



European Association for
Quality Assurance in Higher Education

Prof. Dr. Petya Kabakchieva
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Brussels, 3 March 2023

Subject: Statement on validation of the external review report of NEAA

Dear Prof. Dr. Petya Kabakchieva,

I would like to inform you that, at its meeting on 17 February 2023, the ENQA Agency Review Committee validated the external review report of NEAA. The committee concluded that the report has been produced in accordance with the Guidelines for ENQA Agency Reviews and can thus be used to apply for ENQA membership and EQAR registration, as well as for any other purposes. This is in line with article 26, paragraph 2 of ENQA's Rules of Procedure, which states that the review report can be further used only once this statement of validation has been issued. The purpose of this statement is to set out the committee's views on the quality of the final report and consistency of the panel's evaluation on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

The committee made the following observations on the review report that was submitted for scrutiny:

On the ESG 3.3 Independence, the committee noted the agency's dependence from academics not only due to their involvement in various committees, but also due to their involvement in the training of experts and appointment of expert groups. Following this and taking into consideration the critical recommendations provided by the panel on this standard, in the committee's view the standard can be considered only as partially compliant with the ESG.

Secondly, in relation to ESG 2.7, the committee noted that NEAA does not have both complaints and appeals processes defined as part of the design of EQA processes, and poorly communicates the existing processes on this to HEIs. Following this, in the opinion of the committee, the standard can be considered only as partially compliant with the ESG.

In addition, the committee asked the panel for minor revisions on standards 3.1, 3.5, 2.1, 2.2, and 2.3 of the ESG:

- ESG 3.1 Activities, policy and processes for quality assurance

The committee noted that the regularity of all six external QA procedures of the agency in the observed period of the external review was not clearly presented in the report (i.e., data per procedure was provided solely for 2021). Moreover, the summary table showed large number of procedures conducted during the last four years, but it was not clear to the committee how the agency's work was divided per each external QA procedure.

- 3.5 Resources

The committee noted that scarce resources do not allow the agency to develop. To understand the ongoing developments at NEAA in this regard, the committee asked for clarification on the number of open positions in FTE in relation to the overall current number of staff members (in FTE) at the agency.

- ESG 2.1 Consideration of internal quality assurance

The committee asked the panel for any further information, to the extent possible, on how the agency addresses ESG 1.4 through its work. The committee namely found no evidence on how the promotion of fair recognition is being addressed by NEAA and what kind of cooperation already exists in this regard between the agency, HEIs and Bulgarian ENIC-NARIC.

- ESG 2.2 Designing methodologies fit for purpose

The committee noted that some evidence presented under ESG 2.3 could be better incorporated into standard ESG 2.2, e.g., the statements as follows: "This especially relates to the new simplified subsequent institutional accreditation and to the accreditation of professional fields/majors from regulated professions which will require simultaneous site visits of EGs to all HEIs providing the training in a given professional field. Also, there are some plans for better binding the accreditation of doctoral programmes with the accreditation of professional fields". The committee asked the panel to consider this request to the extent possible.

- ESG 2.3 Implementing processes

The committee asked for further information on the six external QA procedures of the agency, including on briefings of expert panels (who performs such activity), how many panel members are appointed for each of these procedures, what determines the length of the site visit (varying from three to five days), and does the agency perform site visits when evaluating distance learning offers at HEIs.



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The committee received the final review report that addressed the additional requirements. The final review report can thus be further used to apply for ENQA membership and EQAR registration, as well as for any other purposes, as stipulated above.

This statement will be published on ENQA's website as an annex to the review report.

Thank you for your trust placed in ENQA to conduct this agency review. If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alastair Delaney', is positioned above the printed name.

Alastair Delaney
Chair of ENQA Agency Review Committee

Annex: Areas for development

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As outlined by the review panel and further discussed by the committee (where relevant), NEAA is recommended to take appropriate action, in so far as it is empowered to do so, on the following issues:

ESG 3.1 Activities, policy, and processes for quality assurance

The agency is recommended to include a representative of students and a representative of employers/industry in the AC.

The agency is recommended to include a representative of students (preferably with a legal background) in the Ethics Committee.

ESG 3.3 Independence

The agency is recommended to reconsider possible risks for NEAA's independence that could eventually arise from the predominantly academic representation in its governing body (i.e. the AC).

The agency is recommended to explore possibilities and actively propose measures to strengthen its financial independence, especially with regard to the possibility of deciding on the amount of the experts' fees.

ESG 3.5 Resources

The agency should pursue with the MES changes in the financial management legal framework to ensure fair and structured remuneration of the work of both staff and EG members.

The agency is recommended to continue with recruitment of new staff to ensure optimal workload and implementation of EQA processes on time.

Staff members, in particular chief experts, should be more involved in the EQA procedures with more responsibilities at the higher level.

The agency is recommended to encourage further professional development of the key staff and their participation in seminars, conferences, and international activities.

ESG 3.6 Internal quality assurance and professional conduct

The agency is recommended to reconsider the current IQA framework, starting from the adoption of fundamental documents which regulate this area following the necessary improvements in NEAA's strategic planning and monitoring of the results achieved. The agency should involve its internal and



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external stakeholders in NEAA's IQA activities, regularly implement such activities and communicate better to a wider audience the results of such activities and improvements made.

ESG 2.3 Implementing processes

During the planned revision of the methodologies and procedures, the agency is recommended to ensure that the consistent follow up is included in all EQA procedures.

ESG 2.4 Peer-review experts

In addition to the briefings of experts which are organised prior to the site visits, the agency is recommended to encourage the organisation of training of experts on a regular basis with the focus on the procedure, quality standards, consistency, writing reports etc.

ESG 2.7 Complaints and appeals

The agency is recommended that, in order to have some formal, internal input into the process for appealing the decisions of its AC, it reconsiders the comment made by the ENQA Board in its decision letter of 12th March 2018: "...the Board...encourages NEAA to consider whether it could introduce an internal step allowing institutions to question the formal outcomes with the agency first before taking legal action".