

MONITORING THE NATIONAL DISABILITY ACTION PLAN

(2016-2020)
SUMMARY



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Introduction

The National Disability Action Plan 2016-2020 (NDAP) is the action plan of the Government of Albania that aims inclusion of persons with disabilities in the Albanian society, outlines ways to prevent discrimination, and eliminate any barriers to accessing public services and the fulfilment of their right in line with the UN Convention on the Rights of Persons with Disabilities and the European Disability Strategy.

The national action plan on disability was adopted by Decision of Council of Ministers no. 483, of June 29, 2016 and defines the objectives to be reached within 2016-2020 as well as the responsibilities of the institutions in attaining these objectives. This plan was developed in cooperation with disability organizations, other civil society organizations that promote disability rights, international community and the local government units.

The plan includes eight strategic goals for eight priority areas, as follows:

1. accessibility (including physical accessibility and access to information)
2. equality
3. vocational education and training (VET)
4. education
5. social care
6. health care
7. participation in the political and public life (including cultural activities and sports)
8. cooperation, coordination and monitoring and evaluation.

The strategic goals of the Action Plan include:

- ◆ Ensuring accessibility to services and access to information for persons with disabilities.
- ◆ **Goal:** By 2020, all facilities that provide public services should ensure accessibility
- ◆ To ensure access to justice system for all persons with disabilities.
- ◆ **Goal:** By 2020, the institutions of the justice system should be able to procure equal access in benefiting free legal aid, access to court proceedings, including provision of sign language interpretation.
- ◆ To increase labor market participation and promote equal opportunities for dignified jobs for persons with disabilities.
- ◆ **Goal:** By 2020, the number of persons with disabilities employed by the employment offices through specific employment promotion programs to grow annually by 50%, as well as an increase in the number of young persons with disabilities employed in the public administration.

- ◆ To ensure qualitative and inclusive education for all children with disabilities.
- ◆ **Goal:** By 2020, all Multi-Disciplinary Education Commissions should be in place for the appraisal/evaluation of children with disabilities, accompanied with increased number of assistant teachers hired, to reflect the needs of the children with disabilities.
- ◆ To improve the quality of life of persons with disabilities through accessible services/benefits, which are also financially affordable and client-focused services, ensuring that these services are delivered to the client and as close as possible to his/her community.
- ◆ **Goal:** By 2020, the launch of the new evaluation of disability according to the bio-psychosocial model by the reformed commissions and increase in number and types of community social services, including those of independent living.
- ◆ To ensure accessible, affordable and equal health care for persons with disabilities.
- ◆ **Goal:** By 2020, increase in the number and types of reimbursable support instruments for persons with disabilities, as the needs arise, and ensure the operability of a National Rehabilitation Center.
- ◆ To enable persons with disabilities to represent their interests, and to be able to participate in the country's public and political life.
- ◆ **Goal:** By 2020, there should be an increase in the number of persons with disabilities that participate in the ballot casting process, and those that are represented in the municipal councils through greater participation in the political life.
- ◆ To create synergies among different sectors, in order to foster integration of persons with disabilities in an inclusive, continuous and sustainable way.

The National Disability Action Plan which constitutes the bases for monitoring the Action Plan contains 179 activities, alongside with the indicators for their achievement, medium-term and final objectives, respective deadlines, implementing institutions, monitoring, reporting mechanisms, and financing sources. The Action Plan budget identifies the necessary resources for the implementation of activities for promoting disability rights, according to areas of intervention. The budget foresees financial resources for implementation of measures included in the Action Plan which are covered by the state budget. In addition, the Action Plan provides suggestions for bridging the possible financial gap by donor funds.

The purpose of the study

The purpose of this study is to monitor the implementation of National Disability Action Plan (2016–2020) from the perspective of the civil society organizations, that of persons with disabilities and their family members in the cities of Berat, Dibër, Korçë and Lezhë.

The objectives of the study:

- ◆ Develop monitoring tools/instruments for the implementation of the National Disability Action Plan, based on its eight priority areas.
- ◆ To enable the use of the instruments by civil society organizations for the purpose of monitoring the implementation of the NDAP.
- ◆ Generate data to support advocacy initiatives at the local and national level.

This is the first report, assessing the implementation of the NDAP through the perception of persons with disabilities, their families and civil society organizations in Berat, Diber, Korça and Lezha.

Executive summary

According to the most recent official statistics, the official figure for persons with disabilities in Albania is 144,135, of whom 74,392 benefit from social insurance system and 69,743 who are part of the social assistance system¹. Of those, 19,288 persons with disabilities, receive also caretaker payment/benefit.

With the adoption of the National Disability Action Plan 2016-2020, the Albanian Government has committed itself to deliver within timelines and through concrete budgets, 179 activities, focused on the eight priority areas, the implementation of which will enable improvement of quality of life and the participation of persons with disabilities.

In the context of the EU funded project for **“Increasing Civil Society Organizations’ Capacities for Mainstreaming Rights of People with Disabilities in Albania”** ADRF in partnership with World Vision Albania and MEDPAK launched an initiative for monitoring implementation of activities of the (NDAP) 2016–2020, through the perception of persons with disabilities, their family members and that of the civil society organizations in four municipalities, with important geographical spread: Dibër, Lezhë, Korçë and Berat.

The NDAP envisages its annual monitoring at the local level and provision of support for the civil society organizations to conduct an independent progress report. More than two years have passed from the adoption of NDAP and yet there is no monitoring report issued by the civil society. This is the first report which evaluates the impact of the implementation of NDAP on persons with disabilities. The report aims that, through substantial findings at the local level, to generate an evidence-based lobbying and advocacy process, to influence implementation of obligations defined in the NDAP for all responsible institutions.

This report in itself is a novelty in that:

First, the focus is on the people and not on the institutions, and results/outcome are measured by the direct impact that activities foreseen under NDAP have on the lives and real inclusion of persons with disabilities, in line as well with the strategic goal of this document, which is substantially based on the Convention of United Nations on the Rights of Persons with Disabilities and on the EU Disability Strategy;

Second, it takes place at the local level, in four municipalities representing the territory of Albania in the north, south, east and middle Albania, with the aim of measuring the real impact of the implementation of policies and legal framework through provision of accessible, affordable and qualitative services, as close to the communities where persons with disabilities and their families live, as possible.

1. Ministry of Health and Social Protection, State Social Service, December 2018

For the scope of the goal and objectives of the study, a combination of quantitative and qualitative data collection methodology was used. Participants in the study were: 62 representatives of civil society organizations working in the disability area and 530 persons with disabilities and their family members.

The results of the study indicate that still in 2019, persons with disabilities and their family members continue to feel excluded because of a society that should do more to reduce environmental barriers, barriers to information and communication, transport, social and institutional barriers, in order to guarantee non - discrimination, access to services and their inclusion in the Albanian society.

Key findings

Accessibility

Monitoring of NDAP demonstrated that persons with disabilities continue to face with inaccessible environments, information, communication and transports, and consequently they are deprived of full and barrier free access to services, social, economic, cultural and sports life in their communities.

More than one third of persons with disabilities report to be unsatisfied with physical accessibility in social service institutions (47.9%), employment offices (43.9%) and voting centers (44.9%) and accessibility in the municipality offices or administrative units (32.2%). In addition, 52.4% of the participants reported to be dissatisfied with accessibility in culture and sports institutions. There is lack of accessible communication in sign language, audio format, Braille, large print or other simplified formats in all institutions where persons with disabilities should go for obtaining services. Approximately 68% of the persons with disabilities report that in the municipalities, at the KMCAP, daycare and health care centers there is no accessible communication to meet their needs.

There is no accessible and financially affordable transportation, no barrier free mobility for persons with disabilities (average: 1.57 persons with disabilities and family members; average: 1.68 organizations). The data indicate that 44.1% of persons with disabilities are totally dissatisfied with accessibility for persons with disabilities in the city roads. 60.5% are dissatisfied because they have no access to free urban transportation or interurban transportation at 50% of the cost, meanwhile 66% are dissatisfied with fuel reimbursement.

In order to guarantee accessibility, it is important that :

- ◆ Municipalities and their control structures, private entrepreneurs, business administrators, design and project implementation companies, and all responsible structures (including local governmental level institutions), take all measures to ensure a barrier free environment for persons with disabilities² belonging to all disability categories;
- ◆ Every institution at central governmental level should take measures to design and budget accessibility plans which should be consulted with the community of persons with disabilities.

2. DCM 1074, dated 23.12.2015 "On establishing measures for removing barriers to communication and infrastructure in the delivery of public services for persons with disabilities"

Equality

Persons with disabilities find ensuring access to justice system to be “unsatisfactory”, scoring it with an average 1.35 points while representatives of organizations consider it at “poor satisfactory level” scoring it with an average of 2.07.

Access to state legal aid is not guaranteed. 86% of persons with disabilities state that they were never trained on free legal aid and the criteria for eligibility to this service. Meanwhile, it is worth pointing out that 47.6% of the representatives of the organizations report that they have never been trained on legal aid services and criteria for its eligibility.

Serious information gaps were reported with regards to new concepts brought by the Convention on the Rights of Persons with Disabilities, such as “supported decision-making”, “legal capacity” of persons with intellectual and psycho-social impairment. 75% of persons with disabilities and their family members had never heard of supported decision-making against 52% of representatives of CSOs who have never heard of that concept either. Institutions have not taken measures to address these issues and consequently no actions were taken to improve the knowledge of the community.

Meanwhile, “legal capacity to act” is still being restricted and removed and legal custodians are appointed by court decision.

76.6% of CSOs report that they have not provided assistance to persons with disabilities in court cases, against almost 12.8% who report to have supported them “sometimes” to “always”. In those cases, when CSOs have provided support, approximately 45% of them do not report information regarding the quality of proceedings, expenses, duration, access or communication; about 50% report that “they are dissatisfied” with the quality of services and almost 17.6% reported to find these services “satisfactory”. While 78% admit absence of accessible proceedings in the court process, including the absence of sign language interpretation, information in Braille, large print, simplified, easy-read format.

The justice system cannot still guarantee the rights of persons with disabilities in line with international standards, regarding procedures, expenses, duration, access and communication in the court.

In order to ensure equality before the law, it is recommended:

- ◆ Enforcement of law on free legal aid, and of its bylaws. In addition, it is necessary to take measures for equal recognition before the law for persons with disabilities, while abolishing provisions related to removal of the legal capacity to act, and “substitute decision making”. To this end, the recommendation is to undertake studies that clarify the concept of “legal capacity” and “supported decision-making”;
- ◆ In addition, in this context, improving standards of access to the justice system for persons with disabilities regarding physical access, access to legal information in accessible formats for all types of disabilities, audio version formats, Braille, simplified/ easy read format and securing sign language interpretation is of prime importance.

Vocational Education Training (VET) and Employment

Vocational education training and employment of persons with disabilities, while being a priority in the context of the reforms undertaken by the government, continue to remain challenging for all disability categories. Approximately 42% of persons with disabilities report to be “not at all satisfied” regarding information for VET courses and only 30% of them are satisfied regarding typology of courses. 51% of them report to be “somewhat satisfied” regarding the quality of teaching, while 69% of them report to be “not at all satisfied” with the curricula and their accessibility. Only 8.8% of them are satisfied with the support in terms of self-employment once completing a VET course.

Results indicate that approximately 50% of persons with disabilities have “no information” about employment promotion programs, opportunities for internships in institutions and businesses and for the support for social businesses that hire persons with disabilities. Meanwhile, approximately 8% of the persons that are informed, report to be “satisfied”. 69% of them report to be “dissatisfied” with the opportunities offered to persons with disabilities to be employed in accordance with their skills and abilities.

Unlike persons with disabilities, representatives of CSOs report that they are informed about the activities of this objective. Almost half of them, 57.4% report that they are “not at all satisfied” with the opportunities given to persons with disabilities to work in accordance with their abilities. Regarding employment programs offered by the labor offices, 58.8% admit that they are “not at all satisfied” and 31% state that they are “slightly satisfied”, while 68.8% admit that they are “not at all satisfied” with the opportunities offered to persons with disabilities for internships in institutions or businesses.

Regional Directorates of National Employment Service and Employment Offices still do not provide qualitative and efficient employment services, to promote employment of persons with disabilities in the labor market. Results indicate that 63% of persons with disabilities “have no information” regarding detailed evaluation/assessment of special needs and skills of persons with disabilities by employees in the employment offices. Meanwhile, only 8.2% of the 37% of persons who are informed, report to be satisfied with the evaluations/assessment.

Employment rates for persons with disabilities remain low, leading to dissatisfaction for the majority of participants in this study (89.6% of the respondents stated to be “not at all satisfied” and “slightly satisfied”).

To ensure VET and employment it is recommended:

- ◆ Improvement of infrastructure, including access to the environment, information (in alternative formats), transport; tailor-made/accessible curricula to ensure the improvement of the quality of services provided at the centers and schools of vocational education and training, making them accessible to persons with disabilities;
- ◆ Information and awareness raising for all disability categories regarding services provided by Employment Offices, VET schools and centers, aiming at their inclusion in the open labor market and ensuring their professional training, habilitation and rehabilitation;
- ◆ Training and professional development of the staff of VET schools and centers and of those of the employment offices, with the view of improving the quality and enhancing

efficiency of services delivered by these institutions for persons with disabilities, to further promote and facilitate their integration in the labor market;

- ◆ Raising awareness and information of public and private employers regarding programs that provide subsidies for employment of unemployed jobseeking persons with disabilities, promote their effectiveness and their continuous extension;
- ◆ Improvement of the quality of employment services and of VET centers, through improving the evaluation system and the preparation of standard instruments and modules that will assist in all this process;
- ◆ Review and harmonize the legal framework, with the view to promote employment of persons with disabilities through a special cooperation of MHSP with MFE, particularly to address issues that hinder/inhibit employment of persons with disabilities, such as those related to disability payments and employment of persons with disabilities, assessment etc.

Education

Persons with disabilities and their families, as well as representatives of organizations, highlighted improvements in the implementation of inclusive education for children with disabilities. Approximately 63% of persons with disabilities and their family members report to be “somewhat” (50%) and “very” (12.4%) satisfied about education of children with disabilities, 60.4% report that they are happy with the presence of the assistant teacher (42% “somewhat” and 18.4% “very” satisfied) and 62.5% are satisfied with the possibilities provided to children with the disabilities to participate in different activities in the school. Results indicate that representatives of CSOs are sceptical regarding achievement of objectives under this goal. They report low levels of satisfaction (29.2%) regarding education of children with disabilities. 40.8% of them report to be satisfied with the presence of the assistant teacher, and 38.9% are satisfied with the opportunities that schools provide for the participation of children with disabilities in different school activities.

Unlike other indicators under this objective, 83.9% of persons with disabilities and their family members report to be unsatisfied with the transport provided to children with disabilities to attend school. Same way, representatives of CSOs report high levels of dissatisfaction with regards to this indicator (76.7% are “not at all satisfied”).

In order to ensure inclusive and qualitative education for children with disabilities it is recommended:

- ◆ Immediate measures to improve the quality of inclusive education by the Ministry of Education, Regional Department of Education (RED), and Education Offices (EO), in cooperation with the local government and strengthen capacities for teaching tailored to individual education needs of children with disabilities; these measures should address; (a) ensuring sustainability and sound practices, by investing in improving the quality and ensuring continuous monitoring; (b) ensuring that every child in each municipality should have an assistant teacher with the necessary skills; qualitative PEI developed and agreed with the parents; appropriate evaluation by commissions established to this end in the regional education departments and education institutions;
- ◆ Investing in increasing capacities of assistant teachers, as well as of all teaching staff through qualitative training, as a must to ensure quality in teaching for children with disabilities;
- ◆ Investing in infrastructure to avoid barriers related to access of children with disabilities in education institutions, including ensuring free and accessible transport, access to premises, both internal and external, access to necessary supportive infrastructure (Braille/sign language interpreter / teaching kits and other services within and outside school premises), in support

of the work with children with disabilities. To do this, RDE/EO and all educational institutions at all levels, including private ones, should be able to draft an action plan, including relevant budgets with timeframes, to avoid barriers in communication, infrastructure, and transport in educational services at all levels, for all disability categories and to coordinate with the municipalities and MESY to ensure their funding.

Social Services

The new approach to disability assessment by KMCAP (Medical Commission on disability assessment), according to bio-psycho-social model is evaluated positively by persons with disabilities and their family members³. Approximately 47.2% of them, report to be satisfied with the recent changes in the process of disability evaluation by KMCAP.

Persons with disabilities and their family members, as well as the CSOs believe that social protection services in their communities are either missing (Peshkopi) or are insufficient in capacities and typology to meet their needs (Berat, Korçë and Lezhë). Results indicate that only 28.3% are satisfied with social services for persons with disabilities in their areas.

The disability benefit is deemed to be insufficient to cover costs related to disability. Only 7.5% of the respondents admit to be satisfied with the disability benefit/allowance.

Provision of services that enable deinstitutionalisation for adult persons with intellectual disabilities seems to be missing in the communities where monitoring was conducted. Approximately 22% of persons with disabilities and their family members report that they have no information about services that support independent living. Meanwhile, the rest report that they are “not at all satisfied” or “slightly satisfied” (93.5%) with services that support independent living.

In order to ensure access and quality of social services for persons with disabilities it is recommended:

- ◆ Interventions by MSHMS (Ministry of Health and Social Welfare), ShSSH (Social State Service), as well as the municipalities and administrative units, through information campaigns about the goal, process and benefits that the new bio-psycho social model of disability evaluation brings for them and their families;
- ◆ Capacity building of the responsible structures at the local level, in the municipalities, at DRSHSSH (Regional Directory of Social State Services), centers that provide social care services, for providing integrated social care services for persons with disabilities;
- ◆ Review of financial support schemes for persons with disabilities, including level of disability benefits available, to help in meeting up additional livelihood costs related to disability, as well as to create schemes for facing the necessary costs for social services which are currently not covered by public services;
- ◆ Introduction of services that support independent living for adult persons with disabilities, including improved access in bonus schemes for social housing, with the view to implement de-institutionalization;
- ◆ Continuous information of specialists who are providers of social care services for persons with disabilities, for legal changes in the disability area, in order to enable them to timely and properly inform people with disabilities and family members of the benefits they may have due to disability from the financially supported scheme by the state;

3. Positive evaluation for this objective is related to the facilitation of procedures for disability evaluation of January 2018 (Order no. 47/1, of 11.1.2018) and not to the new bio-psycho- social evaluation. This was confirmed during the process of validation of findings. For a more accurate information regarding this question, it is important to conduct further studies/monitoring.

Health care services

The monitoring results showed that health services are unavailable and/or not accessible. Specifically, 73% of persons with disabilities and their relatives report that they are dissatisfied with the services offered by health care institutions (15.8% “not at all satisfied” and 57.6% “slightly satisfied.”) Almost the same level of dissatisfaction (66.7 %) is also noted by the representatives of the organizations.

93% of persons with disabilities and their family members admit to be unsatisfied with the free dental care service offered in the community (76.8% “not at all satisfied” and 16.2% “slightly satisfied”, while dental care offered in the schools to the children with disabilities reverberates almost the same levels of dissatisfaction (95.8%). Representatives of CSOs (95.7%) state that they are not satisfied with free dental care service provided in the community, and the same holds true for the free dental care offered to children with disabilities in the schools.

Approximately 31% of persons with disabilities and their family members admit that they have no information on specialized treatment offered to persons with disabilities. The rest, 83.1% report that they are not satisfied with the specialized treatment. The same situation is true related to rehabilitation services (physiotherapy, speech therapy etc.), whereby 35.8% of persons with disabilities and their family members report not to have any information regarding these services. The part that report to have information (64.2%) states that they are not satisfied with these services (91.5% are not at all satisfied). Furthermore, approximately 40% of persons with disabilities and their family members do not have any information about prevention and early detection/identification of disability.

Results indicate that representatives of CSOs as well, report high levels of dissatisfaction regarding prevention of disability (84.1%), specialized treatment (80%) and rehabilitation services (67.3%). The situation is considered however satisfaction regarding disability assessment by 33.3% of the representatives of the civil society organizations (CSOs).

In order to ensure access and quality of health care services delivered to persons with disabilities it is recommended:

- ◆ To run an evaluation of the level of accessibility of the institution by each health care institution which should include aspect of construction infrastructure, and in terms of information and services, with the goal of identifying the needs and developing a plan to ensure full access of persons with disabilities to health care services;
- ◆ Systematic inspection by the responsible institutions for the inspection of standards of health care service delivery, both at the local and central levels, and annual evaluation of the level of accessibility of health care institutions in line with the standards, but as well regarding respect to legislation regarding free delivery of certain health care services, such as the dental care service;
- ◆ Introduction and development of identification, diagnosis and early intervention services;
- ◆ Establishment of local centers for habilitation and rehabilitation of persons with disabilities;
- ◆ Strengthening capacities of MHSP, RDHC, and the staff of all health care institutions, health care specialists about the methodology of communication and treatment, necessary for persons with disabilities in need of health care;
- ◆ Organization of awareness raising campaigns through dissemination of informative leaflets that are accessible for persons with hearing and/or visual impairment, persons with intellectual disabilities, with the goal of informing them about the health care services offered by the health care service in place, and the rights they have vis-à-vis these services.

Participation in the political and public life

The assessment about the participation of persons with disabilities in the political and public life of the country speaks of insufficient efforts in the delivery of activities foreseen under the Action Plan. Approximately 30% of persons with disabilities report that they “are not informed” about accessible formats for participation in the elections, including their participation as observers in the electoral processes, and inclusion of persons with disabilities at the central and local levels.

In addition to barriers in infrastructure, mainly in premises, transportation and communication, barriers in attitudes and mentality continue to keep persons with disabilities still far from being involved in the public life, including culture and sports activities. 82.9% of persons with disabilities or their family members are highly unsatisfied with participation in cultural activities.

In order to ensure the participation of persons with disabilities in the country’s political and public life it is recommended:

- ◆ To improve and implement the Electoral Code and its provisions which still make it practically impossible for persons with disabilities to be able to cast their ballot in a secret and equal way with everybody;
- ◆ Keeping and updating the data and information system with data on CSOs, in order to ensure timely and continuous update of stakeholder groups, including disability related organizations, regarding different changes and/or amendments to policies, legislation and programs that affect the lives of persons with disabilities;
- ◆ Raising awareness and capacities of persons with disabilities and CSOs that are active in the disability relate areas about the importance of their inclusion and being active partners in the process of public consultations and decision-making at the local and central level;
- ◆ Ensuring barrier-free access to environments, information and communication, and support for accessible transportation when necessary to ensure active participation and inclusion of persons with disabilities in the facilities of the institutions where political or public events are organized, including in the case of elections or other cultural or sports activities.

Fostering cooperation, monitoring and evaluation

The findings of the study demonstrate that there are no concrete efforts towards inclusion of persons with disabilities and their family members, as well as of the CSOs in the monitoring and evaluation processes, as stated in NDAP. Approximately 30% of persons with disabilities and their family members report not to have any information about this goal. Furthermore, they are not satisfied with the progress so far in terms of their participation in the monitoring processes (90.3%), national conferences (93.8%) and international conferences (95.5%). In addition, 86% of the representatives of the CSOs admit that they were not involved in the process of NDAP monitoring.

In order to ensure cooperation, monitoring and evaluation in the delivery of NDAP and CRPD it is recommended:

- ◆ To establish monitoring structures while hiring/appointing contact persons for each institution at the central and local level, in charge of collecting data, informing and coordinating and implementing NDAP;
- ◆ To establish communication mechanisms with the civil society and all stakeholder groups;
- ◆ To organize regional conferences, with the goal of exchanging experiences, in light of improving and advancing measures provided for under this plan;

- ◆ To improve and strengthen cooperation, and in particular coordination with donors and CSOs, in order to enable timely and qualitative delivery of measures under NDAP, and the local plans for its implementation;
- ◆ To organize annual conferences at the central and local levels, in order to have the responsible authorities report about the results achieved on annual bases regarding the implementation of national and local disability action plans;
- ◆ To draft alternative reports of monitoring NDAP implementation by the CSOs that are active in the disability area.

General Recommendations

- ◆ To draft and implement a communications plan which should include use of different communication tools, including alternative formats, sign language, subtitles, audio, printing in easy read formats, in order to disseminate the National Disability Action Plan to 61 municipalities and in all their administrative units. The communication campaign in this context should be periodical, based on the areas of the action plan and the forms of how it can be delivered to ensure inclusion, equality, and non-discrimination. This communication plan will have an impact on raising awareness on NDAP, in particular of the institutions that are responsible for its implementation, as well as of stakeholder groups, to be active in the process of implementation and monitoring, but of the society as a whole, as well;
- ◆ To translate NDAP into local plans, with timeframes and financial costs. To ensure their efficiency, these plans can be integral components of other local plans, such as those for inclusion of children with disabilities or social plans that get approved in the municipal councils. These plans for the implementation of NDAP should be forerun by a situation analyses and should ensure full participation of persons with disabilities and disability CSOs;
- ◆ To increase inter-institutional cooperation at the central and local levels, aiming at coordinating the work between them, in light of benefiting of mutual expertise during the process of the implementation of the plan;
- ◆ To appoint disability contact points, responsible for information, data collection, coordination and reporting on disability issues. This intervention improves the level of information, but also of orientation and addressing disability issues for persons with disabilities, family members and CSOs that operate in this area. At the same time, this intervention serves for a better institutional and inter-institutional cooperation to coordinate and monitor on ongoing bases and frequently the implementation of NDAP at the central and local levels;
- ◆ To develop and implement specific programs for enhancing capacities, in particular of the contact points regarding disability issues, in line with areas and directions as defined in NDAP. It is essential that these programs include the staff at managerial and expert levels, and that they are acquainted with the obligations and activities of the plan, to ensure its comprehensive implementation.

