



**ASSOCIATION EUROPÉENNE DES MÉDECINS DES HÔPITAUX
EUROPEAN ASSOCIATION OF SENIOR HOSPITAL PHYSICIANS
EUROPÄISCHE VEREINIGUNG DER LEITENDEN KRANKENHAUSÄRZTE
EUROPESE VERENIGING VAN STAFARTSEN
DEN EUROPÆISKE OVERLÆGEFORENING
ΕΥΡΩΠΑΪΚΟΣ ΣΥΛΛΟΓΟΣ ΝΟΣΟΚΟΜΕΙΑΚΩΝ ΙΑΤΡΩΝ ΔΙΕΥΘΥΝΤΩΝ
ASSOCIAZIONE EUROPEA DEI MEDICI OSPEDALIERI
DEN EUROPEISKE OVERLEGEFORENING
ASSOCIAÇÃO EUROPEIA DOS MÉDICOS HOSPITALARES
ASOCIACIÓN EUROPEA DE MÉDICOS DE HOSPITALES
EUROPEISKA ÖVERLÄKARFÖRENINGEN
EVROPSKO ZDRŽENJE BOLNIŠNIČNIH ZDRAVNIKOV
EUROPSKA ASOCIACIA NEMOCNICNÝCH LEKAROV
EUROPSKA UDRUGA BOLNIČKIHI LIJEČNIKA
ΕΒΡΟΠΕΪΣΚΑ ΑΣΟΪΙΑΪΙΑ ΗΑ ΣΤΑΡΣΗΤΕ ΒΟΛΗΙΧΝΗ ΛΕΚΑΡΗ
ASOCIATIA EUROPEANA A MEDICILOR DIN SPITALE**

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Questionnaires on introducing the European Professional Card
doctors, pharmacists, physiotherapists, engineers, mountain guides
agents
(to professional associations and other interested organisations
unions)

Fields marked with * are mandatory.

Introduction

The **European Professional Card (EPC)** is a key element of **Directive 2005/36/EC on the recognition of professional qualifications**. This electronic document will be issued to professionals interested in working in another EU country, using a new electronic procedure for the recognition of professional qualifications. Applicants will have the option of applying online, and the EPC will be sent to them online through the **Internal Market Information System**, which enables authorities from different EU countries to share information quickly and efficiently. The EPC will be available both to professionals wishing to practise their profession temporarily and occasionally, and to those wishing to settle permanently in another EU country.

The EPC is designed to make procedures for recognising the professional qualifications and for making declarations on temporary provision of services easier. This will be achieved by, e.g.,

- involving the authorities in EU professionals' home countries more
- using electronic procedures such as the IMI system
- recognising qualifications tacitly (possibly).

Directive 2005/36/EC (as recently amended) outlines how the EPC will work. Its introduction for specific professions remains subject to the following conditions.

- There must be significant mobility in the profession concerned (or potential for significant mobility).
- Parties with a legitimate interest must have expressed sufficient interest.
- The profession (or the education and training associated with it) must be regulated in a significant number of EU countries.

This means that the EPC should not be introduced until it has been established that it is appropriate for the profession concerned and its impact on EU countries has been assessed.

Once the EPC has been introduced for a particular occupation, individual professionals can opt either for the simplified EPC procedure, or for an existing recognition procedure.

The questionnaire is designed to gather your views and data on the possibility of introducing the EPC for 7 professions pre-selected for more in-depth assessment:

- Nurses
- Doctors
- Pharmacists
- Physiotherapists
- Engineers
- Mountain guides
- Estate agents

The Commission will examine other professions that have expressed (or will express) interest at a later stage.

N.B. Please read this summary of how the EPC will work (either in *English, French or German*) before completing the questionnaire.

[EPC summary.doc](#)

The questionnaire is designed for the professional associations representing one or more of the 7 professions pre-selected for more in-depth assessment. Other interested organisations, such as trade unions, are also welcome to give their views.

Complete the questionnaire for the profession(s) represented by your organisation. If you are responsible for more than one of the 7 professions concerned, complete the questionnaires for each profession.

If you are responding on behalf of a regional, an EU-wide or international organisation, complete the questionnaire for each country (or region) separately.

If your organisation is acting both as a professional association and as the competent authority dealing with the recognition of professional qualifications, please fill in only the questionnaire addressed to competent authorities and questions 8.2, 8.3, 11 and 21 (or 20 for physiotherapists, engineers, mountain guides or estate agents, respectively) of the present questionnaire.

Thank you.

INFORMATION ABOUT THE RESPONDENTS

Please indicate the name and contact details of your organisation:*

AETH: Association Européenne des Médecins des Hôpitaux
European Association of Senior Hospital Physicians
Rue Guimard 35 - B-1040 Brussels

Is your organisation registered in the Transparency Register? (If your organisation is not registered, we invite you to [register here](#), although it is not compulsory to be registered to reply to the consultation)*

- Yes
 No

If so, please indicate your Register ID number:

29179039021-46

Please indicate the EU country which is represented by your organisation

*(Please note that if you are a regional or European association representing several countries (or regions), you are kindly requested to fill in this questionnaire for each EU country (or region) concerned).**

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other - Norway, Switzerland

Please provide more details about the role of your organisation, the sectors and professions that it is representing:

[insert description here as it is on AENA website]

In order to ensure transparency all contributions to public consultations are made public. You may however request anonymous publication if your legitimate interest may be harmed.*

- I consent to publication of all information in my contribution
- I object to publication of the name and address of my organisation
- I disagree to publication (please note that your reply will not be considered)

If you disagree to publication of your personal data or your contribution, please give the reasons:

If you would like to submit any information or documents, which you consider confidential and which should not be made public, you can send them to the following address:

MARKT-E4-EPC@ec.europa.eu

Please select the questionnaire which is relevant to the professions represented by your organisation (multiple choice possible):*

- A. Questionnaire - nurses
- B. Questionnaire - doctors
- C. Questionnaire - pharmacists
- D. Questionnaire - physiotherapists
- E. Questionnaire - engineers
- F. Questionnaire - mountain guides
- G. Questionnaire - estate agents
- H. Other professions (not listed above)

A. QUESTIONNAIRE - NURSES

1. Please select the professions which are represented by your organisation:*

- Nurse responsible for general care
- Specialised nurse
- Other nurse

If "Specialised nurse" or "Other nurse", please specify:

22. Do you have any further comments as to the suitability of the EPC procedure for the profession of nurse?

B. QUESTIONNAIRE - DOCTORS

1. Please select the professions which are represented by your organisation:*

- Basic medical doctor
- Medical specialist
- General practitioner

Please specify the number of doctors represented by your organisation:

→ [only AEMH Board]

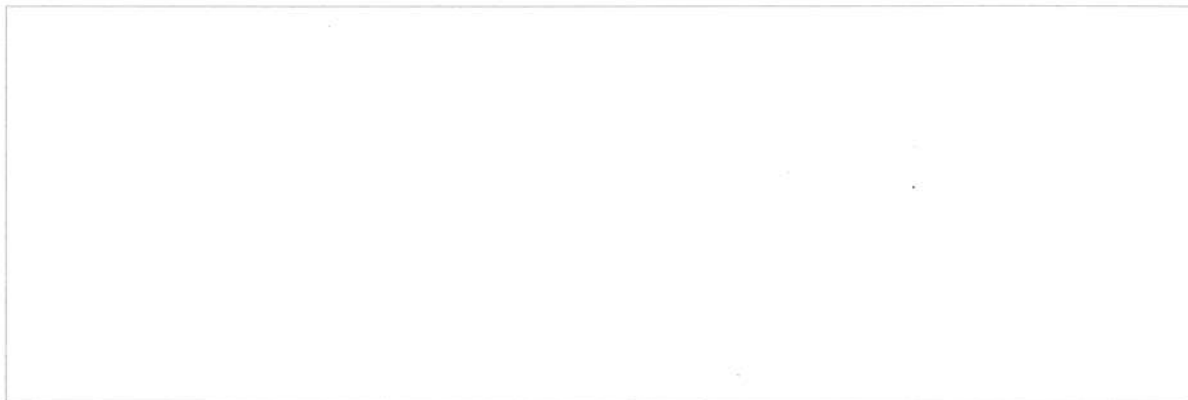
2. The introduction of the EPC for specific professions is subject to the conditions set out in Article 4a(7) of Directive 2005/36/EC, which include a sufficient interest being expressed by the relevant stakeholders.

Does your organisation support the introduction of the EPC for your respective medical profession(s)?*

- Yes
- Yes, but only for certain medical profession(s) represented by your organisation
- No
- We do not know

2.1 If your organisation supports the introduction of EPC only for certain (not all) medical professions represented by your organisation, please specify the professions for which you support introduction of EPC:

2.2 If you consider that EPC should NOT be introduced for any of the professions represented by your organisation, please explain your position:



- **MOBILITY DATA**

Please note that you are requested to answer the following questions ONLY IF (and to the extent) you have access to the data requested.

Only for indi. countries.

3.1 Please add any comments/observations you consider necessary in relation to the data provided above:

4. In your view, is the mobility of doctors in your country (i.e., the number of incoming and/or outgoing professionals) likely to increase in the coming 5 years?

- Yes
- No
- We do not know

4.1 Please explain why, in your view, the mobility of doctors is likely to increase or decrease in/out of your country:

5. Do you have any evidence (studies/reports/surveys or similar information) that would demonstrate the mobility trends of doctors and/or their potential for mobility in the future?

If so, please upload any relevant documents:

Alternatively, please specify a link to an online document:

● **APPLICATION PROCEDURES** - *per member state*

Please note that you are requested to answer the following questions ONLY IF you are familiar with the procedures for the recognition of professional qualifications in your country.

1) Document requirements in your country acting as the host Member State (i.e., a country of destination)

Not relevant
EU Wide

3. How many professionals (represented by your organisation) currently practice on a permanent basis and how many professionals provide services on a temporary basis in your country? Please also indicate the verified data source each time you provide information.

	Number of permanently established professionals:	Number of professionals providing services on a temporary basis:	Date of reference	Data source:
Basic medical doctors:				
Medical specialists:				
General practitioners:				

6. What mandatory application documents are typically requested by the competent authority in your country from doctors from another EU country who want to establish themselves permanently and seek for the recognition of their professional qualifications?

Point 5.1.1. of Annex V of Directive 2005/36/EC lists the national titles in basic medicine which meet the harmonised training requirements of Article 24 of the Directive and therefore benefit from the automatic recognition of basic medical qualifications. Point 5.1.4. of Annex V of the Directive list the national titles for evidence of formal qualifications of general practitioners.

Under the system of mutual recognition of professional qualifications provided by Directive 2005/36/EC medical specialisations have a special regime. There is a significant difference regarding the number of regulated medical specialisations amongst Member States. The Directive covers the harmonisation of the minimum training requirements of 54 categories of medical specialisations. The national titles of Member States are listed in Annex V, point 5.1.3. of Directive 2005/36/EC. These titles are covered by the automatic recognition regime to the extent that the speciality exists both in the home and the host Member State and the titles are listed for both Member States under the same medical specialist category. In other cases, the general system of recognition is applicable for the recognition of medical specialist qualifications.

Only for indi. countries

	Automatic system of recognition	Automatic recognition through acquired rights	General system of recognition
Proof of nationality (e.g., passport or ID card)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate of compliance (conformity) with Directive 2005/36/EC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate of change of denomination (if the name of qualification meeting the minimum training requirements does not correspond to the name given in Annex V of Directive 2005/36/EC)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate of acquired rights (attestation on the effective and lawful practice)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of attestation or qualification (e.g., a copy of diploma)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other information about the training (duration, subjects studied, ratio between theory and practice, continuous professional development, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate issued by a public authority on proof of professional experience if qualified in a non-EEA country and qualification has already been recognised by another EU country	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other proof of professional experience (e.g., payslip or attestation from employer)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of good character/repute/no declaration of bankruptcy or the fact that a professional has not been suspended or prohibited from practice for serious professional misconduct or criminal offence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Medical certificate/fitness to practice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of financial standing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of insurance cover or other means of protection with regard to professional liability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other mandatory documents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Only for indiv. countries.

6.1 If there are "Other mandatory documents" not mentioned in the table above, please specify:

6.2. Is the professional invited to provide any other (optional) documents?

- Yes
- No
- We do not know

If so, please specify what documents a professional can provide on an optional basis:

6.3 How much is the applicant required to pay for the recognition of his or her professional qualifications in your country (in EUR)?

	Automatic recognition	Automatic recognition through acquired rights	General system of recognition	Comments
Average fee for the recognition of professional qualifications (in EUR)				

Only for indi. countries

6.4 Please explain how the levels of recognition fees are calculated in your country:

7. Do the competent authorities in your country require that doctors from another EU country who want to provide temporary services submit a prior written declaration?

- Yes
- No
- We do not know

7.1 Do the competent authorities in your country carry out prior check of qualifications under Article 7(4) of Directive 2005/36/EC of any doctors who do not benefit from the automatic recognition coming from another EU country before the first provision of temporary services?

- Yes
- No
- We do not know

If so, please specify what doctors are subject to prior check of qualifications under Article 7(4) of the Directive prior to the first provision of temporary services:

7.2. What mandatory documents (if any) are typically requested by the competent authority in your country from doctors from another EU country who want to provide temporary services?

	Documents for a prior declaration under Article 7(2) of Directive 2005/36/EC	Documents for cases with prior check of qualifications under Article 7(4) of Directive 2005/36/EC
Proof of nationality (e.g., passport or ID card)	<input type="checkbox"/>	<input type="checkbox"/>
Proof of legal establishment in a home Member State (such as attestation from a competent authority or competent professional body, or copy of professional license, extract from trade register, certificate from employer accompanied by tax or social security document)	<input type="checkbox"/>	<input type="checkbox"/>
Proof that a professional is not suspended or prohibited from practice, even temporarily, in a home Member State (such as, extract from juridical records, certificate from judicial or police organisation)	<input type="checkbox"/>	<input type="checkbox"/>
Proof of insurance cover or other means of protection with regard to professional liability	<input type="checkbox"/>	<input type="checkbox"/>
Evidence of professional qualifications	<input type="checkbox"/>	<input type="checkbox"/>
Proof of practical experience of at least two years during the last ten years, when training/profession are not regulated in an EU country of establishment	<input type="checkbox"/>	<input type="checkbox"/>
Other documents	<input type="checkbox"/>	<input type="checkbox"/>

If there are "Other documents" not listed above or if the list of documents differs for different types of doctors, please specify:

8. Do the competent authorities in your country typically ask for translations and certified copies of the application documents? If so, for which documents?

	Certified copy	Ordinary translation	Certified/authorised translation
Proof of nationality (e.g., passport or ID card)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate of compliance (conformity) with Directive 2005/36/EC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate of change of denomination (if the name of qualification meeting the minimum training requirements does not correspond to the name given in Annex V of Directive 2005/36/EC)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate of acquired rights (attestation on the effective and lawful practice)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of attestation or qualification (e.g., a copy of diploma)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other information about the training (duration, subjects studied, ratio between theory and practice, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate issued by a public authority on proof of professional experience if qualified in a non-EEA country and qualification has already been recognised by another EU country	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other proof of professional experience (e.g., payslip or attestation from employer)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of good character/repute/no declaration of bankruptcy or the fact that a professional has not been suspended or prohibited from practice for serious professional misconduct or criminal offence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Medical certificate/fitness to practice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of financial standing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proof of insurance cover or other means of protection with regard to professional liability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other documents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

8.1 If there are "Other documents" not mentioned above, please specify:

8.2 Given your answer to question 8 above, please estimate the time and costs (in EUR) incurred by a professional in order to provide translations and certified copies of application documents. Please estimate the number of pages for which translations and/or certified copies are required, as well as the time and costs in ranges (e.g. 1-2 pages, 5-10 days, 20-30 EUR).

	Number of pages:	Number of days per page:	Cost (in EUR) per page:
For certified copies:			
For ordinary translations:			
For certified/authorised translations:			

8.3 Are there other expenses being incurred by a professional seeking recognition of qualifications in your country? If so, please specify what other costs are incurred and estimate the time and expenditure per action (in EUR).

9. What types of payment are acceptable for recognition procedures in your country (acting as host Member State)?

- Onsite payments (i.e., done in the location of the organisation, the bank, post office, etc.)
- Online payments (i.e., done remotely via web or mobile device)

9.1. If "Online payments" are accepted by the authorities in your country, please specify the means of online payments available:

- credit card
- bank card
- bank transfer
- PayPal
- Other

If "Other", please specify:

9.2 When do professionals have to execute the payments for applications?

- Prior to application (attach to application)
- During application
- After the procedure for recognition is completed
- Other

If "Other", please specify:

2) Procedures in your country acting as the home Member State (i.e., a country of origin)

10. What application documents do doctors typically request from the authorities in their country of origin (acting as the Member State) prior to submitting an application for recognition of qualification in another EU Member State in respect to the issuance of the certificate in EUP? (to who is it valid to issue the requested documents?)

Documents issued in the Member State (please mark 'X'):	Average applicable fees (in EUR):	Issuing authority (or relevant body):	Average time (days) required to receive the document:
Certificate of good conduct/good standing/good health/good character/declaration of bankruptcy or the fact that the professional has not been suspended or prohibited from practice for serious misconduct or criminal offence			
Certificate of professional experience if a professional holds qualification obtained in a non-EU country and the qualification has already been recognized by another EU country			
Other proof of professional experience (e.g., pay slips or attestations from employers)			
Proof of legal establishment in an EU country (e.g., in case of prior declaration for temporary provision of services)			
Certificate of compliance (conformity with Directive 2005/36/EC)			
Certificate of change of denomination			
Certificate of acquired rights			
Other documents: (Please specify)			

Please explain how the levels of fees for issued certificates are calculated in your country:

11. What types of payment are acceptable for issuing the certificates specified above in Q10 in your country (acting as home Member State)?

- Onsite payments (i.e., done in the location of the organisation, the bank, post office, etc.)
- Online payments (i.e., done remotely via web or mobile device)

11.1. If "Online payments" are accepted by the authorities in your country for issuing the certificates specified above in Q10, please specify the means of online payments available:

- credit card
- bank card
- bank transfer
- PayPal
- Other

If "Other", please specify:

11.2 When do professionals have to execute the payments for certificates?

- Prior to request of the documents concerned
- During the treatment of request
- After the issuance of the documents
- Other
- We do not know

If "Other", please specify:

3) Other questions related to the procedures of recognition

12. In your view, what types of payment would be most preferred in the context of EPC procedure?

- Onsite payments (i.e., done in the location of the organisation, the bank, post office, etc.)
- Online payments (i.e., done remotely via web or mobile device)

12.1. If "Online payments" are most preferred, please specify the means of online payments:

- credit card
- bank card
- bank transfer
- PayPal
- Other

If "Other", please specify:

12.2 Please explain your position:

13. How can the doctors apply for the recognition of their professional qualifications in your country (multiple choice possible)?

- By an online application
- By a written application (offline)
- We do not know

14. In your view, is there any need for written (off-line) applications for the EPC (in addition to a possibility to apply online via a public interface)?

- Yes
- No
- We do not know



Please explain your answer:

15. If online applications are possible in your country(ies), do the competent authorities request any particular form of the electronic documents (e.g., a document validated by an electronic signature)?

- Yes
- No
- We do not know

15.1. If the competent authority in your country accepts any particular form of electronic documents for the applications for recognition of qualifications, please provide more details (e.g., what are these documents? how are they are submitted?):

16. Please describe the experiences (either positive or negative) encountered by doctors which are related to online applications and/or submission of electronic documents in your country:

17. To your best knowledge, how many doctors in your country would be able to use an online application for the EPC?

- None
- Only a few
- Majority
- A vast majority
- All of them

● OTHER QUESTIONS

18. To your best knowledge, how long does it typically take in your country for a doctor from another EU country to receive recognition of professional qualifications under the system of automatic recognition from the moment of the application?

- 1-3 months
- more than 3 months
- We do not know

Europe

18.1. Why in your view do the procedures for recognition in your country take more than 3 months under the automatic recognition regime?

19. To your best knowledge, how long does it typically take in your country for a doctor from another EU country to receive recognition of professional qualifications under the general system of recognition from the moment of the application?

- 1-4 months
- more than 4 months
- We do not know

19.1. Why in your view do the procedures for recognition in your country take more than 4 months under the general system of recognition?

20. To your best knowledge, how long does it typically take in your country for a doctor from another EU country to make a declaration for temporary provision of services from the moment of the application?

- less than 1 month
- 1-2 months
- more than 2 months
- We do not know

20.1. Why in your view do the procedures for prior declaration in case of temporary provision of services in your country take more than 2 months?

22. Do you have any further comments as to the suitability of the EPC procedure for the medical profession?

C. QUESTIONNAIRE - PHARMACISTS

1. Please select the professions which are represented by your organisation (please refer to the generic name of the professions as listed in the Database of Regulated Professions):*

- Pharmacists
- Specialist pharmacists
- Other pharmacist

If "Specialist pharmacist" or "Other pharmacist", please specify:

Please specify the number of pharmacists represented by your organisation:

2. The introduction of the EPC for specific professions is subject to the conditions set out in Article 4a(7) of Directive 2005/36/EC, which include a sufficient interest being expressed by the relevant stakeholders.

Does your organisation support the introduction of the EPC for pharmacist professions represented by your organisation?*

- Yes
- Yes, but only for certain pharmacist profession(s) represented by your organisation
- No
- We do not know

21. To your best knowledge, what are the main obstacles for a professional who wants to work in another EU country to submit an application for recognition in another Member State under the current rules? Please rank the relevant obstacles in order of difficulty from 5 (most difficult) to 1 (least difficult).

	Please rank (from 5 to 1)
Foreign language	5
Difficulties in finding relevant information	2
Difficulties in identifying a competent authority in the host Member State	1
A need to provide translations of documents	3
A need to provide certified copies	
Additional expenses/time related to travel to the host Member State	4
Other obstacles (please specify)	How MS competent authority lacks of information.

