

# PAR Monitor Report Montenegro

## SERVICE DELIVERY AND DIGITALISATION

2024/2025



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## ABOUT WEBER 3.0

Building upon the achievements of its predecessors, the WeBER (2015 – 2018) and WeBER 2.0 (2019 – 2023) projects, the **Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0** project is the third consecutive EU-funded grant of the largest civil society-led initiative for monitoring public administration reform (PAR) in the Western Balkans. Its implementation period is February 2023 – July 2026. Guided by the SIGMA/OECD Principles, the first two phases of the initiative laid the foundation for WeBER 3.0's ambition **to further empower civil society organisations (CSOs) to contribute to more transparent, open, accountable, citizen-centric and thus more EU-compliant administrations in the WB region.**

WeBER 3.0 continues to promote the crucial role of CSOs in PAR, while also advocating for broader citizen engagement in this process and inclusive reform measures which are user-tailored and thus lead to tangible improvements. By grounding actions in robust monitoring data and insights, WeBER 3.0 will empower civil society to more effectively influence the design and implementation of PAR. To foster collaborative policymaking and bridge the gap between aspirations and actionable solutions, the project will facilitate sustainable policy dialogue between governments and CSOs through the WeBER Platform and its National PAR Working Groups. Finally, through small grants for local CSOs, WeBER 3.0 bolsters local-level PAR engagement, amplifying the voices of citizens – the final beneficiaries of the public administrations' work.

WeBER 3.0 products and further information about them are available on the project's website at [www.par-monitor.org](http://www.par-monitor.org).

WeBER 3.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level visibility.



## ACKNOWLEDGEMENTS

The Service Delivery and Digitalisation Montenegro 2024/2025 is a product of a three-month long monitoring process, which relied on different data collection techniques and thus resulted in an abundance of findings.

As in the case of the previous editions of the National PAR Monitor reports, published for 2017/2018, 2019/2020 and 2021/2022, special acknowledgements go to members of the WeBER Platform and the National Working Group in Montenegro, and other stakeholders in Montenegro that shared their experiences through interviews, who immensely contributed to the content of this report and its quality, and who will not be identified due to the respect of the principle of anonymity.

Lastly, the WeBER 3.0 team would also like to thank its main partners and associates, who have supported the project in research and other activities. Most notably, these are the SIGMA (Support for Improvement in Governance and Management)<sup>1</sup>, the ReSPA (Regional School of Public Administration), and the Ministry of Public Administration in Montenegro, as a project associate.

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<sup>1</sup> A joint initiative of the European Union and the OECD.

## EXECUTIVE SUMMARY

*The assessment of the transparency and citizen centricity of service design and delivery focuses on three critical aspects – 1) citizen-centric service delivery and design, 2) service accessibility and availability of information on services, and 3) digitalisation of service delivery. The first aspect is devoted to examining the extent and manner in which relevant institutions involve citizens in service design and delivery, focusing on the practice of collecting feedback and incorporating it into the (re)design of services. The second aspect focuses on service accessibility, with the emphasis on citizen-friendly approaches when informing on service provision and accessibility of services to persons with disabilities, vulnerable and marginalised groups. Finally, the last aspect examines the progress of the digitalisation of services, highlighting the practice of establishing user-oriented digital platforms and enablers for the citizens. Findings of this report reflect the period since the publication of the PAR Monitor 2021/2022, starting from the second half of 2022, and until the end of 2024.<sup>2</sup>*

Despite clear strategic commitments to citizen-centric service design and delivery in Montenegro, articulated through the Public Administration Reform Strategy and the Strategy for Digital Transformation, their practical implementation remains limited. While the strategic documents outline measures that emphasise user involvement, feedback mechanisms through introducing systematic measurement of the satisfaction of users of public services and quality management system, these intentions are insufficiently embedded in the legislative framework, particularly regarding service design.

User feedback mechanisms on service delivery do not exist for observed sample services in this monitoring cycle, neither institutions report on the citizens' feedback. Citizens and civil society organisations both perceive limited opportunities to influence services or provide meaningful feedback.

In Montenegro, legal framework supports the use of digital services, electronic signatures, and e-payments, ensuring that electronic documents have the same legal validity as paper ones. The eGovernment (eUprava) portal do not serve as the main platform for digital service delivery, since other institutions use specific platforms, such as eFirma, eTaxis portal, etc.

Even the Government of Montenegro adopted Information on establishing a

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<sup>2</sup> For 2022, only developments not captured by the PAR Monitor 2021/2022 are included.

new unique portal of electronic administration in December 2024<sup>3</sup>, the new portal was not functional. The Ministry of Public Administration on 22<sup>nd</sup> of April 2025 published that the first electronic services are available on the new Electronic Administration Platform (eUprava.gov.me). According to the notice on the portal, the process of collecting and updating data on the availability of e-services is still ongoing. New portal is created in citizen-friendly manner, including accessibility preferences and contact-support data.

What can be seen from the services that are available at the moment of writing the report, new portal is improved compared to the previous one. This portal improved information for the users on details on the available services, instructions how to use services, required documentation and fillable forms available, including information on costs, contact persons, as well as legal framework. **However, establishing new portal did not contribute to improving the grades for the SDD area, because none of the services included in the sample for this monitoring, are available on the new e-government portal.**

The latest Report on the Implementation of the Digital Transformation Strategy showed that this Action Plan was not implemented with the desired dynamics, as only 43,14% of planned activities in 2024 were realised. As it is stated in the report, the given data is more than alarming that it is necessary to dedicate a greater degree of control over the implementation of planned activities, noting that lack of inter-institutional cooperation is one of the obstacles for realisation of the planned activities.

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<sup>3</sup> Information on establishing a new unique portal of electronic administration in December 2024, Available here: <https://www.gov.me/dokumenta/428200b3-fdc3-4c90-9aa1-dda3c05c671c>

## LIST OF ABBREVIATIONS AND ACRONYMS

AP – Action Plan

CSO – Civil Society Organisation

EU – European Union

FOI – Freedom of Information

ID – identification/identity document

MPA – Ministry of Public Administration

PAR – Public Administration Reform

PWB – Persons with Disabilities

ReSPA – Regional School of Public Administration

SIGMA – Support for Improvement in Governance and Management

UNDP – United Nations Development Programme

VAT – Value-Added tax

WeBER 3.0 – Western Balkan Enablers for Reforming Public Administrations



# I. WEBER PAR MONITOR

## What we monitor and how?

### I.1 WeBER's approach to monitoring PAR

The Public Administration Reform (PAR) Monitor methodology was developed in 2015-2016, as part of the first Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER) project. Since the onset, WeBER has adopted a markedly evidence-based approach in its endeavour to increase the relevance, participation and capacity of civil society organisations (CSOs) in the Western Balkans to advocate for and influence the design and implementation of PAR. The PAR Monitor methodology is one of the main project results, seeking to facilitate civil society monitoring of PAR based on evidence and analysis.

In line with WeBER's focus on the region's EU accession process, once the SIGMA *Principles of Public Administration*<sup>4</sup> were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024. This was done in order to keep the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.<sup>5</sup>

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<sup>4</sup> Available at: <https://www.sigmaweb.org/publications/principlesofpublicadministration.htm>.

<sup>5</sup> For detailed information on the scope and process of methodology revision please visit <https://www.par-monitor.org/par-monitor-methodology/>.

**Table 1: Main changes in the PAR Monitor methodology**

<b>STRUCTURE</b>
<ul style="list-style-type: none"><li>• Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (specific criteria assessed)</li><li>• Introduction of types of indicator elements, meaning that each element has a specific focus on one of the following aspects of reform:<ol style="list-style-type: none"><li>1) Strategy and Policy</li><li>2) Legislation</li><li>3) Institutional Set-up</li><li>4) Practice in Implementation, and</li><li>5) Outcomes and Impact</li></ol></li><li>• Introduction of a 100-point scale, allowing for a more nuanced assessment of progress in each PAR area</li></ul>
<b>DATA SOURCES</b>
<ul style="list-style-type: none"><li>• Introduction of interviews with “key informants”, i.e. key non-state actors engaged and familiar with the processes. These interviews serve as a data source for the “Outcomes and impact” elements instead of the formerly implemented survey of civil society organisations.</li><li>• Use of public perception survey results as a data source for “Outcomes and Impact” elements, and expanding its scope to complement the assessment in five PAR areas, except for “Strategy for PAR”</li><li>• Removal of survey of civil servants as a data source due to persistent issues with ensuring adequate response rates across the region’s administrations.</li></ul>
<b>PAR MONITOR REPORTING</b>
<ul style="list-style-type: none"><li>• Six national PAR Monitor reports, one per PAR area (36 in total for the entire PAR Monitor), in order to facilitate timely publication and advocacy for the monitoring results rather than publishing the results of 18 months of research at the end of the process.</li><li>• Six regional Western Balkan overview reports, one per PAR area (6 in total)</li></ul>

## I.2 Why and how WeBER monitors the “Service Delivery and Digitalisation” area

WeBER’s focus on transparency and citizen centricity of service design and delivery is crucial for several reasons. Public administration services serve as the primary point of interaction between institutions and citizens, making their accessibility, responsiveness, and quality critical to effective governance. In order to achieve these standards, public services should be designed based on citizens’ needs and preferences rather than bureaucratic convenience. A user-centered approach helps reduce inefficiencies and improves satisfaction while simultaneously enhancing the legitimacy of public institutions. Monitoring developments in this area provides data-driven insights that support evidence-based advocacy for improving how public institutions design and deliver services, as well as how they engage with citizens throughout these processes. Moreover, the focus on inclusivity ensures services are designed and delivered in a way that enables all individuals – regardless of their socioeconomic background, geographic location, gender, disability status, or other factors – to access and benefit from them. By tracking progress and challenges, the monitoring provides for actionable recommendations for sustainable, citizen-oriented reforms in public service delivery.

Monitoring in **the Service Delivery and Digitalisation** is based on all four SIGMA Principles in this area:



**Principle 19:** Users are at the centre in design and delivery of administrative services.



**Principle 20:** The public administration delivers streamlined and high-quality services

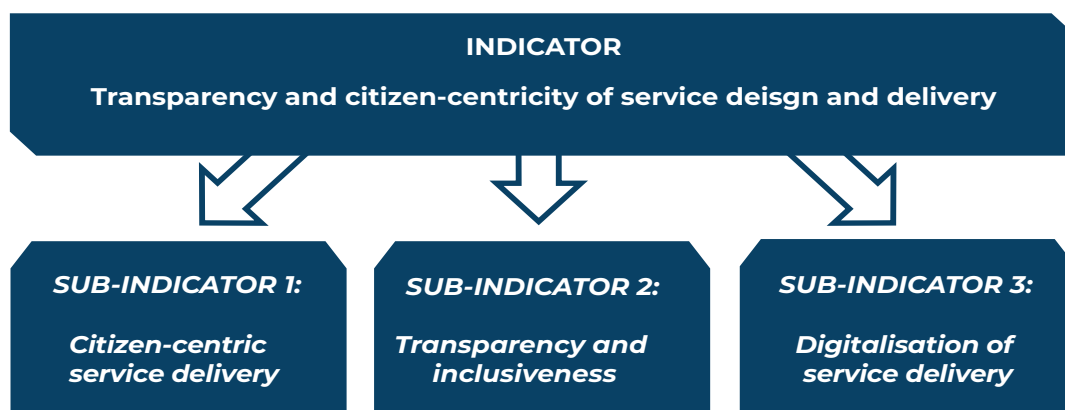


**Principle 21:** Administrative services are easily accessible online and offline, taking into account different needs, choices and constraints.



**Principle 22:** Digitalisation enables data-driven decisions and effective, efficient and responsive policies, services and processes in the whole of government.

These Principles are assessed from the perspective of public involvement in the processes of service design and delivery and the outward-facing aspects of administration that are crucial for the daily provision of administrative services and contact with the administration. A focus on transparency and citizen-centricity aims to determine the extent to which stakeholders’ needs and views are consulted and taken into consideration by authorities when developing and providing administrative services, both in the electronic form and in person.



The monitoring period for the Service Delivery and Digitalisation covers developments since the last PAR Monitor cycle, which lasted from January until November 2022. Thus, this report focuses primarily on 2023 and 2024, as well as the end-of-2022 developments not covered in the previous cycle. Although this report provides a comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring results due to methodological changes described above.

For the Practice type of elements based on a sample throughout all three sub-indicators, the same seven administrative services are observed to allocate points.<sup>6</sup> These sample services include:

1. Property registration
2. Company (business) registration
3. Vehicle registration
4. Passport issuance
5. ID card issuance
6. VAT declaration
7. VAT payment.

The first sub-indicator focuses on the existence of mechanisms that provide for citizen-centric service design and delivery. WeBER assesses whether relevant public policy documents in this area envisage specific measures and activities that put citizens at the centre of service design and delivery and whether the relevant legislative framework enables such an approach. Additionally, it examines the existence of feedback mechanisms and the practice of relevant authorities in terms of analysis and use of gathered feedback in designing new and improving existing services.

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<sup>6</sup> Unless specified otherwise in the methodology of individual elements.

Monitoring of strategy and policy, legislation and practice aspects is performed by combining data sources to ensure reliability of results, including qualitative analysis of strategic documents, and official data that is publicly available or obtained from responsible institutions through FOI requests. For the assessment of the outcomes and impact, researchers conduct key informants' interviews with non-state actors who possess significant expertise in the area and use the findings from the public perception survey conducted within the scope of the assessment.

Indicator elements that are assessed under the first sub-indicator are listed in the Table 2.

**Table 2: Indicator elements under the sub-indicator 1**

Indicator element - number and title	Type
E1.1 There is a strategic document in force that envisages the provision of citizen-centric service design and service delivery	Strategy and policy
E1.2 Regulations stipulate citizen-centric service design and service delivery	Legislation
E1.3 Regulations stipulate an obligation of service providers to keep and publish metrics of users' participation in service design	Legislation
E1.4 Regulations stipulate application of 'once-only principle'	Legislation
E1.5 Institutional responsibility for steering and continuously improving service design and service delivery at the central administration level is assigned	Institutional setup
E1.6 Service providers collect and publish information on users' participation in service design	Practice in implementation
E1.7 Service providers collect and publish users' feedback on their experience with service delivery	Practice in implementation
E1.8 The administration uses citizens' feedback to improve administrative services	Practice in implementation
E 1.9 Public service providers implement the once-only principle during service delivery	Practice in implementation

Indicator element - number and title	Type
E 1.10 Key non-state actors consider service design and delivery as citizen centric	Outcomes and impact
E 1.11 Citizens' perception of their ability to influence service design	Outcomes and impact
E 1.12 Citizens' perception of their opportunity to provide feedback on public service quality	Outcomes and impact
E 1.13 Citizens' awareness of the once-only principle	Outcomes and impact
E1.14 Citizens' reported experience with the implementation of the once-only principle	Outcomes and impact

The second sub-indicator assesses the accessibility of services, both online and in person, and the availability of information necessary to obtain a service. Specifically, the assessment focuses on the extent to which service providers take into consideration the needs of vulnerable and minority groups in the process of delivering services, the format and territorial distribution of services and the availability of necessary guidance and information.

Monitoring of this sub-indicator is based on the review of official documents and websites of institutions in charge of service delivery, in order to assess different aspects related to issues of accessibility, while also taking into account official documents and data obtained from responsible institutions through FOI requests. For the assessment of outcomes and impact, researchers conduct key informants' interviews with non-state actors who possess significant expertise in the area and use the findings from the public perception survey conducted within the scope of the assessment.

Indicator elements that are assessed under the second sub-indicator are listed in the Table 3.

**Table 3: Indicator elements under the sub-indicator 2**

Indicator element - number and title	Type
E 2.1 The strategic framework envisages enhancement of accessibility of services and availability of service delivery information	Strategy and policy
E 2.2 Regulations stipulate service provision through one-stop shops	Legislation
E 2.3 Regulations stipulate that service providers keep key metrics on the use of services	Legislation
E 2.4 Regulations stipulate provision of services in the form of life events	Legislation
E 2.5 Regulations stipulate mandatory adaptation of service delivery to the needs of vulnerable groups	Legislation
E 2.6 Service providers publish basic procedural information on how to access public services online	Practice in implementation
E 2.7 Service providers publish citizen-friendly guidance on accessing public services online	Practice in implementation
E 2.8 Service providers publish information on services they offer as life events	Practice in implementation
E 2.9 Information on services is available in multiple formats to meet diverse users' needs	Practice in implementation
E 2.10 Information on public service delivery is available in multiple languages to meet diverse users' needs	Practice in implementation
E 2.11 Service providers publish information on the prices of their services	Practice in implementation
E 2.12 Service providers publish information on the rights and obligations of users	Practice in implementation

Indicator element - number and title	Type
E 2.13 Service providers publish precise contact information for service provision	Practice in implementation
E 2.14 Data on administrative services are available in open formats	Practice in implementation
E 2.15 Service providers train their staff on how to treat vulnerable groups	Practice in implementation
E 2.16 Service providers ensure adequate territorial distribution of service delivery	Practice in implementation
E 2.17 Key non-state actors consider service delivery as accessible	Outcomes and impact
E 2.18 Citizens' perception of the accessibility of information necessary for obtaining services	Outcomes and impact
E 2.19 Citizens' perception of the ease of in-person access to services	Outcomes and impact
E 2.20 Citizens' perception of the ease of online access to services	Outcomes and impact

Finally, the third sub-indicator is devoted to the provision of services in the electronic format and the process of service digitalisation. The assessment focuses on the relevant strategic framework that ensures a smooth and stable digitalisation process; the legislative framework regulating all key aspects of electronic service delivery; institutional responsibilities; the user orientation of the e-service platform; and the availability of digital tools and enablers necessary to access e-services.

Monitoring is based on the review of official documents and websites of institutions relevant to electronic service design and delivery, while also taking into account official documents and data obtained from responsible institutions through FOI requests. For the assessment of the outcomes and impact, researchers conduct key informants' interviews with non-state actors who possess significant expertise in the area.

Indicator elements that are assessed under the third sub-indicator are listed in the Table 4.



**Table 4: Indicator elements under the sub-indicator 3**

Indicator element - number and title	Type
E 3.1 There is a strategic document in force that envisages digitalisation of service delivery	Strategy and policy
E 3.2 Regulations stipulate provision of digital services, digital signature and e-payment in digital service delivery	Legislation
E 3.3 Institutional responsibility for steering the digital service delivery at the central administration level is assigned	Institutional setup
E 3.4 Online central platform for digital service delivery is established and user-oriented	Practice in implementation
E 3.5 Digital signature and digital payment are available to all users	Practice in implementation
E 3.6 Key non-state actors consider digital services as easy to use	Outcomes and impact

## II. TRANSPARENCY AND CITIZEN-CENTRICITY OF SERVICE DESIGN AND DELIVERY

TRANSPARENCY AND CITIZEN-CENTRICITY  
OF SERVICE DESIGN AND DELIVERY  
(score 0-100)

36

64

■ Awarded    ■ Not achieved

### II.1 Citizen-centric service delivery

Principle 19: Users are at the centre in design and delivery of administrative services.

Principle 20: The public administration delivers streamlined and high-quality services

**Sub-indicator 1:**  
**Citizen-centric service delivery<sup>7</sup>**

Indicator elements	Element type	Score
E 1.1 There is a strategic document in force that envisages the provision of citizen-centric service design and service delivery	Strategy and policy	0.5/0.5
E 1.2 Regulations stipulate citizen-centric service design and service delivery	Legislation	1/2
E 1.3 Regulations stipulate an obligation of service providers to keep and publish metrics of users' participation in service design	Legislation	0/2
E 1.4 Regulations stipulate application of 'once-only principle'	Legislation	1/1
E 1.5 Institutional responsibility for steering and continuously improving service design and service delivery at the central administration level is assigned	Institutional set-up	0/2
E 1.6 Service providers collect and publish information on users' participation in service design	Practice in implementation	0/3.5
E 1.7 Service providers collect and publish users' feedback on their experience with service delivery	Practice in implementation	0/4
E 1.8 The administration uses citizens' feedback to improve administrative services	Practice in implementation	0/3
E 1.9 Public service providers implement the once-only principle during service delivery	Practice in implementation	3/3
E 1.10 Key non-state actors consider service design and delivery as citizen centric	Outcomes and impact	0/3
E 1.11 Citizens' perception of their ability to influence service design	Outcomes and impact	0.5/2
E 1.12 Citizens' perception of their opportunity to provide feedback on public service quality	Outcomes and impact	1/2

<sup>7</sup> Through the first sub-indicator, the following SIGMA sub-principles are monitored: The government establishes and co-ordinates a whole-of-government policy to continuously improve design and delivery of public administrative services, based on evolving user needs; Public administration bodies engage users to understand their needs, expectations and experiences and to involve them actively in the (re)design of public administrative services (co-creation); The public administration regularly monitors service quality against delivery standards and other metrics, to learn lessons and improve service design and delivery; and Users have the legal right to provide the public administration with information and documents only once. The public administration applies this right consistently.

Indicator elements	Element type	Score
E 1.13 Citizens' awareness of the once-only principle	Outcomes and impact	1/2
E 1.14 Citizens' reported experience with the implementation of the once-only principle	Outcomes and impact	0/2
<b>Total score for sub-indicator 1</b>		<b>8/32</b>

*Citizen-centric service design and service delivery are recognised with the key strategic documents - Public Administration Reform (PAR) Strategy 2022-2026 and Montenegro Digital Transformation Strategy 2020-2026 and its action plans. However, the dynamic of realisation of the Strategy for digital transformation is slow, since according to the latest report only 43.14% activities planned in 2024 are realised.*

*The European Commission's 2024 report assessed the process of modernising public service delivery as slow. The report says that the Law on administrative procedures was not consistently implemented, notably concerning the 'once only' principle and electronic communication, while services in general remain bureaucratic and are not user-friendly.<sup>8</sup> The SIGMA report for Montenegro also confirms that strategic documents for modernising the system of public services is in place, but the implementation has not yet brought tangible benefits.<sup>9</sup>*

*When it comes to the legal framework, key gaps refer to the absence of legal obligations for public administration bodies to involve users in designing services or to publish data on such participation, as well as the absence of mandatory collection of key metrics on service delivery. Observed institutions do not publish reports on the users' participation in service delivery, nor reports on user feedback on service delivery. When it comes to the citizens, only 27,8 of respondents agree or strongly agree that they can influence development of public administration services.*

As stated, citizen-centric approaches to service design and service delivery are recognised in both strategic and legislative frameworks. The Public Administration Reform (PAR) Strategy defines an entire strategic goal dedicated to citizen-centric service design and delivery, with its main goal being "high-quality services of the public administration" aimed at citizens and business in Montenegro. Furthermore, two operational goals define concrete activities, which include complete interoperability of information systems, increasing the number of electronic services at a high level of sophistication, developing a

<sup>8</sup> European Commission Report on Montenegro 2024, October 2024. Available at: [https://enlargement.ec.europa.eu/montenegro-report-2024\\_en](https://enlargement.ec.europa.eu/montenegro-report-2024_en)

<sup>9</sup> SIGMA, Public Administration in Montenegro 2024, January 2025. Available at: [https://www.sigmaxweb.org/en/publications/public-administration-in-montenegro-2024\\_6b3dec38-en.html](https://www.sigmaxweb.org/en/publications/public-administration-in-montenegro-2024_6b3dec38-en.html)

methodology for introducing quality management into public administration, etc. The Strategy for Digital Transformation also includes broadly citizen-centric service design through one of its operational goal - Improvement of quality, quantity and use of e-services. However, the dynamic of realisation of the Strategy for digital transformation is slow, since according to the latest report only 43.14% activities planned in 2024 are realised.

When it comes to the legal framework, none of the regulations stipulate provisions explicitly requiring citizen participation in service design or mandating alignment of services with user preferences. On the other side, when it comes to the citizen centric approach in the service delivery, the general Law on Administrative procedure defines provisions on electronic communication, as well as those related to one-stop shop and once-only principles.

Alongside that, there is no central institution responsible for steering and continuously improving both service design and service delivery. The Role of Ministry of Public Administration is more focused on the digitalisation of services, while service design remains in the hand of different institutions.

However, the biggest gap in the legislative framework is that there is no legal provisions related to keeping and publishing metrics of user participation in service design. The previously noted absence of legal provisions for keeping and publishing metrics on citizen involvement in service (re)design is reflected in practice, as no such data was available for any of the sample services analysed. Public perception survey<sup>10</sup> results showed that only 27.8% respondents believe that they have the opportunity to influence the development of public administration services. Ministry of Public Administration informed us that they have conducted three cycles of Survey on satisfaction of citizens on existing and identification of needs for new e-services (in cooperation with UNDP). The latest cycle is conducted in April 2024<sup>11</sup>. Even though this report covers all sample services, there is available only general satisfaction on e-services, not specifically for each of sample services in this monitoring cycle. There is no publicly available report on the official website of the Government, only on the UNDP website, this is why this element gained zero points.

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<sup>10</sup> The survey was conducted between the 1<sup>st</sup> and 12<sup>th</sup> of February 2025 in Montenegro, on a sample of 1010 citizens. The same survey was conducted in all WB administration on a sample of 6077 citizens. For additional information see Methodology appendix.

<sup>11</sup> UNDP, Satisfaction survey on the existing e-services and identification of needs for new ones – citizens and business community – 2024. March 2025. Available here: <https://www.undp.org/montenegro/publications/satisfaction-survey-existing-e-services-and-identification-needs-new-ones-citizens-and-business-community-2024>

When it comes to implementation in practice, this monitoring cycle has shown that service providers at most apply the once-only principle when it comes to the sample services, except for the property registration. Points for this element were allocated since for other sample service there is publicly available information on which documentation should be submitted by citizens and which should be collected ex-officio for the sample services. It should be noted that SIGMA report for Montenegro pointed that practice is inconsistent when it comes to the once-only principle application, specifying that special laws regulating various proceedings are not aligned with this principle.<sup>12</sup> Public perception survey showed that 53.6% of respondents are aware that they are not required to provide documents already held by the state, while only 19,9% of them reported implementation of once-only principle in practice.

There is still no channel for feedback on specific services on websites of institutions providing these services. When it comes to those electronically available sample services (related to VAT declaration and payment and business registration), the e-government portal includes short questionnaire on how citizens are satisfied only with information on specific e-service. Ministry of Interior (which provides three sample services) have comment section on its website, but only for comments on experience with using electronic ID, not the sample services itself.

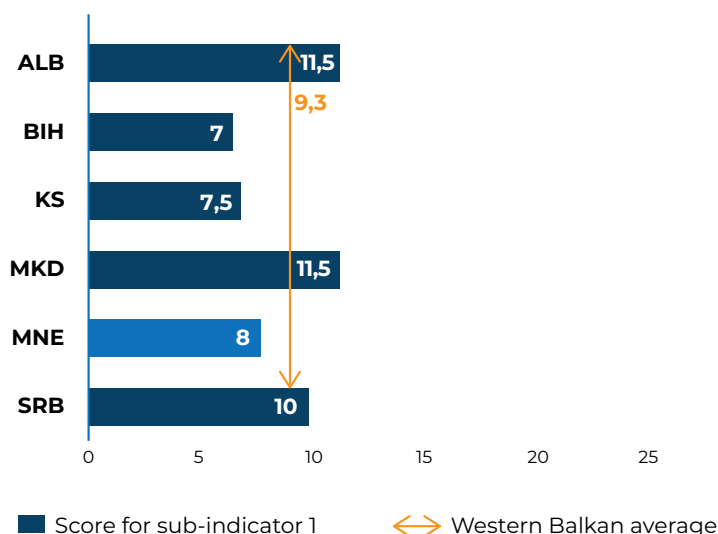
Key informants' answers indicates that even where feedback is collected, it is rarely systematically used by relevant authorities. Three key informants do not agree that service design and service delivery are in general citizen centric, nor that channels for citizens' feedback are available and used to improve service delivery. One key informant stated that feedback from e-government portals, social media, and mobile apps is often collected but is not always systematically categorized or analysed. In many cases, feedback is logged manually, leading to slow processing and a lack of a continuous or structured approach." On the other side, citizens' perception shows that 40,2% of respondents agree or strongly agree that have opportunity to share their opinion on the quality of public administration services.

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<sup>12</sup> SIGMA, Public Administration in Montenegro 2024, January 2025. Available at: [https://www.sigmaweb.org/en/publications/public-administration-in-montenegro-2024\\_6b3dec38-en.html](https://www.sigmaweb.org/en/publications/public-administration-in-montenegro-2024_6b3dec38-en.html)

## How does Montenegro do in regional terms?

### Sub-indicator 1: Citizen-centric service delivery



## II.2 Service accessibility and availability of information on services

**Principle 19: Users are at the centre in design and delivery of administrative services.**

**Principle 20: The public administration delivers streamlined and high-quality services.**

**Principle 21: Administrative services are easily accessible online and offline, taking into account different needs, choices and constraints.**

**Principle 22: Digitalisation enables data-driven decisions and effective, efficient and responsive policies, services and processes in the whole of government.**

## Sub-indicator 2: Service accessibility and availability of information on services<sup>13</sup>

Indicator elements	Element type	Score
E 2.1 The strategic framework envisages enhancement of accessibility of services and availability of service delivery information	Strategy and policy	0,5/0,5
E 2.2 Regulations stipulate service provision through one-stop shops	Legislation	1/1
E 2.3 Regulations stipulate that service providers keep key metrics on the use of services	Legislation	0/1.5
E 2.4 Regulations stipulate provision of services in the form of life events	Legislation	0/1
E 2.5 Regulations stipulate mandatory adaptation of service delivery to the needs of vulnerable groups	Legislation	<b>1.5/2</b>
E 2.6 Service providers publish basic procedural information on how to access public services online	Practice in implementation	2/5
E 2.7 Service providers publish citizen-friendly guidance on accessing public services online	Practice in implementation	0/3
E 2.8 Service providers publish information on services they offer as life events	Practice in implementation	0/4

<sup>13</sup> Through the second sub-indicator, the following SIGMA sub-principles are monitored: The government establishes and co-ordinates a whole-of-government policy to continuously improve design and delivery of public administrative services, based on evolving user needs; The public administration regularly monitors service quality against delivery standards and other metrics, to learn lessons and improve service design and delivery; The public administration ensures that service delivery is streamlined for the maximum convenience of the service users; The public administration organises and offers public services in the form of "life events"; The public administration applies omni-channel service delivery, combining online and (digitally-assisted) offline channels, so users have a seamless user journey with the possibility to interact digitally with any part of administration, if desired; All potential users have physical access to high-quality public services within reasonable distance, through collaboration of involved public administration bodies and co-ordination across and within levels of government; The public administration takes account of the diverse needs of different user groups in delivering services (including with respect to physical and intellectual ability, digital skills and language) and ensures there are no barriers to service access; The public administration ensures that users can easily find their preferred channels and have easy access to information about their rights, obligations, services and the institutions providing them, for example through a service catalogue; In their communication tools (websites, leaflets, forms, etc.) and in the context of administrative decisions, public administration bodies use concise and understandable language that conveys all relevant information in a manner appropriate to the diverse circumstances of service users (minority languages according to the law, visual and hearing impairments, etc.); Public registries are digital by design, and data governance is coherent and systematic, to ensure the trustworthiness and high quality of data and access to it, with active use and sharing of data within the public administration and beyond; and The public administration actively collaborates with relevant stakeholders to enhance the re-use of digital solutions developed with public budget to boost a collaborative ecosystem for the provision and use of digital services economy-wide.



Indicator elements	Element type	Score
E 2.9 Information on services is available in multiple formats to meet diverse users' needs	Practice in implementation	0/3
E 2.10 Information on public service delivery is available in multiple languages to meet diverse users' needs	Practice in implementation	1.5/3
E 2.11 Service providers publish information on the prices of their services	Practice in implementation	3/3
E 2.12 Service providers publish information on the rights and obligations of users	Practice in implementation	3/3
E 2.13 Service providers publish precise contact information for service provision	Practice in implementation	3/3
E 2.14 Data on administrative services are available in open formats	Practice in implementation	0/4
E 2.15 Service providers train their staff on how to treat vulnerable groups	Practice in implementation	0/3
E 2.16 Service providers ensure adequate territorial distribution of service delivery	Practice in implementation	3.5/3.5
E 2.17 Key non-state actors consider service delivery as accessible	Outcomes and impact	0/3
E 2.18 Citizens' perception of the accessibility of information necessary for obtaining services	Outcomes and impact	1/2
E 2.19 Citizens' perception of the ease of in-person access to services	Outcomes and impact	1/2
E 2.20 Citizens' perception of the ease of online access to services	Outcomes and impact	1/2
<b>Total score for sub-indicator 2</b>		<b>22/52.5</b>

*While PAR Strategy defines goals and activities related to setting the infrastructure in order to increase electronic service provision and accessibility, Digital Transformation Strategy complements with activities related to the enhancing availability of information, raising awareness and promotion of e-services and electronic ID. Despite set strategic goals, realisation of these activities has not so far contributed to less bureaucratic system. This is confirmed by the European Commission's assessment in the latest 2024 report, where it is stated that the process of modernising public service delivery is slow.*

*SIGMA report for Montenegro points that the Government continues to expand the scope of digital services, but examined services are mostly traditional and paper-based; A focus on different access channels is generally missing,*

*limiting the adaptation of services to diverse user groups. SIGMA report shows that physical accessibility is ensured through a good distribution of offices and mandatory construction standards, and e-accessibility regulations are in place. However, the current number of public institutions accessible to users with special needs is unclear.<sup>14</sup>*

*The monitoring shows that while basic service information is available, it is often incomplete, while institutions lag behind in accessibility and user instructions. The new e-Government portal is designed to be citizen-friendly, but monitored services are not integrated. When it comes to the information on services<sup>15</sup>, issues remain with missing details on pricing, limited accessibility features, and lack of international language support. Citizens generally find in-person services easier to access than online ones, with vulnerable groups facing the greatest barriers.*

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Two key strategic documents envisage the enhancement of accessibility of services and availability of information on service delivery, with clear assignment of responsibilities. Namely, one of the operational goals set by PAR Strategy refers to full interoperability of information systems and increase in the number of electronic services at a high level of sophistication (2.2). As a part of this operational goal and activity 2.2.2. - the creation of a new unique e-portal of public administration, one of the indicators of results is “improved e-administration portal in the area of PWD accessibility”. The PAR Strategy also recognise improving capacities on the concept of e-accessibility as one of the activities, together with trainings for persons with disabilities to use options of e-accessibility on the portal gov.me. Digital Transformation Strategy clearly defines activities related to enhancing availability of information on service delivery with the aim of raising awareness of citizens and business about the importance of digital development, including educational campaigns and promotion of e-services and promotion of e-ID as key document for obtaining digital services.

When it comes to the legislation framework, within the Law on Administrative procedure Montenegro defines one-stop shops within the article 43 stipulating that the public law authorities are obliged to enable the party to submit request and other submissions in one place, receive notifications, information advice and prescribed forms in connection with the exercise of their rights or legal interests under the jurisdiction of those public law authorities. Key gap when it comes to the legislative framework for this sub-indicator reflects in the fact

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<sup>14</sup> SIGMA, Public Administration in Montenegro 2024, January 2025. Available at: [https://www.sigmaweb.org/en/publications/public-administration-in-montenegro-2024\\_6b3dec38-en.html](https://www.sigmaweb.org/en/publications/public-administration-in-montenegro-2024_6b3dec38-en.html)

<sup>15</sup> Property registration, Company (business) registration, Vehicle registration, Passport issuance, ID card issuance, VAT declaration, VAT payment.

that there is no obligation on publishing metrics on the services provided, processing time and the cost of obtaining a service for the users. According to the Law on electronic government, there is only obligation to publish up to date record of the e-services (catalogue of electronic administration services), which contains the conditions for the provision of the electronic administration service, the method of submission and delivery of documents in electronic form, as well as the method of payment of administrative fees. Beside this, there is only a general obligation of keeping records on handling of administrative matters according to the Law on Administrative Procedure, but this general provision does not answer the set criteria for this element.

There is no any legal obligation which strictly prescribe provision of services in the form of life events. In the practice, services available at the e-government portal are classified by areas of life for citizens, businesses and administration. SIGMA also reports that services from the same life event but managed by different agencies are not available through a single procedure or location and must be handled separately.<sup>16</sup>

Regarding to the legislative framework which require service delivery to be adopted to the needs of vulnerable population and people with disabilities, Montenegro meets three out of four criteria of this element. In the legislation there is no explicitly defined free assistance for targeted population during the service delivery, while on the other side we do have regulated physical accessibility of service providers' buildings/premises, information publishing in multiple formats by the Law on Prohibition of Discrimination of Persons with Disabilities. Montenegro also meets the criteria that information should be available in all official languages in a country. Constitution defines official language, as well as languages in official use. Also, the Law on Minority Rights and Freedoms defines that minority peoples and other minority national communities and their members have the right to use their own language and script when issuing public documents, keeping official records, in administrative procedures etc. When it comes to the accessibility of the e government portal, according to the Accessibility Standards<sup>17</sup>, a special place on the website where information about accessibility standards is given; On the official government website there is generic article on accessibility of the portal with detailed instruction how to use this option, with option to report (via e-mail) if there is some problem or help is needed.

When it comes to the implementation in practice, analysis for the five sample services showed that service providers generally ensure basic procedural

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<sup>16</sup> SIGMA Report, Public Administration in Montenegro 2024 Page 92 of the Report  
[https://www.sigmaweb.org/en/publications/public-administration-in-montenegro-2024\\_6b3dec38-en.html](https://www.sigmaweb.org/en/publications/public-administration-in-montenegro-2024_6b3dec38-en.html)

<sup>17</sup> <https://www.gov.me/clanak/pristupacnost-portala-vlade-crne-gore>

information such as service description and contact information available. All basic information is available only for the company/business registration via eFirma portal, including description of the service, how to access service online, information for physical access, contact phone as well as required documentation specified and forms available. For services provided by the Ministry of Interior (ID and passport issuance, and vehicle registration) information on how to access service in the physical location exist on the government website, but lack details on address and working hours. Precise contact information is missing for vehicle registration and passport issuance since only contact for the Directorate for civil status and personal documents within the Ministry of Interior is available, but there is no contact info per regional units. Those services are not available online, and there are no fillable forms available. When it comes to the services provided by Tax Administration, there are instructions on how to use e-Taxis portal, register and complete the service online, including option to download required documentation to be filled. For only three out of five sample services citizen-friendly guidance is available, all three provided by Tax Administration. On e-Firma portal, on the homepage there is citizen-friendly step by step instructions on how to use portal and how to finalise concrete service, including list of frequently asked questions with detailed instructions. For VAT related services, there are video instructions on how to use e-Taxis portal (uploaded 7 years ago). Ministry of Interior also published video instruction on why it is important to obtain new electronic ID, but this video refers to importance of this ID and how to activate this document (once obtained); not on how to issue this ID card.

It should be noted that new e-government portal is created in citizen-friendly manner with information and description of the services, required documentation and fillable forms available, including information on costs, contact persons, as well as legal framework. However, establishing new portal did not contribute to improving the grades for the SDD area, because none of the services included in the sample for this monitoring, are available on the new e-government portal.

When it comes to the availability of information, about only three sample services provided by Ministry of Interior information can be found in multi format through the “accessibility option” of the official government website which offers audio format. Information for other sample services is available only in written form. None of the information on the sample services is available in any international language. Even though, the official website of the government offers option to use portal in English version, once you go to specific pages, such as information on these services, these pages and forms are not translated.

Majority of the websites of administrative service providers include information

on the rights and obligations of users. Information on the price of the seven sample services is available for all services except for two services related to VAT procedure. On the homepage on the Taxis portal, there is only list of the services, along with the download section. Full use of the portal is available only to the registered users, those with digital certificate. According to the practice, once you sign with this certificate, and full access the portal, there is no information on price neither. The most problematic is that there is no information on the price of digital certificate that is required for those services. The service is not charged by the Tax Administration, but in order to use its e-system for declaration of VAT, a digital certificate is needed. There is no clear and accessible information on the website of the Tax Administration that mentions that the digital certificate is not free or how much it costs. On the e-Firma portal where service of company registration is available, there are details on all registration fees (not only those that should be paid to Tax administration), it is stated that digital certificate is needed for this service, but without details on the price of this digital certificate.

In relation to availability of data on delivery of sample services, our monitoring showed that there is no data on delivered services in machine-readable format on the website of institutions, nor there is information about any of sampled services in open data portal<sup>18</sup>.

In respect to how provider support vulnerable groups when delivering services, Human Resource Management Administration which organise all trainings for public administration employees, did not provide any of the trainings on how to treat vulnerable groups in two years prior to the assessment.<sup>19</sup>

When it comes to regional distribution of services, six out of seven sample service are available in local branch offices, except company registration which is available online or in the premises of the CRPS (Central Register of Business Entities), based in Podgorica.

Conversation with key non-state actor showed that they generally consider that premises of service providers are not accessible, as well as that services offered online are not easily accessible.<sup>20</sup> One key informant pointed that one of the barriers for accessing services is limited support for people with disabilities

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<sup>18</sup> Montenegro Open Data Portal available at <https://data.gov.me/>

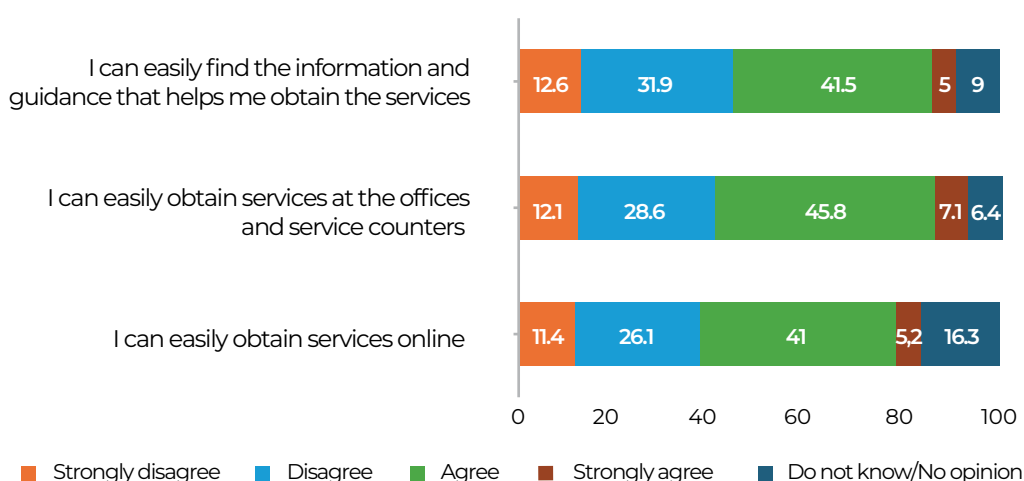
<sup>19</sup> Answer on the FOI request from the Human Resource Management Administration from 5th February 2025.

<sup>20</sup> Key informant interviews were held on the 3rd, 9th and 18th of March. To the statement "that territorial network for accessing administrative services is adequate" all key informants responded with "tend to disagree". To the statement "premises of service providers are accessible" two key informants responded with "tend to disagree", a third one responded with "tend to agree". To the statement "services offered online are easily accessible" one key informant "tend to agree", while two key informants responded "tend to disagree".

- Many online services lack accessibility features such as screen readers, voice navigation, and easy-to-read formats. Also, what is stressed during the interview is that for specific groups of people is harder to get services – such as those from rural areas, vulnerable groups like Roma people, older people, people living below poverty line, people with low level of digital skills, people who don't have access to computers but only mobile phones. These barriers may also be for people who commute to other cities to work (as they have to often spend more than one day to be available during working hours of an institution to either wait or have all documentation or similar), etc.

Finally, public perception of the accessibility of services<sup>21</sup> showed that respondents think that services at the counter are easier to access compared to those online. Survey showed that 46,6% of the respondents agree or strongly agree that they can easily find the information and guidance for obtaining public administration services. Majority of respondents (52,9%) agree or strongly agree that they can easily obtain public administrations services at the offices and service counters of the relevant authorities. Less than half of the respondents, 46,2% of them, agree or strongly agree that they can easily obtain public services online (via the eGovernment portal, or Tax authority, etc). It should be noted that 16,3% of respondents do not know or do not have opinion of provision of services online, while 37,5 of them disagree that services are easy to obtain online, which indicate the challenge in digital provision of services.

**Chart 1: Share of citizens' responses per agreement scale (%)**

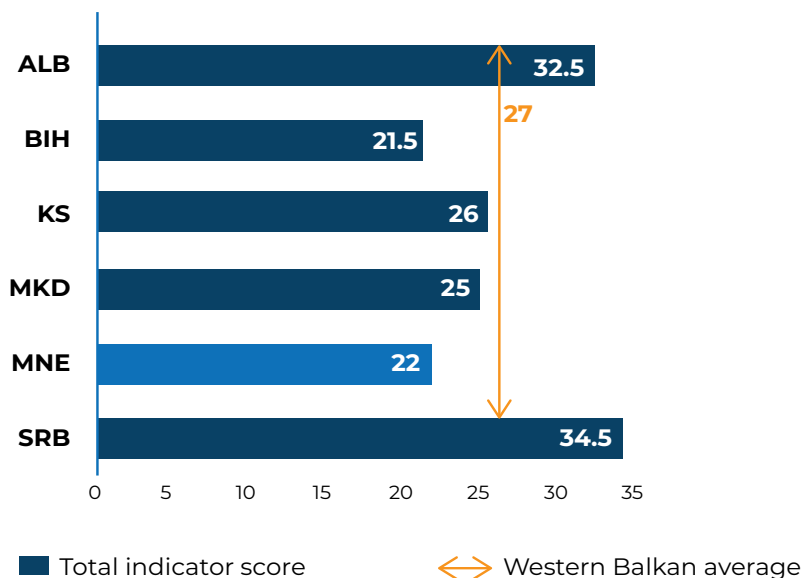


**Note:** All results rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The for questions was N = 1006.

<sup>21</sup> The survey was conducted between the 1st and 12th of February 2025 in Montenegro, on a sample of 1010 citizens. The same survey was conducted in all WB administration on a sample of 6077 citizens. For additional information see Methodology appendix.

## How does Montenegro do in regional terms?

Sub-indicator 2: Service accessibility and availability of information on services



## II.3 Digitalisation of service delivery

**Principle 19: Users are at the centre in design and delivery of administrative services.**

**Principle 22: Digitalisation enables data-driven decisions and effective, efficient and responsive policies, services and processes in the whole of government.**



## Sub-indicator 2: Service accessibility and availability of information on services<sup>22</sup>

Indicator elements	Element type	Score
E 3.1 There is a strategic document in force that envisages digitalisation of services	Strategy and policy	0.5/0.5
E 3.2 Regulations stipulate provision of digital services, digital signature and e-payment in digital service delivery	Legislation	1.5/1.5
E 3.3 Institutional responsibility for steering the digital service delivery at the central administration level is assigned	Legislation Institutional set-up	2/2
E 3.4 Online central platform for digital service delivery is established and user-oriented	Practice in implementation	2 /4
E 3.5 Digital signature and digital payment are available to all users	Practice in implementation	0/4.5
E 3.6 Key non-state actors consider digital services as easy to use	Outcomes and impact	0/3
<b>Total score for sub-indicator 3</b>		<b>6/15.5</b>

*Montenegro has established a solid legal and strategic framework for digitalising public services, but progress in practice remains slow. When it comes to digitalisation, the latest 2024 EC Report on Montenegro recognises that there was some progress in digital governance, particularly regarding the interoperability framework and the electronic exchange of data among various government bodies. Also, the e-Payment portal became fully operational in 2023, allowing citizens to electronically pay administrative fees.*

*Our monitoring showed that while some steps have been made, such as introducing the ePayment portal and partial digitalisation of services, many systems are outdated, user-unfriendly, and lack full functionality. Our key-informants pointed out that low digital literacy further limits usage, highlighting the need for stronger focus on implementation, accessibility, and user-oriented solutions.*

<sup>22</sup> Through the third sub-indicator, the following SIGMA sub-principles are monitored: The government establishes and co-ordinates a whole-of-government policy to continuously improve design and delivery of public administrative services, based on evolving user needs; The public administration ensures leadership, co-ordination and capacity for the creation of effective, integrated and digital government strategies and services; and User-friendly digital identity, digital signature and trust services, digital payment and digital delivery solutions are easily available to everyone, legally enacted, technically functional and widely used.



*Legal framework supports the use of digital services, electronic signatures, and e-payments, ensuring that electronic documents have the same legal validity as paper ones. The Government portal do not serve as the only platform for digital service delivery, since other institutions use specific platforms, such as eFirma, eTaxis portal, etc.*

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The importance of digitalisation of service delivery is clearly stated in Public Administration Reform (PAR) Strategy and the Digital Transformation Strategy. PAR Strategy defines operational objectives aimed at complete interoperability of information systems and increasing the number of electronic services at a high level of sophistication – introducing 20 fully digitalised life services. The PAR Strategy also envisions improving the e-Government portal by introducing options such as e-payment, e-authentication, and e-identification, to enable citizens to receive paperless and electronic services. Alongside that, similar actions are defined in the Digital Transformation Strategy, which defines specific operational goals aimed at improving the quality, quantity, and use of existing e-services, preparation of methodology at the level of state and local administration for standardisation and development of user-orientated e-services, as well as developing and implementing new citizen-oriented e-services.

Both strategic documents and legislative framework stipulate the provision of digital services, the use of digital signatures, and the implementation of e-payment systems. Montenegro adopted the Law on Electronic Government and Law on Electronic Identification and Electronic Signature back in 2020, containing provisions that determine the legal stipulation of digital services, digital signature, and e-payment, thus meeting all criteria when it comes to legislative framework for this element. These laws in details prescribe the provision of electronic administration services through the information system of the authorities, the use of electronic signature through 19 specific articles, as well as collection of administrative fees electronically. The Ministry of Public Administration remains the central authority responsible for steering and coordinating the digitalisation of service delivery, as defined by the Decree on the Organisation and Method of Work of the State Administration. Coordination Body for Managing the Digital Transformation Process serves as a key body with role in coordinating the activities of different institutions.

One of the reforms set by the Reform Agenda<sup>23</sup> is delivery of user-friendly digital public services, starting with the creation of the Digital Services Plan

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<sup>23</sup> Montenegro Reform Agenda 2024-2027 defines a set of reforms that Montenegro must implement to receive money from the European Growth Plan, including reforms in the area of digital transition. Available here: [https://reform-monitor.org/wp-content/uploads/2025/05/Reform-agenda-Montenegro\\_.pdf](https://reform-monitor.org/wp-content/uploads/2025/05/Reform-agenda-Montenegro_.pdf)

for the period 2025-2027.<sup>24</sup> As it is stated in this plan, state of play points that the only available service that has been developed to level 4 (which foresees full interoperability of registers) is a service that enables online enrolment of children in schools and kindergartens, as well as online enrolment of students for the first year of college (these services are implemented in May 2020). Since there is no service at all on the fifth level (full online service), the current situation indicates a lack of service on level 4 and 5 in the existing Montenegrin e-government system.<sup>25</sup> During the latest meeting of this Coordination body held in July, it is stated that out of planned 57 services for 2025 to become digitalised, 25 of them are digitalised.<sup>26</sup>

This monitoring cycle has shown that the practice in implementation, especially activities defined by strategic documents, remains a key problem in Montenegro. The eGovernment portal represents the key online central platform for digital service delivery, while number of services was provided through additional portals of specific institutions, such as eTaxis, eFirma etc. During the monitoring period, the eGovernment portal was under construction.

Besides digitalisation and establishing of new electronic services, the strategic framework also envisages activities aimed at enabling electronic data exchange and/or possibility of electronic collection through the electronic payment system.

Our monitoring showed that Montenegro does not meet the element 3.5 - digital signature and digital payment are available to all users - primarily because four<sup>27</sup> out of seven sample services are not available online, resulting that there is no option to apply digital signature and payment. When it comes to the digital signature, according to the instructions available on both eFirma and eTaxis portals for company registration and VAT declaration and payment, there is option to electronically sign documents. On the eFirma portal is noted that, to obtain services, it is necessary to have one of the qualified certificates for qualified electronic signatures. Yet, there is still no option for applying digital payment for any of sample services. On the eFirma portal, there is option just to upload evidence for administrative taxes. Administrative taxes can be paid online through different portal e-placanja.me (<https://eplacanje.gov.me>).

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<sup>24</sup> As part of the implementation of the Digitalisation Services Plan, the implementation of 171 public services is foreseen services by 21 institutions, and 5 uniform services under the jurisdiction of 6 pilot localities self-government for which the Directorate for Infrastructure, Information Security, Digitization and eServices in the Ministry of Public Administration, directly responsible for providing methodological and technical support.

<sup>25</sup> Digitalisation Services Plan 2025 – 2027 available here <https://www.gov.me/dokumenta/3e3e7217-c2e2-401d-b073-6d1770fc67b5>

<sup>26</sup> Information on the realisation of the Digital Services Plan, July 2025, Available at: <https://wapi.gov.me/download-preview/20d3245e-c59c-4669-af79-9dd491990398?version=1.0>

<sup>27</sup> Property registration, vehicle registration, passport and ID issuance are not available online.

[me](#)) established in 2023. According to the step by step instruction on specific services, including company registration, evidence that fee is paid should be uploaded through the system. It is explicitly stated that fee should be paid before the starting the service through the system.

The electronic payment portal (ePlacanje) is result of the project of an establishing information system for electronic billing and control of the collection of administrative fees and fees, in order to facilitate the process of paying state fees and services from the domain of state authorities and local self-governments of Montenegro. NS NAT is a platform that unites the functionalities, payments, collection, records of payment release related to all administrative fees, fees, prescribed by the laws of Montenegro. With this system, it is enabled for citizens to pay administrative fees, fees, etc. pay electronically with payment cards without coming to the institution's counters. According to the report for 2024, in the e-payment system, data are available from 17 institutions that submitted data for 219 administrative fees and 154 fees (fines, etc.). In 2024, 1,070 transactions were carried out over this system.<sup>28</sup>

The slow pace of digitalisation is accentuated and confirmed by key non-state actors with whom we conducted interviews during the monitoring period.<sup>29</sup> They all agreed upon and stated issues such as outdated or non-user-friendly platforms, many of which have complex interfaces and lack mobile optimization, as well as general low digital literacy levels; many citizens, especially older populations and rural communities lack the necessary skills to use digital services effectively.

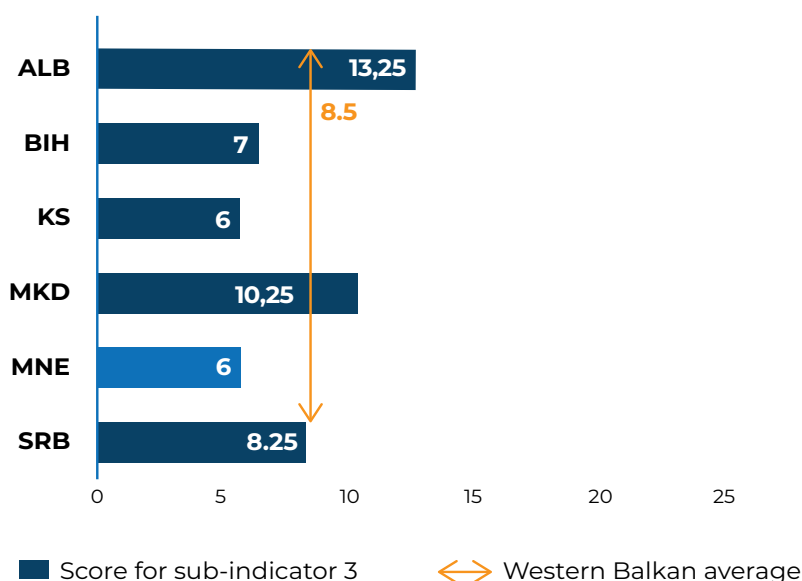
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<sup>28</sup> Report on the implementation of the Action Plan for the implementation of the Digital Transformation Strategy of Montenegro 2022-2026, for the year 2024. April 2025, page 24. Available at: <https://wapi.gov.me/download-preview/e49a65a7-bd45-491a-b27b-0a30f8132138?version=1.0>

<sup>29</sup> Key informant interviews were held on the 3rd, 9th and 18th of March. To the statement "Digital services are easy to use by all citizens", two key informants responded with "tend to disagree", a third one responded with "tend to agree".

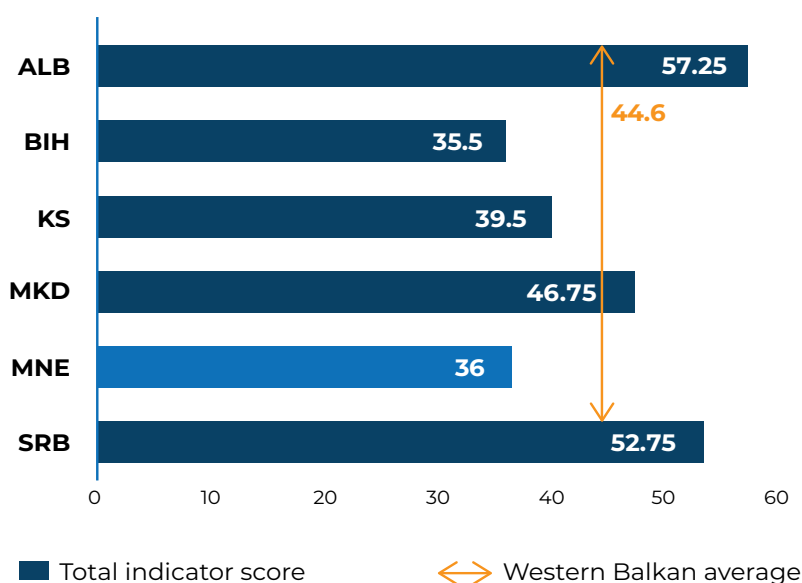
## How does Montenegro do in regional terms?

### Sub-indicator 3: Digitalisation of services



## Overall scores comparison in the Service Delivery and Digitalisation

Indicator: Transparency and citizen-centricity of service design and delivery



Regional overview report for Service Design and Digitalisation area, with results for all WB administrations is available at: [www.par-monitor.org](http://www.par-monitor.org)

## II.4 Recommendations for the for the Service Delivery and Digitalisation

### II.4.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022

<i>Recommendations</i>	<i>Type (short/ medium/ long term)</i>	<i>Status</i>	<i>Explanation</i>
In order to increase the usage of the e-government portal, the administration needs to enhance both its usefulness by increasing the number of fully digitalised services available as well as improving the user experience through simplification and better design of the portal.	Long term	Partially implemented	Some progress has been registered. The central eGovernment (euprava) website has been updated. During the monitoring period the new portal was still in the process of updating. None of the sample services monitored are included in the new eGovernment portal. MPA has developed a webpage for administrative taxes and fees payment (ePayment). Montenegro adopted Digital Service Plan with aim to digitalise 171 public services by the end 2027. Report form July 2025 notes that 25 services were digitalized so far.
Service providers should conduct, collect, analyse and publish data on user feedback regarding various aspects of the services they provide, in order to use them as an input for improving the services. In the case of contracting external agencies for polling the users, resulting paper should be proactively published.	Long term	Not implemented	No progress was found in this round of monitoring. Neither Law on Administrative Procedure nor Law on Electronic Government prescribe keeping metrics of user participation in service design. Alongside that, the review of official websites and e-government portal showed that service providers do not publish metrics on participation in service (re)design. MPA stated that they had conducted three cycles of Surveys on satisfaction of citizens on existing and identification of needs for new e-services. However, these reports are not published online, and can only be obtained through FOI request.

Service providers websites and the e-government portal should ensure feedback channels for users as a standard practice.		Partially implemented	When it comes to the sample service, there is still no channel for feedback on specific services on websites of institutions providing these services. When it comes to those electronically available sample services (related to VAT declaration and payment and business registration), the e-government portal includes short questionnaire on how citizens are satisfied only with information on specific e-service. Ministry of Interior (which provides three sample services) have comment section on its website, but only for comments on experience with using electronic ID, not the sample services itself. New eGovernment portal is created in more citizen friendly manner with channels for feedback, but the use of these channels remains to be seen.
Websites of administrative service providers should in an easily accessible manner present procedural information on how to access the services and, in those services that are used universally or by a majority of citizens, user-friendly guidance on accessing them.	Long term	Partially implemented	When it comes to the implementation in practice, analysis for the five sample services showed that service providers generally ensure basic procedural information such as service description and contact information available. For only three out of five sample services citizen-friendly guidance is available. New eGovernment portal is created in more citizen - friendly and accessible manner. When it comes to the accessibility of the e government portal, according to the Accessibility Standards, a special place on the website where information about accessibility standards is given; On the official government website there is generic article on accessibility of the portal with detailed instruction how to use this option, with option to report (via e-mail) if there is some problem or help is needed. It is needed to have uniform practice among all websites that provide service, other than eGovernment portal.

Where forms are required for accessing a service, they should be available on the website of the service provider.	Short term	Partially implemented	Four out of five monitored sample services do not have fillable forms available. Services such as property and business registration, tax declaration and payment have the required fillable forms published on websites of competent institutions.
Service providers must be completely transparent when it comes to cost of services, both direct and indirect (e.g. the price of the digital certificate required for accessing various services, although not issued by the service providers).	Short term	Not implemented	When it comes to the sample service, for those that are available online providing institutions provide information on price of the service itself and that digital certificate is needed, but do not mention that the digital certificate is not free or how much it costs.

## II.4.2 RECOMMENDATIONS FROM THE 2024/2025 MONITOR REPORT

- The lack of data on how users are involved in the design of services indicates an absence of standardized and systematic use of feedback mechanisms, reporting, and follow-up on the received inputs. The existing legislative framework should be amended to ensure systematic involvement of end users in the (re)design of public services, including obligations to collect, analyze, and publish data on user participation.
- Mechanisms for collecting and publishing information on users' participation in service design should be established. Implement channels for collecting and publishing users' feedback on their service delivery experience. Use citizens' feedback systematically to improve the quality and accessibility of administrative services.
- Since there are no data on delivered services in machine-readable format on the websites of institutions, nor any information about the sampled services in the open data portal, it is necessary to ensure that once the data on administrative services are collected and systematized, they are also published in open and reusable formats.
- Guarantee that digital signature and digital payment functionalities are available and accessible to all users.
- According to the data received, Human Resource Management Administration which organise all trainings for public administration employees, did not provide any of the trainings on how to treat vulnerable groups in two years prior to the assessment. It is needed to introduce systematic training programs for service providers' staff on how to adequately treat vulnerable groups.
- Bearing in mind that not all services are provided via a single web portal (eGovernment), it is crucial to ensure that all service providers publish clear, citizen-friendly guidance on how to access public services online and establish uniform practices.
- Service providers should provide information in multiple formats (e.g., text, audio, video, easy-to-read) to meet the diverse needs of all user groups.



## METHODOLOGY APPENDIX

For producing this report for Montenegro, the following research methods and tools were used for data collection and calculation of elements:

- Analysis of official documentation, data, and official websites
- Requests for free access to information
- Interviews with stakeholders and key informants
- Public perception survey.

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

**Table 5. FOI requests sent in Montenegro**

Institution	Date of request	Date of reply to the request
Tax Administration	1/31/2025	2/19/2025
Tax Administration	1/31/2025	2/10/2025
Ministry of Public Administration	1/31/2025	2/10/2025
Ministry of the Interior	1/31/2025	2/12/2025
Ministry of the Interior	2/17/2025	3/20/2025
Health Insurance Fund	1/31/2025	2/14/2025
Employment Agency of Montenegro	1/31/2025	2/20/2025
Pension and Disability Insurance Fund	1/31/2025	2/18/2025
Human Resources Administration	1/31/2025	2/5/2025
Real Estate Administration	1/31/2025	2/10/2025

Interviews with key informants were conducted and used as a base for point allocation for elements 1.10, and 2.17 and 3.6. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Interviews with other stakeholders (such as representatives of public administration bodies) were additionally used in the research to complement and verify otherwise collected data and findings. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.10, 2.17 and 3.6 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

**Table 6. Interviews conducted in Montenegro**

Date	Interviewees
2.27.2025.	Key informant 1, investigative journalist
2.27.2025.	Key informant 2, CSO representative
2.27.2025.	Key informant 3, expert on digitalisation

## List of interview questions

### Element 1.10

1. To what extent do you agree with the following statement: **Service design and service delivery are citizen centric.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
2. To what extent do you agree with the following statement: **Channels for citizen feedback are available.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
3. To what extent do you agree with the following statement: **Citizens' feedback is used to improve service delivery.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. What are the main barriers to achieving citizen-centric service design and delivery in your experience?
2. Can you share examples of good practices in citizen-centric service delivery?
3. What feedback channels do you perceive most effective for citizens to communicate their needs and experiences?
4. Are these feedback mechanisms widely accessible to all population groups (e.g., vulnerable or marginalized groups)?
5. How do you think citizen feedback is processed and acted upon by service providers?
6. Can you provide examples where citizen feedback led to visible improvements in service delivery?

7. In your opinion, what systemic changes are needed to strengthen the citizen-centric approach in service design and delivery?
8. How can non-state actors contribute to ensuring that citizen feedback is integrated into service improvement processes?

#### **Element 2.17**

1. To what extent do you agree with the following statement: **The territorial network for accessing administrative services by all citizens is adequate.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
2. To what extent do you agree with the following statement: **The premises of service provides are physically accessible by all citizens.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
3. To what extent do you agree with the following statement: **Services offered online are easily accessible by all citizens.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. What challenges exist in ensuring an adequate territorial network for administrative service access?
2. Are there areas or groups particularly underserved by the current network?
3. Are there specific barriers to physical access in service provider premises (e.g., infrastructure, location)?
4. Can you identify good practices in improving physical accessibility?
5. What are the primary barriers citizens face when accessing online services?

6. How can service providers improve the accessibility and usability of online platforms?
7. In your opinion, what systemic improvements are needed to ensure that all citizens have equitable access to administrative services?
8. How can civil society and other non-state actors support better accessibility?

### **Element 3.6**

1. To what extent do you agree with the following statement: **Digital services are easy to use by all citizens.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. What are the most significant challenges citizens face when using digital services?
2. Are there specific population groups (e.g., older adults, rural residents, individuals with disabilities) for whom digital services are less accessible?
3. What features or support mechanisms could make digital services more user-friendly for all citizens?
4. Can you provide examples of good practices or successful digital service implementations?
5. How (can) service providers ensure that digital services are accessible to citizens without reliable internet or digital literacy skills?

The public perception survey is based on a questionnaire targeting the general public (18+ permanent residents) of Montenegro. The survey was conducted through computer-assisted telephone interviewing (CATI) in combination with computer-assisted web interviewing (CAWI).

The survey was conducted between 1.02-12.02.2025. The margin of error for the sample of 1010 citizens is  $\pm 3,51\%$ , at the 95% confidence level.

**Table 6: Public perception survey questions in the area of Service Delivery and Digitalisation<sup>30</sup>**

<b>Statement 8</b>					
<p>In the past two years, have you interacted with the administration in [Montenegro] to receive any public administration services? (such as renewal of personal ID documents, applying for unemployment benefits or any other social financial support, registering marriage or the birth of a child, registering a new business, vehicles etc.)</p> <p>a. Yes</p> <p>b. No</p>	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
<b>Statement 9</b>					
<p>In the past two years, have you interacted with the administration in [Montenegro] to receive any public administration services? (such as renewal of personal ID documents, applying for unemployment benefits or any other social financial support, registering marriage or the birth of a child, registering a new business, vehicles etc.)</p> <p>a. Yes</p> <p>b. No</p>	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
	1	2	3	4	99
<b>Statement 10</b>					
<p>Public administration should use citizens' experience to improve public administration services.</p>	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
	1	2	3	4	99
<b>Statement 11</b>					
<p>I have the opportunity to share my opinion on the quality of public administration services I received with the relevant state authorities.</p>	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
	1	2	3	4	99

<sup>30</sup> The following statements from this section were not used to allocate points within the methodology for the Service Delivery and Digitalisation area: statement 8, statement 10, statement 15, statement 16 and statement 19.

<b>Statement 12</b>	1	2	3	4	99
I can easily find the information and guidance that helps me obtain public administration services.	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/ No opinion</i>
<b>Statement 13</b>	1	2	3	4	99
I can easily obtain public administration services at the offices and service counters of the relevant authorities.	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/ No opinion</i>
<b>Statement 14</b>	1	2	3	4	99
I can easily obtain public administration services online (e.g., via the eGovernment Portal, the portal of the Tax authority, etc.).	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/ No opinion</i>
<b>Statement 15</b>	1	2	3	4	99
How do you prefer accessing public administration services?					
How do you prefer accessing public administration services?					
a. Access to services online					
b. Access to services at the offices and service counters of relevant authorities					
c. I have no preference.					
<b>Statement 16</b>					
Thinking about the past two years how often have you used e-services of the public administration?					
a. Never					
b. Rarely					
c. Sometimes					
d. Often					
<b>Statement 17</b>	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/ No opinion</i>
When requesting public administration services, I am not required to provide documents already held by the state (such as birth, citizenship, unemployment certificates, etc.).	1	2	3	4	99

<b>Statement 18</b>	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/ No opinion</i>
The last time I requested a public administration service, I had to submit documents already held by the state (such as birth, citizenship, unemployment certificates, etc.).	1	2	3	4	99
<b>Statement 19</b>	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/ No opinion</i>
In the past two years, citizens or civil society have been involved in the monitoring of public administration services.	1	2	3	4	99



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