Competent authority recommendations on the European professional card

This paper summarises the recommendations on the European professional card (EPC) arising from the Healthcare Professionals Crossing Borders (HPCB) conference in October 2016.

At the conference, healthcare professional competent authorities with direct experience of the EPC over the past 12 months highlighted the need to make improvements to the EPC system to improve functionality and ensure patient safety is met.

Summary of competent authority views on the EPC

At the conference, a number of competent authorities questioned the disproportionate impact that the EPC has on those member states that act as the home member state. The EPC system places the burden of the responsibility for the verification of documents on the home member state. This has proved to be resource intensive, especially for those countries that see a large ‘outflow’ of professionals.

At the same time, host member states raised the constraints that bind them with regards to the information they can request from applicants and their lack of involvement in certain routes to recognition.

It would seem that a re-balancing of the respective roles and responsibilities of the home and host member state would go some way to addressing the concerns and providing host authorities with the necessary reassurance.

1. Administrative burden on home member state

Some authorities who act largely as a home member state believe that the information an EPC applicant is expected to submit needs revising as a matter of urgency. The obligation for home member states to verify a large number of documents, with different rules for different receiving countries, is proving to be a large administrative burden for those smaller authorities with a large number of outgoing professionals.

This view was balanced by comments from host member states who have a duty to ensure public protection in their countries and who find it difficult to rely on over-burdened home member states to verify large numbers of important documents.

It was suggested that the existence of a route to revoke an issued EPC could demonstrate any emerging patterns of requests to revoke which would highlight any
poor verification practices in home member states and indicate where further guidance may be required.

The administrative burden is particularly onerous in cases of general system recognition where the host member state has to make an individual assessment of the applicant’s training and experience within a very tight timeframe.

**Recommendation:**
We call on the European Commission to:

- Revisit the responsibilities of the home and host member state to ensure that host countries are not overburdened by the need to verify large numbers of documents, and that host member states are able to assure themselves of the validity and content of documents

**2. Duplication of existing methods of recognition**

Some competent authorities see the EPC process as a significant administrative burden as it doubles the procedures involved in registering a new professional i.e. all existing procedures for professional registration / licences to practice still need to be met once the EPC has been issued.

This results in additional work for the competent authority as there are numerous instances when an application is submitted with incorrect documents and when authorities must then liaise with individual applicants to explain how the national system works. In addition, many applicants assume that the issuance of an EPC grants them access to the profession which is not true.

There are also instances of applicants submitting duplicate applications – one via the traditional method of application and one via the EPC route. This creates further administrative burden in the host member state.

**Recommendation:**
We call on the European Commission to:

- Improve the clarity of the EPC website to highlight that the EPC does not grant access to the profession and that the usual national registration rules must still be met
3. High numbers of failure rates

A number of authorities have seen a relatively high failure rate in EPC applications, for example due to administrative errors in the home member state or the applicant selecting the wrong type of application or field on the EPC interface.

Decisions on the routes to registration that were previously made by host competent authorities, such as whether an applicant benefits from a complex legal provision known as EC Rights, are now made by the applicant themselves using the EPC interface. This results in a large number of unsuitable and ultimately rejected applications.

**Recommendation:**

We call on the European Commission to:

- Improve the information available for applicants on the EPC interface
- Consider whether it is appropriate for applicants to select their route to recognition when these are governed by strict legal rules and may not be widely understood

4. Temporary & occasional registration applications

A number of authorities across Europe voiced concerns with the EPC process for temporary & occasional applications under the automatic recognition procedure. This is because the host member state does not receive information on the applicant’s intentions and may find it difficult to judge whether the applicant meets the temporary & occasional criteria once the EPC has been issued.

The host member state is ultimately responsible for patient safety on its territory and needs to be able to make a decision on whether the applicant meets the temporary & occasional criteria in a timely manner. If the EPC holder does not meet the criteria, the host member state can then revoke the EPC. The 18 month validity for such applications via the EPC route also raises questions about whether the service to be provided is genuinely temporary and occasional.
Promoting patient safety across borders

Recommendation:

We call on the European Commission to:

- Amend the EPC process so that in cases of temporary & occasional applications without prior check of qualifications, the host member state is able to view the full details of application as soon as it is issued so as to enable it to assess whether the automatic route is appropriate and the application is genuinely temporary & occasional to allow it to revoke the EPC if necessary and in a timely manner.

EPC evaluation

At the conference, authorities were united in calling for a full evaluation of the first 12 months of the EPC for professions taking part in the first phase of the roll out. It was clear that authorities wanted this to not simply look at the numbers behind the EPC (such as number of EPCs issued, rejected etc.) but at the experiences of the individual competent authorities in using the system and the effectiveness of the current process in guaranteeing patient safety.

This would also ensure that the system is fit for purpose and working efficiently before it is expanded to further professions.

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