanism. The high level requirements for these workflows have been defined in close cooperation with Member States.

As the anticipated volume of authorities using IMI for the Services Directive is significantly higher than for Professional Qualifications, analysis has also been completed on a module to allow authorities to self-register in IMI.

## **3. IMPLEMENTATION AND ROLL-OUT – THE PROFESSIONAL QUALIFICATIONS DIRECTIVE PILOT PROJECT**

### *3.1.1. Approach taken*

The Commission and Member States are working together to establish a general information exchange system to facilitate efficient cooperation in the internal market. But in order for IMI to deliver the expected benefits, establishing the system alone is not sufficient. Additional steps need to be taken to roll-out IMI across the EEA.

Each country has nominated a 'National IMI Coordinator' (NIMIC) to manage overall IMI project coordination. It is up to the NIMIC to decide how best to do this. Critical elements of a successful IMI roll-out would include the following tasks:

- Registration of authorities in IMI
- Organisation of awareness-raising and training for competent authorities

- Provision of support facilities for end-users
- Involvement in requests in case of problems

It is possible to carry out all the above tasks within one NIMIC. Depending on the administrative structures, it is also possible to delegate all or certain coordinating functions to other levels of the administration, acting as 'Super-Delegated IMI Coordinators' (SDIMIC) or 'Delegated IMI Coordinators' (DIMIC) within IMI.<sup>6</sup> Each country has to decide on the IMI set up which is best suited to its administrative structure and practices.

IMI also offers the flexibility for each Member State to find the most appropriate fit in terms of how to best organise the workflows. It is possible, for example, for some Member States to involve IMI Coordinators in approving information requests sent by its authorities, and for others to allow authorities to send information directly. A Member State may choose that certain authorities should only be allowed to send queries, but not be able to respond to requests from other Member States.

In Member States with regional structures, IMI also allows each region to choose its own set up so that it is possible for the set up to vary between different regions in the same Member State. IMI can also be set up differently between legislative areas – this is particularly important since the mutual assistance provisions are not the same in different community acts.

The first step in rolling-out and testing the IMI system was the launch of the Professional Qualifications pilot project in November 2007. Initially, Member States concentrated on identifying and registering relevant competent authorities. By February 2008, a sufficient critical mass of authorities had been registered for the pilot information exchange between authorities to commence. The project was limited to four professions (doctors, pharmacists, physiotherapists and accountants) and involved all 30 EEA countries.

#### *Professional Qualifications Directive pilot project*

The use of IMI is not expressly foreseen in the Professional Qualifications Directive. The Commission makes it available to Member States who are free to use it in support of the administrative cooperation provisions of the directive.

The aim of the Professional Qualifications pilot project is two-fold. First, it is an opportunity to assess the added value of the IMI system in supporting the exchange of information between competent authorities, which is required by the administrative cooperation provisions of internal market legislation. Secondly, it provides an important opportunity for Member States to progressively put in place appropriate organisational structures to support a large-scale use of IMI in future.

In the summer of 2008, the Commission undertook a series of steps to gather feedback from Member States and to evaluate the pilot project:

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<sup>6</sup> A DIMIC can carry out all the same actions as a NIMIC within the IMI system with the exception of registering other DIMICs. In order to cater for Member States with federal structures, it is possible to nominate regional "Super DIMICs" who will be able to register further DIMICs in its region.

- Electronic questionnaire sent to IMI Coordinators and to the Group of Coordinators for the recognition of professional qualifications: 28 (out of 30) National IMI Coordinators responded as well as 21 (out of 59) Delegated IMI Coordinators<sup>7</sup>
- Electronic end-user feedback gathered after each request: 43 responses were received by 28 July 2008
- Interactive feedback session on 24-26 June 2008: 40 participants from 21 Member States attended (20 National IMI Coordinators, 10 Delegated IMI Coordinators, 10 Competent Authorities)

The results of this exercise are presented below.

## 3.2. Organisational aspects

### 3.2.1. *IMI suitably flexible for diverse administrative structures but some Member States have not yet made the necessary investment in understanding the available choices*

For the Professional Qualifications Directive pilot, Member States decided to delegate the role of National IMI Coordinator (NIMIC) to national-level ministries, either responsible for economic affairs, European affairs or administrative reform. In addition, almost all Member States chose to also involve other ministries with responsibility for the recognition of professional qualifications (in most cases education, labour or health/ social affairs).<sup>8</sup>

Of all Member States, only Germany implemented a decentralised IMI model: each federal state or *Land* nominated a Super-Delegated IMI Coordinator (Super-DIMIC) responsible for overall IMI coordination in its territory.<sup>9</sup> In addition, the majority of the German *Länder* also involved the authorities responsible for professional qualifications recognition, as Delegated IMI Coordinators.

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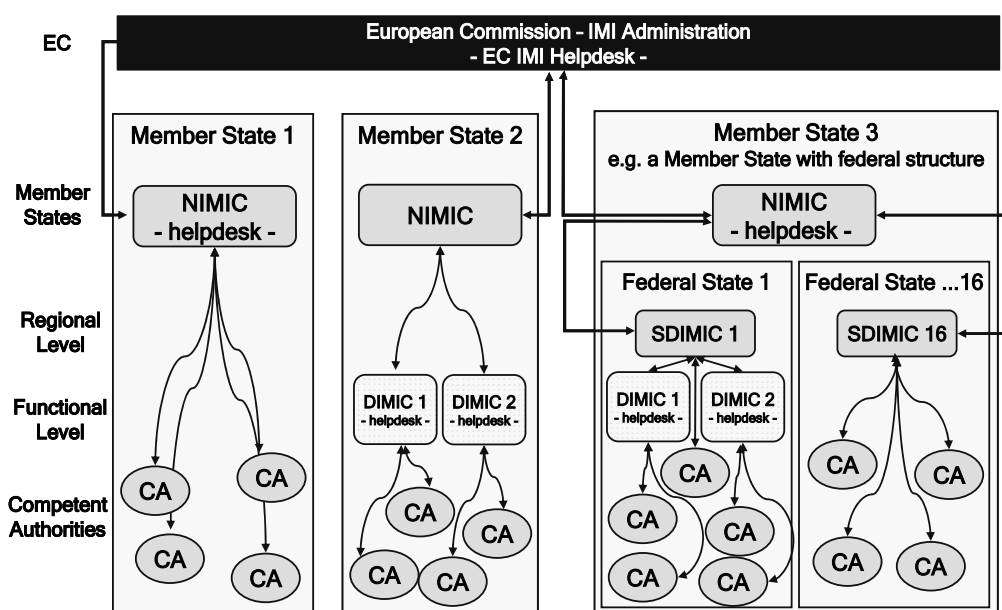
<sup>7</sup> In addition to the 28 National IMI Coordinators and the 21 Delegated IMI Coordinators, the Commission also received the response from 2 Professional Qualifications Coordinators: Denmark and Cyprus. The views expressed have been taken into account throughout the report.

<sup>8</sup> For the IMI pilot project, Finland, Italy, Malta and Portugal decided that it was sufficient to nominate a National IMI Coordinator and no additional Delegated IMI Coordinators.

<sup>9</sup> Most SDIMICs in Germany are institutions with responsibility for IT and public administration (8), some are situated in the economics, finance or labour ministry (6). In one case the SDIMIC is the Ministry of the Interior and in another it is the Ministry of Health.



Figure 2 - Different options for the set-up of IMI



Most of the Member States report that the organisational structure chosen proved suitable to support the smooth running of the IMI pilot project.<sup>10</sup> In response to the European Commission questionnaire, most IMI Coordinators state that they encountered no problem in relation to the organisational structure of IMI. The main problems that were encountered – according to the questionnaire responses – were:

- Unsure how to best reflect administrative structure of Member State within the IMI virtual organisational architecture<sup>11</sup>
- Unsure which responsibilities to delegate to Delegated IMI Coordinators<sup>12</sup>
- Difficulty in identifying all competent authorities<sup>13</sup>

A similarly positive picture emerged in terms of the suitability of the structure for the extension of IMI to additional professions under the Professional Qualifications Directive. Most think that no significant changes are required but that additional IMI Coordinators will be needed to support such system growth.<sup>14</sup> Belgium and Spain, for instance, have both come to the conclusion that a model similar to the German example outlined above may be more suitable in the long run.

<sup>10</sup> In response to the Commission electronic questionnaire, 23 NIMICs fully agree that their organisational structure was suitable to run the IMI pilot project, 5 NIMICs tend to agree. The DIMICs were slightly more sceptical: about half fully agree, half tend to agree.

<sup>11</sup> 3 NIMICS, 7 DIMICs

<sup>12</sup> 4 NIMIC, 4 DIMIC

<sup>13</sup> 3 NIMIC, 3 DIMIC

<sup>14</sup> 17 NIMICs believe that the organisational structure is adequate to support this growth. 8 think it is adequate but additional Coordinators will have to be nominated. All DIMICs think that the organisational structure is adequate for an extension to additional profession but that additional Coordinators will have to be nominated.

The pilot has illustrated that IMI is able to reflect the diverse administrative realities in Europe. This flexibility, however, means that each Member State has to make an initial investment in understanding the available possibilities. At this stage, not all have done so.

### 3.2.2. *Getting competent authorities on board is crucial*

Perhaps the most important and in some cases challenging aspect of rolling out IMI is the identification and registration of competent authorities in the system. With only four professions included in the pilot project, the number of competent authorities in the majority of Member States was limited: with the exception of Poland (27 authorities), Greece (59) and Germany (109), no country registered more than ten authorities to deal with the four professions.

Member States did not always register all authorities involved in professional qualifications recognition for the professions involved. As expected, there was a marked difference from profession to profession. Where levels of cross-border activity are particularly high and there is a regular need for administrative cooperation, authorities were far more interested in being part of the pilot project.<sup>15</sup> Therefore, for doctors the proportion of registered competent authorities is highest, followed by physiotherapists and pharmacists. For accountants, on the other hand, 10 Member States registered either no authorities at all or only some. The main reason appears to be the low level of cross-border migration; other reasons include the fact that the profession of 'accountant' is not regulated everywhere and it may cover different sets of activity in each Member State concerned.

Other challenges encountered by Member States in relation to the registration of competent authorities include delays in the transposition of the Professional Qualifications Directive and difficulties in identifying all competent authorities. Some Member States have expressed uncertainty about whether to register only those authorities competent which take decisions or also those that hold specific pieces of information that may be required by another Member State. In some cases, a conscious decision was taken to only register a limited number of authorities and to rely on those authorities to contact others in order to answer requests via IMI.

It is up to Member States to decide how to best organise their mutual assistance obligations. However, the pilot shows that it is most efficient if the exchange directly involves the requesting authority in one country and the competent authority in the other country that actually holds the required information.

### 3.3. **Quality and benefits of the IMI system**

It is important to bear in mind that the aim of the Professional Qualifications Directive pilot was to test the suitability of the IMI system in supporting administrative cooperation. To do so, a critical mass of requests was needed. However, IMI does not set out to increase the volume of information exchanges but

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<sup>15</sup> Compare for instance the number of decisions taken in relation to the professional recognition of doctors (2006=8650) with the number of decisions in relation to accountants (2006=15). See the summary compiled by the Commission of the requests for recognition of diplomas by profession: [http://ec.europa.eu/internal\\_market/qualifications/regprof/index.cfm?fuseaction=home.welcome](http://ec.europa.eu/internal_market/qualifications/regprof/index.cfm?fuseaction=home.welcome)

rather to increase their quality and efficiency. It is intended to support the exchange of information between competent authorities only when this is required by the provisions of internal market legislation.

### 3.3.1. Levels of system usage meets expectations

In the five months of the pilot more than 130 information requests were dealt with through IMI.<sup>16</sup> With the exception of Iceland, Liechtenstein, Malta and Estonia, all Member States submitted or received requests.

It is interesting to note that three-quarters of requests were sent from the UK, Germany, Ireland and Belgium. More than half of the requests were addressed to Romania, Bulgaria, Poland, and Italy.<sup>17</sup> In terms of the professions covered by the requests, almost two-thirds concerned doctors, followed by pharmacists and physiotherapists. Only 4% of requests covered accountants.<sup>18</sup> It is also worthwhile mentioning that the majority of requests concerned the permanent establishment of professionals or contained questions of a general nature; no exchanges took place on the provision of temporary services.<sup>19</sup> This is probably because – unlike the permanent establishment rules – the general provisions on temporary services have only been introduced with the new directive on professional qualifications. Since the directive has only recently come into effect<sup>20</sup>, the number of professionals making use of the new provisions at this early stage is likely to be rather low. As professionals and authorities become more familiar with this chapter of the directive, the number of cases – and of requests in IMI – is likely to increase.

**Figure 3 - Number of requests handled per Member State (from 28.02.2008-31.07.2008)**

<b>AT</b>	<b>6</b>	<b>FR</b>	<b>9</b>	<b>IT</b>	<b>14</b>
<b>BE</b>	<b>19</b>	<b>GR</b>	<b>4</b>	<b>LI</b>	<b>0</b>
<b>BG</b>	<b>12</b>	<b>HU</b>	<b>8</b>	<b>LT</b>	<b>4</b>
<b>CY</b>	<b>2</b>	<b>IE</b>	<b>17</b>	<b>LU</b>	<b>3</b>
<b>CZ</b>	<b>4</b>	<b>IS</b>	<b>0</b>	<b>LV</b>	<b>1</b>
<b>DE</b>	<b>31</b>	<b>RO</b>	<b>23</b>	<b>MT</b>	<b>0</b>
<b>DK</b>	<b>2</b>	<b>SE</b>	<b>6</b>	<b>NL</b>	<b>5</b>
<b>ES</b>	<b>19</b>	<b>SK</b>	<b>4</b>	<b>NO</b>	<b>1</b>
<b>ET</b>	<b>0</b>	<b>SL</b>	<b>1</b>	<b>PL</b>	<b>12</b>
<b>FI</b>	<b>4</b>	<b>UK</b>	<b>47</b>	<b>PT</b>	<b>6</b>

<sup>16</sup> All statistics related to system usage refer to the time period between 28 February and 31 July 2008, thus covering a total of 5 months.

<sup>17</sup> In the time period covered by this report, the UK sent 37 requests, followed by Germany (26), Ireland (15), Belgium (13) and Spain (7). Most were addressed to Romania (23), followed by Bulgaria (12), Poland (11) and Italy (11). To a lesser degree requests were also addressed to Spain (9), Hungary (7), Germany (7), UK (6) and France (5).

<sup>18</sup> In the time period covered by this report, 87 requests dealt with doctors, 29 with pharmacists, 11 with physiotherapists and 5 with accountants.

<sup>19</sup> In the time period covered by this report, 74 requests contained questions related to permanent establishment and 58 requests were of a general nature.

<sup>20</sup> The transposition deadline for Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications was the 20 October 2007.

Although it is too early to reach any definitive conclusions, the numbers do seem to suggest that IMI usage roughly reflects migration patterns recorded for the four professions. It also seems clear that countries with higher levels of in- or out-migration of professionals have higher levels of IMI usage.

20% of authorities registered in IMI were involved in requests. It is apparent from user feedback that not all communication between authorities has taken place in IMI, particularly, where existing contacts are already in place and there is no language barrier. Other reasons why authorities did not make use of IMI include hesitation to use IT systems in general as well as uncertainty as to how IMI works and what it adds.<sup>21</sup>

However, feedback also seems to indicate that as authorities get used to the application, they start recognising its added value. This translates into higher system usage: compared to the first months, the average number of requests per month at the end of the pilot phase has more than tripled.

Three-quarters of IMI Coordinators state that this level of usage is what they had expected for the pilot phase. Around two-thirds of Member States think it is likely that authorities will use IMI whenever the need arises and about half are convinced that IMI will become the preferred communication channel between authorities.

### 3.3.2. *IMI has the potential to simplify administrative cooperation for the benefits of citizens in the internal market*

#### Quality of the IMI System

Based on the experience of the pilot project, Member States report that the IMI system is suitable to support crossborder cooperation. Almost all IMI Coordinators believe that the IMI system is easy to use.<sup>22</sup> The building blocks that IMI offers are seen to be of good quality. Member States highlight in particular the ease of registering competent authorities in IMI<sup>23</sup>, the ability to search for competent authorities in other Member States<sup>24</sup> and the availability to monitor progress of requests<sup>25</sup> within the system, including the use of automatic email alerts<sup>26</sup>. The request creation and request reply module was also seen as very good.<sup>27</sup>

Feedback from end-users gathered after each request draws a similar picture: more than half of the respondents found IMI to be very user-friendly, whilst the remainder described the system as 'quite user-friendly'.

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<sup>21</sup> The vast majority of IMI Coordinators state that the main reason why authorities did not use IMI is because there was no need to contact partner authorities in other Member States (70% of NIMICs and 86% of DIMICs). 44% of NIMICs (26% DIMICs) believe that authorities not using IMI have already existing contacts to their counterpart, thus not needing to make use of IMI in those cases. IMI Coordinators also think that a significant factor why authorities may not use IMI yet is uncertainty as to how IMI works and what value it adds (22% of NIMICs and DIMICs).

<sup>22</sup> 27 NIMICs and 18 DIMICs responded that they believe IMI is easy to use.

<sup>23</sup> 26 NIMICs and 17 DIMICs answered excellent or very good.

<sup>24</sup> 24 NIMICs and 19 DIMICs answered excellent or very good.

<sup>25</sup> 19 NIMICs and 12 DIMICs answered excellent or very good.

<sup>26</sup> 21 NIMICs and 11 DIMICs answered excellent or very good.

<sup>27</sup> 21 NIMICs and 13 DIMICs answered excellent or very good.

*"The IMI system is a very useful alternative to simple email as a means of contacting other Member State competent authorities when we have queries or need to raise 'justified doubts' as per Article 50 of Directive 2005/36/EC.*

*The high number of times we have used the system is a result of the high number of EEA applications we receive every year (around 700, of which around 500 register), the vast majority of which do not require further clarification. When the system came online, we used the opportunity to send requests via IMI that had not received responses via email for some time. From our perspective, the system is a much better alternative to email as*

- we are able to keep track of all the requests we have sent,*
- we are sure that we are sending the request to the correct person or body (rather than emailing an individual who no longer works for the organisation concerned for example, as has happened in the past)*
- we are able to use preset questions to ensure that we receive all the information we require."*

*Frequent IMI user, United Kingdom*

The pilot phase has also shown that more work is needed to fine-tune the application. In particular, users have expressed a need for more advanced language support. A number of end-users have stated that at times due to the complexity of the cases they are dealing with, it is not always possible to resort to the structured, pretranslated questions/ answers. Whilst IMI provides the possibility to enter free-text, the pilot version does not yet offer the translation of this text – a functionality much sought after by users involved. To respond to this need, the next version of IMI will offer online machine translation for certain language pairs.

IMI Coordinators have also indicated that a more sophisticated competent authority search module as well as other practical improvements would be helpful for the long term success of IMI.<sup>28</sup>

#### *Added value of IMI*

The great majority of end-users and IMI Coordinators emphasise that IMI is a very useful tool with great potential. Particularly for professions with high cross-border migration, where there are language barriers or no established contacts, IMI can be extremely useful. Member States particularly emphasise the following benefits:

Helps authorities identify their counterparts in other Member States<sup>29</sup>

Overcomes language barriers and make communication easier<sup>30</sup>

Can lead to faster and clearer responses<sup>31</sup>

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<sup>28</sup> For further details on the next IMI versions, refer to section 2.3 of this report.

<sup>29</sup> Very beneficial=25 NIMICs, 14 DIMICs; Beneficial=2 NIMICs, 6 DIMICs

<sup>30</sup> Very beneficial=18 NIMICs, 15 DIMICs; Beneficial=7 NIMICs, 2 DIMICs

Offers a uniform, transparent working method.<sup>32</sup>

*"Ladies and gentlemen. I have been very content with IMI until now (my compliments to the company; I did not think such good quality was possible). IMI contributes significantly to making my job easier."<sup>33</sup>*

*IMI user, Germany*

In terms of response times, system statistics back the feedback provided from Member States. Despite initial teething problems and some delays, even in the early phase of the project, almost one-quarter of the requests were answered within one day and three-quarters received a response within two weeks. In general, the system does speed up the process and enables competent authorities to take more informed decisions quickly, thus providing a better service to citizens and businesses and reducing the costs associated with delays.

### 3.4. Training, support and awareness

The success of IMI does not only depend on having the right software in place and the right fit between a country's administrative structure and the 'virtual' structure in IMI. Without an adequate level of awareness, users will be hesitant to make use of this new tool. Based on the Pilot project, Member States have singled out training and awareness-raising as the single most important success factor.

The Commission has supported Member States with the organisation of awareness-raising and training for competent authorities. The following approach has been taken:

- (1) Investment in 'training-the-trainers', including training sessions and material for IMI Coordinators<sup>34</sup>
- (2) Assistance with the organisation of national IMI training events<sup>35</sup>
- (3) Development of an IMI Training System as a tool to familiarise end-users with IMI
- (4) Promotional activities such as a multilingual IMI website or conference participation

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<sup>31</sup> Very beneficial=11 NIMICs, 10 DIMICs; Beneficial=7 NIMICs, 4 DIMICs

<sup>32</sup> Very beneficial=11 NIMICs, 6 DIMICs; Beneficial=14 NIMICs, 9 DIMICs

<sup>33</sup> This is a translation of the original comment received by a German user through the online IMI user questionnaire. The original reads: "*Sehr geehrte Damen und Herren, bisher bin ich mit IMI sehr zufrieden. (Mein Kompliment an die Firma; ich habe solch eine gute Qualität nicht für möglich gehalten.) IMI erleichtert die Arbeit deutlich.*"

<sup>34</sup> In the course of the pilot project, the Commission held 4 training sessions for IMI Coordinators catering for an average of 60 participants on each occasion. In addition, IMI Coordinators were offered training material and support in the preparation of national training events.

<sup>35</sup> The Commission offers assistance upon request in developing and organising national training events. This is subject to availability and can range from advice in developing the course to acting as trainers. Priority has been given to Member States with large user groups. During the pilot project, the Commission collaborated in organising IMI training activities in Germany, Greece, Hungary, Cyprus and Romania.

- (5) Limited end-user support material such as a user handbook<sup>36</sup> or interactive presentations of the IMI system<sup>37</sup>
- (6) Regular assistance to IMI Coordinators through the Commission IMI Helpdesk

#### 3.4.1. *European-level support is seen as helpful*

During the pilot project, all Member States participated in IMI training sessions offered by the Commission. All IMI Coordinators state that they have found them very useful. The training material provided by the Commission was also seen in a positive light: all NIMICs and over three-quarters of DIMICs reported making use of the material and found the presentations provided as well as the access to the IMI training system particularly useful.

Member States also see a role for the Commission in raising awareness on IMI through the provision of generic promotional material, such as an information brochure or European-level awareness events. Further steps will be taken in this direction as the project progresses.

#### 3.4.2. *Member States have taken first steps to provide training and support*

As the majority of Member States only registered a limited number of authorities for the Professional Qualifications pilot project,<sup>38</sup> the need to undertake comprehensive training measures was limited. Accordingly, most Member States offered only a number of small training events (10-25 participants) or raised awareness about IMI at conferences. In addition, 4 Member States set up national IMI websites and 3 Member States prepared paper-based IMI brochures.

With a view to the expected expansion of the IMI system in the near future, it is of particular interest to take a closer look at the countries where the number of IMI users during the pilot phase was substantially higher. In Greece, for instance, a national IMI training week for over 90 users was offered by the National IMI Coordinator, organised and executed in cooperation with the Commission.

In Germany – with 140 competent authorities and over 300 registered users – the National IMI Coordinator took a two-step approach. The priority was to ensure that IMI Coordinators at *Länder*-level were enabled to use the system and to train further users in their territory. In cooperation with the European Commission, initial training was offered over four days. It was open to IMI Coordinators as well as competent authorities. Through this initial step, one-fourth of IMI users received a comprehensive introduction to the system. As a second step, the *Länder*-level IMI Coordinators were encouraged to organise additional training where required – a full set of training material was provided for this purpose. Five IMI Coordinators report

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<sup>36</sup> The user handbook is available in all official EU languages on the IMI website. See: [http://ec.europa.eu/internal\\_market/imi-net/docs/user\\_procedures2\\_en.pdf](http://ec.europa.eu/internal_market/imi-net/docs/user_procedures2_en.pdf)

<sup>37</sup> The interactive presentations (Captivate presentations) are available in English on the IMI website. See: [http://ec.europa.eu/internal\\_market/imi-net/training\\_en.html](http://ec.europa.eu/internal_market/imi-net/training_en.html)

<sup>38</sup> See section 3.2.2 of this report: with the exception of Poland (27 authorities), Greece (59) and Germany (109), no country registered more than ten authorities to deal with the four professions.

having organised their own training sessions, partly using existing IT education programmes for public authorities. This brought the proportion of German-based IMI users that benefited from training up to around 60%.

### 3.4.3. *More efforts are needed to equip authorities to make use of IMI*

Despite these efforts across the Member States, some end-users report that they did not always feel equipped to use the IMI system properly. Almost half of the IMI Coordinators confirm that one of the key challenges during the pilot was that users were not aware of the added value of IMI.

One of the reasons is undoubtedly the limited availability of resources. IMI Coordinators often have not had the means to carry out structured IMI training, both financially and in terms of skills. In other cases, training was provided too late or too early in the process or training material was not available in the relevant language on time.

It is clear that as the IMI system grows and the number of users increases, further activities will be required. Based on the pilot project, a number of potential steps have been identified to improve the level of awareness of IMI users in the future. These include:

- Providing more multilingual user material such as basic IMI Guide or eLearning tools
- Increasing promotional activities
- Ensuring that appropriate authorities participate in Commission training sessions
- Embedding IMI training into existing administrative capacity programmes

## 3.5. Overall view of the pilot project

### 3.5.1. *Lessons learnt for future roll-outs of IMI*

During the pilot, a number of critical success factors were identified:

- (1) ***Awareness-raising*** amongst competent authorities of the added value and functionality of IMI was seen as the most important aspect.
- (2) ***European Commission guidance***, regular meetings amongst IMI Coordinators and the provision of a European IMI Helpdesk was felt to have made a significant contribution to the pilot project and should be continued in future.
- (3) ***IMI coordination within a Member State*** will become particularly important as the system grows. This includes not only the timely registration of competent authorities but also well trained IMI Coordinators that can assist competent authorities and can ensure that requests are dealt with in a timely fashion.



- (4) **Political support** was considered vital to support a larger operational system. IMI Coordinators need to have formal backing and mandate to coordinate the project in their respective areas of competence

3.5.2. *Extension of IMI to additional professions is recommended*

Member States agree that the Professional Qualifications Directive pilot project has shown that the IMI system offers the functionality needed to support administrative cooperation. The majority see it is a very useful tool that has the potential to bring substantial benefits to authorities across the EEA in the implementation of internal market legislation.<sup>39</sup> On that basis, over two-thirds of IMI Coordinators fully agree that it is advisable to extend IMI to additional professions. The remaining one-third tend to agree.

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<sup>39</sup> IMI Coordinators gave the following answers to evaluation questionnaire:

- *"The pilot project has shown that IMI offers the functionality to support administrative cooperation."* – Fully agree= 13 NIMICs, 9 DIMICs; Tend to agree= 12 NIMICs, 8 DIMICs; Tend to disagree= 1 DIMIC
- *"The pilot project has shown that IMI is a very useful tool."* – Fully agree= 16 NIMICs, 9 DIMICs; Tend to agree= 10 NIMICs, 7 DIMICs; Tend to disagree= 3 DIMICs
- *"The pilot project has shown that IMI has the potential to bring great benefits to authorities across the EEA".* – Fully agree= 14 NIMICs, 11 DIMICs; Tend to agree= 13 NIMICs, 7 DIMICs; Tend to disagree= 2 DIMICs.