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EXECUTIVE SUMMARY

This report analyses the compliance of the Bulgarian National Evaluation and Accreditation Agency (NEAA or the Agency) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) in order to provide information to the European Association for Quality Assurance in Higher Education (ENQA), i.e. its Board, on whether membership of NEAA should be reconfirmed and to the European Quality Assurance Register for Higher Education (EQAR) to support NEAA’s application to the register. NEAA has been a member of ENQA since 2009 and has been registered in EQAR between 2009 and 2013.

The third review of NEAA is based on an external review conducted from July 2017 (submission of the Self-Assessment Report (SAR)) until January 2018 (submission of the panel report to ENQA). The whole process followed the Guidelines for ENQA Agency Reviews as of October 2015.

The panel for external review of NEAA was appointed by ENQA and included the following members:

- Jean-Marc Rapp, Honorary Professor at the University of Lausanne and President of the Swiss Accreditation Council, Switzerland (Chair of the panel, EUA nominee);
- Maria E. Weber, Head of Department of Accreditation & International Affairs, Agency for Quality Assurance and Accreditation Austria (AQ Austria), Austria (Secretary of the panel, ENQA nominee)
- Mieczysław Socha, Emeritus Associate Professor of the University of Warsaw, former Vice-President and Secretary General of Polish Accreditation Committee, Poland (ENQA nominee)
- Simona Dimovska, master’s student in Intellectual Property (LL.M) Ss. Cyril and Methodius University in Skopje, Macedonia. Steering Committee Member of European Students’ Union (ESU nominee)

The review panel considered the evidence, provided in SAR, and performed a site-visit. The review panel requested additional evidence prior and during the site-visit. Additionally, the review panel took into consideration the status quo of implementation of recommendations as follow-up from external reviews conducted in 2014 (full review) and 2015 (partial review). The review panel analysed all the evidence and considered NEAA’s compliance with the ESG. It concluded that NEAA has fully, substantially or partially complied with the ESG as follows:
ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE | Substantially compliant
---|---
ESG 3.2 OFFICIAL STATUS | Fully compliant
ESG 3.3 INDEPENDENCE | Fully compliant
ESG 3.4 THEMATIC ANALYSIS | Fully compliant
ESG 3.5 RESOURCES | Substantially compliant
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT | Fully compliant
ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES | Fully compliant
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE | Fully compliant
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE | Fully compliant
ESG 2.3 IMPLEMENTING PROCESSES | Fully compliant
ESG 2.4 PEER-REVIEW EXPERTS | Substantially compliant
ESG 2.5 CRITERIA FOR OUTCOMES | Fully compliant
ESG 2.6 REPORTING | Substantially compliant
ESG 2.7 COMPLAINTS AND APPEALS | Substantially compliant

Table 1: Review Panel’s Judgements. Review 2017

The external review has addressed the following activities, which are under NEAA’s remit:

- Institutional accreditation and programme accreditation, including accreditation of professional fields, majors in the regulated professions and doctoral programmes;
- Post-Accreditation Monitoring and Control (PAMC) procedure (in conjunction with the institutional and programme accreditation);
- Evaluation of projects (for the establishment of new higher education institutions or the introduction of new study programmes) and reviews for altering the capacity of a higher education institution;
- Assessment of distance learning offers.

NEAA is commended for its approach to the revision of its standards and criteria in the light of the adoption of the revised ESG in 2015 and for the development and implementation of software that supports the facilitation of documents relevant for external quality assurance processes.

The review panel identified areas for improvement, for which a detailed analysis, recommendations and suggestions will be presented in the various sections of the report.

The review panel hopes its findings will provide support and input towards further enhancement to the agency’s work in the near future.
INTRODUCTION

This report analyses the compliance of NEAA (Националната агенция за оценяване и акредитация) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted between July 2017 (submission of SAR to the review panel) and January 2018 (submission of the review panel’s report to ENQA).

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA’s regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG, as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

NEAA has been a member of ENQA since 2008 and is applying for renewal of its ENQA membership. As it was stated above, NEAA has also been listed in EQAR between 2009 and 2013. In addition to its renewal of ENQA membership, the agency is also applying for registration in EQAR. NEAA’s ENQA current membership is valid until April 24, 2019. NEAA wished to be registered on EQAR, thus had to undergo a review against the ESG 2015. With the result of this review, NEAA applies also for reconsideration of its membership in ENQA, so that the time duration of the ENQA membership and EQAR registration can be aligned, and to avoid that NEAA needs to do yet another review in a couple of years to renew its ENQA membership.

The review panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review(s). The review panel has adopted a developmental approach, as the Guidelines for ENQA Agency Reviews aimed at constant enhancement of the agencies. As this is NEAA’s third review, the report will elaborate, in brief, the background of the previous review, which will be addressed as full review 2014 and partial review 2015.

MAIN FINDINGS OF THE 2014 FULL AND 2015 PARTIAL REVIEW

NEAA was last under external review for the purpose of extending its membership in ENQA in 2014. The ENQA Board awarded NEAA in April 2014 the status of a full member under review for a period of two years. The ENQA Board identified from the 2014 review report a number of specific areas, which would be the focus of the review procedure (partial review). There were aspects of the Agency’s work where the level of the compliance with the ESG criteria had been judged to be weak. (ENQA, as of May 2014). In line with the ENQA statutes, the agency was given two years to undergo a new review process, a so-called partial review.

NEAA was also informed by ENQA that it could also opt for a new review at an earlier stage. NEAA took advantage from this option and submitted in December 2014 a self-assessment report (SAR) providing information on the criteria mentioned above. SAR was supported by additional information on areas of development by the agency over the past month since finalisation of the full review in May 2014. Following its rules, the ENQA Board appointed a review panel to carry out the partial review in the spring of 2015. In order to guarantee continuity, the ENQA Board appointed three members who have also been involved in the full review.

The focus of the partial review 2015 was laid on the evolving level of compliance with the following ESG standards (ENQA Membership Criterion / ESG 2005):
1. Criterion 1, sub-criterion ESG 2.5 – reporting;
2. Criterion 1, sub-criterion ESG 2.8 – system-wide analysis;
3. Criterion 3, ESG 3.4 – resources;
4. Criterion 6, ESG 3.7 - external quality assurance criteria and processes used by the agencies;
5. Criterion 7, ESG 3.8 – accountability procedures.

Table 2: Focus of Partial Review 2015

The judgements and recommendations from the full as well as the partial review are presented in the following:¹

<table>
<thead>
<tr>
<th>ENQA Criterion/ESG</th>
<th>2014 full review incl. partial review 2015</th>
<th>Recommendation(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ESG 2.1 (FORMERLY ESG 2.1)</strong></td>
<td>(Formerly 2.1 Use of internal quality assurance processes) <strong>Fully</strong> (Review 2014)</td>
<td>ESG 2.1: none</td>
</tr>
</tbody>
</table>
| **ESG 2.2 (FORMERLY ESG 2.2 AND ESG 2.4)** | (Formerly 2.2 Development of external quality assurance processes) **Fully** (Review 2014) (Formerly 2.4 Processes fit for purpose) **Substantially** (Review 2014) | ESG 2.2: none  
ESG 2.4 (Review 2014): That NEAA develops strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in its procedures. The enhancement agenda would benefit from greater exposure to good international practice through the routine involvement of international experts in NEAA assessment activity. That NEAA considers how the outputs from its review activities can be further focused to support system-wide institutional quality improvement and enhancement. That NEAA further strengthens the involvement of students and representatives of professional bodies as full participants, in all stages of the accreditation process. That NEAA should seek to ensure greater consistency in its involvement of students, in particular with regard to experts’ training and their participation in the work of Standing Committees. |
| **ESG 2.3 IMPLEMENTING PROCESSES (FORMERLY ESG 2.6 AND 3.7)** | (Formerly ESG 2.6 Follow-up Procedures and ESG 3.7 External Quality Assurance Criteria and Processes) **Fully** (Review 2014) | ESG 2.6 (Review 2014): That NEAA considers how the wealth of sector information gathered through its follow-up procedures can be deployed to support system wide quality enhancement. ESG 3.7: see below |
| **ESG 2.4 PEER-REVIEW EXPERTS (FORMERLY ESG 3.7)** | (Formerly ESG 3.7 External Quality Assurance Criteria and Processes) **Substantially** (Review 2014) (Formerly ESG 3.7 External Quality Assurance Criteria and Processes) **Substantially** (Partial Review 2015) | ESG 3.7 (Review 2014): Since the last report, an amendment has been made to accord full status to student team members. The Panel heard, however, of some instances where Standing Committees had opted to deploy student members in a slightly different way. The Panel urges NEAA to issue consistent guidance on this policy, for the avoidance of doubt. ESG 3.7 (Partial Review 2015): NEAA should ensure that when the reconstitution of its Standing Committees takes place, student representatives are made full members of all of those committees, on a consistent |

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Formerly ESG Criteria and Processes</th>
<th>Outcome</th>
</tr>
</thead>
</table>
| **ESG 2.5 Criteria for Outcomes (Formerly ESG 2.3 and 3.7)**             | (Formerly ESG 2.3 Criteria for Decision) **Substantially** (Review 2014)  
(Formerly ESG 3.7 External Quality Assurance Criteria and Processes) **Substantially** (Review 2014) | ESG 2.3: none  
ESG 3.7: see above |
| **ESG 2.6 Reporting (Formerly ESG 2.5)**                                  | (Formerly ESG 2.5 Reporting) **Non-Compliant** (Review 2014)  
(Formerly ESG 2.5 Reporting) **Fully** (Partial Review 2015) | ESG 2.5 **(Review 2014):** That NEAA, institutional representative bodies and the Ministry of Education and Science review the current policy of not publishing reports in full and as a priority take the necessary measures to resolve this major deviation from the ESG.  
**ESG 2.5 (Partial Review 2015):** So as to provide even more accessible information for stakeholders, it will be helpful in the medium term to consider whether an introductory statement might be included for each report, giving an executive summary of the judgments, recommendations, and the most significant evaluative information. In the interest of wider communication and transparency, it would be desirable in future, should resources permit, to publish such a summary in English. |
| **ESG 2.7 Complaints and Appeals (Formerly ESG 2.7 and 3.7 [Guideline])** | (Formerly ESG 2.7 Periodic Reviews) **Fully** (Review 2014)  
(Formerly ESG 3.7 External Quality Assurance Criteria and Processes) **Substantially** (Review 2014)  
(Formerly ESG 3.7 External Quality Assurance Criteria and Processes) **Substantially** (Partial Review 2015) | ESG 2.7: none  
ESG 3.7: see above |
| **3.1 Activities, Policy and Processes for Quality Assurance (Formerly ESG 3.1, 3.3, and 3.5)** | (Formerly ESG 3.1 Use of external quality assurance procedures for higher education and ESG 3.5 Mission Statement) **Substantially** (both) (Review 2014)  
(Formerly ESG 3.3 Activities) **Fully** (Review 2014) | ESG 3.1: none  
**ESG 3.3 (Review 2014):** NEAA operates a comprehensive and complex set of external quality assurance procedures determined by statute. It is open for discussion as to whether the combined weight of these procedures is really the optimum mechanism for the maintenance and enhancement of quality in Bulgarian Higher Education. It was suggested to the Panel that programme-level and institutional-level accreditation may in future be merged into a single process. It is recommended that this positive opportunity be further reviewed by NEAA in consultation with Government and HE stakeholders.  
**ESG 3.5 (Review 2014):** The Agency operates in accordance with a strategic plan, currently under revision. Annual activity plans are derived from the strategy. The Panel was unable to access a number of source documents, but recommends the publication of a strategic plan, which sets out the main goals and objectives over a stated period of time. During the annual planning process, the strategic plan should be used as the basis for developing a (published) annual |
<table>
<thead>
<tr>
<th>3.2 OFFICIAL STATUS (FORMERLY ESG 3.2)</th>
<th>(Formerly ESG 3.2 Official Status) Fully</th>
<th>ESG 3.2: none</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3 INDEPENDENCE (FORMERLY ESG 3.6)</td>
<td>(Formerly ESG 3.6 Independence) Substantially</td>
<td>ESG 3.6: none</td>
</tr>
<tr>
<td>3.4 THEMATIC ANALYSIS (FORMERLY ESG 2.8)</td>
<td>(Formerly ESG 2.8 System-Wide-Analysis) Partially (Review 2014) Substantially (Partial Review 2015)</td>
<td>ESG 2.8 (Review 2014): The Panel recognizes the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realize its potential, the Agency discuss with its stakeholders the options to increase both its resources and the cost-effectiveness of its activities (see below). The additional resource thus gained could then be directed to increase the volume of system-wide analysis and quality enhancement activity that NEAA can undertake. NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity. ESG 2.8 (Partial Review 2015): NEAA should aim to extend the scope of its system-wide analysis and reporting so as to provide more information on wider trends and developments across the Bulgarian higher education sector.</td>
</tr>
<tr>
<td>3.5 RESOURCES (FORMERLY ESG 3.4)</td>
<td>(Formerly ESG 3.4 Resources) Partially (Review 2014) Substantially (Partial Review 2015)</td>
<td>ESG 3.4 (Review 2014): NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity. ESG 3.4 (Partial Review 2015): none</td>
</tr>
<tr>
<td>3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT (FORMERLY ESG 3.8)</td>
<td>(Formerly 3.8 Accountability Procedures) Substantially (Review 2014) Fully (Partial Review 2015)</td>
<td>ESG 3.8 (Review 2014): That the Agency takes further steps to introduce a comprehensive system for feedback on its own activities. ESG 3.8 (Partial Review 2015): In the interest of accessibility for the general public and its stakeholders, NEAA should consider producing a briefer and more straightforward statement on its internal quality assurance procedures, for publication on its website. The Accreditation Council should continue to give its fullest support to the work of the Quality Assurance Committee, as it develops and fully implements its revised procedures for feedback and monitoring.</td>
</tr>
<tr>
<td>3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES (FORMERLY ESG 3.8 [GUIDELINE])</td>
<td>(Formerly 3.8 Accountability Procedures) Substantially (Review 2014) Fully (Partial Review 2015)</td>
<td>See above</td>
</tr>
</tbody>
</table>

The 2015 review panel recommended the agency to consider producing a **briefer and more straightforward statement on its internal quality assurance procedure and to publish it accessible on the website**. NEAA, additionally, was recommended to **the AC to continue its support to the work of the Quality Assurance Committee, especially regarding the development and implementation of revised procedures for feedback and monitoring NEAA’s work**. A recommendation dealt as well with the **reconstitutions of NEAA’s Standing Committees, it should be ensured that student**
representatives are made full members of all of those committees, on a consistent basis. NEAA was also to extend the scope of its system-wide analysis and reporting so as to provide more information on wider trends and developments across the Bulgarian higher education sector. With regard to reporting, the review panel recommended providing even more accessible information for stakeholders; it will be helpful in the medium term to consider whether an introductory statement might be included for each report, giving an executive summary of the judgments, recommendations, and the most significant evaluative information. In the interest of wider communication and transparency, it would be desirable in future, should resources permit, to publish such a summary in English.

NEAA has dealt with the recommendations issued. In its 2017 review progress has been demonstrated.

REVIEW PROCESS

The 2017 external review of NEAA was conducted in line with the process described in the Guidelines for ENQA Agency Reviews and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of NEAA was appointed by ENQA and composed of the following members:

- Jean-Marc Rapp, Honorary Professor at the University of Lausanne and President of Swiss Accreditation Council, Switzerland (Chair of the panel, EUA nominee);
- Maria E. Weber, Head of Department of Accreditation & International Affairs, Agency for Quality Assurance and Accreditation Austria (AQ Austria), Austria (Secretary of the panel, ENQA nominee)
- Mieczysław Socha, Emeritus Associate Professor of the University of Warsaw, former Vice-President and Secretary General of Polish Accreditation Committee, Poland (ENQA nominee)
- Simona Dimovska, master’s student in Intellectual Property (LL.M) Ss. Cyril and Methodius University in Skopje, Macedonia. Steering Committee Member of European Students’ Union (ESU nominee)

The review panel agreed on what was to be either provided prior to the site-visit or during the site-visit. A list with all documents requested indicating the date of transmission to the review panel has been submitted to NEAA’s contact person at ENQA. As agreed, during the review panels preparatory skype-meeting, which has been arranged by the ENQA review coordinator, each panel member was encouraged to use the ESG mapping grid, supplied by ENQA, in identifying evidence provided in SAR and supporting the conduct of the site-visit. All review panel members submitted their mapping to the Secretary in time before the site-visit. Based on the documents, the Secretary aligned the individual findings to the areas of inquiry. In consequence, they were linked to specific interview sessions. Prior to the site-visit and finally during the review panel’s kick-off session on-site, each panel member was designated to lead a specific interview session, aiming to collect evidence and to support the work on the report. The review panel used the allowed briefing sessions as foreseen in the agenda to discuss thoroughly all evidence gathered. With intensive briefing sessions, the review panel was aiming to ensure consistency in evidence gathering and decision-making. The review panel led by the Chair reached all decisions collectively. Members actively discussed and finally agreed on judgments, recommendations, suggestions etc. on each criterion. The Secretary collated after the site-visit an initial draft reflecting the agreements reached already on-site. The draft was further re-defined with the Chair before it was circulated to all panel members. The report was finalized based on their written comments. The report reflects on information gained from the SAR,
on oral evidence given during the site visit, as well as additionally provided documentation prior and during the site-visit. NEAA had the opportunity to comment on the factual accuracy of the draft report.

The review panel likes to mention that in May 2017, the term of office of the President Boyan Biolchev and of several Members of the Accreditation Council (AC) expired. In consequence of this, the review panel was informed that the mandate of the acting General Secretary (GS) terminated as well. Shortly before the site-visit, a new President and new AC members have been appointed by the Council of Ministers. The position of GS has not been filled by the date of site-visit, since, according to the rules, the President in office has the right to make a decision; the review panel learned during the interviews conducted that the GS is considered to be a post of trust to the President. The external review process, as a whole, was not affected by this change. The review panel considers the external review for the new members of NEAA’s leadership as a condition and starting point to fine-tune and outline its strategic plans for the agency in the upcoming future period. This is also stated in the light of the need for NEAA to renew its strategic planning for the time after 2017, since current plans will be terminated.

**Self-assessment report**

NEAA produced a SAR, which provided first evidence that the review panel used to draw its conclusion. The review panel was supported with this SAR from the ENQA review coordinator in July 2017. Overall, the report addressed the relevant components following the report template as provided by ENQA. The SAR provided a sound starting point for discussions to which extent NEAA adheres compliance to the ESG. However, during the site-visit, the review panel observed possible nuances between the Bulgarian version and the English version of the SAR. These shortcomings would have been prevented if, possibly, the translated version of the SAR had been crosschecked by the agency. To some extent, additional evidence was needed, either due to lacking information in the SAR or due to difficulties assessing information directly via embedded external links on NEAA’s website. With the embedded links, NEAA was aiming to support the review panel with relevant additional information by direct access from the website. All requested information was provided in a timely manner.

**Site visit**

The agenda for the site-visit was prepared jointly between the Secretary and NEAA’s ENQA contact person. Despite of the fact that the final agenda has been agreed, in some interview sessions changes occurred during the site-visit. The agenda, provided as Annex 1 to this report, identifies all interview partners, who have actually participated in the meetings.

The site-visit took place at NEAA’s office premises between September 20 to 23, 2017. The work of the review panel started with an intensive kick-off meeting in the afternoon of September 20, 2017. The review panel made use of the possibility to hold a meeting with representatives of NEAA. Mila Penelova (Former Secretary General, external Consultant to NEAA, Contact coordinator for ENQA) and Prof. Todor Shopov (External Consultant to NEAA and Expert on international cooperation for NEAA) provided the review panel with an overall outline on the Bulgarian higher education system. In addition, the review panel also took advantage of this meeting regarding clarification on concrete issues e.g. the revision of the standards and criteria (the new so-called Criteria System (CS)) in place to be in line with the revised ESG 2015 part 1.

The review panel was also provided with background information regarding the above-mentioned, new-appointment of the President and AC members and the current vacant position of the GS. It
was stated during the site-visit, that the mandates were already terminated in May 2017. Nevertheless, due to national election in early summer 2017, nominations and appointment went slow and only took place in September 2017. Some of the previously mentioned changes in the agenda could be seen in connection with the personnel changes due to the recent appointments.

During September 21 and 22, 2017, the review panel met with the President (former and newly appointed), members of the AC, the various SC, staff of NEAA and as well with external stakeholders from Ministry, HEI, experts, students, employers, etc. The review panel benefited from all discussions.

Due to a Bulgarian bank holiday on September 22, the review panel agreed to not extend interview sessions on this day for too long and agreed, also, on having its final debriefing and wrap up meeting in the morning of September 23 in the hotel premises.

The review panel would like to thank NEAA’s contact person to ENQA for supporting the review panel and also to all NEAA staff for taking care of all catering and services provided during the site-visit. Additionally, the review panel likes to thank Mrs. Albana Iliev for her professional translation service provided during all interview sessions. With her support, all interview sessions were conducted in an open and constructive conversational atmosphere. Finally, the review panel appreciated the support of the ENQA coordinator during the whole process.

**HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY**

**HIGHER EDUCATION SYSTEM**

As of SAR, the overall structure of Higher Education (HE) in Bulgaria is laid down in the Act on Higher Education (in the following HEA). The Bulgarian Parliament has adopted this law in 1995; in the last years, the law has been subject of revisions and amendments. With the HEA three-tiered system - Bachelor-Master-PhD have been introduced and the ECTS has been implemented. Additionally, as it is stated in the SAR teaching, learning and academic degrees are in line with the classification of areas of HE as well as professional directions. The HEA provided also that, as of SAR, the *regime of accepting undergraduates and doctoral students and specializing students in European Union* is harmonized with that of Bulgarian citizens; branches of foreign HEI and educational franchise was made possible in Bulgaria.

According to the Bulgarian Constitution and the normative documents, the State needs to provide opportunities of access to HE and for its development, especially with regard to academic autonomy, self-regulation of HEI; financing schemes, granting support, etc. In line with that, the State also needs to define the framework and areas for development of HE in Bulgaria. With regard to this, it can be stated that Bulgaria is aiming to set up a higher education system contributing to the development of knowledge-based society for the overall benefit of the Bulgarian society as well as to foster the development of research and culture. Additionally, HE in Bulgaria tries to be in line with all developments in the European Higher Education Area (EHEA).

Currently, the system of HE in Bulgaria includes 51 higher schools, to be in this report addressed as HEI, out of which 37 are public and 14 private including 30 universities, 18 specialized higher schools and three independent colleges. Overall, HEI in Bulgaria provides a wide range of teaching and research in the various specialised and professional direction among which are humanities, natural sciences, social sciences and technologies. The SAR refers to data form the Bulgarian National Statistical Institute, according to which the majority of graduates have finished studies in economics and administration (29.7%) followed by social and behavioural sciences (13.7%), engineering
(10.7%), pedagogy and educational sciences (8.12%), healthcare (6.81%). Only a minority has graduated from computer sciences (3.18%), life sciences (0.83%) and mathematics and statistics (0.16%).

HEIs are spread over to regional cities in the six regions of Bulgaria. Around 11 of them have also opened branches in other then its main location. NEAA provides data from the National Statistical Institute, according to which, the amount of graduates from HEI has reached 32.1% in 2015, which according to NEAA, means that Bulgaria is on the way to accomplish the national aim, according to which by 2020 (Strategy Europe 2020), 36% of the population between 30-34 should hold a degree from an HEI.

Since 2010, Bulgaria has established a national ranking system of all HEI. The ranking system was introduced with a project, financed by the Operative Programme “Human Resource Development” funded by the European Social Fund (ESF). The review panel has learned that currently public HE is financed based on learning outcomes. Which means, according to SAR, that public financing will not be based first and foremost on the number of students registered in a given study programme, but it will be estimated according to certain criteria for quality of education and correspondence to needs of labour market, such as accreditation, evaluation and research work and data on employability of graduates with higher education and also with regard to the country’s social-economic priorities. The review panel understood from meeting with ministerial representatives that in future outcomes from accreditation decisions (grades) will be taken even more into consideration.

All relevant information regarding HE in Bulgaria is provided in a transparent way. While NEAA’s website provides outcomes and information regarding external and internal quality assurance, the Ministry of Education and Science provides information via a special information system: Register of HEI, Register of academic staff, Register of current and returning undergraduates and doctoral students, Register of banks giving grants on the basis of the Law of Crediting Undergraduates and Doctoral Students. The ranking of all Bulgarian HE, into which also the grading results from accreditation procedures feed in, is published in printed version annually but can also be retrieved from the following website: http://rsvu.mon.bg/.

**QUALITY ASSURANCE**

The system of external quality assurance of HE in Bulgaria, stipulated by the HEA, is supported by the work of NEAA due to different types of procedures - institutional and programme accreditation, evaluation, and post-accreditation monitoring. With the amendment of HEA in 2004, it has been introduced that higher education shall be attained at HEI, which have been accredited and established under terms and conditions provided in the HEA (para 5; HEA 2004).

The review panel understood that, according to para 75 of the HEA accreditation is the recognition by NEAA regarding the right of higher schools to give higher education by educational and qualification degrees in certain spheres, professional areas and specialties related to regulated professions through the assessment of the quality of their activities as of para 6 of the law.

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2 English: [http://rsvu.mon.bg/rsvu3/?locale=en](http://rsvu.mon.bg/rsvu3/?locale=en) (As of 1 October 2017)
Quality Assurance in Bulgaria

<table>
<thead>
<tr>
<th>Institutional Accreditation (Art. 77, para 2, HEA)</th>
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<tbody>
<tr>
<td>Programme Accreditation (Art. 78, para 3, HEA)</td>
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<tr>
<td>Post-Accreditation Monitoring and Control</td>
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<tr>
<td>Evaluation of Projects (Art 81, para 6 based upon request to the Ministry as of Art 14, para 1)</td>
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<tr>
<td>Reviews for Altering the Capacity of a Higher Education Institution</td>
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<tr>
<td>Assessment of Distance Learning Offers</td>
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</tbody>
</table>

Table 4: Quality Assurance in Bulgaria (as of NEAA SAR, July 2017)

Art. 79 of the law defines in detail the assessment scale for institutional and programme accreditation to be carried out. It is a ten-grade evaluation scale comprising grades from 0 to 10.00. Whereby, the specific score for each of the assessment criteria referring to art. 22, sub 2 and art. 78, sub 3 of the law, shall, according to the law, be computed as the average of the scores for each indicator multiplied by its coefficient. NEAA has developed a scheme, where grading scales as of HEA are combined with verbal assessment, following a four-scale scheme: fully/substantially/partially, non-compliance.

The specific results of the scoring determines, in further consequence, the periods of accreditation, at institutional and study programme level. Whereby, the period of accreditation varies depending on the assessment.

For all the procedures mentioned before, NEAA’s AC has, according to art. 88 of the law, adopted documents and procedures regulating processes and methodological guidelines and it also has developed criteria.

NEAA

According to art. 8 of the law of 1995, it is stated that the state shall provide conditions for, as stated above, an unrestricted development of higher learning, as well as for conditions defining access to higher education through the various means. Whereby, among others, one of these means refers to organising the operations of the agency, NEAA. According to the law for HE, NEAA is considered being a statutory body, a specialized state organ for evaluation, accreditation and monitoring of the quality in higher education institutions aiming at the enhancement of HEI teaching and research mission, as well as of HEI development as scientific, cultural, and innovative organisations. The statutes of NEAA, defining its set-up, have been adopted in 1996 following an ordinance of the Council of Bulgarian Ministers. According to SAR, AC has been assigned with the task of structuring and organizing the agency; additionally a basic approach regarding the assessment of HEI/study programmes, based on existing good practices at international level, but as well taking into account traditions of Bulgarian higher education, has been adopted.

As it is stated in SAR, the Law on Development of Academic Staff in the Republic of Bulgaria regulates all obligations and rights of the agency, as well as additional unified national requirements for experts of regulated profession and additional legal documents. According to the evidence provided, the agency follows principles of acting independently, being transparent and publicly accountable in all its performing activities.

In the following, the report of the panel will deal in more detail with NEAA’s organisational structure, scope of responsibilities, funding and international activities.
NEAA’s Organisation/Structure

NEAA’s functions, organisation and structure are defined by HEA as of art. 86 and 87.

AC is considered the highest executive/steering and decision-making organ of NEAA. The President is representing the agency and leads its work. AC consists of 11 members, including a President and a Vice-President. One of AC members’ is also acting as Vice-President for PAMC. Six members are from the field of higher education, holding leading positions at HEI institutions; one represents the Bulgarian Academy of Science, one the Academy of Agriculture, two representing the Ministry of Education and Science.

The appointment of AC follows the regulations laid down in HEA. According to the legal requirements, the Ministry and the Bulgarian Rectors’ Conference organize the nomination of members of the AC. By doing so, it should be guaranteed that, as it is stated in SAR, the *maximum representation of all basic academic structures and areas of higher education* are taken into account. The members of AC, the President, the Vice-President are appointed by the Bulgarian Prime Minister on the basis of a so-called labour relations, after a proposal of the Minister of Education and Science (acc. art 86). According to art. 86, para 1, the term of office of the President, the Vice-President and other AC members is six years. The law states that persons stated under art. 86, para 1, may not be appointed for more than one term of office. Further, the law states (art. 86 para 2) that half of all AC members, except for the President, shall be replaced on a quota principle every three years. The law (art. 86, para 4) foresees an incompatibility clause according to which, active Rectors, Vice-Rectors, Deans and/or Directors of an affiliate at HEI, and a President, Vice President and Institute Director at the Bulgarian Academy of Sciences and the Agriculture Academy cannot be appointed as members of the AC.

One of the tasks of the AC is to create the Standing Committee (SC) and the SC for PAMC related to all fields of higher education (as of SAR: 1. pedagogic sciences and social affairs; 2. humanities and arts; 3. social and legal sciences; 4. security and defence; 5. economic sciences and management; 6. natural sciences, mathematics and informatics; 7. technical sciences; 8. agrarian sciences and veterinary medicine; 9. healthcare and sport; and the PAMC). The AC elects members of these
Each committee consists of 7 members, out of which one is acting as chairperson of the respective committee. SCPAMC is chaired by, as stated before, one person from AC.

Opposite to AC in each SC/SCPAMC one member represents students; further stakeholder representation - e.g. labour market, employers etc. - is currently not foreseen. The President of the AC appoints all members with a mandate of three years. The AC adopts, as it is stated in SAR, the legal basis for SCPAMC.

The statute of NEAA, adopted by the Bulgarian Council of Ministers, defines responsibilities of the AC and SCs. As it is explained in SAR and stated in the statutes, the SC makes decision to start a procedure or rejects it, propose nominations of Expert Groups (EG or panels) to the AC, controls the work of the EG, considers the EG reports, takes decisions on accreditation and evaluation procedures in four cases - programme accreditation in professional fields; programme accreditation in scientific majors, other than those included in regulated profession list and in project evaluation for opening professional field, in all other cases, the SC prepares and submits its reports on results to the AC for its decision making. The AC, among other responsibility described in the statues, nominates the EG, makes decisions to concur with or reject what the SC have proposed in their reports. The SC on PAMC carries out post-accreditation monitoring procedures. The following graphic explains the responsibilities of AC, SC incl. SCPAMC:

Graphic 2: Responsibilities of AC, SC and SCPAMC of NEAA (as of NEAA SAR, July 2017)

Administrative services are executed by a general and specialized administration. The general administration is further defined by two executive departments, namely the so-called juridical counsel and accounting. The special administration organised in the department “Evaluation, Accreditation and Post-Accreditation Monitoring and Control” the chairpersons of the SC and SCPAMC (who is at the same time Vice-President of NEAA) and the various (internal) experts of the various SC and SCPAMC are subsumed. Therefore, a detailed view into the organizational outline of NEAA provides the following picture:
With regard to the organisational structure, it is important to note that the special administration, organized as department for Evaluation, Accreditation and Post-Accreditation Monitoring and Control is led by the director. The chart in place does not display that but should be amended accordingly.

**NEAA’s Functions, Activities, Procedures**

As it has been stated already, the aforementioned functions, activities and defined procedures of NEAA are aiming to monitor the ability of public and private HEIs, their main units, faculties and branches to provide good quality of education and scientific research through (well-established) internal quality assurance system at HEI. NEAA’s mission is, therefore, consequently pointing out to encouragement of higher education institutions in assuring and enhancing the quality of education they offer by sustaining high academic standards and good education traditions in Bulgaria. As briefly mentioned before, various amendments and changes of HEA since 1995 have further defined the scope of tasks and responsibilities of the agency. With the amendment of 2004, NEAA was tasked to perform as a (specialized state) agency for evaluation, accreditation and quality control for all HEI in Bulgaria. With reference to these, the following QA activities can be subsumed under the remit of NEAA:

- Institutional accreditation and programme accreditation, including accreditation of professional fields, majors from the regulated professions and doctoral programmes;
- Post-Accreditation Monitoring and Control (PAMC) procedure (in conjunction with institutional and programme accreditation).
- Evaluation of projects (for the establishment of new higher education institutions or the introduction of new study programmes);
- Assessment of distance learning offers and reviews for altering the capacity of a higher education institution.
- In addition NEAA is, according the art 87 par. 6 HEA, supposed to provide advice to HEIs and the MES.

The validity of accreditation, depending on the grading results, the recommendations issued as a consequence of accreditation decisions, limit the agencies capacity in evenly distributing its workload. Similar results from evaluation projects, which due to its specificities (decisions made by
individual HEIs etc.), do not provide NEAA a predictable workload. Taken these together, the management of workload will remain a constant challenge of NEAA.

In the period between 2015 and June 2017 NEAA has completed in total 1261 procedures of various types:

<table>
<thead>
<tr>
<th>N</th>
<th>Procedures completed by</th>
<th>2015</th>
<th>2016</th>
<th>to June 2017</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Institutional accreditation of higher schools</td>
<td>4</td>
<td>5</td>
<td>4</td>
<td>13</td>
</tr>
<tr>
<td>2.</td>
<td>Program accreditations: - professional directions - specialisms from regulated professions</td>
<td>56</td>
<td>28</td>
<td>54</td>
<td>18</td>
</tr>
<tr>
<td></td>
<td></td>
<td>14</td>
<td>14</td>
<td>7</td>
<td>49</td>
</tr>
<tr>
<td>3.</td>
<td>Program accreditations of doctoral programs</td>
<td>312</td>
<td>414</td>
<td>104</td>
<td>830</td>
</tr>
<tr>
<td>4.</td>
<td>Evaluation of projects for opening and reforming a higher school</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>5.</td>
<td>Evaluation of projects for reforming basic units of higher schools</td>
<td>4</td>
<td>4</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>6.</td>
<td>Evaluation of projects for opening: - Professional directions - specialisms from regulated professions</td>
<td>16</td>
<td>8</td>
<td>4</td>
<td>28</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5</td>
<td>1</td>
<td>2</td>
<td>8</td>
</tr>
<tr>
<td>7.</td>
<td>PAMC of fulfillment of given recommendations: - Institutional accreditation - Specialisms from regulated professions - Program accreditation of professional directions Control of adhering to capacity of a higher school</td>
<td>6</td>
<td>18</td>
<td>8</td>
<td>32</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7</td>
<td>6</td>
<td>9</td>
<td>22</td>
</tr>
<tr>
<td></td>
<td></td>
<td>14</td>
<td>25</td>
<td>36</td>
<td>75</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>8.</td>
<td>Changing capacity of specialisms from regulated professions and capacity of professional directions</td>
<td>18</td>
<td>14</td>
<td>10</td>
<td>42</td>
</tr>
<tr>
<td>9.</td>
<td>Evaluation of environment of and distance form of learning</td>
<td>3</td>
<td>11</td>
<td>2</td>
<td>16</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total number of procedures</td>
<td>476</td>
<td>577</td>
<td>208</td>
<td>1261</td>
<td></td>
</tr>
</tbody>
</table>

Graphic 4: Procedures completed by AC and SC between 2015 and June 2017 (as of NEAA SAR, July 2017)

With its strategic plan, NEAA is in the position to establish its strategic priorities and objectives, of course reflecting overarching national needs. The current strategic plan covers the period 2014-2017 and is considered being a short-term plan, mainly reflecting follow-up of previous external reviews by ENQA. In addition, it reflects also the period for accomplishing activities projected and corresponding the timeline of mandates of the President of AC and half of the members of AC who were supposed to rotate in 2017.

One important activity and priority set by NEAA since 2015 was the revision of its CS. This was not directly included in the strategic plan 2014-2017, but being imposed by the revised ESG 2015. Specifically, NEAA’s AC has adopted a Programme and Action Plan for Implementation of ESG 2015. For the task to be fulfilled, the AC has set up a two working groups. In October 2016, the AC adopted the new CS, which is supported by a series of procedures, methodological documents and rules for its various accreditation, evaluation and monitoring tasks as referred to before; since January 2017, NEAA is conducting its procedures according to the new CS for its procedures, overall in line with ESG 2015 part 1, 208 procedures have been conducted until June 2017 following the new CS.

**NEAA’S INTERNATIONAL ACTIVITIES**

NEAA considers internationalisation as a major characteristic of its activities. According to evidence provided internationalisation includes membership in ENQA, CEENQA, registration in EQAR, cooperation with other agencies (e.g. Polish agency PKA, Slovenian NAKVIS). NEAA has been a partner in Erasmus+ research and development project Enhancing Internal Quality Assurance Systems (EIQAS, www.eiqas.com). This project was aiming to enhance internal QA systems of HEI in the European Higher Education Area (EHEA). Within this project NEAA held responsibility for a work
package dealing with survey on HEI readiness to harmonize internal QA systems and work related to ESG 2015 part 1. The survey included 25% of all Bulgarian HEI, selected randomly. The aim was to identify good practices related to the implementation of ESG 2015 part 1. Deliverables of the project are published on the project website mentioned above. NEAA was also contributing to the development of another project proposal funded by the EU-Commission under its Erasmus+ KA2 project scheme; the project Quality Assurance and Accessibility in European Open Education (QAA in EOE) prepared jointly with NAKVIS as coordinator general, represents incentive for national QA agencies via field-test case studies in massively open learning environments and renders effective quality assurance mechanisms and processes for internal QA systems and external QA systems. The project proposal has been submitted in March 2017 to the EU-Commission, but funding has not been granted.

NEAA also invites international experts to participate in EG, as panel members. International experts are coming from foreign QA agencies listed in ENQA/EQAR.

**NEAA’s funding**

NEAA is financed by state budget, collection of fees for its accreditation procedures as well as from revenues resulting from other activities such as participation in national and international projects and funds. With regard to public financial support NEAA is, according to its statutes, considered as a second level user of budget credits from the MES. Financial support of agency’s activities is ensured by a subsidy from the state budget and own income. NEAA is obliged to administer its incomes from accreditation procedures, evaluations, PAMC-procedures, publishing activities and other activities stated above.

NEAA’s, as of SAR, financial policy is regulated by the System of Financial Management and Control, which stipulates transparency (audit tracks conducted by Audit Office of Republic of Bulgaria, internal accountability rules and additional determined processes etc.) and fitness for purpose of all financial operations.

<table>
<thead>
<tr>
<th>Financial year</th>
<th>Real expenditure in BGN</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>1 333 686</td>
</tr>
<tr>
<td>2014</td>
<td>1 235 021</td>
</tr>
<tr>
<td>2015</td>
<td>1 182 986</td>
</tr>
<tr>
<td>2016</td>
<td>1 253 884</td>
</tr>
<tr>
<td><strong>Total for the period 2013-2016</strong></td>
<td><strong>5 005 577</strong></td>
</tr>
</tbody>
</table>

*Graphic 5: Real expenditure of finance of NEAA (as of NEAA SAR, July 2017)*

The table above was specified due to the provision of additional material provided during the site-visit. According to the documents provided, the revenue/expenditures, in this report exemplary demonstrated only for the year 2016, reads following:
<table>
<thead>
<tr>
<th>INDICATORS</th>
<th>Statement</th>
<th>Relative share of the total amount (%)</th>
<th>INDICATORS</th>
<th>Statement</th>
<th>Relative share of the total amount (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SUBSIDIES FROM STATE BUDGET</strong></td>
<td>BGN 476,960</td>
<td>38,04</td>
<td><strong>REMUNERATION/SOCIAL SECURITY</strong></td>
<td>BGN 96,4050</td>
<td>76,89</td>
</tr>
<tr>
<td><strong>FEES FROM ACCREDITATION</strong></td>
<td>BGN 776,924</td>
<td>61,96</td>
<td><strong>ON-GOING MAINTENANCE</strong></td>
<td>BGN 289,834</td>
<td>23,11</td>
</tr>
<tr>
<td><strong>INCL. BUSINESS TRIPS</strong></td>
<td></td>
<td></td>
<td><strong>TOTAL</strong></td>
<td>BGN 145,841</td>
<td>11,63</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>BGN 1,182,986</td>
<td>100</td>
<td><strong>TOTAL</strong></td>
<td>BGN 1,253,884</td>
<td>100</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>€ 604,860</td>
<td></td>
<td><strong>TOTAL</strong></td>
<td>€ 641,110</td>
<td></td>
</tr>
</tbody>
</table>

Table 5: Focus Revenue / Expenditure 2016 (as of NEAA documents, September 2017)

Between 2013-2106, the revenues from HEI amounts to 60-70% of the agencies total revenues. NEAA explains that the largest share accrue from PhD programmes and other programme accreditation.

With regard to expenditures, NEAA spends funds for remuneration (for full-time employees and to staff employed under so-called non-employment legal relationships - fees for EG), insurance contributions and other issues for material maintenance. Overall, as of NEAA, 75% of expenditures amount salaries/insurance contributions according to its legal definitions. NEAA considers its budget resources, financial situation as sufficient for *normal functioning*.

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FINDINGS: COMPLIANCE OF NEAA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:
Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2014 full/2015 partial Review: ESG 3.1 Use of external quality assurance procedures for higher education. For ESG 3.5 Mission statement; ESG 3.3 Activities; Recommendation(s) in short: ESG 3.3: NEAA operates a comprehensive and complex set of external quality assurance procedures determined by statute. The Panel suggested that programme-level and institutional-level accreditation may in future be merged into a single process. It was also recommended that this might be further reviewed by NEAA in consultation with Government and HE stakeholders. ESG 3.5: The Panel recommended the publication of a strategic plan, which sets out the main goals and objectives over a stated period of time. During the annual planning process, the strategic plan should be used as the basis for developing a (published) annual operating plan.

Evidence
The review panel experienced that NEAA within the rather short time since the last review only to a certain extent followed up with recommendations issued before. Progress has been made with regard to the recommendation dealing with the strategic plan. NEAA has put since the last review major efforts on changing its external quality assurance activities to be in line with ESG 2015 part 1, but could not follow up with merging programme-level and institutional level accreditation into a single process.

NEAA’s external quality assurance activities include accreditation of institutions and study programmes, including accreditation of professional fields, majors from the regulated professions and doctoral programmes; post-accreditation monitoring and control procedures (in conjunction with institutional and programme accreditation); evaluation of projects (for the establishment of new HEI, faculties, branches, new study programmes); assessment of distance learning offers and reviews for altering the capacity of a HEI. All external quality assurance activities are supported by clearly defined procedures, instructed and guided by thoroughly developed methodologies in line with the respective legal framework (HEA) and its own statute. All methodological frameworks, rules and regulations are published on NEAA’s website.

With its external quality assurance activities, NEAA is aiming to monitor the ability of public and private HEIs, their main units, faculties and branches to provide good quality of education and scientific research through (well-established) internal quality assurance system at HEI. As mentioned before, NEAA is according to art. 87, para 6 of HEA also supposed to advice HEIs and the MES in
relevant questions regarding further development of higher education in Bulgaria in addition to its responsibility for external quality assurance. As it was confirmed during the site-visit by various representatives from HEIs, NEAA has provided information and methodological support for the implementation of ESG 2015. Representatives from the MES confirmed as well that NEAA has contributed to the development of national higher education policy. NEAA’s mission is therefore consequently pointing out to encouragement of higher education institutions in assuring and enhancing the quality of education they offer by sustaining high academic standards and good education traditions in Bulgaria. The mission is publicly available on NEAA’s website.

Since the last ENQA review, the methodological framework for NEAA’s external quality assurance activities has changed. The agency has introduced a new CS, which guarantees that all procedures take thoroughly the revised ESG 2015, part 1, into consideration. The development of the CS was done under a wide stakeholder involvement. It was expressed in various meetings during the site-visit that the introduction of the new CS was mainly focusing on the reinforcement of quality culture in Bulgarian HE system but did not in particular focus on the overall comprehensive and complex system of external quality assurance according to which NEAA operates.

With a view to implement, to translate the mission defined into the daily work, NEAA is strictly following its methodological approaches, rules and regulations on an everyday basis.

The current strategic plan covers the period 2014-2017 and is considered being a short-term plan. The current strategic plan took into consideration recommendations resulting from the ENQA review 2014. Additionally, it also reflects the period for accomplishing activities projected and corresponding to the timeline of mandates of the President of AC and half of the members of AC. Due to the fact that mandates run out, NEAA will need to spend the upcoming time to reformulate and update its strategic plan covering a period 2017-beyond.

In addition to the strategic plan, NEAA adopts an annual work plan. The work plan sets clear goals, tasks, provides evidence to reference documents (e.g. national educational policy etc.), outlines all planned activities (e.g. for 2017 implementation of new CS, workshops dealing with ESG 2015, etc.), sets deadlines and as well refers to expected results.

For the implementation of ESG 2015 at all levels, NEAA’s AC has in October 2015 adopted a specific Programme and Action Plan.

As from SAR and based upon oral evidence during the site-visit, according to its strategy and mission NEAA implemented also auxiliary units with consultative character to AC, which operates according to defined rules. These units are the Ethic Committee, the Quality Committee as well as the Appeals Committee.

Analysis

NEAA addressed the last ENQA review by amending its strategy in order to reflect on recommendations issued. The current strategic plan is published on the agency’s website; the revision of the strategic plan is a core task of the new AC and its president. A series of documents, rules and regulations developed, aiming to support NEAA’s work and complex operations.

The review panel considers the external quality assurance activities in place, being strongly normative and regulative, and its “fine-meshed”-outline is first and foremost to reinforce/enhance quality culture in the Bulgarian HEI. Although, NEAA had made huge efforts with regarding the development of the new CS, reflecting ESG 2015 part 1, the complexity of procedures and the strong focus on quality control and monitoring has not been changed. With regard to this, NEAA should in
close cooperation with its stakeholders, including the MES balance pros and cons towards shifting to “lighter” fostering quality enhancement in terms of appreciative approaches. This would especially reduce amount of work especially with regard to institutional and programme accreditation procedures.

The current legal framework leads to the fact that the AC is predominately composed of members coming from the field of academia, therefore lacking a broader stakeholder representation at the AC level. Evidence with regard to this is given by SAR, which states, that all members hold a habilitation (postdoctoral qualification), while other qualifications are not mentioned. The alignment on academic qualification/representation was also demonstrated in all meetings during the site-visit. The review panel concluded, NEAA’s AC might be considered as very academia driven body. This impacts a lack of broad(er) stakeholder involvement. With regard to the AC broader stakeholder involvement is not fully ensured, due to the fact that there is no students’ or labour market/employment representatives involved in the core governance body of NEAA (AC). The review panel was informed that there are various processes in place to consult on a working level with stakeholders in order to ensure a broader reflection, in order to overcome limits, set by the legal framework. The review panel is aware of the fact that a broader reflection of stakeholder involvement would possible lead changes in HEA. This in return would also have an impact on the overall outline of the agency; the AC members are fully employed by the agency, which might be seen as obstacle towards broad stakeholder involvement. The review panel appreciates that the restriction of the SC guarantees students’ involvement, but would also here strive for better reflection of labour market/employer representatives. The inclusion of foreign expertise in the AC might also be an added value.

**Panel recommendations**

The review panel recommends NEAA to thoroughly support its comprehensive, complex operations while revising the current strategic plan in the upcoming period. The revised strategic plan, should especially allow the AC (in cooperation with the GS) to streamline resources, operations in an effective and efficient manner while reflecting the agencies mission.

The review panel recommends considering and expanding its AC to ensure a wider stakeholder involvement it its own governance. If this would need a legal change, NEAA should pro-actively map possible ways forward and take into consideration experience from reconstruction of its SC, which now e.g. includes student members. Additionally, NEAA should strive for at least formalised procedures regarding the now ad-hoc consultations of stakeholders on a working level by AC.

**Panel conclusion: Substantially compliant**

**ESG 3.2 Official Status**

<table>
<thead>
<tr>
<th>Standard:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.</td>
</tr>
</tbody>
</table>

**2014 full/2015 partial Review: ESG 3.2 Official Status; No Recommendation.**
Evidence

The SAR indicated that NEAA is recognized by HEA as an independent specialised state organ for evaluation, accreditation and monitoring of quality activities of Bulgarian private/public HEI. With the amendment of HEA, in 2004, NEAA was assigned to perform functions of post-accreditation monitoring and quality control of Bulgarian public/private HEI. All activities NEAA is performing are in compliance with its statute, which have been adopted by the Bulgarian Council of Ministers. Additionally the statute prescribes NEAA’s structure, its model of governance (AC, SC etc.).

Analysis

The review panel finds that NEAA carries out its activities in accordance with HEA. The statutes of the agency form a legal basis for activities set and prescribes the way of governance and the agencies structures.

According to the review panel, NEAA is to be considered as a core stakeholder in Bulgarian educational policy. The MES is referring to NEAA’s decision and outcomes while establishing a nation-wide ranking of all study programmes delivered in Bulgaria. In addition, as the review panel was informed, due to fact NEAA being a cornerstone in Bulgarian HEI, the agency is involved in various working groups jointly with the ministry aiming to (further) develop higher education.

Panel conclusion: Fully compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

2014 full/2015 partial Review: ESG 3.6 Independence; No Recommendation.

Evidence

Concerning evidence regarding NEAA’s independence, the review panel needs to state that SAR did not reflect sufficiently on evidence along with operational, organisational independence and independence of formal outcomes. SAR provides, under the particular ESG 3.3, overall statements. Various documents (HEA, statute of NEAA, procedural guidelines, methodologies) provide evidence regarding NEAA’s capacity to work without third party influence. During the interviews conducted, the review panel was supported with oral evidence demonstrating that NEAA is to be considered and in the position to act independent to a great extent.

Organisational independence is safeguarded due to regulations spring from HEA and supported by the agencies statute. According the legal framework under which the agency operates, NEAA is an independent specialized state agency responsible for accreditation, controlling and monitoring quality of Bulgarian HEI. The nomination of the AC members is based on nominations, even though strongly representing academia in Bulgarian and less reflecting on all-encompassing stakeholders at large. Similar applies for its SC, which members reflect to a vast majority academia, since restructuring as well students. Since July 2015, it has been put into operation on a constant basis that students are full members of SC/SCPAM. The SC and the SCPAMC are formed by the AC, which
appoints members through selection by applications. During the site-visit it was explained to the review panel that interested person can apply after a public call. The practice is in place since 2013.

With regard to operational independence and the independence of formal outcomes NEAA has, as mentioned before, created all-encompassing methodological frameworks, rules and regulations aiming to guarantee the conduct of procedures independently from third parties. All methodological frameworks, rules and regulations are published on NEAA’s website. As stated above, SC makes decision to start a procedure or rejects it, propose nominations of Expert Groups (EG or panels) to AC, controls the work of EG, considers the EG reports, takes decisions on accreditation and evaluation procedures in four cases - programme accreditation in professional fields; programme accreditation in scientific majors, other than those included in regulated profession list and in project evaluation for opening professional field, in all other cases SC prepares and submits its reports on results to the AC for its decision making. AC, among other responsibility described in the statutes, nominates the EG, makes decisions to concur with or reject what the SC have proposed in their reports. The SC on PAMC carries out post-accreditation monitoring procedures. As of HEA and NEAAs statutes incompatibility clauses are defined, aiming to guarantee that members of the AC are, in short, not acting e.g. as rectors, directors of one of those entities represented in the AC. Similar applies for members of SC as well as for members of EG. Members of EG should not be affiliated to an institution/programme under review for a defined period of months before a procedure takes place. As a rule, NEAA has developed various internal observation, control steps. E.g. one member of a respective SC takes part as an observer on site-visit or a member of AC takes part as an observer in SCs meetings. According to the review panel, these procedural steps aim to enhance diligence in operations. In addition, NEAA’s Code of Ethics guarantees that QA procedures are carried out respecting impartiality, objectivity, integrity, confidentiality etc. In order to observe this, NEAA has installed (auxiliary unit) an Ethic Committee. Concerning financial independence, the review panel evidenced that, as other state agencies as well, is considered being a second level user of budget credits by the MES. Support of its activities is ensured by subsidy from state budget and own income.

Analysis

The review panel appreciates NEAA’s effort regarding its organisational, operational structure, guaranteeing tasks to be fulfilled in an unbiased and uninfluenced way by third parties. With regard to this, one of NEAA’s strengths is laid down in its strongly formalised and normative approaches, during the whole operational cycle of QA process from opening to independent decision-making. Additionally, in light of the evidence provided, the review panel is content with the legal provisions for the structural and financial independence of NEAA, which allow the agency to establish itself as an autonomous legal entity. Besides of NEAA’s governing bodies (AC, SC), overall governance of the agency’s procedures and processes is also supported by its auxiliary units such as its Ethic Committee, CQ, and as well its Appeals Committee. With the following statement, the review panel does not aim to contradict its own findings, but wishes to point towards the possible need to rethink its strongly academia driven governance structure and as well its impact on the compositions of EG. According to the evidence gained, HE community in Bulgaria is to be considered as small. With regard to this, the review panel verifies challenges for NEAA ensuring a constant level of awareness towards avoiding any kind of “soft” biased, academic driven views on the issues to be negotiated. Based on its external view, the review panel states that hidden incompatibilities resulting from “soft” biased, academic driven views possibly endangering independence could be avoided by considering broader stakeholder involvement at all levels (governance of the agency, composition of EG). It became evident to the review panel that experts at various levels either represented in AC, SCs, on EG or entities under evaluation/accreditation have created over the years a common ideas
and understanding of specific measures of external QA. This is to be considered as a strength of the system in place, but might fuel its pitfalls. All involved parties have certainly adapted to the intensive scheme of QA procedures and processes in place (on side of HEI but as well on side of NEAA and its organs). Hence the focus should not be solely on procedures and processes but should also provide room for “quality” of HE itself. The review panel learned that NEAA invests sever amount of time to develop and guarantee unbiased, diligent procedures aiming to control, monitor its own work. Eventually, some structural changes e.g. broader stakeholder involvement, increasing the inclusion of international experts in panels etc. would also contribute to the aim.

**Panel suggestions for further improvement**

The review panel suggests NEAA to thoroughly review its pool/list of experts aiming to support a broader stakeholer reflection (labour market/employer) since the pool/list currently reflects first and foremost academia beside of students. In addition, the review panel suggest increasing the inclusion of foreign experts, even though fully aware of the language barriers explained and discussed during the site-visit with this regard.

**Panel conclusion: Fully compliant**

**ESG 3.4 THEMATIC ANALYSIS**

<table>
<thead>
<tr>
<th>Standard:</th>
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<tbody>
<tr>
<td>Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.</td>
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</table>

**2014 full/2015 partial Review: ESG 2.8 System-Wide Analysis; Recommendation(s) in short:** ESG 2.8 (Review 2014): The Panel recommended that [...] additional resource thus gained could then be directed to increase the volume of system–wide analysis and quality enhancement activity that NEAA can undertake. NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity. ESG 2.8 (Partial Review 2015): The Panel recommended that NEAA should aim to extend the scope of its system-wide analysis and reporting so as to provide more information on wider trends and developments across the Bulgarian higher education sector.

**Evidence**

The review panel was provided with evidence that NEAA followed up with recommendations issued during the last reviews.

As it was stated in the SAR, NEAA has introduced in 2016 a practice regarding the preparation and publishing summary reports on outcomes of accreditation procedures. NEAA considers its summary reports as comparative sector analysis/empirical studies (study programmes/professional directions). With these reports NEAA is aiming to present good practices in place but also provides analysis on identified areas for further improvement. Focus is also laid on summary reports dealing with analysis on the overall - as it is stated in SAR - state of education in the respective professional direction. These reports aim to formulate visions for future development areas. As it is stated in SAR, findings and conclusions made in reports provide categorisation of quality of education in particular professional direction for education-qualification degrees; description of specific aspects; account on degree of inclusion in the regional and economic life; comparisons with similar programmes of
foreign HEI; proofs of satisfaction/dissatisfaction of employers and the whole society with educational and scientific output related to the professional direction.

The review panel found that in March 2017, the AC has adopted 42 summary reports. All reports are published on NEAA’s website (www.neaa.government.bg/en/publications/summarizing-reports), including annotations in English. In addition, with these reports NEAA intend to distribute information on quality in HE in Bulgaria more broadly i.e. going beyond a narrow circle of experts involved in procedures, and HEI under review or the MES. They also aim to provide orientation to future students in selecting a study programme as well as to support future employers with relevant information on quality of programmes from which (future) employees have graduated. Reports also intend to address media and support their information on quality of HE in Bulgaria, by doing so the wider-public at large should gain sufficient information.

A similar approach has been made with regard to summary reports on internal quality assurance in HEI. The analysis conducted by PAMC, mainly focused on organisation and the management of teaching & learning processes. The analysis demonstrated the HEI have reached with regard to the state a good level. Higher education is carried out in line with institutions mission on education, the set aims and task. The conducted analysis provided also evidence that HEI have developed internal normative documents regarding the development of study programmes, approval, monitoring and revision processes. As a consequence, it was stated in SAR that a system of control and management of quality has been created in HEI in Bulgaria. The findings also demonstrated that HEI have found their way to apply approaches to teaching and learning centred on students and their needs. Further evidence was provided that opinions of students and employers on the education systems are taken into account in the revision of study programmes. As stated in a previous chapter, the new CS was also accompanied by a study. Collecting and analysing opinions of stakeholders with regard to the new set of criteria in line with ESG 2015 part 1.

As it was discussed during the site-visit and stated in the SAR, the EIQAS project was important for the revision of criteria in place. NEAA contributed to the project with an overall report on the implementation of ESG in Bulgarian HE. Various good practices have been identified. As it was stated during the site-visit, the project and in particular the report has supported the revision of criteria in place with regard to ESG 2015 part 1.

NEAA has also implemented special seminars to discuss results from accreditation procedures with relevant stakeholders. Information obtained in these seminars is as well published on the agencies website. The practice in place is considered by NEAA as a fundament for comparability of the work of HEI in Bulgaria.

As it was stated during the site-visit, NEAA is publishing each year a so-called Bulletin (annual report) of its work.

Analysis

The review panel appreciates NEAAs efforts made with regard to thematic analysis since the last ENQA review. According to the evidence provided in SAR and oral testimonies during the site-visit, NEAA has extended the scope of its thematic analysis and reporting regarding the identified need to provide information on wider trends and developments across the Bulgarian higher education sector. The review panel also learned that NEAA has developed an approach to share, to future develop and to disseminate its finding to/for various stakeholders. The review panel considers that although thematic analysis has been carried out during the last years, there remained a lack of clarity regarding the role and function of thematic analysis in NEAA’s external quality assurance
activities. Since NEAA is conducting its procedures in line with the new criteria, topics and areas of interest will arise, worth to be monitored and analysed thematically and systematically. Findings gained from thematic analysis should continually feed into the further development and reflection of the system(s) in place.

Experience gained from the above mentioned EIQAS project should be followed up by system-wide analysis focusing on lessons-learned and experience with the new criteria in place. Findings might provide sufficient evidence by what means the various approaches could even better stimulate enhancement oriented approaches as opposed to quality control approaches.

**Panel suggestions for further improvement**

The review panel suggests NEAA to monitor and thematically analyse the new CS in place after a first round of procedures following the new CS, in order to show the progress and problems encountered by higher education institutions/study programmes but as well by EG, SCs, SCPAMS and AC in their work.

The review panel suggests NEAA to analyse developments, trends, areas of good practice and identified/challenges with regard to their impact on constant development of QA activities.

The panel members suggest NEAA to include in its upcoming strategic plan to continue the tradition of regular summary reports in line with its methodology.

**Panel conclusion: Fully compliant**

**ESG 3.5 RESOURCES**

<table>
<thead>
<tr>
<th>Standard:</th>
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<tbody>
<tr>
<td>Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.</td>
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</table>

**2014 full/2015 partial Review: ESG 3.4 Resources; Recommendation(s) in short:** *ESG 3.4 (Review 2014): NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity.*

**Evidence**

With regard to financial resources and also as outlined above, NEAA is financed by the state budget (approved by the Bulgarian Council of Ministers, after proposal submitted and negotiations with MES) as well as from revenues (fees) for accreditation procedures. Concerning the fees for procedures, the review panel understood that the Ministry of Finances adopts the rates. Concerning the budget in general, NEAA is, as stated in its statute and mentioned before, a so-called second level user of budget credits by MES. Support of its activities is ensured by subsidy from the state budget and own incomes - fees and if applicable from (national/international) project revenues, as well as from other sources related to NEAA's activities.

NEAA considers its budget resources, financial situation as sufficient for normal functioning. Following the information provided in SAR and supported with additional material provided during the site-visit, the agency’s budget revenues/expenditure for 2016 indicates the following (details have been outlined before): revenues € 604,860 and expenditures € 641,110. As of the evidence provided, NEAA, in general, accounts small on permanent expenditure. Due to being a second level
user of budget credits, NEAA has to follow governmental accounting, which overall means that profit goes by the end of the year back into the state budget. During the site-visit it was stated that the remuneration for experts is rather low (around € 100) which, beside of language issues, hampers the process of recruiting foreign experts.

A System of Financial Management and Control aiming to stipulate transparency and fitness for purpose regulates the financial policy of all financial operations. The President orders NEAA’s finances and submits the budget for adoption to AC. Periodically independent financial audits are carried out by the Audit Office of the Republic of Bulgaria.

Concerning the recommendation from the previous review it can be stated that NEAA has recently tried to be again partner jointly with other partners (e.g. such the Slovenian Quality Assurance Agency for Higher Education, SQAA) in an EU-funded project. However, the project proposal was not successful. At the moment of the review no new plans regarding projects based on external funding sources for were evident.

The information provided with regard to human resources in SAR did not provide a clear understanding at first place, the document was confusing with regard to the notions full-time/part-time to be understood as differences regarding the contract types and on whether positions are part of the so-called (state) approved positions of being a position resulting from a civil contract; during the site-visit clarification was created. The following applies:

<table>
<thead>
<tr>
<th><strong>President of NEAA and of AC</strong></th>
<th>1 Full-Time (approved status)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Vice President of PAMC and Member of Accreditation Council</strong></td>
<td>1 Full-Time (approved status)</td>
</tr>
<tr>
<td><strong>Accreditation Council</strong></td>
<td>9 Full-Time (approved status)</td>
</tr>
<tr>
<td><strong>Standing Committee on PAMC</strong></td>
<td>1 Full-Time (approved status) 6 Part-Time (Civil-Contract with NEAA)</td>
</tr>
<tr>
<td><strong>Secretary General</strong></td>
<td>1 Full-Time (approved status)</td>
</tr>
<tr>
<td><strong>8 SCs on HE</strong></td>
<td>8 Full-Time (approved status) (Chairs) 47 Part-Time (Civil-Contract with NEAA)</td>
</tr>
<tr>
<td><strong>Special Administration</strong></td>
<td>5 Full-Time (approved status) 6 Part-Time (Civil-Contract with NEAA)</td>
</tr>
<tr>
<td><strong>General Administration</strong></td>
<td>4 Full-Time (approved status)</td>
</tr>
<tr>
<td><strong>Total as per NEAA categories</strong></td>
<td>30 staff members with a so-called full-time approved status 59 staff members with civil-contrats</td>
</tr>
</tbody>
</table>

Table 6: Human Resources of NEAA (as of information provided during the site-visit)

After clarification, the review panel understood that full-time contracts result from approved status. NEAA has, as a state organ, 30 (full-time) positions approved (civil servants/or nominated/appointed following the roles for the AC, SC etc. as laid down in HEA and statute). All others are considered as part-time staff with NEAA contracts, linked with civil contracts. In short, full-/part time does not necessarily deal with the weekly hours of work, but first and foremost with kind of contract. With reference to explanation concerning the age-structure of NEAA employees, the following can be stated:

The majority of full-time employees (AC, SCs, SCPAMC, and Administration etc.) are over 60 years; the similar applies for part-time employees. It also became evident that the higher in the hierarchies of the agency the less female employees are presented. E.g. while at the level of general administration / administration females are in the majority, at all other level the majority is male.
Concerning human resource development, the review panel learned, that annual qualification and career development activities for the so-called “expert staff” (esp. linked to special administration, which is organised in the before mentioned department “Evaluation, Accreditation and Post-Accreditation Monitoring and Control”) are in place. The review panel learned that the head of the department has to conduct interviews with that staff on a semi-annual basis. Decisions for participation in training are made during those interviews. A plan should allow training, participation in seminars and forums related to quality in HE mainly at a national and international level. The review panel found that no specific training with regard to EHEA, ESG etc. on international level have been implemented by now for the expert staff.

For the on-going accreditation period, following the new CS - up to June 2017, NEAA has executed procedures with around 275 experts in the EG panels. The EG members are “affiliated” to the agency by signing a contract with the President following the Law of Obligations and Contracts.

NEAA has developed an information system with regards to managing the administrative processes related to evaluation and accreditation processes. The review panel was introduced to the software and learned about the electronic processing of documentations. Even though the system just recently implemented, the review panel is of the opinion that the system in place and further developed will support efficient facilitation of all relevant steps. As it is stated in SAR, the system should be connected in the future to other state institutions and central administration in the sphere of HE (MES, Council of Ministries, Fond Scientific Research).

The review panel had some challenges to understand NEAA’s structural and organisational outline at first place. Charts provided in the SAR did not include so-called auxiliary units with consultative character. Paths of interconnections of these units with NEAA’s other committees became clear to the review panel during the interviews. The basic structural/organisational chart provided did not sufficiently reflect the CQ, the appeals committee, the Committee on Ethics. In addition, from the written evidence e.g. it was not clear that the special administration is considered being as a department dealing with evaluation, accreditation and PAMC.

Analysis

The review panel appreciated the open and informative interviews with all NEAA employees at its various levels. The interviews with external stakeholder provided evidence that NEAA as an organisation is considered as a professional body, competent to deal with its activities and procedures. The review panel is convinced that NEAA has adequately qualified and competent employees at its various positions, as defined in the organisational outline. NEAA’s employees demonstrated commitment, knowledge and experience relevant for the conduction of various procedures in a complex set-up. The review panel would like to emphasise especially the strong commitment of the expert staff from special and general administration demonstrating relevant capabilities for carrying out day-to-day quality assurance activities. However, the competences should be constantly developed, as offered in international workshops, and conferences should also be opened to this staff level. It is considered to be important for the reflection on and further development of procedures in place.

The review panel learned that NEAA is operating under the strict financial outlines as being a specialised state organ. The agency is operating with manageable financial resources; revenues form procedures vary in line with accreditation results determining validity. Striving for external funds through involvement in internationally funded projects would support the agency’s financial situation.
Nevertheless, with regard to this, it might be a prerequisite to enhance overall agencies staff with regard to the English language skills. While doing so, the agency would benefit in a double sense from international projects - gaining financial support to the agency and also creating a benefit for human resource development. The review panel assumes that, currently, the involvement in such programmes might be limited to specific staff or affiliates acting as international experts for the agency.

Panel commendations

The review panel commends NEEA’s efforts made in development of the information system, aiming to support accreditation processes in an efficient, transparent way.

Panel recommendations

The review panel recommends NEAA to put processes in place aiming to develop staff competences further, regarding the needs for being QA professionals.

Panel suggestions for further improvement

The review panel suggests NEAA to fine-tune its structural/organisational charts in such a way that also interconnections of the so-called agency experts with its various committees (as of SAR: auxiliary units with consultative character) are made visible. It should be also made clear that the special administration is considered as department dealing with evaluation, accreditation and PAMC. In addition, the structural/organisational chart should also reflect the CQ, the appeals committee, the Committee on Ethics.

The review panel suggests NEAA to strive for better equality (age/gender) at various operational and steering bodies. NEAA’s highest steering bodies should not only support the task regarding staff development but also might set a good example and include more women.

Panel conclusion: Substantially compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

<table>
<thead>
<tr>
<th>Standard:</th>
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</thead>
<tbody>
<tr>
<td>Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.</td>
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</table>

2014 full/2015 partial Review: ESG 3.8 Accountability Procedures; Recommendation(s) in short:

ESG 3.8 (Review 2014): The Panel recommended the Agency to take further steps to introduce a comprehensive system for feedback on its own activities. In addition in 2015 the Panel recommended NEAA to consider producing a briefer and more straightforward statement on its internal quality assurance procedures, for publication on its website. It was also recommended that AC should continue to give its fullest support to the work of the Quality Assurance Committee, as it develops and fully implements its revised procedures for feedback and monitoring.

Evidence

From the evidence gained the review panel learned that NEAA has followed-up with the recommendations issued in the previous reviews. Within the short period NEAA has worked on its policies and procedures assuring and enhancing the overall quality of its work.
The review panel was provided with evidence from SAR and also from oral testimonials, that internal quality assurance is a task of utmost concern within NEAA. NEAA’s policy of internal QA is published on the website. Two policy strings are of relevance:

- Policy of NEAA for the internal quality assurance in its activities is constructed by the AC and its President, considering the opinion of all structural units of the agency.
- Policy for partnership with Bulgarian and foreign public authorities, competent in the Bulgarian and European area of higher education.

Evidence are not only provided because of NEAA’s detailed defined processes and accountability processes in place, which have been referred to in the report before, but also due to the strong commitment by NEAA staff to quality and integrity of their work. Professional conduct of all procedures is guaranteed due to well-developed and described processes. The review panel got the impression that it seems almost impossible to work without respecting the procedures in place.

NEAA has implemented, as stated in SAR, overall monitoring mechanism in order to safeguard competent achievement of its mission and function.

The review panel learned that NEAA produces bulletin reports demonstrating accountability for its activities to the public. As mentioned before, external auditors assess financial statements according to a defined schedule.

The review panel learned that during the last years effort has been put regarding the quality standards in its various reports; the AC has adopted templates for all reports to be produced during an external quality assurance process (EG report, SCs report etc.). This provision is to be considered as an important step to monitor and guarantee consistency in the reporting way. In addition, NEAA has developed guidelines for EGs preparation and training. NEAA has also introduced a feedback mechanism, with the name Corrector NEAA, aiming to continuous improvement of the agency’s work.

In order to overall guarantee a systematised internal QA approach, NEAA has installed the auxiliary unit Commission of Quality Assurance (CQ). NEAA considers CQ a major player to guarantee quality in its operations. The commission is adopted by the AC and has also developed its own working plan.

The composition of the commission reflects NEAA’s internal and external members from the relevant stakeholder groups (as of adopted rules): three members of the AC (one acting as a Chair); one member from a SC; one member of previous governing bodies of NEAA, four representatives from HEI; one from the Academy of Sciences, one from Agricultural Academy; three representatives from students/PhD students; three representatives of the users of staff with HE; one representative of the trade unions; one representative from MES.

It is one of the CQ tasks to analyse findings from the feedback gained with Corrector NEAA. The analysis reflects not only on feedback from accreditation procedures but it also takes into account other observations and findings from stakeholders. The CQ also holds the task to comment, review procedural documents before adoption. It presents its comments of documents to the AC, it issues draft documents e.g. draft questionnaires, etc.

The CS holds meetings at which it presents its findings concerning the operations of NEAA; issues for improvement and/or change are presented. At these meetings, it is also possible that external stakeholders are invited to discuss and also to formulate recommendations for actions regarding NEAA’s work. The review panel learned that minutes from such meetings are published as well. It was also explained in the SAR that the CQ keeps contact with representatives of quality committees
of HE; the CQ also provides consultancy support regarding internal QA documents, procedures and activities.

Analysis

The review panel is convinced that with its comprehensive approach regarding internal quality assurance, NEAA is striving for constant improvement of its work and operations. The work and activity of the CS is supported by a work plan and by rules to be adopted by the AC. Its aim to improve quality of NEAA’s operation is linked to improvement of quality in HE itself.

NEAA installed various mechanisms of internal and external feedbacks.

Beside of “desktop” work - analysing of written feedback gained after reviews conducted, the AC in cooperation with CS and with participation of SCs, SCPAMC, is holding internal and external meetings aiming to address its stakeholders. The CS is also held responsible to consult HEI with regard to the development of their internal QA documents; in addition, the CQ is also drafting, revising, commenting documents NEAA is developing.

However, the review panel would like to point out, that the composition of the commission is (again) reflecting the same entities already represented in other bodies of NEAA.

The review panel has missed an active involvement of expert staff from the department Evaluation, Accreditation, Monitoring and Control. The review panel is of the opinion that the staff from this department would hold capacity to be assigned with an active task in line with the internal QA.

Panel suggestions for further improvement

The review panel suggests reflecting on whether it is necessary that - again - the same group of stakeholder compose the CQ.

The review panel suggests to clearly including the CQ in its organizational outline; it might be beneficiary to reconsider the multiple tasks and narrow it down to either being a consultative body or an operative as well.

The review panel suggests reconsidering in what ways eventually Expert staff from department of Evaluation, Accreditation, Monitoring and Control could be stronger assigned to tasks regarding the internal QA.

Panel conclusion: Fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:
Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

2014 full/2015 partial Review: formerly ESG 3.8 Accountability Procedures (Guideline); Recommendation(s) in short: ESG 3.8 (Review 2014): The Panel recommended the Agency to take further steps to introduce a comprehensive system for feedback on its own activities. In addition in 2015 the Panel recommended NEAA to consider producing a briefer and more straightforward statement on its internal quality assurance procedures, for publication on its website. It was also
recommended that AC should continue to give its fullest support to the work of the Quality Assurance Committee, as it develops and fully implements its revised procedures for feedback and monitoring.

Evidence

The last ENQA review took place in 2014 followed-up by a partial review in 2015. The regular ENQA review would be scheduled for 2019. The review panel learned that the reason for the current review is aiming to support NEAA’s endeavour to be listed in the EQAR register. NEAA has been registered until 2013. The agency decided to underwent external review once their procedures and criteria are in line with the revised ESG 2015, part 1. Nevertheless, to a certain extent, the review panel got the impression that the review process, as such, came a bit too early for the agency.

Concerning recommendations issued in the previous review(s), the review panel learned that NEAA has substantially implemented these recommendations. As mentioned before, some of the recommendations e.g. merging institutional and programme accreditation into one single process have not been implemented because of the current legal framework. It might be possible that improvement, with regard to this, could have been demonstrated during a review scheduled for 2019.

Beside the work on recommendations, NEAA has used the revision of the ESG 2015 as starting point for revision of its own criteria and procedures, which is considered strongly linked to the preparation of the current review.

Analysis

Periodic external reviews are considered by NEAA as a mean to demonstrate compliance with the ESG and also to provide room for reflection on policies in place. The above-mentioned work on the new criteria and procedures is considered as important for the current review. During the various interviews conducted, the review panel learned that NEAA, but also external stakeholder, such as MES, considers demonstrating compliance with the ESG by being a member in ENQA/listed in EQAR as important. ENQA/EQAR are considered as agents for support towards constant development and further improvement for quality in HEI in Bulgaria.

Panel conclusion: Fully compliant

ESG Part 2: External Quality Assurance

ESG 2.1 Consideration of Internal Quality Assurance

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

2014 full/2015 partial Review: ESG 2.1 Use of Internal Quality Assurance Procedures; No Recommendation.

Evidence

As of SAR and underlined with NEAA’s mission, the external quality assurance in Bulgaria is based on the understanding to enhance quality in HEI. This irrespective of the fact, that, as the review panel
learned from oral testimonies provided, the overall idea is still more strongly focused on quality control and monitoring.

As mentioned before, NEAA started in autumn 2015, right after the adoption of revised ESG 2015 in Yerevan, with revision of its criteria to be in line with the ESG 2015 part 1. The project outline for the development of the new CS was all-encompassing and resulted in revision of all its procedures and criteria as addressed before.

In October 2016, NEAA adopted new criteria, which are in accordance with ESG 2015 part 1. The new criteria in accordance with ESG are, as of NEAA, to be considered as a key measure of HEI’s ability to implement ESG for enhancing the quality of HE. The review panel understood from evidence gained that NEAA aims to respect conformity between ESG 2015 part 1 and the national criteria.

A detailed description of the criteria is attached to this report (see Annex 5 NEAA’s Mapping of Accreditation Criteria with ESG 2015 part 1).

<table>
<thead>
<tr>
<th>Quality Assurance in Bulgaria / ESG 2015 part 1</th>
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<tbody>
<tr>
<td><strong>INSTITUTIONAL ACCREDITATION (ART. 77, PARA 2, HEA)</strong></td>
</tr>
<tr>
<td>Assessment of the way in which a HEI pursues its mission and objectives in accordance with art. 17 of HEA.</td>
</tr>
<tr>
<td><em>Criteria</em> for institutional accreditation in accordance with ESG 2015 part 1 /1-10/ and within the meaning of art. 77, para. 2 of the HEA.</td>
</tr>
<tr>
<td><strong>PROGRAMME ACCREDITATION (ART. 78, PARA 3, HEA)</strong></td>
</tr>
<tr>
<td>Assessment of the quality of the instruction offered in a specific professional area at a primary unit and/or affiliate of the HEI, majors from the regulated professions and doctoral programmes. For doctoral programmes NEAA has jointly with stakeholders (Academy Science, Agrarian Academy) developed an approach.</td>
</tr>
<tr>
<td>NB 1: Evaluation of accredited HEI and study programmes can also be done by international agencies, which are members of ENQA and/or are included on EQAR at the invitation of the respective institution. In case a HEI starts with an evaluation/accreditation carried out by a foreign agency NEAA would still need to recognize/validate the decision. The AC has the period of one year to prepare a special report, based on the self-evaluation documents prepared for the foreign agency, based on its findings; the AC makes its decision. Only after the AC’s decision, the study programme is officially recognized in Bulgaria. Currently, there are no automatic recognition/validation procedures in place.</td>
</tr>
<tr>
<td>NB 2: According to art. 79a para 3 HEI under which the accreditation have been granted in line with legal framework, it is allowed to teach students and doctoral students under the so-called joint teaching agreements with oversea HEI, which meet the following criteria: 1. They shall be accredited by an agency, which is a member of the European Association for Quality Assurance in Higher Education (ENQA) and/or listed in the European Quality Assurance Register for Higher Education (EQAR); this shall apply to higher schools from EU and EEA member-states. 2. They shall be accredited according to the relevant national legislation; this shall apply to overseas higher schools from third countries.</td>
</tr>
<tr>
<td><em>Criteria</em> for programme accreditation of professional fields and specialities from the regulated professions in accordance with ESG 2015 part 1 and within the meaning of art. 78, para. 3 of the HEA.</td>
</tr>
<tr>
<td><em>Criteria</em> for programme accreditation of doctoral programmes in accordance with ESG 2015 part 1 and within the meaning of art. 78, para. 3 of the HEA.</td>
</tr>
</tbody>
</table>
POST-ACCREDITATION MONITORING AND CONTROL

Procedures for PAMC on implementation of recommendations resulting from decisions taken by the AC are applied depending on the given assessment in institutional, programme accreditation. The evaluation of the internal quality assurance system of education and academic staff is applied depending on the given assessment in institutional accreditation on the basis of criteria for PAMC in line with ESG Part 1.

SCPAMC is obliged by the law to control the execution by the particular HEI of the institutional capacity as determined by AC. The report of the SCPAMC on the results is accepted by AC which informs the MES. Under the framework of the process of implementation of recommendations on the respective professional direction and specialisms from regulated professions, the fulfilment of the defined capacity is accounted for.

EVALUATION OF PROJECTS (ART 81, PARA 6 BASED UPON REQUEST TO THE MINISTRY AS OF ART 14, PARA 1)

Evaluation, prior to the establishment of new higher education institutions or the introduction of new study programmes, reforming of faculties, branches. In these cases, the assessment of a decision can only be positive or negative. In case of a positive assessment, the decision is valid for a period between two or three years. After this period a regular accreditation process follows. In case the evaluation results in a negative decision the accreditation decision is revoked. NEAA has, according oral evidence during site-visit provided, only a limited role in evaluation projects - compared to its responsibilities in accreditation procedures. The MES will take a decision.

Criteria for evaluating projects for the opening or transformation of basic units of a higher education institution and/or a branch in accordance ESG 2015 part 1 /1-10/ and within the meaning of art. 81, para. 6 of the HEA.

Criteria for evaluation of projects for opening a professional field/speciality from the regulated professions in accordance with ESG 2015 part 1 and within the meaning of art. 81, para. 6 of the HEA.

ASSESSMENT OF DISTANCE LEARNING OFFERS

As far as distant learning is concerned, according to HEA art. 85, para. 1, item 1 of HEA and art. 2 of the Ordinance on the State Requirements for Organization of Distance Learning in HEI, (Ordinance for DL). Distance learning is organized and carried out only by accredited higher education institutions.

With regard to this, criteria for institutional accreditation are taken into account. This in return means that also ESG 2015 part 1 is of relevance. NEAA carries out a procedure for evaluation of distance learning environment and distance learning on the basis of an Instruction and Criteria adopted by the AC.

REVIEWS FOR ALTERING THE CAPACITY OF A HIGHER EDUCATION INSTITUTION;

Procedure for changing capacity of specialisms from regulated professions and capacity of professional directions is carried out after a report of the SC on the basis of published requirements for the higher school. With regard to this, criteria for institutional accreditation/programme accreditation are taken into account. This in return means that also ESG 2015 part 1 is of relevance.

Table 7: Procedures / Criteria in line with ESG 2015 part 1 (Alignment based upon various sources of evidence gained during the review process)

Since the introduction of revised ESG and adoption of new criteria by the AC in October 2016 and implementation as of January 2017, NEAA conducted several procedures of various types. The amount of procedures finished until June 2017 has been listed in this report as well. At the time of the review it was too early to have sufficient first findings on experience with the new criteria. Even though procedures have been conducted according to the new criteria, time will be needed to as well analyse first experiences. The following table shows how ESG 2015 part 1 is reflected in the agency’s criteria:
Table 8: Mapping of ESG 2015 part 1 with NEAA criteria (Alignment based upon various sources of evidence gained during the review process)

### Analysis

With regard to the procedures, methodologies defined, published on the website of NEAA, and in particular with evidence gained during the whole review process, the review panel is of the opinion that the new criteria in place are broadly in line with the ESG 2015. The overall rationale was to align national criteria with ESG 2015 part 1. The review panel learned that, with regard to ESG part 1, HEI internal QA, elements were already covered in the previous set of criteria. The most important change towards ESG 2015 lies in the fact, that comparing to previous 4 criteria addressing HEI internal quality assurance now there are 10 criteria in place aiming to address IQA. The vast majority of HE stakeholders considered the new approach being a fine-tuning of the old, in terms of criteria defined.

NEAA has mapped its criteria against the ESG part 1 and by doing so it took a lot of efforts to align its criteria against ESG part 1; while doing so, a specific project was set up, working for more than half a year on the task. The review panel appreciated the seriousness of the particular project, taking into consideration relevant stakeholders.

The review panel overall assesses that the revised criteria focus adequately on the HEI’s internal quality assurance system. The review panel still would see some room for improvements; at some parts, it might be not that clear what specific evidence HEI/study programmes should demonstrate. Some of the explanation provides references, which are not clear at first side to external views. In particular, the criteria dealing with institutional aspects seem to be overloaded when it comes to evidence/fulfilment expectations. To a certain extent, the review panel got the impression that there
might be overlapping between institutional/study programme related aspects. A way out towards providing clarity might be to split the text into criteria and guidelines.

In conclusion, the review panel is of the opinion that the criteria in place addresses requirements deriving from ESG 2015 part 1 adequately. However, since NEAA started in January 2017 with procedures following the new criteria in place, no first analysis of experiences gained has been conducted in a systematised way. At the time of the review it was too early to measure how these criteria are applied in practice. The review panel was convinced during the site-visit that complaints against the new system did not occur so far.

**Panel suggestions for further improvement**

The review panel suggest NEAA to timely collecting feedback and analysing it with regard to applicability and clarity of the new criteria.

**Panel conclusion: Fully compliant**

**ESG 2.2 Designing methodologies fit for purpose**

**Standard:**

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

**2014 full/2015 partial Review: ESG 2.2 Development of External Quality Assurance Processes; ESG 2.4 Processes fit for purpose; Recommendation(s) in short:**

ESG 2.4 (Review 2014): The Panel recommended NEAA to develop strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in its procedures. [...] That NEAA considers how the outputs from its review activities can be further focused to support system-wide institutional quality improvement and enhancement. NEAA was recommended to further strengthen the involvement of students and representatives of professional bodies as full participants, in all stages of the accreditation process. [...] should seek to ensure greater consistency in its involvement of students, in particular with regard to experts' training and their participation in the work of Standing Committees.

**Evidence**

With regard to the recommendations issued in the last review(s) NEAA has progressed in different ways. Whereas it was possible to include, as stated in the following chapter, students at least in SC, progress need to be made, as addressed in the report already with regard to a broader stakeholder involvement in other committees. NEAA has put a lot of effort with regard to the development of its new CS.

The review panel was provided with evidence from SAR and also during the site-visit that NEAA defines and develops all its procedures (mentioned prior) in line with the set legal framework. As it was discussed during the site-visit and presented as well in SAR, NEAA follows the set imperative according to which external quality assurance should foster quality enhancement by quality control and monitoring.
As it is stated in SAR, all developed methodologies, described in NEAA’s documents whether being seen as guidelines or defined procedures for the respective type of procedures, are mutually preconditioned. NEAA states in its SAR that their common and complex character determines both their applicability to all types of accreditation despite specifics and their equal standing with regard to all evaluated institutions.

During the site-visit it was stated that because of NEAA’s active work with stakeholders, the processes/criteria in place have received considerable support. NEAA took opinion of stakeholders adequately into consideration. Rational, imperative laid down in the procedures are widely shared. Only some opinions shared with the review panel pointed out, that the current system should improve for the future to be simplified and less overlapping. From the evidence gained the review panel concluded, that the revision of its CS was an important activity and priority set by NEAA since 2015. An activity, which was not directly included in the strategic plan 2014-2017, but being imposed by the revised ESG 2015. Specifically, NEAA’s AC has adopted a Programme and Action Plan for Implementation of ESG 2015. For the task to be fulfilled, the AC has set up a two working groups (WG on ESG, WG formed by the special Commission for Quality, CQ), which had the liberty to consult as well with external stakeholders (Council of Rectors, BA-MA-PhD Students, researches from scientific organisations, employers from different sectors of business). Findings from meeting with stakeholders were collected and fed into a survey NEAA has carried out; as of SAR special attention was given on student’s opinions regarding the application of the new accreditation criteria. The CQ specifically worked with national representatives of students’ councils. Additionally, discussions with Bulgarian Academy of Sciences and Agrarian Academy were considered as beneficial for the development of criteria for the accreditation of PhD programmes. As elaborated in SAR, NEAA used also its longstanding collaborations with the National Branch Syndicate “Higher Education and Science”. Experts from this syndicate actively contributed to the development of various standards and criteria. Various Chambers demonstrated equal professional collaboration during the whole process of revision of the CS. In October 2016, the AC adopted the new CS, which is supported by a series of procedures, methodological documents and rules for its various accreditation, evaluation and monitoring tasks as referred to before; since January 2017, NEAA is conducting its procedures according to the new CS for its procedures, overall in line with ESG 2015 part 1, overall 208 procedures of various kinds have been conducted until June 2017 following the new CS.

NEAA has developed in addition feedback mechanism (Corrector-system), including dialogue, meetings with e.g. rectors, students, administrative officers, employers. Based upon feedback gained NEAA is aiming to enhance effectiveness of its procedures in place.

As stated above, NEAA is operating according to a fine-meshed system in which programme/institutional procedures followed by post-accreditation procedures a frequently foreseen. Some stakeholders from HE addressed that there might be a danger to increasingly create accreditation fatigue in future and also habituation to the procedures. These statements might result from the need to constantly repeat institutional and programme accreditation, following the same procedures. With regard to this, the review panel repeats the suggestion already made to consider merging institutional and programme accreditation into one single approach (at least for institutions who have undergone already several circles), with stakeholders from HEI.

Responses and opinions shared were diverse, while some would support the idea, others underlined that especially the programme accreditation is of importance. This could probably be because of the fact that results of programme accreditation feed into, the previously mentioned, ranking system of study programmes in Bulgaria. The resulting burden regarding the fact that an institution is constantly in the process of preparing self-evaluation documents, documents for post-accreditation
monitoring and control etc. were discussed and shared. Nevertheless, with regard to this, the opinions from public/private universities were to a certain extend in contrary. As reason for that might be that funding for public HEI takes also into account outcomes from external QA; showing good results (ranking) are considered beneficiary. A connection, which is not that relevant for private HEI; even though ranking results have an impact on students demand to study at a private HEI.

During the site-visit it was stated that especially the process regarding post-accreditation monitoring and control (follow-up procedure) is widely considered as being a very beneficiary and supportive to the further development of internal quality assurance in HE.

Analysis

With regard to designing its methodologies, NEAA follows the set imperative according to which external quality assurance should foster quality enhancement by quality control and monitoring.

The review panel is convinced that NEAA’s aim is using its set methodologies, to create conditions for achieving publicity, accountability, support of institutions in their quality assurance activity, for gathering truthful information on the results of evaluation, for stimulating institutions to continue their policy of quality assurance.

As stated before, all procedures are guided with supportive material and explanations and are mutually agreed with its stakeholders. To an overall extent, it could be understood that the ESG part 1 has been linked with the national criteria defined. For institutional/programme accreditation 12 criteria are applicable, for all other procedures 10 criteria are relevant, which equal ESG part 1.

The relevant stakeholders support the designed and developed methodologies in place. With its sustaining academic dialogue between its stakeholders, NEAA has set a prerequisite for carrying out rhythmical and transparent accreditation processes with predefined stages transparent for all involved. All documentation available is published on the website. The review panel is of the opinion that NEAA has vital interaction with its stakeholders; all changes and further developments are done with stakeholders’ involvement.

Panel suggestions for further improvement

The review panel suggests discussing jointly with stakeholder if and how the current system in place could be made more flexible with regard to programme accreditation, evaluations concerning changes at programme/institutional/faculty level once HEI have demonstrated sufficiently effectiveness of their own internal quality assurance. NEAA, being a core stakeholder in Bulgarian educational policy making, might be in the position to start a discussion process on whether institutional and programme (re)-accreditation may in future be merged into a single process or „lighter“ procedure.

The review panel suggest NEAA to create a simplified synthesis/synopsis document, which displays differences in procedures/criteria linked to its aims and objective at one place. It might be useful to introduce an external view (non-familiar with the Bulgarian rational and imperative on QA) into differences.

Panel conclusion: Fully compliant
ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

2014 full/2015 partial Review: ESG 2.6 Follow-Up Procedures; ESG 3.7 - External Quality Assurance Criteria and Processes; Recommendation(s) in short: ESG 2.6 (Review 2014): That NEAA considers how the wealth of sector information gathered through its follow-up procedures can be deployed to support system wide quality enhancement. ESG 3.7 (Review 2014): [...] The Panel urges NEAA to issue consistent guidance on this policy, for the avoidance of doubt. ESG 3.7 (Partial Review 2015): NEAA should ensure that when the reconstitution of its Standing Committees takes place, student representatives are made full members of all of those committees, on a consistent basis.

Evidence

Concerning the follow-up of recommendations issued in the previous reviews the review panel heard during the site-visit that all stakeholders appreciate the implementation of follow-up procedures – basically the PAMC is considered as valuable and supporting quality enhancement of programmes/institutions. NEAA has put a lot of effort in the development of guidance of methodologies in place. The review panel is of the opinion that NEAA has taken the recommendations into consideration. NEAA has also followed up with the inclusion of students in its SC. The issue is addressed in other chapters as well.

The review panel has to state, that the evidence provided in SAR did not reflect thoroughly on whether all external quality assurance processes include the four steps or not; if not for what rationale.

The review panel learned that NEAA has adopted, in October 2016, a set of documents describing procedures and methodologies in place. The update was necessary because of the development of criteria in line with the ESG 2015 part 1. As it was explained to the review panel, the documents aim to support HEI, EG, NEAA SC, AC in conduction of the various procedures. The overall aim is to provide consistency, transparency and fair procedures. The procedural descriptions have been developed in detail for:

- Institutional accreditation;
  - as for: distant learning > can be assessed in two ways: within an institutional accreditation (following defined procedures) or using an independent procedure based upon HEI request (validity of decision is then in line with those issued for institutional accreditation)
- Programme accreditation of professional fields and doctoral programmes other than those on regulated professions;
- Programme accreditation of majors and doctoral programmes of the regulated professions;
- Project evaluation (opening/transition institutional/programme/faculty etc.);
Post-accreditation monitoring and control (various cases e.g.: grade - 4.00-4.99; 5.00-6.99; 7.00-8.99; 9.00-10.00, after decision on denial; after a proposal for submitted by MES; regulated professions);

In addition, a so-called Supplement to the procedures for institutional/programme accreditation and evaluation projects with reference to art. 88a, para. 3 of HEA has been adopted.

Additional methodological documents have been adopted as well:

- Methodological guidelines for drafting a self-evaluation of accreditation procedures
- Methodological guidelines for the activities of the Expert Group on accreditation procedures of NEAA
- Rules for students and doctoral students, members of the EG for evaluation and accreditation procedures
- Rules for the participation of foreign experts in EG in relation to evaluation and accreditation procedures
- Methodological guidelines on determining/changing the capacity of a higher education institution of a professional field/major from the regulated professions list for institutional and programme accreditation
- Methodological guidelines on the preparation of a report of a higher school about the implementation of recommendation from the institutional/programme accreditation and the implementation of the internal quality evaluation and assurance system for training and academic staff

Overall the review panel learned that the various external quality assurance procedures are in line with the expected four steps’ implementation scheme. The review panel learned from oral evidence provided, that the legally defined duration in which procedures have to be finalised is not always the same. Whereas accreditation procedures have to be finished within 12 months after submission of self-evaluation report to NEAA, an evaluation procedure has to be finished in 5 months. The review panel learned that in case of the programme accreditation, the SC has already a decision-making power, whereas in all other cases this step applies to the AC.

NEAA is supporting the implementation of its procedures with a set of methodological guidelines addressing and supporting HEI, experts, etc. with adequate guidance.

Analysis

The review panel found evidence that NEAA’s various external quality assurance procedures are based on a methodological guidelines and description considered to be as reliable and predefined. The review panel is convinced that NEAA in all its procedures is following the defined steps; all procedural guidance has been developed and agreed upon with stakeholders. Nevertheless it might be needed to evaluate in the future if the guidance provided really supports consistency and efficiency.

NEAA applies a four-step process for its external quality assurance activities, which includes self-evaluation report, external review with a site-visit, publication of the report, follow-up procedure (PAMC). NEAA’s external quality assurance processes are defined in comprehensive methodological documents, explaining criteria, procedures. It has also developed guidance, templates to be used by HEI, EG and its various committees for the concrete procedural steps.
Panel suggestions for further improvement

The review panel suggests NEAA to evaluate its methodological/procedural guidance documents once a sufficient number of procedures have been conducted. Such an evaluation could provide evidence on whether work and efforts really support consistent guidance for all stakeholders involved.

Panel conclusion: Fully compliant

ESG 2.4 Peer-review experts

<table>
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<th>Standard:</th>
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<tr>
<td>External quality assurance should be carried out by groups of external experts that include (a) student member(s).</td>
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</table>

2014 full/2015 partial Review: ESG 3.7: External Quality Assurance Criteria and Processes; Recommendation(s) in short: ESG 3.7 (Review 2014): [...] The Panel urges NEAA to issue consistent guidance on this policy, for the avoidance of doubt. ESG 3.7 (Partial Review 2015): NEAA should ensure that when the reconstitution of its Standing Committees takes place, student representatives are made full members of all of those committees, on a consistent basis.

Evidence

Concerning the recommendation regarding the inclusion of students in its SC NEAA has made progress since 2015. Based upon a decision of AC students are now included in NEAA’s SC.

The review panel learned that NEAA has adopted a document defining the procedure for selection of experts. NEAA is searching for experts both directly asking its stakeholders, and it is frequently publishing a call on its website. Experts in NEAA’s procedures are either from Republic of Bulgaria including representatives of undergraduate and doctoral students or international experts. NEAA has adopted specific rules for the selection/appointment of experts. Besides specific requirements, resulting from a particular external quality assurance procedure, the following applies to all experts. All experts are elected on the basis, as it is stated in SAR, of equal requirements, which are:

- They should be habilitated experts, to have professional experience in education, research or artistic work and in supervising doctoral students,
- They should have scientific and teaching authority in the academic sphere, in design and management of quality management systems, participation in scientific councils and structures,
- They should know normative base of higher education and the accreditation practice of NEAA,
- They should know tendencies in development of education, scientific research and systems of management predominantly of countries in EU,
- They should have declared their consent to participate in accreditation procedures.

With regard to students, involved in NEAA’s procedures mentioned above, NEAA explains that the AC only selects students as experts, who are nominated by Bulgarian National Student Union (NRSU) and by the leadership of HEI. The inclusion of undergraduates and doctoral students in each EG has become a consciously proven policy which has been applied also in the formation of SC. Students are elected according to a decision of AC of July 2015, their membership includes students as full...
members participating in evaluation, accreditation and PAMC of the activity of programmes/institutions. Student should have:

- Very good academic assessment to the moment or to have succeeded in executing their individual plan as doctoral students,
- Be familiar with the normative base of higher education in Bulgaria and in particular of NEAA and follow tendencies in development of education predominantly in the countries of the EU. The review panel learned from SAR and evidence provided during the site-visit that the majority of experts are habilitated university teachers. As explained to the review panel and defined in the agencies rules, experts can be also employers, leading managers in respective professional directions and national companies, human resource units, representatives from branch chambers etc.

With regard to experts with pertinent experience in professions/labour market/employers, the review panel learned that while HEI seem to have a good cooperation with professionals from the labour market, regarding e.g. their involvement in curricula development, reluctance was demonstrated by HEI regarding their inclusion in the accreditation procedures.

The composition of EG is approved by AC of NEAA numbering from 3 to 7 people depending on complexity of procedure.

The inclusion of international experts only applies to institutional accreditation for the time being. Regarding international experts, it was explained that effort for further inclusion in the programme accreditation are considered being too demanding, first and foremost with regard to costs. Fees for experts are, as mentioned before, around €100,-, which would not be acceptable for international experts; in addition, if an international expert cannot speak the national language, costs related to translation work would not be in relation with the procedure, as such. For the time being, and the preferred inclusion into institutional procedures, the agency mainly contacts quality assurance agencies from abroad to recommend experts. As stated above, NEAA has developed:

- Rules for students and doctoral students, members of the EG for evaluation and accreditation procedures.
- Rules for the participation of foreign experts in EG in relation to evaluation and accreditation procedures.

NEAA has established ‘non-conflict’ policies to be followed by experts appointed after proposal from the SC by the AC. Experts sign a contract with the President following the Bulgarian Law of Obligations and Contracts.

NEAA has developed a methodology to train and prepare experts for its procedures. Having in mind the complex structure to be followed in the various procedures, training and preparation is of utmost importance. The review panel learned that members of the AC conduct periodical training sessions including also chairs from the SC and members from the CQ. During these meetings, participants discuss materials, documents related to the legal basis of NEAA, methodological guidelines, samples of reports. The review panel learned, that NEAA has established good practices aiming to create consistence in application of criteria and conduction of procedures. In addition to organised training, experts also experience a briefing directly before a site-visit at HEIs. For this purpose, the AC has adopted a specific briefing programme. The briefing is conducted by the chairperson of the SCs jointly with an expert staff member of the particular SC. The review panel learned from SAR, that the AC has adopted a so-called route, based on methodological guidelines, for the work of EG:
The review panel heard that it seems to be possible to make a career from starting as an expert, followed by being involved in the SCs and further continuing to be member of the AC.

Analysis

NEAA has established procedures in place regarding the selection, training/briefing of experts. The agency has developed clear written guidance for all relevant procedural steps addressing work/involvement of experts. NEAA takes responsibility that experts hold appropriate skills and are competent to perform their tasks.

The review panel would like to point out that NEAA’s experts involved in its procedures are representing widely academia. Academic qualification (habilitation or other) is of high importance. In the whole context of operations of NEAA, it’s rational, imperative to be followed is understandable. However, it is limiting a broader stakeholder inclusion at various levels as discussed before.

Panel recommendations

The review panel would like to follow-up with a recommendation issued during the last ENQA review and recommends accelerating the development of strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in its procedures. This task, of course, requires efforts of all stakeholders involved (MES, HEI).

Panel conclusion: Substantially compliant
ESG 2.5 Criteria for Outcomes

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

2014 full/2015 partial Review: ESG 2.3: Criteria for Decisions; ESG 3.7 External Quality Assurance Criteria and Processes; Recommendation(s) in short: ESG 3.7 (Review 2014): [...] The Panel urges NEAA to issue consistent guidance on this policy, for the avoidance of doubt. ESG 3.7 (Partial Review 2015): NEAA should ensure that when the reconstitution of its Standing Committees takes place, student representatives are made full members of all of those committees, on a consistent basis.

Evidence

With the development of guiding material NEAA has as well followed-up with the previous panels’ recommendation to provide guidance on its policies and methodologies in place.

In line with the amendment of criteria, NEAA has also updated and adopted its methods for evaluation of using NEAA-criteria system in 2016. The document is published in conjunction with other documents on the website. The review panel was impressed by NEAAs efforts made regarding guaranteeing equity, reliability of outcomes from external quality assurance procedures. All criteria for decisions are pre-defined and published. A fine-meshed working approach (cf. criteria before) guarantees that criteria/assessment is interpreted consistently and that it is evidence-based.

The procedural steps define clearly who in the process is expected to deliver what - before either finally the AC is making a decision or the SCs. The statute of NEAA defines responsibilities of the AC and SCs also with regard to decision-making. As it has been explained, the SC makes decision to start a procedure or rejects it, propose nominations of Expert Groups (EG or panels) to the AC, controls the work of the EG, considers the EG reports, takes decisions on accreditation and evaluation procedures in four cases - programme accreditation in professional fields; programme accreditation in scientific majors, other than those included in regulated profession list and in project evaluation for opening professional field, in all other cases, the SC prepares and submits its reports on results to the AC for its decision making. The AC, among other responsibility described in the statues, nominates the EG, makes decisions to concur with or reject what the SC have proposed in their reports. The SC on PAMC carries out post-accreditation monitoring procedures.

The method applied combines the grading scales as defined in HEA (listed above) with verbal estimations according to ENQA assessment scale (full, substantial, partial, and non-compliance). The review panel was impressed to learn that not all criteria have the same relative weight. According HEA (Art. 79, para 2) for institutional accreditation/programme accreditation of professional field/major of the regulated profession the criterion with the highest weight is criterion 5.2 (Scientific, artistic and sports activities of the teaching staff and students’ participation in that activity).

NEAA has developed specific algorithm to assign grades to every criterion. The final evaluation grade is the average of the voting participants’ grades.

According to the law (Art. 79, para 4; 5; 7) the following applies with regard to validity of accreditation decisions:
<table>
<thead>
<tr>
<th>Six Years</th>
<th>Grade of 9.00 to 10.00 (verbal assessment - full compliance as of NEAAs rules)</th>
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<tr>
<td>Five Years</td>
<td>Grade of 7.00 to 8.99 (verbal assessment - substantial compliance as of NEAAs rules)</td>
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<tr>
<td>Four Years</td>
<td>Grade 5.00 to 6.99 (verbal assessment: 4.00 - 6.99 - partial compliance as of NEAAs rules)</td>
</tr>
<tr>
<td>Three Years</td>
<td>Grade 4.00 to 4.99 (verbal assessment: 4.00 - 6.99 - partial compliance as of NEAAs rules)</td>
</tr>
<tr>
<td>Non-Accreditation</td>
<td>Grade 0 to 3.99 (verbal assessment: non-compliance as of NEAAs rules)</td>
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</table>

**Revocation of Institutional Accreditation (Art. 79, para 5)**

HEI has received an assessment from 0 to 3.99 in one of the following criteria:

1. The internal system for assessment and assurance of the quality of education;
2. The profile and qualifications of the faculty. The available facilities for the purposes of education;

**Negative Programme Accreditation (Art. 79, para 7)**

Study programme has received an assessment score less than 4.00 in one or more of the following criteria:

1. Teaching documentation and tuition in the professional area or specialty related to regulated professions;
2. The profile and qualifications of the faculty from the relevant professional area or specialty related to regulated professions;

**Right to Only Teach at Bachelor Level in the Relevant Field or Speciality from a Regulated Profession (Art. 79a, para 1)**

Study programme accreditation resulted with a score between 4.00 and 4.99

**Right to Teach at Bachelor, Master, PhD Level (Art. 79a, para 2) and PhD (Art. 80, para 2)**

Study programme accreditation resulted with a score between 5.00 and 10.00

HEI and organisations as of Art. 47, para 1 are allowed to offer training and confer doctoral degrees in doctoral programmes, which have scored between 8.00 and 10.00 in the programme accreditation exercise.

Table 9: Grading Scheme defined by the law aligned with NEAA’s verbal assessment.

The assessment of each criterion is carried out, pursuant to art. 79, para 3 of HEA with verbal grading: positive / negative. The evaluation is positive if more than half of the members of the AC, who have voted, have given a positive evaluation grade; otherwise, the grade is negative. In addition, the methodology defines that, in case of a negative evaluation of a specific set of criteria (2.1; 5.1; 6.1) occurs, the evaluation project is given an overall negative evaluation grade. A project is granted positive evaluation, if not less than six criteria are evaluated positive, including the set of criteria mentioned before.

Depending on the final results, various PAMC procedures start: Defined for various cases - grade - 4.00-4.99; 5.00-6.99; 7.00-8.99; 9.00-10.00, after decision on denial. The PAMC follows in return its well established and published procedures.

**Analysis**

The review panel concludes, that NEAA is operating within a very complex grading and decision-making scheme. All assessment schemes are accessible to stakeholders, NEAA has published its booklet *NEAA Criteria for Assessment and Accreditation in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* on its website and as well as printed version. This document includes as well the comprehensive assessment schemes.
Rules and responsibilities are clearly defined and documented in writing. The legal framework has a strong impact on grading and final outcomes. NEAA has found a way to align verbal assessment (following ENQA grading) scale with the grading. Stakeholders (MES, HEI) are familiar with the scheme and appreciate its contribution to consistent and fair decision making.

The review panel was, however, wondering why the overall rationale to support enhancement and functioning internal quality assurance at HEI is not reflected in the relative weight of respective criteria. The relative weight is, in accreditation procedures, laid on scientific, artistic and sports activities of the teaching staff and students’ participation in that activity. According to this criteria, HEI either have to demonstrate institutional policies with regard to activities stated or at the programme level, as it is necessary to demonstrate e.g. publications, research outcomes etc.

Panel conclusion: Fully

ESG 2.6 REPORTING

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<tr>
<td>Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.</td>
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2014 full/2015 partial Review: ESG 2.5: Reporting; Recommendation(s) in short: ESG 2.5 (Review 2014): The Panel recommended NEAA to review the current policy of not publishing reports in full and as a priority take the necessary measures to resolve this major deviation from the ESG. ESG 2.5 (Partial Review 2015): The Panel recommended NEAA to provide even more accessible information for stakeholders. The Panel considered it as helpful on whether an introductory statement might be included for each report, giving an executive summary of the judgments, recommendations, and the most significant evaluative information. In the interest of wider communication and transparency, it was also considered as desirable in future, that if resources would not permit it, to publish such a summary in English.

Evidence

The ENQA review 2014 assessed the criterion as a non-compliant. NEAA was recommended, jointly with institutional representative bodies and MES to review the policy of not publishing reports in full and as a priority take the necessary measures to resolve this major deviation from the ESG. The partial review 2015 provided sufficient evidence to assess the standard fully compliant. The 2015 Panel found that NEAA has responded actively and effectively to this recommendation. Previously a major obstacle to publication had been gaining the full agreement of institutions in Bulgaria to report publication. NEAA committed itself to full publication through an internal order of the President. The agency entered into correspondence with the national Conference of Rectors, and secured its agreement, together with that of other stakeholders, to publish reports in full. A formal decision to publish reports, confirming the President’s order, was then taken by the NEAA AC in November 2014. The review panel back then was convinced NEAA having improved their practice regarding publishing reports. Nevertheless, the review panel recommended that the agency should provide more accessible information for stakeholders. NEAA was recommended to assess on whether or not it would be helpful in a medium term to consider introductory statement to be included for each report, giving an executive summary of the judgments, recommendations, and the
most significant evaluative information. In the interest of wider communication and transparency, it would be desirable in future to publish such a summary in English.

The review panel learned that NEAA has developed and supports its EG, SCs including SCPAMC with the report templates. By doing so NEAA provides clear report structure of its different kinds of reports resulting from its external accreditation procedures. The templates allow EG, SCs. to follow a common structure, which aims to provide consistency. All reports have a common core introducing section e.g. EG-reports start with an interlocution to EG (incl. observer from SC), provide information of AC session of appointment of the EG.

The EG report is then further providing information on implementation of recommendations from previous accreditation; verification of fulfilment of criteria applicable for the procedure; attachments (compulsory/optional as defined in the specific rules). Each EG has to present and to discuss its report with SC; in case the SC sees an issue for clarification, the report is submitted back to the EG. The report is as well submitted to the HEI. If there is a need, factual corrections can be made.

The agency took effort to familiarize EG with its expectation towards by what means the report should demonstrate compliance with criteria of NEAA. Trainings and briefing before the site-visit support EGs for their task and using tools (templates) provided.

The SCs report provides information regarding the time schedule/chronology of the procedure conducted; implementation of recommendations from previous procedures; findings and assessment of the implementation of criteria applicable for the procedure; conclusions/draft recommendations of the SC. The report of SC is written on the basis of EG report; the AC is taken its final decision based on EG/SC report. As it was explained to the review panel over the years maybe 10% of reports have been returned from AC back to SC for clarification.

Each final report, which is to be understood as the SC report based on EG report, including the AC decision, is published on NEAA website with a summary in Bulgarian and in English. Concerning decisions, as it was stated in SAR, they are to be considered as official documents in line with requirements as HEA and statutes of the agency. Since the EG report is reflected in the SC report it is not published as a single report, the review panel concluded from the evidence gained that there is no sufficient difference between both reports.

As from the SAR, every six months the Internal Audit Committee, to be seen as an auxiliary unit of NEAA, assesses a final report; the committee organizes meeting with members of SCs and EG. During these meetings outcomes of reviews, issues for further enhancement are discussed.

**Analysis**

According to the evidence provided, NEAA has developed the clear report structures supporting each bodies’ task in the overall assessment procedures. The reports provide HEIs and the general public in a comprehensive way relevant information on outcomes of various assessments. With regard to this, the agency has demonstrated evolving practice. However, from the samples provided to the review panel, it was not clear on whether the name of the EG are as well included in the published reports. In order to enhance quality in HEI in Bulgaria, the review panel is of the opinion that good practices in place by HEI could be pointed out in the final reports.

The review panel is convinced that NEAA has set up mechanism to assure the EG, SC are following rules defined in order to ensure consistent assessment of criteria. However NEAA should strive in the future for a possible revision of its current practice in place according to which the EG report is reflected in the SC report and not being published as a single report – even though that there are no
sufficient differences between both reports. The panel is yet of the opinion that focus should be given to the panel’s findings directly.

**Panel recommendations**

The review panel recommends to reconsider its current practice in place according to which the EG report is reflected in the SC report.

**Panel suggestions for further improvement**

The review panel suggests to include in published reports beside of the chronology as well the names of the EG.

The review panel suggests highlighting areas of good practice especially with regard to the ESG 2015 Part 1.

**Panel conclusion: Substantially compliant**

**ESG 2.7 Complaints and appeals**

| Standard: |
| Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions. |

**2014 full/2015 partial Review: ESG 2.7: Periodic Review - fully compliant; ESG 3.7 (Guideline) External Quality Assurance Criteria and Processes - substantially compliant; Recommendation(s) see above.**

**Evidence**

The review panel learned from the SAR and during the site visit, that NEAA has, as a rather new auxiliary unit, established an Appeal Committee. NEAA is convinced that external quality assurance requires objective and fair evaluation in each accreditation procedure. As it is stated in SAR, NEAA has provided accredited HEI with the opportunity to appeal against infringements occurred in the course of an accreditation procedure. By doing so, NEAA wants to guarantee open, responsible and fair decision-making and as well to protect the rights of students. From the provided evidence it became evident, that the AC has announced (December 2015) publically the setting up of an Appeals Committee; the status and composition of the Committee have been adopted by the AC. The respective plan has been included in NEAA’s Action Plan connected with the Action Plan for Implementation of ESG (point 5).

The Committee consists of two teachers nominated by the National Sector Syndicate “Higher Education and Science”, one student representative of the National Students’ Representation. The Chair is habilitated teacher of law; the mandate of the Committee is three years. The Committee organises its work according the set rules. Appeals to the Committee are reviewed in chronological order. Submitted appeals and student complaints are registered and included in the general register of NEAA.

The status of NEAA has been amended in order to include the Appeals Committee. The review panel was supported with an amendment version of the statues, since the one submitted prior to the site-visit did not include the Appeals Committee. The actual version of the statutes is officially only
available in the Bulgarian language. As of SAR, the Committee follows HEA, the Law on Preventing and Ascertaining of Conflict of Interests (LDASRB), the Code of Ethics of Civil Servants in State Administration, Statues of NEAA, procedures and schedules of operations as defined for various types of procedures and the Code of Ethics of NEAA.

The core task of the Committee is to handle students’ complaints and contestations resulting from accreditation procedures. As being a consulting organ to the AC, it adopts statements of opinion that do not bear upon decision of the AC or the SC. All statements have recommendatory character and are not binding to either the AC or the SC.

As it was stated during the site-visit, due to the fact that NEAA’s decisions are formal decisions which have formal consequences based on legal requirements (HEA), HEIs have the right to directly appeal in front of an administrative court against the decisions of NEAA.

The review panel was also told, that the work of the Committee needs to be further published to the community. As it seems to be the tradition in the past, HEI address still the President directly if there are complaints resulting from a procedure. This tradition seems to be followed-up until the present, since SAR state, that anonymous appeals and documents are not reviewed. Complaints, documents submitted to NEAA are distributed by the President to the respective unit in charge, as it is stated in SAR. The Committee is only handling appeals/complaints, if they are related to the HEA.

Analysis

Overall the review panel appreciates NEAAs’ efforts with regard the establishment of the Committee. However, the SAR and also the evidence provided during the site-visit was lacking clarity with regard to the real means of the Committee.

The review panel is of the opinion that the scope of work and responsibility of the Committee needs to be further clarified and, above all, communicated to the potential claimants. Given that the Committee deals with objections raised about the conduct of the process or those carrying it out, it is rather a Complaint Committee than an Appeals Committee and should perhaps be renamed. In that respect, the students’ complaints possibility is not entirely clarified by the documents and hearings, and the link of those complaints to NEAA would deserve clarification. For these complaints, the setting up of an Ombudsman might be a proper solution.

The possibility of an appeal is, according to its meaning as restated by the ESG, the process allowing HEI to question the formal outcome of a process, for various reasons (lack of sound evidence, improper application of criteria, inconsistent implementation of the processes). This possibility is granted to Bulgarian HEIs since they have access to the judicial system to contest NEAA’s decisions on the merits. This seems sufficient with respect to the ESG, whose function cannot be to impose to national legal systems, in addition to access to judicial courts, the setting up of a supplemental internal “appeal” system. Such an internal system is certainly required by the ESG when the legislation does not allow access to courts, as is the case in some countries, e.g. Switzerland. But where judicial access is granted, this additional requirement would clearly delay the process to a large extent by imposing two appeals procedures, which cannot be the meaning of the ESG. This burden would be all the more unjustified when the internal “appeals” body would not be authorized to issue binding decisions, but only recommendations to the agency, thus forcing an institution to a first “appeal” without a real guaranty of redress. One should not forget, in addition, that a first court decision is normally itself subject to another review by a superior court. This is still another reason to interpret ESG 2.7, as suggested here, as requiring no less than one complaint process and one
appeals process, leaving to the national systems the option - but not the obligation - to set up more possibilities if it is thought proper.

Considered as a whole, the system in place for NEAA offers both a complaint and an appeals process, which is thus what ESG 2.7 requires, as interpreted by the review panel. However, the precise functions of the “Appeals” Committee, especially with regards to students, and a clear communication of the system in place on NEAA website would be necessary.

Panel recommendations

The review panel recommends NEAA to reconsider and clarify the role of the “Appeals Committee” as a Complaint Committee, especially as students complaints are involved, and to communicate in a transparent way to third parties the complaint and appeals procedures that are available, notably on its website.

Panel conclusion: Substantially compliant
CONCLUSION

The review panel has no further additional observations to be reported on. However, it likes to point out again, that SAR, supporting the review panel with first evidence, to some extent, was misleading, which potentially was caused by shortcomings occurring from translation from Bulgarian into English. Additionally, the review panel had to request documents before the site-visit, either due to lacking information in SAR or due to difficulties assessing information directly via embedded external links on the NEAA’s website. Both shortcomings, which have been overcome due to the open communication during the site-visit, would have been diminished, if a final check has been done before submission.

SUMMARY OF COMMENDATIONS

ESG 3.5 Panel conclusion: Substantially

The review panel commends NEEA’s efforts made in development of the information system, aiming to support accreditation processes in an efficient, transparent way.

SUMMARY OF SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 3.3 Panel conclusion: Fully compliant

The review panel suggests NEAA to thoroughly review its pool/list of experts aiming to support a broader stakeholder reflection (labour market/employer) since the pool/list currently reflects first and foremost academia beside of students. In addition, the review panel suggest increasing the inclusion of foreign experts, even though fully aware of the language barriers explained and discussed during the site-visit with this regard.

ESG 3.4 Panel conclusion: Fully compliant

The review panel suggests NEAA to monitor and thematically analyse the new CS in place after a first round of procedures following the new CS, in order to show the progress and problems encountered by higher education institutions/study programmes but as well by EG, SCs, SCPAMS and AC in their work.

The review panel suggests NEAA to analyse developments, trends, areas of good practice and identified/challenges with regard to their impact on constant development of QA activities.

The panel members suggest NEAA to include in its upcoming strategic plan to continue the tradition of regular summary reports in line with its methodology.

ESG 3.5 Panel conclusion: Substantially compliant

The review panel suggests NEAA to fine-tune its structural/organisational charts in such a way that also interconnections of the so-called agency experts with its various committees (as of SAR: auxiliary units with consultative character) are made visible. It should also make clear that the special administration is considered as department dealing with evaluation, accreditation and PAMC. In addition, the structural/organisational chart should also reflect the CQ, the appeals committee, the Committee on Ethics.
The review panel suggests NEAA to strive for better equality (age/gender) at various operational and steering bodies. NEAA's highest steering bodies should not only support the task regarding staff development but also might set a good example and include more women.

**ESG 3.6 Panel conclusion: Fully compliant**

The review panel suggests reflecting on whether it is necessary that - again - the same group of stakeholder compose the CQ.

The review panel suggest to clearly including the CQ in its organizational outline; it might be beneficiary to reconsider the multiple tasks and narrow it down to either being a consultative body or an operative as well.

The review panel suggests reconsidering in what ways eventually Expert staff from department of Evaluation, Accreditation, Monitoring and Control could be stronger assigned to tasks regarding the internal QA.

**ESG 2.1 Panel conclusion: Fully compliant**

The review panel suggest NEAA to timely collecting feedback and analysing it with regard to applicability and clarity of the new criteria.

**ESG 2.2 Panel conclusion: Fully compliant**

The review panel suggests discussing jointly with stakeholder if and how the current system in place could be made more flexible with regard to programme accreditation, evaluations concerning changes at programme/institutional/faculty level once HEI have demonstrated sufficiently effectiveness of their own internal quality assurance. NEAA, being a core stakeholder in Bulgarian educational policy making, might be in the position to start a discussion process on whether institutional and programme (re)-accreditation may in future be merged into a single process or „lighter“ procedure.

The review panel suggest NEAA to create a simplified synthesis/synopsis document, which displays differences in procedures/criteria linked to its aims and objective at one place. It might be useful to introduce an external view (non-familiar with the Bulgarian rational and imperative on QA) into differences.

**ESG 2.3 Panel conclusion: Fully compliant**

The review panel suggests NEAA to evaluate its methodological/procedural guidance documents once a sufficient number of procedures have been conducted. Such an evaluation could provide evidence on whether work and efforts really support consistent guidance for all stakeholders involved.

**ESG 2.6 Panel conclusion: Fully compliant**

The review panel suggest to include in published reports beside of the chronology as well the names of the EG.

The review panel suggest highlighting areas of good practice esp. with regard to ESG 2015 Part 1.
**ESG 3.1 Panel conclusion: Substantially compliant**

The review panel recommends NEEA to thoroughly support its comprehensive, complex operations while revising the current strategic plan in the upcoming period. The revised strategic plan, should especially allow the AC (in cooperation with the GS) to streamline resources, operations in an effective and efficient manner while reflecting the agencies mission.

The review panel recommends considering and expanding its AC to ensure a wider stakeholder involvement in its own governance. If this would need a legal change, NEAA should pro-actively map possible ways forward and take into consideration experience from reconstruction of its SC, which now e.g. includes student members. Additionally, NEAA should strive for at least formalised procedures regarding the now ad-hoc consultations of stakeholders on a working level by AC.

**ESG 3.2 Panel conclusion: Fully compliant**

**ESG 3.3 Panel conclusion: Fully compliant**

**ESG 3.4 Panel conclusion: Fully compliant**

**ESG 3.5 Panel conclusion: Substantially compliant**

The review panel recommends NEAA to put processes in place aiming to develop staff competences further, regarding the needs for being QA professionals.

**ESG 3.6 Panel conclusion: Fully compliant**

**ESG 3.7 Panel conclusion: Fully compliant**

**ESG 2.1 Panel conclusion: Fully compliant**

**ESG 2.2 Panel conclusion: Fully compliant**

**ESG 2.3 Panel conclusion: Fully compliant**

**ESG 2.4 Panel conclusion: Substantially compliant**

The review panel would like to follow-up with a recommendation issued during the last ENQA review and recommends accelerating the development of strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in its procedures. This task, of course, requires efforts of all stakeholders involved (MES, HEI).

**ESG 2.5 Panel conclusion: Fully compliant**

**ESG 2.6 Panel conclusion: Substantially compliant**

The review panel recommends to reconsider its current practice in place according to which the EG report is reflected in the SC report.

**ESG 2.7 Panel conclusion: Substantially compliant**

The review panel recommends NEAA to reconsider and clarify the role of the “Appeals Committee” as a Complaint Committee, especially as students complaints are involved, and to communicate in a transparent way to third parties the complaint and appeals procedures that are available, notably on its website.
In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, NEAA is in compliance with the ESG.

**Suggestions for further development**

The review panel appreciates NEAA’s highly committed contributions to the external quality assurance in Bulgaria. NEAA is without doubt to be considered being a cornerstone in educational policy in Bulgaria. NEAA has used the last years to further develop the criteria in place in line with ESG 2015; a series of documents, methodological guidelines have been developed, convincingly with consultation of its stakeholders. However, the review panel evidenced also that the development might have been made at the risk of losing sight of the general purpose and of quality in HE. Namely, that (internal/external) QA should enable the assurance and improvement of quality of HE (institutions and its provisions). While doing so it is important to provide space for HEI to demonstrate that they have primary responsibility for the quality of their provision and its assurance. A too fine-meshed system might put this idea at risk. With regard to this, the review panel recommends NEAA to become an even more active contributor, facilitator of new ideas, and developments with regard to QA in the EHEA – and transfer them as well to the Bulgarian QA-system. Experiences shared in networks such as ENQA, CEENA from other countries should be discussed in Bulgaria.

The review panel considers it as important to actively work on the broader inclusion of all stakeholders into NEAA’s work. NEAA needs jointly with MES, HEI, to come up with ideas, proposals with regard to increase experts from pertinent professions in external quality assurance.

The review panel found that NEAA, in order to become an even better recognized expert and knowledge-based organisation, needs to actively deploy expertise gained (nationally and internationally) to the system. However, with regard to this, NEAA needs to reconsider staff development approaches including language training, participation of staff in international WG etc. also on the level of so-called expert staff of the agency.

Having in mind the agencies staff (at all levels) with regard to gender and age, NEAA needs to develop action plans regarding better equality at all levels. Also, it needs to define actions regarding the fact that habilitated staff members (at AC, SC-level but probably as well experts from EG; staff irrespective of the contractual relation to NEAA) are close to retirement; new ways to reflect academia in NEAAs’ work needs to be found.
## ANNEXES

### Annex 1: Programme of the site visit

#### 1st Day - 20 September 2017

<table>
<thead>
<tr>
<th>TIMING</th>
<th>TOPIC</th>
<th>PERSONS FOR INTERVIEW</th>
<th>ISSUES TO BE DISCUSSED</th>
<th>LEAD PANEL MEMBER</th>
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<tbody>
<tr>
<td>16.30 - 17.30</td>
<td>Review panel’s kick-off meeting – preparation for the Review MEETING AT: BEST WESTERN HOTEL EUROPE MEETING ROOM</td>
<td>SAR, open issues, preparation of meeting with NEAA resource persons</td>
<td></td>
<td>JMR and ALL Shared</td>
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<tr>
<td>17.30-17.45</td>
<td>Break</td>
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</table>
| 17.45-18.45  | Meeting with resource person from NEAA                                | Mila Penelova ( Former Secretary General, external Consultant to NEAA, Contact coordinator for ENQA)  
               |                                                                         | Prof. Todor Shopov ( External Consultant to NEAA and Expert on international cooperation for NEAA) | Presentation/Clarification of the overall higher education system / History of NEAA / Impact of the overall system on the outline of external QA in Bulgaria background | JMR               |
| 18.45-19.30  | Continue: Review panel’s kick-off meeting – preparation for the Review | Preparation of following days, reflection of meeting with NEAA resource person         |                                                                                        | ALL - Shared      |
| 20.30        | Working Dinner                                                        | Restaurant Hotel                                                                       |                                                                                        |                   |

#### 2nd Day - 21 September 2017

<table>
<thead>
<tr>
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<tr>
<td>8.30 - 8.45</td>
<td>Transfer form Hotel to NEAA office</td>
<td>Panel &amp; ENQA review coordinator</td>
<td>Meeting Hotel Lobby at 8.30</td>
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<tr>
<td>8.45 - 9.00</td>
<td>Preparation for Panel</td>
<td>Panel &amp; ENQA review coordinator</td>
<td>All meetings – NEAA Meeting room</td>
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</tbody>
</table>
| 9.00 – 9.15  | Session 0 / Introduction and Welcome &                                 | Prof. Petya Kabakchieva (President of NEAA as of September 14, 2017)  
<pre><code>           |                                                                         | Prof. Boyan Biolchev (President of NEAA until September 14, 2017)                    | Welcome and practical orientation                                                     | JMR               |
</code></pre>
<table>
<thead>
<tr>
<th>Time</th>
<th>Session</th>
<th>Participants</th>
<th>Topics</th>
<th>Code</th>
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</table>
| 9.15 - 10.00 | Session 1 / Meeting with NEAA managerial level | Prof. Stanka Velichkova (Vice-President of NEAA and a member of the Accreditation Council)  
Mila Penelova (Former Secretary General, external Consultant to NEAA, Contact coordinator for ENQA)  
Prof. Todor Shopov (External Consultant to NEAA and Expert on international cooperation for NEAA) | Higher education in the Bulgaria (external quality assurance) in a wider context  
Future developments, challenges and changes in the external quality assurance in the Bulgaria etc.  
Strategic planning; annual planning; scope of operation  
Resources, activities | JMR |
| 10.00 – 10.30 | Session 2 / Meeting with NEAA staff and managerial level who contributed to self-assessment report | Prof. Stanka Velichkova (Vice-President of NEAA and a member of the AC)  
Prof. Vera Boneva (Member of the AC and Chair of the Quality Commission of NEAA)  
Stoyanka Kireva (Directorate of NEAA Evaluation, Accreditation and Post-Accreditation Monitoring and Control)  
Prof. Todor Shopov (External Consultant to NEAA and Expert on international cooperation for NEAA)  
Mila Penelova (Former Secretary General, external Consultant to NEAA, Contact coordinator for ENQA) | Process and preparation of ENQA review; internal reflection, external consultation/stakeholder view / accountability | MEW |
| 10.30 - 11.15 | Session 3 / Meeting with NEAA managerial level - members of AC holding as well responsibilities in various WG of NEAA | Prof. Stanka Velichkova (Vice-President of NEAA and a member of the AC)  
Prof. Vera Boneva (Member of the AC and Chair of the Quality Commission)  
Assoc. Prof. Boris Stefanov (Member of the AC and Chair of the WG on the Institutional accreditation criteria in accordance with ESG-2015)  
Prof. Ivan Varliyakov (Member of the AC and Chair of the Programme accreditation criteria WG in accordance with ESG-2015)  
Prof. Georgi Kamarashev (Member of the AC and Observer to the Standing Committee on Social and Legal Sciences, Security and | Operation task sharing btw various bodies of NEAA  
Assessment methodologies, procedures and development or methodologies  
Resources, activities  
Expert selection and handling conflict of interest | JMR |
<table>
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<tr>
<th>Time</th>
<th>Description</th>
<th>Participants</th>
<th>Notes</th>
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<tbody>
<tr>
<td>11.15 - 11.30</td>
<td>Break / Discussion among panel members / Preparation for upcoming sessions</td>
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</tbody>
</table>
| 11.30 - 12.15| Session 4 / Meeting with representatives of the Ministry of Education and the Parliamentary Commission on Education and Science | Maria Fartunova, Ph.D. (Ministry of Education and Science - Director Higher Education Directorate)  
Ivana Radonova (Expert from Higher Education Directorate, BFUG member)  
Prof. Ivan Dimov, (Ministry of Education and Science - Deputy Minister) | Accountability, external relations, professional conduct; role in of NEAA in the system  
MS                                                                  |
| 12.15 - 13.15| Lunch Break / including preparation for up-coming sessions                   |                                                                               |                                                                    |
| 13.15 - 14.00| Session 5 / Meeting with representatives of the labour market                | Georgi Shivarov (Deputy Chairman of the Bulgarian Industrial Association) Involved in commission  
Assoc. Prof. Liliya Valcheva (Chair of the National Branch Trade Union “Higher Education and Science” – HES-CITUB) voluntary representative of the agency  
Prof. Ivan Kralov (Member of the Management Board of the Union of Scientists in Bulgaria)  
Boryana Dimitrova (Lawyer and member of the Supreme Judicial Council)  
Ivan Glavinchev (Chamber of engineers in the investment design)  
Georgi Kuzmov (Member of the Supreme Judicial Council) | Accountability  
External relations & stakeholder involvement  
Professional conduct  
Role in of NEAA in the system  
JMR                                                               |
| 14.00 - 15.00| Session 6 / Meeting with students participating in NEAA procedures            | Radoslava Topalska (Student, member of EG/SC on Educational Sciences and Social Activities)  
Svetoslav Mishev (student/member of SC on Social and Legal Sciences, Security and Defence)  
Marina Marinova (student, member of EG/SC on Humanities and Arts)  
Valentin Karabeliev (student, member of EG/SC on Healthcare and Sports)  
Georgi Popov (PhD student, member of EG/SC on Agrarian Sciences and Veterinary Medicine)  
Kaloyan Yovchev (PhD student, member of SC on Natural Sciences, Mathematics and Computing)  
Gabriela Antonova (student member of EG/SC on Agrarian Sciences | Involvement of students in NEAA’s activities;  
Assessment methodology and criteria  
Expert selection and handling of conflict of interest  
Professional conduct, support experts, reporting  
SD                                                                |
Cvete Gergova (student, member of EG/SC on Economic Sciences and Management)
Gabriela Naskova, Vice-Chair, National Assembly of Students’ Council

15.00 - 15.45 Break / Discussion among panel members / Preparation for upcoming sessions

15.45 - 16.45 Session 7 / Meeting with representatives of state and private universities, which have recently undergone a procedure of NEAA

- Prof. Galya Hristova (Rector of Burgas Free University)
- Prof. Reneta Bozhankova (Deputy Rector of Sofia University)
- Prof. Dr Hristo Krushkov (Deputy Rector of the University of Plovdiv)
- Prof. Statty Stattev (Rector of the University of National and World Economy)
- Prof. Slaveiko Gospodinov (Deputy Rector of University of Architecture, Civil Engineering and Geodesy – Sofia)
- Prof. Evdokia Pasheva (General Scientific Secretary, Bulgarian Academy of Science)
- Prof. Ivan Atanasov (Director of Agro-Institute of Agricultural Academy)
- Chief Assist. PhD Kiril Avramov (Deputy Rector of the New Bulgarian University)

Assessment methodology and criteria
Expert selection and handling conflict of interest, professional conduct
Accountability, external relations, professional conduct
Decision making, follow up
Consultancy by agency, feedback, appeal

16.45 - 17.45 Session 8 / Meeting with representatives of the team of experts involved in the procedures of NEAA

- Prof. Siika Kostova (University of Sofia / Expert from the EG/SC on Educational Sciences and Social Activities)
- Prof. Julia Boyadzhieva (Academy of Ministry of Interior - Sofia/Expert from the EG/SC on Social and Legal Sciences, Security and Defence)
- Prof. Ilko Getov (Medical Sofia University / Expert from the EG/SC on Healthcare and Sports)
- Assoc. Prof. Georgi Donev (South-West University “Neofit Rilski” – Blagoevgrad / Expert from EG/SC on Humanities and Arts)
- Prof. Zoya Madenova - (University of Economics – Varna / Expert from EG /SC on Economic Sciences and Management)
- Prof. Plamen Maldjanski (University of Architecture, Civil Engineering and Geodesy – Sofia / Expert from EG/SC on Technical Sciences)
- Prof. Ilia Iliev (Plodiv University/Expert from EG/SC on Natural Sciences, Mathematics and Computing)
- Assoc. Prof. Stamen Dimitrov (University of Forestry / EG/SC

Consideration ESG
Assessment methodology and criteria
Expert selection and handling conflict of interest, professional conduct
Training and briefing
Reporting process
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<td>Panel &amp; ENQA review coordinator</td>
<td>Meeting Hotel Lobby</td>
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</tr>
<tr>
<td>9.00 - 9.45</td>
<td>Session 10 / Meeting with representatives of NEAA staff and managerial level &lt;br&gt; <strong>NB: it turned out during the SV that participants in the sessions, invited by NEAA, did not exactly match the addressed group (NEAA staff / and managerial level)</strong> Prof. Pencheva, Prof. Peneva and Prof. Krastevich are</td>
<td>Mila Penelova ( Former Secretary General, external Consultant to NEAA, Contact coordinator for ENQA) &lt;br&gt; Prof. Todor Shopov ( External Consultant to NEAA and Expert on international cooperation for NEAA) &lt;br&gt; Prof. Velizara Pencheva ( Rector of University of Rousse and until 2015 member of the AC) &lt;br&gt; Prof. Elena Peneva ( University of Architecture, Civil Engineering and Geodesy – Sofia and former SCPAMC member) &lt;br&gt; Assoc. Prof. Todor Krastevich ( Rector - Academy of economics “D.A. Tsenov” and former member PAMC)</td>
<td>Consideration of ESG &lt;br&gt; Operation task sharing btw various bodies of NEAA &lt;br&gt; Activities &lt;br&gt; Independence &lt;br&gt; Assessment methodologies, procedures &lt;br&gt; Resources &lt;br&gt; Integrity QA System ( internal QA)</td>
<td>MS</td>
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<tr>
<td>17.45 - 18.30</td>
<td>Ad hoc Session 9</td>
<td>Prof. Petya Kabakchieva – new President of NEAA (as of September 14, 2017) &lt;br&gt; Prof. Stanka Velichkova ( Vice-President of NEAA and a member of the Accreditation Council) &lt;br&gt; Stoyanka Kireva ( Directorate of NEAA Evaluation, Accreditation and Post-Accreditation Monitoring and Control) &lt;br&gt; Asya Stoyanova ( Chief Expert, Standing Committee on Educational Sciences and Social Activities) &lt;br&gt; Mariela Alexieva ( Chief Expert, Standing Committee on Humanities and Arts)</td>
<td>Presentation of the administrative support software</td>
<td></td>
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<tr>
<td>Time</td>
<td>Event Description</td>
<td>Participants</td>
<td>Consideration Areas</td>
<td>Location</td>
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| 9.45 - 10.30 | Session 11 / Meeting with representatives of the Rectors’ Council                 | Prof. Anastas **Gerdjikov** (Rector of Sofia University)  
Prof. Zapryan **Kozludzhov** (Rector of Plovdiv University)  
Prof. Grigorii **Vazov** (Rector of Higher School of Insurance and Finance)  
Prof. Georgi **Mihov** (Rector of Technical University of Sofia)  | Consideration ESG, Accountability, external relations, professional conduct, decision making, follow up, consultancy by agency, feedback, appeal | JMR      |
| 10.30 - 11.00| Break / Discussion among panel members / Preparation for upcoming sessions         |                                                                                                                                                |                                                           |          |
| 11.00 - 11.45| Session 12 / Meeting with representatives chairs of Standing Committees by areas  | Prof. Emilia **Vassileva** (Chair of the Standing Committee on Educational Sciences and Social Activities)  
Prof. Gosho **Petkov** (Chair of the Standing Committee on Social and Legal Sciences, Security and Defence)  
Prof. Maria **Shishinjova** (Chairwoman of the Standing Committee on Natural Sciences, Mathematics and Computing)  
Prof. Raicho **Ivanov** (Chair of the Standing Committee on Technical Sciences)  
Prof. Boris **Bogov** (Chair of the Standing Committee on Healthcare and Sports)  
Prof. Galina **Mladenova** (Chair of the Standing Committee on Economic Sciences and Management)  
Dimitar **Braikov** (Chair of Standing Committee on Agrarian Sciences and Vet. Medicine)  
Peatya **Janeva** (Standing Committee on Humanities and Arts)  | Consideration ESG Assessment methodology and criteria  
Expert selection and handling conflict of interest, professional conduct, support experts, reporting Decision making, follow up | MS       |
| 11.45 - 12.30| Session 13 / Meeting with representatives of Standing Committee on Post-Accreditation Monitoring and Control | Prof. Iliya **Gyudjenov** (Chairman of the Standing Committee on Post-Accreditation Monitoring and Control)  
Prof. Zlatakivka **Zdравкова** (Member of the Standing Committee on Post-Accreditation Monitoring and Control)  
Assoc. Prof. Gergana **Boyanova** (Member of the Standing Committee on Post-Accreditation Monitoring and Control)  | Consideration ESG Assessment methodology and criteria  
Professional conduct | JMR      |
| 12.30 - 13.00| Lunch Break                                                                        |                                                                                                                                                |                                                           |          |
| 13.00 - 13.45| Session 14 / Meeting with representatives of the general and                       | Stoyanka **Kireva** (Directorate of NEAA Evaluation, Accreditation and Post-Accreditation Monitoring and Control)  
Snezhana **Vladimirova** (Chief Accountant)  | Consideration ESG Accountability  
Operation task sharing btw various | SD       |
<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
<th>Participants</th>
<th>Details</th>
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<tbody>
<tr>
<td>13.45 - 14.00</td>
<td>Break / Discussion among panel members / Preparation for upcoming sessions</td>
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<tr>
<td>14.15 - 15.00</td>
<td>Session 15 / Meeting with representatives of NEAA staff and managerial level to clarify any pending issues</td>
<td>Prof. Petya Kabakchieva (President of NEAA as of 14 September 2017)</td>
<td>Clarification regarding appeal and complaint system</td>
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<td></td>
<td></td>
<td>Prof. Stanka Velichkova (Vice-President of NEAA and a member of the AC)</td>
<td>Clarification concerning processes applied by NEAA</td>
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<tr>
<td></td>
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<td>Mila Penelova (Former Secretary General, external Consultant to NEAA, Contact coordinator for ENQA)</td>
<td>Clarification regarding human resources</td>
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<tr>
<td></td>
<td></td>
<td>Prof. Todor Shopov (External Consultant to NEAA and Expert on international cooperation for NEAA)</td>
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<td></td>
<td></td>
<td>Mariela Alexieva (Chief Expert, Standing Committee on Humanities and Arts, member of the Appeal Committee)</td>
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<tr>
<td>14.45 - 15.30</td>
<td>Panel meeting reparation for the final feedback and debriefing meeting</td>
<td></td>
<td>JMR</td>
</tr>
<tr>
<td>15.30 - 16.00</td>
<td>Session 16 / Final debriefing meeting with NEAA staff and managerial level to inform about</td>
<td>Prof. Petya Kabakchieva (President of NEAA as of September, 14 2017)</td>
<td>Closure of the review, overall feedback</td>
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<tr>
<td></td>
<td></td>
<td>Prof. Stanka Velichkova (Vice-President of NEAA and a member of the Accreditation Council)</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Mila Penelova (Former Secretary General, external Consultant to NEAA)</td>
<td></td>
</tr>
<tr>
<td>Timing</td>
<td>Topic</td>
<td>Persons for Interview</td>
<td>Issues to be discussed</td>
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<tr>
<td>16.00 – 16.30</td>
<td>Panel transfer to Hotel</td>
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<tr>
<td>16.30 – 18.30</td>
<td>Panel meeting / closure of the day (The meeting was held at the Best Western Hotel Europe meeting room)</td>
<td>Reflection on preliminary conclusion, division of labour, detailed timetable and milestones</td>
<td>ALL shared</td>
</tr>
<tr>
<td>19.00</td>
<td>Working Dinner</td>
<td>Restaurant Moma</td>
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</table>

**4th Day - 23 September 2017**

- **9.00 – 11.00** Final wrap-up meeting among panel members, division of labour (The meeting was held at the Best Western Hotel Europe meeting room)
  - Panel & ENQA review coordinator
  - Division of labour, detailed timetable and milestones
  - ALL shared

- **11.00** End of work - Departure of the Panel
**Annex 2: Terms of Reference of the Review**

External review of the National Evaluation and Accreditation Agency (NEAA) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

May 2017

1. Background and Context

The Bulgarian National Evaluation and Accreditation Agency (NEAA or the Agency) is a statutory body for evaluation, accreditation and monitoring of the quality in higher education institutions and scientific organisations aiming at the enhancement of their teaching and research, as well as of their development as scientific, cultural, and innovative organisations.

The Agency monitors the ability of institutions, their main units and branches to provide good quality of education and scientific research through an internal quality assurance system.

NEAA’s mission is to encourage higher education institutions in assuring and enhancing the quality of education they offer by sustaining high academic standards and good education traditions in Bulgaria.

NEAA has been a full member of ENQA since 2008 and is applying for renewal of its ENQA membership.

NEAA is also applying for registration on EQAR. NEAA has been in the Register from 7/10/2009 until 31/07/2013.

2. Purpose and Scope of the Evaluation

This review, will evaluate the way in which and to what extent NEAA fulfils the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015). Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of NEAA should be reconfirmed and with regard to its application for registration in EQAR – to support NEAA’s application to the Register.

The review panel is not expected, however, to make any judgements as regards to the granting of membership.

2.1 Activities of NEAA within the scope of the ESG

In order for NEAA to apply for ENQA membership and for registration in EQAR, this review will analyse all activities NEAA that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

2.2 The following activities of NEAA have to be addressed in the external review:

- Institutional accreditation;
- Programme accreditation, including accreditation of professional fields, majors from the regulated professions and doctoral programmes;
– Evaluation of projects (for the establishment of new higher education institutions or the introduction of new study programmes);
– Assessment of distance learning offers;
– Reviews for altering the capacity of a higher education institution;
– Post-Accreditation Monitoring and Control (PAMC) procedure (in conjunction with institutional and programme accreditation).

As pointed out by EQAR, according to the information obtained, the current legal framework in Bulgaria does not seem to be clear as to whether or not NEAA has a role in recognising/validating external quality assurance procedures carried out by foreign quality assurance agencies, thus the self-assessment report should provide more clarity about NEAA’s (potential) role.

3. The Review Process

The process is designed in the light of the Guidelines for ENQA Agency Reviews and in line with the requirements of the EQAR Procedures for Applications.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by NEAA including the preparation of a self-assessment report;
- A site visit by the review panel to NEAA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel’s and/or ENQA Board’s recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case an additional fee to cover the reviewer’s fee and travel expenses is applied.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.
ENQA will provide NEAA with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards NEAA review.

3.2 Self-assessment by NEAA, including the preparation of a self-assessment report

NEAA is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency’s QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NEAA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

NEAA will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2.5 days. The approved schedule shall be given to NEAA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by NEAA in arriving in Sofia, Bulgaria.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and NEAA.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel’s findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to
each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to NEAA within 11 weeks of the site visit for comment on factual accuracy. If NEAA chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by NEAA, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the EQAR Policy on the Use and Interpretation of the ESG, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

NEAA is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which NEAA expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

NEAA will consider the expert panel’s report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. NEAA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board’s decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by NEAA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether NEAA has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to NEAA and ENQA and until it is approved by the Board the report may not be used or relied upon by NEAA, the panel and any third party and may not be disclosed without the prior written consent of ENQA. NEAA may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership. The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.
6. Budget

NEAA shall pay the following review related fees:

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<tr>
<th>Fee</th>
<th>Amount</th>
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<tr>
<td>Fee of the Chair</td>
<td>4,500 EUR</td>
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<tr>
<td>Fee of the Secretary</td>
<td>4,500 EUR</td>
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<tr>
<td>Fee of the 2 other panel members</td>
<td>4,000 EUR  (2,000 EUR each)</td>
</tr>
<tr>
<td>Fee of 2 panel members for follow-up visit</td>
<td>1,000 EUR  (500 EUR each)</td>
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<td>Administrative overhead for ENQA Secretariat</td>
<td>7,000 EUR</td>
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<td>Experts Training fund</td>
<td>1,400 EUR</td>
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<tr>
<td>Approximate travel and subsistence expenses</td>
<td>6,000 EUR</td>
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<tr>
<td>Travel and subsistence expenses follow-up visit</td>
<td>1,600 EUR</td>
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This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, NEAA will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to NEAA if the travel and subsistence expenses go under budget. The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it. In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

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<tr>
<th>Activity</th>
<th>Date</th>
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<tr>
<td>Agreement on terms of reference</td>
<td>May/June 2017</td>
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<tr>
<td>Appointment of review panel members</td>
<td>June/July 2017</td>
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<tr>
<td>Self-assessment completed</td>
<td>By the end of June 2017</td>
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<tr>
<td>Pre-screening of SAR by ENQA coordinator</td>
<td>July 2017</td>
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<tr>
<td>Preparation of site visit schedule and indicative timetable</td>
<td>August 2017</td>
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<tr>
<td>Briefing of review panel members</td>
<td>August 2017</td>
</tr>
<tr>
<td>Review panel site visit</td>
<td>Late September 2017</td>
</tr>
<tr>
<td>Draft of evaluation report and submitting it to ENQA coordinator for pre-screening</td>
<td>November 2017</td>
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<tr>
<td>Draft of evaluation report to NEAA</td>
<td>December 2017</td>
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<tr>
<td>Statement of NEAA to review panel if necessary</td>
<td>December 2017</td>
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<tr>
<td>Submission of final report to ENQA</td>
<td>January 2018</td>
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<tr>
<td>Consideration of the report by ENQA Board and response of NEAA</td>
<td>February 2018</td>
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<tr>
<td>Publication of the report</td>
<td>February/March 2018</td>
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### Annex 3: Glossary

<table>
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<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tr>
<td>AC</td>
<td>Accreditation Council</td>
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<td>AQ Austria</td>
<td>Agency for Quality Assurance and Accreditation Austria</td>
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<td>BA</td>
<td>Bachelor</td>
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<tr>
<td>CEDIDAC</td>
<td>Swiss Accreditation Council, and Director of the Business Law Centre</td>
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<tr>
<td>CS</td>
<td>Criteria System</td>
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<td>EG</td>
<td>Expert Group</td>
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<td>ENQA</td>
<td>European Association for Quality Assurance in Higher Education</td>
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<td>EHEA</td>
<td>European Higher Education Area</td>
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<td>EQAR</td>
<td>European Quality Assurance Register for Higher Education</td>
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<td>EQAS</td>
<td>Enhancing Internal Quality Assurance Systems</td>
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<tr>
<td>EAAQ</td>
<td>External Quality Assurance</td>
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<tr>
<td>ESF</td>
<td>European Social Fund</td>
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<tr>
<td>ESG</td>
<td>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</td>
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<td>EUA</td>
<td>European University Association</td>
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<td>GS</td>
<td>General Secretary</td>
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<td>NEAA</td>
<td>National Evaluation and Accreditation Agency</td>
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<td>NRSU</td>
<td>Bulgarian National Student Union</td>
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<td>HEA</td>
<td>Higher Education Act (Law on HE Bulgaria)</td>
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<tr>
<td>HE</td>
<td>higher education</td>
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<tr>
<td>HEI</td>
<td>higher education institution</td>
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<tr>
<td>MA</td>
<td>Master</td>
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<td>MES</td>
<td>Ministry of Education and Science</td>
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<tr>
<td>NAKVIS (SQAA)</td>
<td>Nacionalna Agencija Respublike Slovenije za Kokavost V Visokom Solstvus (Slovenian Quality Assurance Agency for Higher Education)</td>
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<tr>
<td>QA</td>
<td>quality assurance</td>
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<tr>
<td>QC</td>
<td>Quality Committee</td>
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<td>IQA</td>
<td>Internal Quality Assurance</td>
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<td>PAMC</td>
<td>Post-Accreditation Monitoring Control</td>
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<tr>
<td>PKA</td>
<td>Polish Accreditation Committee</td>
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<tr>
<td>PhD</td>
<td>Doctor Philosophy</td>
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<td>SAR</td>
<td>self-assessment report</td>
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<tr>
<td>SC</td>
<td>Standing Committee (field of HE)</td>
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<tr>
<td>SCPAMC</td>
<td>Standing Committee Post-Accreditation Monitoring Control</td>
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**Annex 4. Documents to support the review**

The listed documents have been crosschecked with NEAA’s contact person for the ENQA review. During its preparation for the task the review panel was challenged, because the vast majority of links in the SAR did not work adequately. The review panel supposed that references in the SAR are to be considered as important source of evidence. Therefore NEAA was requested to a. either provide documents before the site-visit and b. support the review panel with hard copies of all documents referred to in the SAR and some additional documents, were review panel requested.

**Documents provided by NEAA prior to the site-visit**

- NEAA Self-Assessment Report, as of May 2017, submitted to review panel by July 2017-10-19
- NEAA External-review-report-of-ENQA review, as of March 2014 (full review)
- ENQA letter informing about outcome review 2014, May 2014
- NEAA - External-review-report-of-ENQA review, as of March 2015 (partial review)
- NEAA - ENQA Follow-Up Report, as of March 2016
- ENQA letter confirming full membership as of October 2015

**Strategic documents**

- Higher Education Act 1995, as of 2013
- Statute of NEAA (as of July 3, 2013; latest amendment was not available in English; the review panel was provided on-site with a version incl. appeals committee in English; the specific chapter has been translated during site-visit)
- NEAA’s Strategic Plan 2014-17 (as of October 30, 2014, adopted by Accreditation Council)
- Work plan of the National Evaluation and Accreditation Agency for 2017 (as of February 16, 2017, adopted by Accreditation Council)
- NEAA presentation of the application of the internal quality assurance standards (ESG - Part 1) (as of June 22, 2017)
- NEAA’s System of Quality Assurance (short version) (as of April 30, 2015)

**Overall methodological guidelines (procedures and criteria)**

- NEAA’s Criteria for Assessment and Accreditation in Accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (as of October 20, 2016, adopted by AC. This document is also available as a printed booklet; it was handed out to the review panel during the site-visit. And can be downloaded as well under: [https://www.neaa.government.bg/images/Reports/sbornici/NEAA_sbornik_eng.pdf](https://www.neaa.government.bg/images/Reports/sbornici/NEAA_sbornik_eng.pdf). The document is considered to be as core outcome from the development of new CS.)
- NEAA’s Criteria for Institutional Accreditation (as of October 20, 2016, adopted by AC)
- NEAA’s Criteria for Programme Accreditation of Professional fields and Doctoral programmes other than those on the regulated list (as of October 20, 2016, adopted by AC)
- NEAA’s Criteria for Programme Accreditation of Doctorial programmes (as of October 20, 2016, adopted by AC)
- NEAA’s Procedure for project evaluation and documentation for their implementation (as of October 20, 2016, adopted by AC)
- NEAA’s Criteria for evaluation of projects for opening and transformation of Higher Education Institutions (HEI) (as of October 20, 2016, adopted by AC)
- NEAA’s Criteria for evaluation of projects to open and transform a HEI basic unit (BU) or affiliate (as of October 20, 2016, adopted by AC)
- NEAA’s Criteria for evaluation of projects for opening a professional field / major of the regulated professions (as of October 20, 2016, adopted by AC)
- NEAA’s Criteria on post-accreditation monitoring and control on the implementation of the internal quality evaluation and assurance system for training and academic staff of higher schools (as of 20.10.2016, adopted by Accreditation Council)
- NEAA’s Methodological Guidelines for Drafting a Self-Evaluation Report for Accreditation Procedures (as of October 20, 2016, adopted by AC)
- NEAA’s Methodological guidelines on determining / changing the capacity of a higher education institution for institutional and programme accreditation (as of October 20, 2016, adopted by AC)
- NEAA’s Methodological guidelines on the preparation of a report of higher schools about the implementation of recommendations from the institutional / programme accreditation and the implementation of the internal quality evaluation and assurance system for training and academic staff (as of October 20, 2016, adopted by AC)
- NEAA’s Rules for the participation of foreign experts, members of expert groups for evaluation and accreditation procedures (as of October 20, 2016, adopted by AC)
- NEAA’s Work Rules for students and doctoral students, members of the expert groups for evaluation and accreditation procedures (as of October 20, 2016, adopted by AC)
- NEAA’s Methodological guidelines for the activities of the Expert Group on accreditation procedures of the National Evaluation and Accreditation Agency (as of October 20, 2016, adopted by AC)
- NEAA’s Programme for briefing the members of expert groups in relation to evaluation and accreditation procedures (as of October 20, 2016, adopted by AC)
- NEAA’s Example of an Expert Group Report (as of November 10, 2016, adopted by AC)
- NEAA’s Example of a Standing Committee Report (as of November 10, 2016, adopted by AC)
- NEAA’s Procedure for selection of experts (as of January 15, 2009, adopted by AC)
- NEAA’s Corrector Feedback (as of April 30, 2015, adopted by AC)
- NEAA’s Rules of Procedure of the Committee on Students’ Complaints and Challenges to Accreditation Procedures (as of December 3, 2015, adopted by AC)
- NEAA’s Guidelines and Criteria for assessment of distance learning in a professional field (as of March 9, 2017, adopted by AC)
- NEAA’s Criteria for defining the capacity of the HEI (as of March 9, 2017, adopted by AC)
- NEAA’s Procedure for changing the capacity of a HEI and documentation on their implementation (as of March 9, 2017, adopted by AC) NEAA Templates of Reports
DOCUMENTS PROVIDED BY NEAA DURING THE SITE-VISIT

(NB: All documents names as of provided by NEAA, sorted by area done by review panel)

Strategic documents / background

- Document referring the development strategy of NEAA for the period 2014-2017 (NB: Document explains background of strategy plan for indicated period)
- NEAA Analysis on the budget implementation (revenues and expenditure 2013-2016)
- Action plan for the commission for quality assurance of the activities of NEAA in 2017 (NB: Work plan of CQ for on-going year)
- Rules of procedure of the quality assurance commission of the performance of NEAA (NB: Rules of procedures of the CQ’s performance have been updated in accordance with the Programme for the Implementation of Standards and Guidelines for Quality assurance in the EHEA, adopted by AC, October 20, 2016 - see above)
- Commission on student complaints and challenges of accreditation procedures
- A brief presentation of the application of the internal quality assurance standards (ESG part 1) by NEAA (in connection with annex 4 of “Use and Interpretation of ESG for Agencies in the European Quality Assurance Register for Higher Education) (NB: Rational concerning reflection of ESG part 1 in NEAA criteria)
- A brief overview of the state and trends of higher education system and the quality assurance of higher education in the context of the agency (NB: To be considered as thematic analysis)
- Resolutions of the accreditation council of November 10, 2016 (minute of meeting no. 24) (NB: Minutes from AC meeting, where important decisions regarding the implementation of new criteria system have been taken)
- Voting rules for accreditation and project evaluation procedures (NB: Voting rules have been adopted in February 5, 2015; supplemented in June 11, 2015 and November 11, 2016 and repeal all existing internal voting rules)
- Reference for evaluations under 9.00 for programme and institutional accreditation, refusal to evaluate projects and doctoral programmes for 2014-2017
- Information on Post-Accreditation Monitoring and Control (PAMC) procedures for the period from 2014 to July 2017 (non-fulfilment, non-compliance with criteria, sanctions applied)
- Summary Report on the Activities of NEAA for the Period 2014-June 2017 / Based on a comparative analysis
- National Qualification framework of the republic of Bulgaria

Documents related to procedures

NEAA has provided to the review panel hard copies of criteria, methodological guidelines, work rules for experts, programme for briefing etc. this documents are either part of the booklet mentioned above or could be retrieved by the review panel prior to the site visit. (available under: https://www.neaa.government.bg/images/Reports/sbornici/NEAA_sbornik_eng.pdf.)

- Experts list (Habilitated persons, students and PhD students, international experts, users of cadres and practitioners) (list only in Bulgarian language)
- Question asked by the Members of the EG during a visit to the applicant institution in procedures for programme accreditation of a professional field
Example reports:

- Sample template - Assessment fiche on the institutional accreditation procedures
- Sample template - EG report to be submitted to the SC - on the “inspection carried out under an institutional accreditation procedure of HS....”
- Sample template - SC report to be submitted to the AC on the “results of the completed evaluation under institutional accreditation procedures of HS...”
- Report of the Standing Committee on Social and legal Sciences, Security and Defense of the Results of the completed evaluation under an Institutional Accreditation Procedure of Burgas Free University
- Report on the review performed under the procedure for programme accreditation of professional field 3.4 Social activities, higher education area 3. Social, Economic and Leagal Sciences, in Shumen University “EP. Konstantin Preslavski” (NB: submitted as well before site-visit)
- Report on the completed inspection under a programme accreditation procedure of a PhD Programme “Philosophy of History” from the professional field 2.3 Philosophy, an area of higher education 2.Humanitarian Sciences, at Sofia University “St. Kliment Ohridski” (NB: submitted as well before site-visit)
- Report of the Standing Committee on Health and Sports on the Result of the completed Evaluation of a project for opening a specialty from regulated professions “medical assistant” of the educational-qualification degree “Bachelor” from a professional field 7.5 Health Care at “Prof. Dr. Ivan Mitev” Vratsa Branch of the Medical University Sofia

Other sources used by the review panel

Brochure - Bulgarian University rankings (handed over by repr. form MES); document also available on http://rsvu.mon.bg/
## Annex 5. NEAA's Mapping of Accreditation Criteria with ESG 2015 Part 1

NB: Contents as provided by NEAA

<table>
<thead>
<tr>
<th>Criteria for institutional accreditation</th>
<th>Criteria for programme accreditation of a professional field / a speciality from the regulated professions in correspondence</th>
<th>Criteria for programme accreditation of doctoral programmes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.1</strong> The HS has a documented, publicly announced, with an official status and accountability policy for quality assurance as part of the strategic management of the educational institution in the interest of public needs. The criterion is in line with ESG 1.1. It is used to evaluate the application of ESG 1.1 by analysing how the content of the criterion is fulfilled: The HS’s responsibility for the development of quality culture; building internal structures for developing and implementing quality assurance policy and involving students and stakeholders; the organizational and functional structure of HS; the level and interrelation between education and research; respect for academic freedoms, intolerance to discrimination and academic fraud.</td>
<td><strong>1.1.</strong> In carrying out training in the professional field/specialty from the regulated professions a quality assurance policy is supported and developed, which is disclosed and is part of the strategic management of the higher school. The criterion is in line with ESG 1.1. It is used to evaluate the application of ESG 1.1 by analysing how the content of the criterion is met: for the organization of training in the professional field in selected educational and qualification degrees and forms of training in accordance with the mission, objectives and tasks of the HS; requirements of the institutional quality system to the overall activity of the professional field / specialty from the regulated professions taking into account their specifics; the applied policy for the implementation of the interrelationship between research and training within the national and institutional context.</td>
<td><strong>1.1.</strong> The higher school or scientific organization has a publicly announced, with an official status and accountability policy for ensuring the quality of training in the doctoral programme. The criterion is in line with ESG 1.1. It is used to evaluate the application of ESG 1.1 by analysing how the content of the criterion is met: the higher school or scientific organization organizes training in the doctoral programme in accordance with its mission, objectives, tasks and current legislation; the training in the doctoral program is subordinate to the institutional quality system, without neglecting its specificity; the policy for implementing the interrelationship between research and training in the doctoral programme; an ethical code to ensure academic unity; guaranteeing academic freedoms and intolerance towards discrimination; prevention and sanctioning fraud and plagiarism.</td>
</tr>
<tr>
<td><strong>1.2</strong> The HS supports an internal system for the quality of education and academic staff, which includes studying student opinion, as well. The criterion is in line with ESG 1.1. It is used to evaluate the application of ESG 1.1 by analysing how the content of the criterion is met: the effectiveness of the HS’s internal system for assessing and maintaining the quality of education; the availability of existing internal audit procedures and an operational Coordination and Control</td>
<td><strong>1.2 Management of education quality.</strong> The criterion is in line with ESG 1.1. It is used to evaluate the application of ESG 1.1 by analysing how the content of the criterion is met: organization for quality management of the learning process and related teaching activity; the application of the rules of an ethical code to ensure academic unity, guaranteeing academic freedoms and intolerance to all forms of discrimination; rules and procedures for the prevention and sanctioning cheating and plagiarism.</td>
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<tr>
<td>2.1. The HS establishes and applies procedures for the development, approval, monitoring and updating of the training documents of the professional fields and the relevant majors (qualifications, curricula and programmes, etc.) with the assistance of the interested parties.</td>
<td>2.1. The HS carries out training in the professional field/speciality from the regulated professions by applying procedures for developing, approving, monitoring and updating the academic documentation (qualification characteristics, curricula and programs, etc.) with the assistance of representatives of partner organizations, students and other stakeholders.</td>
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<tr>
<td>The criterion is in line with ESG 1.2. It is used to evaluate the implementation of ESG 1.2 by analysing how the content of the criterion is met: developing programmes in line with the HS and the four higher education objectives of the Council of Europe; the determination of the professional qualification for the individual educational degrees based on the development of the labour market; the organization of education in selected educational and qualification degrees and forms; conditions for learning support, for the development of students by providing them with academic knowledge and skills contributing to their educational and professional development; compliance with European, national and institutional regulatory requirements are defined in the structure of the curricula, the name of the subjects, the structure of the academic year; the allocation of study credits; the regulation of manufacturing traineeships and learning practices.</td>
<td>The criterion is in line with ESG 1.2. It is used to evaluate the implementation of ESG 1.2 by analysing how the content of the criterion is b fulfilled: the programmes developed in accordance with the institutional strategy, with clearly expressed learning outcomes; the professional and general competencies, the training and qualification obtained for the individual EQDs; analyses of potential jobs and national and international surveys, on the development of the labour market; the evaluation system of learning outcomes and acquired competencies; results of specific procedures for monitoring, analysing, evaluating and validating curricula and common learning curricula; drafting and updating stakeholder programmes; compatibility with curricula of other HEIs in Bulgaria, EU or outside the EU, allowing mobility for students and graduates of the relevant specialty; compliance with national and institutional regulatory requirements for the content of curricula in the professional field.</td>
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<tr>
<td>3.1. Methodological standards for academic documentation (curricula and programmes) and standard (procedure) for changes in the academic documentation that are related to stimulating the motivation and commitment of student to the</td>
<td>3.1. There is a system of rules and activities related to stimulating the motivation and active position of the students in the process of training in the respective professional field/speciality from the</td>
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<tr>
<td>3.1. There is a system of rules and activities related to stimulating the motivation and active position of PhD students in the process of training and conducting research, as well as preparation of their</td>
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<tr>
<td>Training process have been officially adopted.</td>
<td>Regulated professions.</td>
<td>Thesis.</td>
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<tr>
<td>The criterion is in line with ESG 1.3. It is used to evaluate the application of ESG 1.3 by analysing how the content of the criterion is met: analysing the relevance of the training material, taking into account students' and users of staff' opinions; the procedures for improving curricula; the established organization for the maintenance and development of modern forms and methods of teaching, practices for encouraging innovative research and the use of interactive forms of multimedia products; analysing and publicizing the achievements of students; the published system for conducting examination procedures for assessing the knowledge and skills of learners; the functioning of a student complaints handling procedure.</td>
<td>The criterion is in line with ESG 1.3. It is used to assess the application of ESG 1.3 by analysing how the content of the criterion is fulfilled: conducting the training of the students according to the current requirements and according to the educational mission, objectives and tasks of the professional field / specialty o from the regulated professions; the organization of involving students in practical activities stimulating their creative activity; use of clear modern and publicly disclosed methods for assessing students' achievements and reporting their degree of interest; the publicly-announced system for conducting test procedures and on-going monitoring; periodic analysis of the effectiveness of processes related to the quality of the training process; the rules and actions of a Students' appeals committee.</td>
<td>The criterion is in line with ESG 1.3. It is used to evaluate the application of ESG 1.3 by analysing how the content of the criterion is met: the preparation of PhD students is implemented through modern teaching forms and methods and using scientific achievements; PhD students are trained through various individual and collective forms under the supervision of the scientific manager to observe the individual plan; all the basic stages in the preparation of the thesis are fulfilled, and the results of the research activity are periodically reported to the training unit seminar; publicly disclosed, clear and up-to-date methods for assessing the achievements of PhD students; rules and actions of a Committee for examining complaints from PhD students.</td>
</tr>
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</table>

4.1 Structures and internal regulations (rules, regulations, and instructions) have been developed for the functioning of the system - from students' admission to their graduation and professional implementation.  

The criterion is in line with ESG 1.4. It is used to evaluate the implementation of ESG 1.4 by analysing how the content of the criterion is fulfilled: the conditions created for informing and directing students about the opportunities offered by the HS for their shaping as specialists, as well as for promoting the mobility of students; the inclusion of students and PhD students in research projects in the main units of the HS and its research structures; rules on the academic recognition of periods of study and practice abroad related to student mobility in the framework of contractual relations with foreign higher education institutions and

4.1 The institution publishes to the public the adopted by it documents outlining the life cycle of the student: admission to the appropriate professional field/speciality from the regulated professions, development, recognition and graduation, as well as evidence of their consistent and transparent implementation.  

The criterion is in line with ESG 1.4. It is used to assess the application of ESG 1.4 by analysing how the content of the criterion is met: the organization for attracting, admitting and adapting Bulgarian and foreign students and PhD students; practices for the recognition of higher education qualifications, both across the country and in the European region; rules for the academic recognition of periods of study and practice abroad related to student mobility in the framework of contractual relations with foreign higher education institutions and European

4.1 Structures have been developed and internal normative documents (rules, regulations, instructions) for the functioning of the system have been worked out - from the admission of PhD students, including to and after their professional fulfilment.  

The criterion is in line with ESG 1.4. It is used to evaluate the application of ESG 1.4 by analysing how the content of the criterion is met: procedures and practice for consistent implementation of predetermined and published regulations covering all phases of the PhD student's life cycle, e.g. admission, development, recognition of periods of study and graduation of PhD students; rules for including PhD students in the implementation of research projects; mobility opportunities for PhD students, incl. periods of study at other HEIs or
<table>
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<tr>
<th>European education programs; the established administrative system for registering the implementation of graduates and PhD students.</th>
<th>programs; inclusion of students and PhD students in the implementation of research projects; compliance with the requirements for the content of the basic documents for education and training issued by the higher school; active system for registering the professional fulfilment of graduates and PhD students.</th>
<th>scientific organizations, participation in national and international scientific forums; an administrative system for registering the course of doctoral studies and the fulfilment of graduates.</th>
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<tbody>
<tr>
<td>5.1. The HS has developed a policy to provide a qualitative academic staff that is part of the institution’s development strategy. Profile and qualification of the teaching staff. The criterion is in line with ESG 1.5. It is used to assess the application of ESG 1.5 by analysing how the content of the criterion is fulfilled: the presence of high-level teaching staff, the share of habilitated teachers, the structure, incl. age of the teaching staff; the created environment; clear employment procedures and conditions for the professional development of staff.</td>
<td>5.1 The HS has developed a policy to provide quality academic staff by applying transparent procedures as part of the strategy for the development of the professional field/speciality from the regulated professions. The criterion is in line with ESG 1.5. It is used to evaluate the application of ESG 1.5 by analysing how the content of the criterion is met: publicly disclosed specific and transparent procedures that meet the legal requirements for the recruitment of qualified teachers providing training in the professional field / speciality from the regulated professions; a functioning system for appraising and promoting the career development of lecturers and for promoting academic mobility within the framework of European programmes and bilateral cooperation.</td>
<td>5.1. The higher school or the scientific organization has developed a policy to provide a qualitative academic staff to prepare PhD students, which is part of the institution’s development strategy. The criterion is in line with ESG 1.5. It is used to evaluate the application of ESG 1.5 by analysing how the content of the criterion is met: PhD students are trained by habilitated lecturers with the required profile and proven qualification in the field of the doctoral programme; the presence of an academic staff of basic employment contracts whose qualifications and professional experience provide a productive academic environment for research; established practices and successful performances in the field of doctoral studies and / or in the professional field to which it belongs.</td>
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<tr>
<td>5.2. Scientific research, artistic and creative and sporting activities of the academic staff and the participation of the trainees in this activity. The criterion is in line with ESG 1.5. It is used to assess the implementation of ESG 1.5 by analysing how the content of the criterion is fulfilled: the procedures developed by the HS to increase the level of scientific research and its links to educational activity; the established policy that creates conditions for competitive research and publicity.</td>
<td>5.2 The scientific research and artistic, creative activities of academic staff and the participation of students and PhD students in it. The criterion is in line with ESG 1.5. It is used to assess the application of ESG 1.5 by analysing how the content of the criterion is met: the participation of lecturers and students in scientific research and artistic, creative activities; the publishing activity of lectures in national and foreign reference journals.</td>
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</table>
6.1. The HS provides and develops the technical and information facilities necessary for the teaching, research, artistic and creative activities and sports activities, as well as an appropriate environment for distance learning.

The criterion is in line with ESG 1.6. It is used to evaluate the application of ESG 1.6 by analysing how the content of the criterion is fulfilled: planning, allocation and provision of material, technical and information resources for training and support for students; providing the HEI with the necessary human resources from the academic staff to support students in the educational process; opportunities to raise staff competencies; administrative servicing of students; the resources provided for the implementation of innovative practices in training and teaching.

7.1. In accordance with its mission, the HS collects and analyses information on the activities of internal structures for the development and implementation of quality assurance policy involving external stakeholders.

The criterion is in line with ESG 1.7. It is used to evaluate the application of ESG 1.7 by analysing how the content of the criterion is met: taking into account the aggregated opinion of the students’ representatives, trade union and consumer organizations involved in internal audit teams; the HS analyses information about the educational and professional fields / specialties from the regulated professions; access to scientific databases.

<table>
<thead>
<tr>
<th>6.1. The higher school or scientific organization develops the material and technical and facilities necessary for the teaching and learning, research, artistic and creative activities.</th>
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<tbody>
<tr>
<td>6.1. There are also a continuously evolving financial, material and facilities necessary for the teaching, research, artistic and sports activities in the professional field/specialty from the regulated professions, as well as an appropriate environment for distance learning if they carry out such.</td>
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</table>

The criterion is in line with ESG 1.6. It is used to evaluate the implementation of ESG 1.6 by analysing how the content of the criterion is met: the institution of higher education has the necessary capacity of audiences, offices, laboratories, ateliers, libraries, etc., creating academic conditions for doctoral work; Experiments, practices, expeditions, creative trips, etc. are provided; activities necessary for the preparation of theses; PhD students have access to relevant scientific publications and databases; stimulating the research and creativity of PhD students, publishing their results in reputable international journals.

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<tr>
<th>6.1. The higher school or the scientific organization has an established organization for managing the information related to the training and implementation of PhD students.</th>
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<tr>
<td>7.1. The institutions of higher education have an organization for managing the information related to the implementation of training in the professional field/specialty from the regulated professions and the subsequent employment of graduates.</td>
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<tr>
<td>7.1. The higher school or the scientific organization has an established organization for managing the information related to the training and implementation of PhD students.</td>
</tr>
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</table>

The criterion is in line with ESG 1.7. It is used to assess the implementation of ESG 1.7 by analysing how the content of the criterion is met: collected and analysed information on: the work of internal structures for the development and implementation of quality assurance policy involving external stakeholders countries; the procedures for
financial resources in support of the professional preparation and development of students; the effectiveness of the methods applied in the internal quality assurance system; the procedures for updating the academic documentation and curricula; students' success rate and the percentage of discontinued students and dropouts; Student opinion reported on regular surveys at least once a year; use feedback from staff users' opinion surveys.

the students and the dropout rate; student satisfaction with programmes; learning resources and available support for students; career development of graduates; information on the assessment of the users for the preparation of the graduates in the specialty; the link with alumni and information about the world achievements in the professional field / specialty from the regulated professions and the up-to-datedness of the offered teaching material.

approving and updating the doctoral study documentation; the development and success of PhD students; the satisfaction of doctoral students with the quality of training; learning resources and available support for PhD students; the career development of graduate students; public disclosure of the effectiveness of outcomes related to the training management and change needs.

8.1. The HS publishes information about:

- adopted programming documents and academic documentation;
- decisions and results of audits related to the quality of students and academic staff's training;
- decisions by academic and faculty councils;
- university forums involving representatives of students, trade unions and consumer organizations.

The criterion is in line with ESG 1.8. It is used to evaluate the application of ESG 1.8 by analysing how the content of the criterion is met: providing clear, accurate, objective, up-to-date and easily accessible information on all activities related to training in the professional field / specialty from the regulated professions.

8.1 The institutions of higher education publish clear, accurate, objective, up-to-date and easily accessible information on all activities related to training in the professional field / specialty from the regulated professions.

The criterion is in line with ESG 1.8. It is used to evaluate the application of ESG 1.8 by analysing how the content of the criterion is met: a system to promote up-to-date and complete information on educational, research and artistic-creative activity; assisting information through the "life" cycle of student education; the training conditions, the qualification forms and the perspectives for professional fulfillment; the promotion of scientific production and the creativity of students and lecturers, and the disclosure of mobility conditions for students and lecturers.

8.1 The HS publishes information about:

- adopted documents and academic documentation of the doctoral programme;
- decisions and audit results related to the quality of training of PhD students and academic staff;
- decisions by academic and faculty councils;
- university forums with the participation of PhD students.

The criterion is in line with ESG 1.8. It is used to evaluate the application of ESG 1.8 by analysing how the content of the criterion is met: the HS (the scientific organization) provides procedures and practice for the sustainable publication of the necessary information about the possibilities and achievements in the research in the field of the doctoral programme; information on PhD students mobility programmes; presenting the innovative results of the doctoral programme to broad and authoritative international forums in Bulgaria and abroad.
results of internal and external audits; results and measures taken after surveys conducted among students on the quality of training and teaching staff; the results of surveys conducted among students and employers on the implementation and employment of graduates.

9.1. Regular monitoring (review) and updating of training programmes, in line with the evolution of scientific knowledge and technology.

The criterion is in line with ESG 1.9. It is used to assess the implementation of ESG 1.9 by analysing how the content of the criterion is met: compliance of training programmes with the economic and social needs of society; the training programmes approved for a particular academic cycle should not have structural or targeted deficiencies requiring their change within the relevant academic cycle; the programmes’ monitoring should ensure the provision of information necessary for their qualitative changes and improvements; changes in the programmes to be justified with regard to the skilled workforce offered on the labour market; the involvement of teachers, students and employers in the monitoring, review and revision of training programmes.

10.1. The HS carries out planned self-assessment activities and external evaluations of all training programmes.

The criterion is in line with ESG 1.10. It is used to assess the application of ESG 1.10 by analysing how the content of the criterion is fulfilled: regular self-assessments and external audits of HEIs by agencies recognized at national and international level;

9.1 The institutions of higher education carry out regular monitoring (review) and updating of training programmes, in line with the evolution of scientific knowledge and technology, training in the professional field /speciality from a regulated profession.

The criterion is in line with ESG 1.9. It is used to evaluate the implementation of ESG 1.9 by analysing how the content of the criterion is met: quality management and monitoring system of the training process, including up-to-datedness of the training programmes; active position of students in the process of their professional training; achievements of students; the quality of teaching relative to modern requirements; the organization and opportunities for dynamic change of the educational environment; the opinion of students about the quality of the acquired knowledge and the perspective of their professional fulfilment; monitoring student success and actions taken to promote it.

10.1 The institutions of higher education carry out planned self-assessment and external evaluation activities on all training programmes in the professional field /speciality from the regulated professions.

The criterion is in line with ESG 1.10. It is used to evaluate the application of ESG 1.10 by analysing how the content of the criterion is met: self-assessments and external audits of doctoral programmes.

The criterion is in line with ESG 1.10. It is used to evaluate the application of ESG 1.10 by analysing how the content of the criterion is met: the HS (scientific organization) provides regular monitoring, periodic review and timely updating of PhD programmes; procedures and practices in planning and implementing activities to increase the effectiveness of the doctoral programmes.
following the accreditation procedure, to ensure that the progress achieved since the last external quality assurance activity is taken into account in the preparation of the next accreditation; the procedures adopted and applied for taking action on and related to the results of programme accreditation.

| agencies recognized at national and international level and the implementation of recommendations made; the state of the professional field / specialty from the regulated professions in the conditions of a competitive environment; the participation of lecturers from other higher schools and users in the semester and state examination committees, with the purpose of feedback on students' achievements; specific results related to the improvement of the professional field / specialty from the regulated professions after a post-accreditation monitoring and control procedure. |

external quality assurance procedure, incl. doctoral programmes in accordance with the ESG and the criteria of NEAA.
<table>
<thead>
<tr>
<th>Criteria for evaluating projects for opening and transformation of Higher Schools (HS)</th>
<th>Criteria for evaluating projects for opening and transformation of a basic unit (BU) or a branch (B) of a Higher School (HS)</th>
<th>Criteria for evaluating projects for opening a professional field/speciality from the regulated professions</th>
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<tbody>
<tr>
<td><strong>1.1.</strong> The project has announced the quality assurance policy of the HS as part of the strategic management of the educational institution and the academic priorities of the HS in accordance with the requirements of the Higher Education Act (HEA) and the Strategy for Development of HSSs in the Republic of Bulgaria. The mission is defined, the need exists at the national and regional level and publicly acceptable goals are set for the establishment or transformation of a HS. The criterion is in line with ESG 1.1. It is used to evaluate the application of ESG 1.1 by analysing how the content of the criterion is met: the responsibility of the higher school and its basic units for the development of quality culture; the internal structures developed for the adoption and implementation of quality assurance policies, including external stakeholders; the envisaged way of management that guarantees responsibility for respecting academic freedoms and creates conditions for intolerance to discrimination and frauds; the attached draft internal system for quality assurance of training and academic staff; the formulated functions and structure of the quality assurance system; the determined order for studying student opinion at least once per an academic year and the manner of disclosure of the results thereof; the internal quality audit procedures developed and the establishment of an operational coordination and control commission.</td>
<td><strong>1.1.</strong> In the project, based on the quality assurance policy announced by the HS, as part of the strategic management of the educational institution and the academic priorities of the HS, the mission has been defined, the existence of a need at national and regional level for opening or transformation of a basic unit of a higher school or a branch. The criterion is in line with ESG 1.1. It is used to assess the application of ESG 1.1 by analysing how the content of the criterion is fulfilled: the university's responsibility for the quality of the offered training in the professional field / specialty from the regulated professions; the need for training at national and regional level; compliance with the legal requirements in achieving the specific objectives of the professional field / specialty from a regulated professions; planned interconnection between research and training; declared intolerance to all forms of discrimination and planned procedures for the prevention and sanctioning exam cheating and plagiarism.</td>
<td><strong>1.1</strong> The project has announced the policy of the HS for ensuring the quality of training in the professional field/speciality from the regulated professions as part of the strategic management of the higher school. The criterion is in line with ESG 1.1. It is used to evaluate the application of ESG 1.1 by analysing how the content of the criterion is fulfilled: the university's responsibility for the quality of the offered training in the professional field / specialty from the regulated professions; the need for training at national and regional level; compliance with the legal requirements in achieving the specific objectives of the professional field / specialty from a regulated professions; planned interconnection between research and training; declared intolerance to all forms of discrimination and planned procedures for the prevention and sanctioning exam cheating and plagiarism.</td>
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2.1. The project includes procedures for developing, approving the academic documentation of the professional fields and relevant specialities (qualifications, curricula and programmes, etc.) with the assistance of interested parties.

The criterion is in line with ESG 1.2. It is used to evaluate the application of ESG 1.2 by analysing how the content of the criterion is fulfilled: the training programmes are developed in accordance with the HS’s strategy, the expected learning outcomes and the procedures for institutional approval; the analysis of potential jobs in the definition of professional qualifications, the study of employers' opinions and conclusions of national and international studies on the labour market developments; the planned training in the selected degrees, the forms of training; upgrading the qualification in accordance with the mission of the HS; objectives, tasks and capacity set; to what extent each draft training programme is compatible with similar programmes of other HSs in Bulgaria, the European Union or outside the European Union, allowing for the professional mobility of students and graduates in the respective specialty; the necessary conditions to support the training and professional development of students by providing them with knowledge and skills that can be applied in their future careers; the opportunities for implementation of the creative activities of academic staff, students and PhD students; conditions for printing scientific works, textbooks, monographs; a library and resources for information services for training and research; information center for administrative servicing of students and PhD students; a system of intellectual property protection, as well as training on intellectual property protection.

2.1. The project includes procedures for developing, approving the academic documentation of the professional fields and the relevant specialities (qualifications, curricula and programmes, etc.) with the assistance of interested parties.

The criterion is in line with ESG 1.2. It is used to evaluate the application of ESG 1.2 by analysing how the content of the criterion is fulfilled: the training programmes are developed in accordance with the HS’s strategy, with clear expected learning outcomes and approved by programme accreditation of the relevant professional field; analysis of potential jobs, conclusions of national and international studies on the labour market developments and employers' opinions on the relevant professional fields; the envisaged training in educational, qualification and scientific degrees (professional bachelor, bachelor, master, doctor), forms of training; comparability of each programme with similar training programmes of other HSs in Bulgaria, the European Union or outside the European Union, allowing for the professional mobility of students and graduates in the respective specialty; justification for the opening or transformation of a basic unit or a branch in order to create the necessary conditions to support the training and professional development of students; in the opened or transformed structural units, opportunities for implementation of creative activities of the academic staff, students and PhD students are envisaged; conditions for printing scientific works, textbooks, monographs; provision of library facilities and other means of information services for training and research; provided opportunities for modern administrative services for students and PhD students; the inclusion of the new structural unit in the HS's system of intellectual property protection, as well as training on intellectual property protection.

2.1. For the offered training in the professional field /the speciality from the regulated professions, the HS has provided for procedures for developing, approving, monitoring and updating the academic documentation (qualification characteristics, curricula and programmes, etc.) with the assistance of representatives of partner organizations, students and other interested parties.

The criterion is in line with ESG 1.2. It is used to evaluate the application of ESG 1.2 by analysing how the content of the criterion is met: the programmes proposed to reflect modern science's achievements and be compatible with the documentation of the European Higher Education Area; what the defined professional competencies and qualifications are like; possibility for professional mobility of students and graduates in the respective specialty; drafting specific procedures for monitoring, analysing, evaluating and validating (approving, accepting) any training programme and training documents of the professional field /specialty from the regulated professions; the participation of representatives of the industry, social institutions, students, graduates and other stakeholders in the process of proposing, developing and updating programmes; integrity with the national qualifications framework.
3.1. Draft methodological standards for academic documentation (curricula and programmes) and standard (procedure) for changes in the academic documentation, which are related to stimulating the motivation and commitment of the student to the training process.

The criterion is in line with ESG 1.3. It is used to evaluate the application of ESG 1.3 by analysing how the content of the criterion is fulfilled: the draft procedure of a periodic analysis for the up-to-datedness of the offered learning material, taking into account the views of students and users of staff; the HS’s project for an organization for developing and maintaining modern methods of teaching the teaching material; the training of students to respond and adhere to the modern methods of teaching and evaluating their achievements; drafting a procedure for periodic analysis and dissemination of results related to methods of teaching and assessing students’ achievements, promoting mutual respect between learners and teachers; the draft of the Examination Testing System (including State Exams and Diplomas), which includes the criteria and methods for verifying and evaluating learners’ knowledge and skills as well as the criteria for awarding a digital grade;

the draft documents of a formal procedure for dealing with student complaints.

3.1. Draft methodological standards for academic documentation (curricula and programmes) and procedure for changes in the academic documentation, which are related to stimulating the motivation and commitment of the student to the training process.

The criterion is in line with ESG 1.4. It is used to assess the application of ESG 1.4 by analysing how the content of the criterion is fulfilled: the draft of a periodic analysis procedure for the up-to-datedness of the offered learning material, taking into account the views of students and users of staff; the HS’s project to develop and maintain modern methods and forms of teaching the teaching material; the training of students to respond and to adhere to the modern methods of teaching and evaluating their achievements; drafting a procedure for periodic analysis and dissemination of results related to methods of teaching and assessing students’ achievements, promoting mutual respect between learners and teachers; special care for the quality of training in profiling subjects and practical classes; the design of the Examination Testing System (including State Exams and Diplomas), which includes the criteria and methods for verifying and evaluating learners’ knowledge and skills as well as the criteria for awarding a digital grade; draft documents of an official procedure for dealing with student complaints.

3.1. A planned system of rules and activities related to stimulating the motivation and active position of the students in the process of training in the respective professional field /speciality from regulated professions.

The criterion is in line with ESG 1.3. It is used to evaluate the application of ESG 1.3 by analysing how the content of the criterion is fulfilled: student training is conducted in accordance with the current requirements for educational qualifications; a clear qualification characteristic is offered according to the educational mission, objectives and tasks of the professional field/speciality from the regulated professions; the project for the implementation of interactive forms of learning by incorporating the results of the research (artistic and creative) activity into the learning process; the inclusion of students in practical activities stimulating their creative activity; surveys of students’ degree of education for training programmes; feedback activities between lecturers and students; the criteria and methods for verifying and assessing learners’ knowledge and skills; an organization for attracting, enrolling and adapting Bulgarian and foreign students and PhD students; mobility of students; draft rules of the Committee for dealing with student complaints.

4.1. A project of the HS for structures and internal normative documents (rules, regulations, instructions) for the functioning of the system - from the students’ enrolment, including to their professional fulfilment.

The criterion is in line with ESG 1.4. It is used to evaluate the implementation of ESG 1.4 by

4.1. Provision of structures and internal regulations (rules, regulations, instructions) for the functioning of the system - from the students’ enrolment, including to their professional fulfilment.

The criterion is in line with ESG 1.4. It is used to assess the application of ESG 1.4 by analysing how the content of the criterion is fulfilled: the draft

4.1. Documents, disclosed to the public and outlining the “life cycle” of the student. Foreseen admission, development, recognition and graduation in the relevant professional field/speciality from the regulated professions. Evidence of their consistent and transparent implementation.

The criterion is in line with ESG 1.4. It is used to
| analysing how the content of the criterion is fulfilled: the draft document for informing and guiding students about the opportunities offered by the HS for their enhancement as specialists and for promoting the mobility of students; the draft rules and regulations for the admission, the qualification and the graduation of students; the envisaged organization for attracting, supporting and adapting Bulgarian and foreign students and PhD students; the draft rules for including students and PhD students in the implementation of research projects in the main units and in its research structures; rules for the academic recognition of periods of study and practice abroad related to student mobility in the framework of contractual relations with foreign higher education institutions and European education and training programmes; the project to build an administrative system for registering graduates' implementation. | document for informing and guiding students about the opportunities offered by the HS for their enhancement as specialists and for promoting the mobility of students; the draft rules and regulations for the admission, the qualification and the graduation of students; the envisaged organization for attracting, supporting and adapting Bulgarian and foreign students and PhD students; the draft rules for including students and PhD students in the implementation of research projects in the main units and in its research structures; rules for the academic recognition of periods of study and practice abroad related to student mobility in the framework of contractual relations with foreign higher education institutions and European education and training programmes; the project to build an administrative system for registering graduates' implementation. | assess the implementation of ESG 1.4 by analysing how the content of the criterion is fulfilled: a study on the recognition of higher education qualifications; the academic recognition of periods of study and practice abroad related to student mobility within the framework of the European education and training programmes; rules for inclusion of students and PhD students in the implementation of research projects in the professional field / speciality from the regulated professions; compliance with the requirements for the content of the basic documents for education and training issued by the higher school; a system for registering the professional fulfilment of graduates. |

5.1. The project covers a well-founded policy and procedures are in place to attract and maintain teaching staff at a highly professional level in educational, research, and/or artistic and creative activities.

The criterion is in line with ESG 1.5. It is used to assess the application of ESG 1.5 by analysing how the content of the criterion is fulfilled: the draft terms and conditions for recruitment and the development of the professional qualification and the academic career of the teachers of basic employment contract; the applied procedures and activities related to enhancing the research work of the faculty and its commitment to the educational process; the design of a system for appraising the academic staff for its teaching and research activities with contributions to improving the quality of training; the procedures for stimulating the

5.1. The project has reasonably provided for procedures for attracting and maintaining high-level teaching staff in educational, research and/or artistic-creative and sports activities.

The criterion is in line with ESG 1.5. It is used to assess the application of ESG 1.5 by analysing how the content of the criterion is fulfilled: the draft terms and conditions for recruitment and the development of the professional qualification and the academic career of the teachers of basic employment contract; procedures and activities related to enhancing the research work of the faculty and its commitment to the educational process; the design of a system for appraising the academic staff for its teaching and research activities with contributions to improving the quality of training; the procedures for stimulating the

5.1 The HS pursues a policy to provide quality academic staff by applying transparent procedures as part of the development strategy for the professional field's /speciality from the regulated professions.

The criterion is in line with ESG 1.5. It is used to assess the application of ESG 1.5 by analysing how the content of the criterion is met: requirements to compliance with the legislation and qualification of teachers providing training; the system of appraisal, stimulation of the career development of lecturers; an envisaged plan for the operation of a system for control, promotion and publicity of the research and artistic activity of the academic staff and the participation of students and postgraduates from the professional field / speciality from the regulated professions; a proofreading programme in the cases of plagiarism by students or lecturers.
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<th>academic and administrative staff, depending on the quality of the training being maintained; the envisaged policy of the HS to create conditions for competitive research (artistic-creative), innovation and publishing activity; the procedures related to the reporting of the results and the role of lecturers in the education process, focusing on the students' training.</th>
<th>academic and administrative staff, depending on the quality of the training being maintained; the envisaged policy of the HS to create conditions for competitive research (artistic-creative), innovation and publishing activity</th>
<th>academic and administrative staff, depending on the quality of the training being maintained; the envisaged policy of the HS to create conditions for competitive research (artistic-creative), innovation and publishing activity</th>
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<td><strong>6.1.</strong> A project for the necessary learning resources in support of students, related to the financing of training and the appropriate academic staff for the educational and research process of the HEI.</td>
<td><strong>6.1.</strong> The necessary learning resources are provided to help students, the necessary financial resources for the training, and to provide the appropriate academic staff in accordance with the educational and research processes.</td>
<td><strong>6.1.</strong> Planned and provided financial, material, technical and information facilities necessary for the teaching, training, research, artistic and creative activities of the professional field/speciality from the regulated professions, as well as a suitable environment for distance learning if such will be conducted.</td>
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<td>The criterion is in line with ESG 1.6. It is used to assess the application of ESG 1.6 by analysing how the content of the criterion is fulfilled: the draft rules on planning, distribution and provision of organizational, material and technical resources for training and support for students; the draft rules and guidelines for accessing students to different types of resources for full awareness of the services provided in the educational, research, artistic, sports and social sectors; the project for raising the competencies of the staff for the administrative servicing of students; the project to provide resources to support and implement innovative practices in student training and teaching.</td>
<td>The criterion is in line with ESG 1.6. It is used to assess the application of ESG 1.6 by analysing how the content of the criterion is fulfilled: the draft rules on planning, distribution and provision of organizational, material and technical resources for training and support for students; the draft rules and organization of the learning process, meeting the student requirements through various alternative models of education and teaching; draft rules for accessing students to different types of resources; conditions for full awareness of the services provided in the educational, research, artistic-creative, sport and social sectors; administrative servicing of students; providing resources to support and implement innovative practices in student education and teaching.</td>
<td>The criterion is in line with ESG 1.6. It is used to evaluate the application of ESG 1.6 by analysing how the content of the criterion is met: provision of audience and laboratory area for all students trained; available library and computer halls with specialized equipment; access to lecturers and students to the Internet and to information products; didactical resources; environment and conditions for distance learning; specialized material and information provision for the work of students with special educational needs; organization of administrative services and academic support for students.</td>
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<td><strong>7.1.</strong> The draft regulatory documents provide for procedures for collecting and analysing information on available learning resources, including financial resources, to support the career development of students and graduates as a goal set out in the HS's</td>
<td><strong>7.1.</strong> Legislation drafts provide for procedures for collecting, analysing and using the information to effectively manage the training programmes and other activities.</td>
<td><strong>7.1.</strong> Planned information management organization related to the implementation of the training in the professional field/speciality from the regulated professions and the subsequent professional fulfilment of the graduates. The criterion is in line</td>
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<td>Strategy.</td>
<td>The criterion is in line with ESG 1.7. It is used to assess the application of ESG 1.7 by analysing how the content of the criterion is fulfilled: the procedures envisaged for summarizing the opinion and the conclusions of the representatives of students, trade union and consumer organizations included in the internal auditing teams on ensuring the quality of the training process, incl. the procedures for updating the academic documentation; the effectiveness of methods for the operation of the internal quality assurance system; the procedures envisaged for the use of information from opinion polls and the recommendations of the users of staff; measures and actions to improve the practical training of students and their successful professional fulfilment.</td>
<td>The criterion is in line with ESG 1.7. It is used to assess the application of ESG 1.7 by analysing how the content of the criterion is fulfilled: the procedures envisaged for summarizing the opinion and the conclusions of the representatives of students, trade union and consumer organizations included in the internal auditing teams on ensuring the quality of the training process, incl. the procedures for updating the academic documentation; the effectiveness of methods for the operation of the internal quality assurance system; procedures are provided for the use of information from opinion polls and the recommendations of the representatives of the users of the personnel when taking measures and actions to improve the practical training of the students and their successful professional fulfilment.</td>
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forms of training, qualification characteristics; evaluation forms and sessions timetable; providing information on: the priorities and objectives of academic research; the achievements of lecturers and students in research, artistic and sports activities; procedures for generalizing and using the results of internal and external audits; the measures taken after surveys conducted among students on the quality of training and the teaching staff; the results of surveys conducted among students and employers on the fulfilment and employment of graduates.

9.1. The project regulates regular monitoring, review and updating of training programmes, in line with the development of science and technology.

The criterion is in line with ESG 1.9. It is used to evaluate the implementation of ESG 1.9 by analysing how the content of the criterion is fulfilled: the planned HS’s policy to ensure that the training programmes comply with the economic and social needs of society; the envisaged conditions for monitoring the training programmes and gathering information necessary for their qualitative changes and improvements; the envisaged engagement of teachers, students and employers in the monitoring, review and updating the training programmes.

9.1. The project for opening and transformation of a basic unit and a branch of a HS regulates the regular monitoring, review and updating of training programmes in accordance with the development of science and technology.

The criterion is in line with ESG 1.9. It is used to evaluate the implementation of ESG 1.9 by analysing how the content of the criterion is fulfilled: the planned HS’s policy to ensure that the training programmes comply with the economic and social needs of society; the envisaged conditions for the monitoring of the training programmes and the collection of information necessary for their qualitative changes and improvements in line with labour market demand; the envisaged engagement of teachers, students and employers in the monitoring, review and updating the training programmes.

10.1. The project regulates the regular conduct of curricula and programmes, forms of training, qualification characteristics; evaluation forms and sessions timetable; data on student achievement and employment of graduates; the envisaged possibilities for providing information on the priorities and objectives of the research activities of the academic staff, according to their specificity; the achievements of lecturers and students in research, artistic, creative and sports activities; the procedures for summarizing and using: the results of internal and external audits, the results and the measures taken after surveys conducted among students on the quality of training and the faculty; the results of surveys conducted among students and employers on the implementation and employment of graduates.

9.1. The institutions of higher education carry out regular monitoring (review) and update the training programmes in line with the evolution of scientific knowledge and technology of training in the professional field/speciality from a regulated profession.

The criterion is in line with ESG 1.9. It is used to evaluate the implementation of ESG 1.9 by analysing how the content of the criterion is met: the planned system for managing and monitoring the quality of the learning process; timeliness of the training programmes; achievements of students; the quality of teaching according to the contemporary requirements; the opportunities for dynamic change of the educational environment; the students' opinion on the quality of the knowledge obtained; the content of the curriculum, the training programmes, the teaching methods; the prospect of professional fulfilment in the specialty; planned activity to reflect students' success and enhancement.
self-assessments and external evaluations to achieve the quality of the educational process.

The criterion is in line with ESG 1.10. It is used to evaluate the application of ESG 1.10. Analysing how the content of the criterion is fulfilled: the planned self-assessments and external audits of HEIs by agencies recognized at national and international level; the project assumes that the recommendations made in the external audits that ensure the progress of the educational process will be taken into account by the HS’s leadership.

10.1. The project for opening and transformation of a basic unit and branch of the HS regulates the regular performance of external evaluations for the achievement of the quality of the educational process according to the ESG.

The criterion is in line with ESG 1.10. It is used to evaluate the application of ESG 1.10. Analysing how the content of the criterion is fulfilled: the project envisages conducting self-assessments and external audits of the opened and transformed basic unit and branch of the HS by agencies recognized at national and international level; it has been declared in the project that the recommendations made in the external audits that ensure the progress of the educational process will be taken into account by the leadership of the opened and transformed basic unit and branch of the HS.

Table 10: NEAA’s APPLICATION OF THE CONFORMITY BETWEEN THE ACCREDITATION CRITERIA OF NEAA AND THE INTERNAL QUALITY ASSURANCE STANDARDS

external evaluations of all training programmes of the professional field/speciality from the regulated professions.

The criterion is in line with ESG 1.10. It is used to evaluate the implementation of ESG 1.10 by analysing how the content of the criterion is fulfilled: planned self-assessments and external audits by nationally and internationally recognized agencies and implementing recommendations; organization for the maintenance and development of cooperation and exchange of teachers from other higher schools; foreseen activities in the composition of the commissions for semester and state examinations to invite lecturers from other higher schools and users of staff in order to provide feedback on the achievements of students; planned activities related to the improvement of the professional field / specialty from the regulated professions.
THIS REPORT presents findings of the ENQA Agency Review of the National Evaluation and Accreditation Agency (NEAA), undertaken in 2017.