

**External Review Report of the Bulgarian
National Evaluation and Accreditation Agency
(NEAA)**

Against the Standards and Guidelines for Quality Assurance in
the European Higher Education Area

July 2008

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1. Executive Summary

This report analyses the compliance of the National Evaluation and Accreditation Agency of the Republic of Bulgaria (NEAA) with the European Standards and Guidelines for Quality Assurance (ESG) in the European Higher Education Area (EHEA).

The National Agency for Quality Assessment and Accreditation (ANECA) has been in charge of the coordination of the evaluation process. ENQA appointed a panel of international experts nominated by ANECA to carry out the external review of NEAA. The site visit took place in Sofia on 17-18 June 2008.

NEAA offers three types of external quality assurance processes – evaluation of new projects, programme/institutional accreditation and post-accreditation monitoring and control activities - that promote the ESG good practices for higher education institutions. NEAA processes for developing accreditation programmes are commendable.

NEAA is recognised as the only national Agency for quality assurance and accreditation in Bulgaria and fully acknowledges its responsibilities in that regard. NEAA has taken initiatives to strengthen the cooperation with other Central European quality assurance agencies and has signed bilateral agreements with related foreign partners.

The services provided by NEAA and the quality of the work of its staff are highly regarded by the Review Panel and by Bulgarian Higher Education institutions. Due to the scope of accreditation activities, careful attention needs to be continuously paid to the monitoring of staff motivation. Training and promotion of staff should be encouraged.

NEAA has set up very rigorous procedures for the management of its evaluators but may want to review their profiles when appointing panels. Special emphasis should be placed on gender policies, student participation beyond their present status as observers, the inclusion of experts with a non-academic profile and of more experts from abroad, in order to give an international view to the accreditation process as well as an important feedback to the Agency.

NEAA is allocated appropriate financial and material resources to effectively fulfil its objectives, but some improvement is necessary concerning the level of the fees paid to the expert teams.

The document called 'Strategic priorities and goals of the Agency 2007 - 2010' sets out NEAA's mission and main objectives. NEAA should introduce annual action plans to support the achievements of these precise goals as well as mechanisms to control their fulfilment.

The content of NEAA's external quality assurance reports is not influenced by third parties. There is a need, however, to make certain that this autonomous responsibility of the Agency is also fully guaranteed for the future, in view of the general dependency of the higher education system on State regulations.

NEAA's procedures are pre-defined and well documented, including procedures for appeal. Programme and institution accreditation generally follow the stages which are expected as good practice in the ESG though, due to the numerous external quality procedures that NEAA develops, a *saturation* of the external quality assurance system is observed. The Panel noted that only the results of the quality assurance procedures are made public and therefore encourages the Agency to publish the complete text of the reports on a regular basis as well as to review its system of awarding grades to appropriately discriminate. NEAA should also pay closer attention to its role in providing

system-wide analyses for the overall improvement of Bulgarian higher education and its optimal insertion in the EHEA.

NEAA has developed a quality assurance system for its activities. Although NEAA already applies a range of external and internal feedback mechanisms there is a potential for the further development and expansion of these. The Panel is of the opinion that the quality management system in place at NEAA provides an appropriate framework for the follow-up of the areas for improvement identified in this review report.

NEAA should consider broadening its vision of accountability: from HEIs to society at large, from a Bulgarian perspective to a European/international one. This requires not only an enhanced effort in the communication with media, but also a gradual move towards a more strategic approach to the Agency's mission statement, organization, staff development and resource allocation and its closer integration into the European/international community for higher education improvement.

In the light of the documentation and oral evidence, the Review Panel concluded that NEAA is in substantial compliance with the ENQA Membership Regulations and the ESG. The Panel consequently recommends the Board of ENQA that NEAA should be awarded full membership for a period of five years. At the same time, it may be requested to provide before that date a progress report with respect to the improvement areas mentioned above.

2. Introduction

This is the report of the external review of the National Evaluation and Accreditation Agency of the Republic of Bulgaria (NEAA) undertaken in June 2008 in Sofia for the purpose of determining whether the Agency meets the criteria for full membership of the European Association for Quality Assurance in Higher Education (ENQA).

2.1. Structure of the document

The first part of the present report provides an introduction including the composition of the review panel, the timeline of the process and the site visit to NEAA.

The second part offers a presentation of the Bulgarian context, Higher Education system, its legal framework and general information of the National Evaluation and Accreditation Agency.

The third part presents an analysis and comment on NEAA's compliance with the ESG for external quality assurance.

The fourth part states the strengths and areas for improvement found during the evaluation process and the Panel's conclusions.

The report includes also three annexes:

- The Terms of Reference for the external review.
- The Agenda of the external review.
- The correspondence between NEAA standards for institutional accreditation and ESG standards (Part 1).

2.2. Review process

The review was conducted in line with the process described in the Guidelines for national reviews of ENQA member agencies and in accordance with the timeline set out in the Terms of Reference (Annex 6.1 of this report).

The review has been coordinated by the National Agency for Quality Assessment and Accreditation (ANECA) of Spain.

The composition of the review panel was as follows:

1. **Prof. Francisco Marcellán – Chair.** Full Professor, Universidad Carlos III de Madrid. Former director of ANECA.
2. **Prof. Guy Haug – Member.** International expert.
3. **Prof. Iordanka Naydenova Kouzmanova – Member.** Former Rector of the Agricultural University – Plovdiv.
4. **Mr Viorel Proteasa – Member.** Member of the Executive Committee 2007 - 2008 of the European Students' Union (ESU), formerly ESIB.
5. **Prof. Christian Thune – Member.** Vice-Chair of the Danish accreditation Council and former ENQA President.
6. **Mrs María Becerro – Secretary.** International and Institutional Relation unit officer, ANECA. Replaced Cecilia de la Rosa, who was responsible for the secretariat function until the site visit.

These experts were nominated by ANECA, appointed by ENQA and accepted by NEAA.

NEAA produced a self-evaluation report that the Panel used to prepare the site visit and to document its conclusions. The Panel received on 7 May 2008 an electronic copy of the self-evaluation report and of the appendices and documents listed in the report.

According to the ENQA guidelines for reviews, the Review Panel prepared an agenda where it decided which groups it wished to meet during the site visit. The agenda was sent to NEAA on 26 May 2008 for comment and suggestions. NEAA accepted the proposed agenda.

The members of the Panel were satisfied that the self-evaluation report provides enough feedback to prepare the site visit. The Secretary of the Panel prepared a consolidated set of lines of enquiries that provided the background for the Panel's discussions when it met for the preparatory meeting and for the interviews conducted during the site visit.

The Panel conducted the site visit to validate the self-evaluation report and to clarify a series of points of issue. The Panel met for a preparatory meeting the day before the site visit, which allowed members to share their views on NEAA's self-evaluation report and other documents. During this meeting key questions to ask in the interviews were drafted and the way to proceed was agreed.

The Panel drew up the present report on the basis of the self-evaluation report, site visit, analyses of evidences and its findings. NEAA had the opportunity to comment on the draft report.

2.3. Timeline of the review

| | |
|------------------------|---|
| December 2007 | ENQA Board appoints ANECA to carry out the coordination of the external review of NEAA. |
| February 2008 | The Terms of Reference and preliminary timetable are agreed between NEAA and ANECA. |
| March 2008 | The Board of ENQA approves the Terms of Reference. |
| April 2008 | The Review Panel is appointed by ENQA. |
| May 2008 | NEAA finishes its self-evaluation report. The report is distributed to the panel members. The Panel sends to NEAA the proposed agenda for the site visit. |
| June 2008 | The Panel holds a preparatory meeting before the site visit. The agenda is discussed. The site visit by the review panel (17-18 June) takes place in Sofia. The members of the Panel send their personal notes to the Chair and the Secretary, who prepare a first draft of the report and circulate it to the Panel. |
| July 2008 | Comments of the Panel members are included in the draft report, which after agreement of the Chair, is submitted to NEAA for comments. The Secretary finalises the report and sends it to ENQA. |
| September/October 2008 | The Board of ENQA processes the report. |

2.4. Site visit

The Panel visited NEAA's offices on 17-18 June 2008. The agenda and the different stakeholders that participated in the interviews are shown in Annex 6.2. of this report.

The Panel would like to point out that the site visit was organised by NEAA in accordance with recognised principles for external reviews of Agencies. Panel members could use all facilities of the Agency (computers, documents, internet access) and NEAA staff made panel members feel comfortable and helped them with practicalities in connection with their task.

As far as the interviews are concerned, it is worth mentioning that they were carried out on time according to the schedule. The Agency had selected relevant stakeholders (NEAA staff, Ministry and Parliament representatives, students, rectors, etc.) to attend the interviews and the majority of the people invited could join the meetings. The Panel would like to commend the high degree of participation in the interviews of the different groups: nearly all participants actually engaged in the discussion and gave their opinion on the Panel's questions.

As a rule, Bulgarian interviewees insisted on speaking their language, even though in some cases their working knowledge of English was noticeable. One exception was the interview with the students, who all spoke excellent English.

The Agency provided a highly professional translator, but the operational time for interviewing in individual sessions was sizeably reduced and the Panel was sometimes concerned that substantial points raised by the Bulgarian participants may have been missed.

The Panel had not previous to the site visit received any indication from NEAA that it would be facing a language problem. The panel recommends to ENQA to include in its procedures for the review of agencies that site visit interviews should be conducted in a language with which all participants are familiar, including Panel members.

3. Bulgarian context, Higher Education System, legal framework and NEAA

3.1. Bulgarian context

The starting point of every evaluation process should be an analysis of the context within which the object of the evaluation is functioning. The knowledge of the legal, social and cultural environment helps to identify and evaluate the barriers which might facilitate or inhibit the achievement of the expected goals. With this in mind, the Panel agreed to include in its review report some key features of the context within which the National Evaluation and Accreditation Agency operates in Bulgaria.

Bulgaria is a country with a relatively young democracy that is trying to find its place in the market economy. In June 1990 the first free elections after 60 years took place, after the Communist Party voluntarily gave up its monopoly of power. In 1991 the country adopted a new constitution.

Since that date, Bulgaria has faced economic difficulties: privatization of land and industry, loss of its main export markets in the COMECON¹, massive unemployment and a tide of corruption affecting both the public and private sector. The economy collapsed in 1996 due to a lack of international support and an unstable banking system.

At the end of the 1990s, EU assistance and a reform package helped the country to start the path to recovery. Nowadays, Bulgaria's real economic growth rates are more than double the EU average².

In 2007, Bulgaria became a member of the European Union. This will bring about important transformations at the economic and social level in the coming years – e.g. in the judicial system, the fight against organised crime and money laundering, the financial control mechanisms, etc.

Bulgaria, with a population of 7.5 million, has one of the lowest population growth-rates in the world. Negative population growth has occurred since the early 1990s due to economic collapse and high emigration: the brain drain has affected over 800.000 Bulgarians - most of them qualified professionals. This has also had consequences on higher education and research, where highly qualified professionals with important research credentials have left the country to work abroad, slowing down improvement and innovation in this sector.

Additionally, Bulgarian authorities do not seem to convince outsiders that they are making real progress in fighting corruption and in speeding up reforms, which means that even today there is a generally low degree of trust in public institutions.

Under these circumstances, and with the heritage of the traditional centralised education system, the National Evaluation and Accreditation Agency carries out its activities trying hard to defend its own model apart from the spoiled image of some other national institutions and to follow the steps of its European partners.

3.2. Bulgarian Higher Education System

Contemporary Higher Education (HE) in Bulgaria is a component of the national educational system of the classical type: pre-primary, basic primary and basic secondary,

¹ The Council for Mutual Economic Assistance (economic organization of communist states).

² According to economic predictions, the country's Gross Domestic Product will grow by 5,7% in 2008, and by 5,5% in 2009.

upper secondary and higher education stages. HE covers all areas of knowledge and its main purpose is to shape "good" citizens for the democratic society, capable of living and working in an environment of market economy built on knowledge. There is a continuous strive to improve the quality of education and the adequacy of the higher education system, keeping accessibility high and increasing equal opportunities. Having been of the elitist type in the past, nowadays Bulgarian HE is accessible to all with new fields of disciplines (called "majors") springing up over time.

In the Bulgarian system of HE, there are 51 higher education institutions (HEIs) (37 public and 14 private), of which 42 are universities and "specialized higher schools" and 9 are "autonomous colleges". There are also 29 colleges affiliated to the universities, a great part of which are being restructured at present. Table 1 illustrates these figures.

Table1: Higher education institutions in the Republic of Bulgaria (2008)

| HEI | Total | Universities and HS | Colleges | |
|-------------|-------|---------------------|----------------------------|------------|
| | | | Affiliated to universities | Autonomous |
| Total | 51 | 42 | 29 | 9 |
| State-owned | 37 | 36 | 29 | 1 |
| Private | 14 | 6 | 0 | 8 |

237,909 students were taught in Bulgaria in 2005. The distribution of students by majors in the HEIs is offer-driven and is decided by the Council of Ministers. Students participate in Higher Education Institutions' decision-making bodies in a percentage of 25%. Their involvement at national level is carried out through the National Assembly of Student Councils, a body which is referred to both in the Higher Education Act and in the National Bologna Reports.

Table 2 shows the different degrees than are awarded in Bulgarian Higher Education.

Table 2. Educational degrees in the Republic of Bulgaria (2007)

| Degree | | Type | Awarded by: | Minimum academic years |
|----------------------------|--|--|---|------------------------|
| Professional bachelor | | Vocational education after secondary education | College | 3 |
| Bachelor | | First qualification degree | University or Higher School | 4 |
| M A S T E R | After bachelor | Second qualification degree | University or Higher School | 1 |
| | Integrated master (a longer period of studies) | Qualification degree | University or Higher School | 5 |
| Doctor ³ | | Third qualification degree | University or Higher School, research institute | 3 |

3.3. Legislative regulations concerning external quality assurance

The Higher Education Act (1995) is the fundamental legal framework concerning Bulgarian Higher Education. It regulates, among others:

- The procedures for institutional and programme accreditation.
- The procedures for post-accreditation, monitoring and control.
- The procedures for evaluation of projects for opening new HEIs.
- The functioning, structure and obligations of NEAA.

³ During the site visit the Panel found out that Doctorate studies are still organised in two levels (instead of the single doctorate required by European agreements on the 3 main Bologna levels).

The HEA obliges the Minister of Education and Science to check whether the HEIs are fulfilling their duties in accordance with the Act. The Act also defines NEAA's mission and the purpose of accreditation: *"The accreditation is a recognition on behalf of the National Evaluation and Accreditation Agency of the right of a HEIs to provide higher education and qualification degrees in certain areas, professional fields⁴ and the majors for the regulated professions by evaluating the quality of their activities under art. 6 of the HEA"*.

The different areas of the Agency's activities are related to other legislative acts and codes:

- Public Education Act (1991);
- Law of Scientific Degrees and Scientific Ranks;
- Law of Qualification Acknowledgement and Labour Code;
- Law of State Administration and Civil Servant Law;
- Law of the National Budget of the Republic of Bulgaria for the relevant year.

Apart from the above, NEAA is subjected to other subordinate legislation, adopted by the Council of Ministers of the Republic of Bulgaria, including:

- Regulations for applying the Law of Scientific Degrees and Scientific Titles;
- Classification of higher education and professional fields;
- Classification of the scientific specialities in the Republic of Bulgaria;
- List of the regulated professions in the Republic of Bulgaria;
- Regulations on governmental requirements for the enrolment and instruction of doctoral students;
- Regulations on the governmental requirements for acquiring higher education in the education and qualification degrees of "bachelor", "master" and "professional bachelor";
- Regulations on the governmental requirements for acquiring higher education in the majors for the regulated professions;
- Norms for the payment of evaluation, accreditation and post-accreditation monitoring and control procedures by the HEIs in the Republic of Bulgaria.

The decisions resulting from the evaluation and accreditation procedures are individual administrative Acts which meet the requirements of the HEA and those of the Administrative Procedure Code. These decisions are made by the competent bodies of NEAA, i.e. the Accreditation Council and the various Standing Committees for each area of higher education (see Section 3.4.4. (*Organization*)).

3.4. National Evaluation and Accreditation Agency

3.4.1. Foundation

NEAA was founded in pursuance of Art.11.1 of the HEA passed by the National Assembly on 27 December 1995. With the Decree of the Council of Ministers No. 189 of 1 August 1996 adopting the Statute of NEAA and defining the number of its employees the subordinate legislative background of the Agency was completed. The first Accreditation Council started its work by the end of 1996.

Due to the initial lack of experience in the area of higher education evaluation and accreditation in Bulgaria, the basic approach that was adopted for the setting-up of the

⁴ Decree No. 125 of the Council of Ministers of 24 June 2002 defines 9 areas of higher education: 1) Pedagogic sciences, 2) Humanities, 3) Social and economic sciences and law, 4) Natural science, mathematics and informatics, 5) Technical sciences, 6) Agrarian science and veterinary medicine, 7) Healthcare and sport, 8) Arts and 9) Security and defense. These areas belong to different professional fields (e.g. the Humanities area gathers four professional fields: Philology, History and archeology, Philosophy and Religion and theology. At the same time, professional fields include "majors" (e.g. the Professional field of Medicine includes the majors of Stomatology and Pharmacy) and various scientific "majors" (Immunology, Cardiology, etc.)

Agency consisted in studying the international experience and the best practices available, correlating them to the specific conditions and traditions of Bulgarian higher education in the intention to find the best suitable system.

It is important to mention that the setting-up of NEAA owes much to the participation of NEAA in a PHARE-BG project⁵. Pilot accreditation procedures were carried out at some HEIs. Seen from the perspective of the past decade, the role of this project in the development of NEAA was substantial. Thanks to it, NEAA was able in a very short time to adopt evaluation and accreditation procedures in line with the European concepts for these processes. In 2004, with the enforcement of amendments to the HEA, some changes occurred in the evaluation and accreditation procedures of HEIs as NEAA became also responsible for post-accreditation monitoring and control.

3.4.2. Legislative status

The Legislation defines NEAA as a specialized state body for the evaluation, accreditation and post-accreditation monitoring and control of HEIs' activities. The status of the National Evaluation and Accreditation Agency affiliated to the Council of Ministers of the Republic of Bulgaria has been regulated by Art.11, para.1, 2, 3 and 4 of the HEA adopted by the National Assembly (Parliament) of the Republic of Bulgaria, according to which:

- (1) The National Evaluation and Accreditation Agency is a specialized governmental body affiliated to the Council of Ministers and responsible for carrying out the evaluation, accreditation and quality control of the HEIs' activities under Art.6 of the HEA.
- (2) The National Evaluation and Accreditation Agency is a juridical body subsidized by the national budget, with its main seat in Sofia;
- (3) The National Evaluation and Accreditation Agency carries out its activities in conformity with the HEA and must have its Statute approved by the Council of Ministers.
- (4) The National Evaluation and Accreditation Agency carries out evaluation, accreditation and quality control.

Thus, the HEA clearly states the activities to be carried out by NEAA, its rights and empowerments as a specialized governmental body for external quality assurance of higher education in the Republic of Bulgaria.

Following the legislative provisions of the HEA, the Accreditation Council worked out the "Statute of the National Evaluation and Accreditation Agency", which was adopted by a Decree of the Council of Ministers of the Republic of Bulgaria on 18 February 2005. The subsequent documents, related to the activities of NEAA for external quality assurance of higher education, were also adopted by the Agency.

3.4.3. Profile

Mission

The mission of the Agency is to contribute to the quality enhancement of Higher Education through cyclical institutional and programme evaluation and accreditation in Bulgaria, through the evaluation of projects for opening new HEIs and their basic units, as well as through post-accreditation monitoring and control, while ensuring the independence and transparency of the procedures and the high competence of all Bulgarian and foreign experts participating in them.

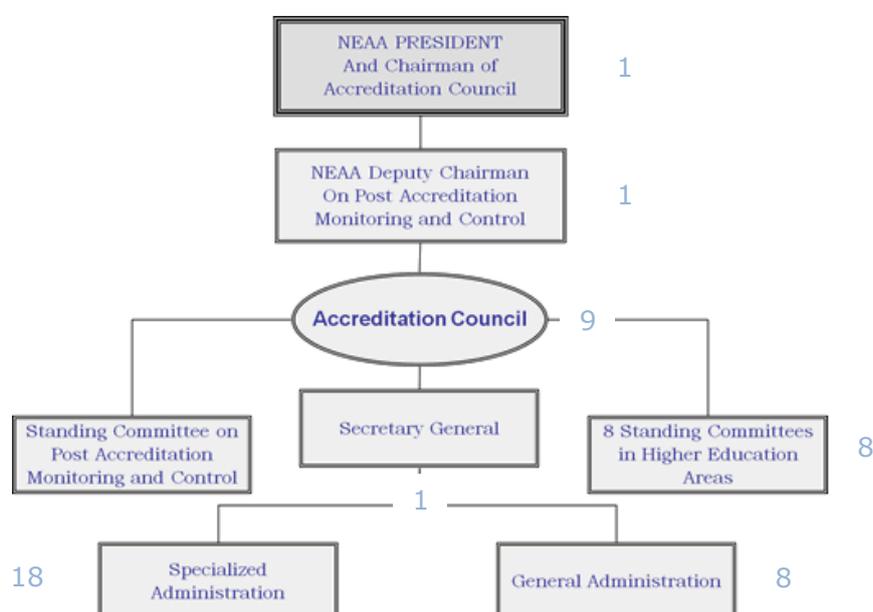
⁵ Its first phase "Feasibility study of Bulgarian higher schools' accreditation" was implemented with advice from the Quality Support Centre of the Open University (London) and its second phase "National Evaluation and Accreditation Agency" was carried out with support from a team of the British Council.

Vision

- To facilitate actively the formation and development of the national policy for quality enhancement in the national system of HE;
- To contribute to the improvement of the quality of HE and research at HEIs on the basis of the principles of transparency and competition;
- To guarantee objective evaluations of HEIs and to set benchmarks for their advancement by achieving excellence in the processes and activities of evaluation, accreditation and post-accreditation and control;
- To promote the harmonization of the processes and activities of NEAA with those of ENQA and to foster the effective cooperation with accreditation agencies of the EU Member States and the other countries participating in the Bologna Process.

3.4.4. Organization

The total number of staff of the Agency is 46 full-time employees, distributed in the structural units as shown in the following chart:



The managerial bodies of NEAA are the Accreditation Council (AC) and its Chairman, who is the Chairman of the Agency as well. The **Accreditation Council** consists of 11 members – the chairman and 10 members – who are Professors and Associate Professors from different areas of higher education; one of them is the Deputy Chairman and is responsible for post-accreditation monitoring and control. The members of the Accreditation Council are representatives of different academic and scientific institutions:

- Six representatives⁶ of higher schools;
- One representative of the Bulgarian Academy of Sciences and one representative of the Academy of Agrarian sciences;
- Two representatives appointed by the Ministry of Education and Science.

The Chairman of the AC represents the Agency and is formally responsible for its activity, but he is evidently also involved in the management of the agency. The procedures for appointing and nominating the members of the Accreditation Council are described in Table 6 of this report.

⁶ The term “representative” is used in the documentation and in the regulations of NEAA, but refers actually only to the origin of members, not to any particular mandate they would hold from their constituency.

The Accreditation Council adopts resolutions on the procedures for:

- Institutional accreditation;
- Programme accreditation of “majors” or “scientific majors” for the regulated professions list;
- Evaluation of projects for opening or transferring a higher education institution, a basic unit and/or an affiliate or a “major” belonging to the list of regulated professions.

The Accreditation Council appoints eight **Standing Committees** (SC) for different areas of higher education and an additional one for post-accreditation monitoring and control. Each SC comprises from 3 to 7 members with a term of office of 3 years. The decision for their appointment and dismissal is made by the Accreditation Council by a secret ballot. The eight functioning standing committees are:

1. Standing Committee on Educational Sciences, Musical and Dance Art.
2. Standing Committee on Humanities and Arts.
3. Standing Committee on Social Sciences, Law and National Security Studies.
4. Standing Committee on Economic Sciences and Management.
5. Standing Committee on Natural Sciences, Mathematics and Computing.
6. Standing Committee on Technical and Military Sciences.
7. Standing Committee on Agrarian Sciences and Veterinary Medicine.
8. Standing Committee on Healthcare and Sport.
9. Standing Committee on post-accreditation monitoring and control.

The chairpersons of the standing committees by areas of higher education and of the standing committee for post-accreditation monitoring and control are appointed on full-time labour agreements, while the members of the SC sign agreements with the Agency under the provisions of the Law of Obligations and Agreements.

The Standing Committees by areas of higher education adopt decisions on the procedures for:

- Programme accreditation of professional fields;
- Programme accreditation of the other scientific “majors”;
- Evaluation of projects for opening a professional field.

When fulfilling their duties, the Accreditation Council and the Chairman of the Agency are assisted by the General and Specialized Administration. **The General Administration** is structured in a Department for “Administrative, financial, legal and information services”, while the **Specialized Administration** consists of a Department for “Evaluation, accreditation and post-accreditation monitoring and control”.

- ✓ The functions of the Department “Administrative, financial, legal and information services” are stipulated in detail in Art.16, para.2 of the Statute of NEAA. The full-time personnel of this Department consists of eight employees.
- ✓ The functions of the Department “Evaluation, accreditation and post-accreditation monitoring and control” are described in detail in Art.17, para.2 of the Statute of NEAA. Essentially, its tasks are to work on the self-evaluation reports coming in from the higher education institutions, and to gather information on nominated experts and on expert reports. Eighteen employees are working full-time in this unit.

The Administration of all structural units is the responsibility of the **Secretary General**, who is appointed by the Chairman of the Agency. The duties of the Secretary General are described in Art 15, para.2 of the Statute of NEAA. However, this important function is not filled at the moment and it is unclear to the Panel when the position will be advertised.

The Accreditation Council, by virtue of its Statute and regulations, establishes assisting and **temporary bodies** (such as commissions and consulting and monitoring teams) in order to carry out its activities and to maintain, monitor and improve the quality of work at the Agency:

- Commission for the financial support of the Accreditation Council, chaired by the Deputy-Chairman of NEAA;
- Commission on Ethics;
- Commission on Quality Assurance with the participation of representatives of external institutions, associated with the activities of NEAA;
- Disciplinary Commission for the Administration of NEAA.

Last but not least, the Agency is supported by experts who integrate the **Expert Teams**. These bodies are contracted under temporary agreements to perform the site visits to the HEIs under evaluation and to submit a report to the corresponding Standing Committee. Although they are not considered full members of them, these teams include students and international experts on a regular basis.

3.4.5. Budget

NEAA is financed from the State budget and from the income it generates itself from its accreditation and evaluation activities. The expenses for the last 3 years are shown in the following Table:

| Year | Expenses in levs | Approximately equivalence in € |
|-------|------------------|--------------------------------|
| 2005 | 634.523 | 324.160 |
| 2006 | 856.997 | 437.816 |
| 2007 | 1.026.712 | 524.519 |
| Total | 2.518.232 | 1.286.496 |

As mentioned, the income of the Agency comes from two different sources: the State budget (53%) and the fees that the HEIs pay for the accreditation procedures (47%). The destination of NEAA expenses are salaries of the staff together with healthcare insurance payments, fees for panels of external experts and for members of the Standing Committees, plus maintenance costs.

The State's Public Internal Control Agency audits the financial activity of NEAA on a regular basis, in conformity with the Law on the National Budget of the Republic of Bulgarian.

An analysis of the economic resources of the Agency is included in Section 4.2 (below) dealing with ESG 3.4 (*Resources*).

4. Review report: NEAA's compliance with the ESG for external quality assurance

4.1. Introductory remarks

Even though the National Evaluation and Accreditation Agency was founded in 1996, it is still considered a relatively young accreditation organisation, since its first accreditation procedure took place only in 2005.

Bearing in mind all the information provided in the section on the Bulgarian context (above), the Panel congratulates the Agency on its positive achievements and its positive recognition by seemingly all key stakeholders in the Bulgarian Higher Education system.

In recent years, NEAA has achieved considerable developments for the establishment of a way of working (know-how, management, procedures) and a firm quality culture, not just among the Higher Education community but also inside the agency itself.

The highly motivated staff of the Agency – starting with its Chairman and ending with the administrative staff – is one of the inner strengths of the organization, without which the success of NEAA in carrying out its mandate would not have taken place.

However, the Bulgarian tradition of being a strongly centralized country is still visible. The close control maintained by the state over HEIs remains a feature of the Bulgarian higher education landscape. State regulation affects all aspects and levels of higher education and could be found contrary to the concept of autonomy promoted by the European Higher Education Area.

Nevertheless, in this State-controlled system, the external QA of higher education is the prerogative of NEAA only. This is evidence of the key role of the Agency in the overall development of Bulgarian higher education and research.

4.2. NEAA's compliance with the ESG for external quality assurance

ESG 3.1 Use of external QA procedures for higher education

- *Description*

"The external quality assurance of the agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the ESG"

NEAA compliance with each of the standards of part 2 of the ESG is analysed next.

2.1 Use of internal quality assurance procedures

"External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the ESG"

The correspondence between NEAA's standards for institutional accreditation and the ESG (Part 1) can be found in Annex 6.3 of this report. Each of the ESG of Part 1 corresponds to a criterion for institutional accreditation of NEAA's. The Agency considers that these standards should be applied with reference to the peculiarities of each given higher school and its surrounding region.

It is important to mention that the majority of the people interviewed during the site visit underlined the significant support of the National Evaluation and Accreditation Agency for

the establishment of internal quality assurance systems in the various higher education institutions. However, there is some doubt about the degree of development of comprehensive quality assurance systems at the level of the HEIs: most seem to be confined to the evaluation of teaching and to staff training programmes, while other aspects - such as curricular renovation, student-centred learning, interdisciplinarity, relevance and European compatibility - seem not to be fully covered by the QA system of individual HEIs. However, whatever the situation, institutional evaluations and accreditations carried out by NEAA do take account of the internal QA in place at HEI.

2.2 Development of external quality assurance processes

"The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used".

Procedures on external quality assurance undertaken by NEAA have explicit goals and are publicly available through the Agency’s website. Table 3 shows the different procedures for evaluation and accreditation that NEAA has developed. The documents include a clear description of the different activities in each procedure and of the stakeholders involved at every step.

Table 3. Procedures for evaluation and accreditation NEAA

| | |
|--|---|
| <p>Procedures for evaluation and accreditation and the documentation related to them</p> | <ul style="list-style-type: none"> • Procedures for institutional accreditation and documentation on their implementation • Procedures for programme accreditation of majors and scientific specialties from the regulated professions and documentation on their implementation • Procedures for programme accreditation of professional fields and scientific specialties other than those from the regulated professions and documentation on their implementation • Procedures for evaluation of projects and documentation on their implementation |
|--|---|

An important observation concerning the design of the external quality assurance procedures is that NEAA should ensure a stronger involvement of key stakeholders. Involvement of Rectors of HEI in setting up procedures consists of a one-day event. Additionally, leaders of HEIs mentioned the overload of work that accreditation procedures imply, and called for special care to be taken to ensure that the processes applied are really fit for purpose. Additionally, the Panel suggests that the Agency should conduct on a regular basis preliminary impact assessments of its actions in the form of pilot projects before adopting new formal procedures. In 1998, the Agency carried out a few pilot accreditation procedures at some higher education institutions, but this practice seems to be forgotten at present time. The Panel believes that the systematic use of pilot procedures would not only help NEAA in guaranteeing the efficiency of its work but would also allow HEIs to adjust their efforts to the demands of the accreditation system.

A consequence of not applying pilot projects as a systematic practice is the conspicuous *saturation* of the accreditation system in Bulgaria. Stakeholders from HEIs that were interviewed expressed the view that their relationship with the Agency is comparable to a marriage. *"We are engaged with NEAA since we are going through accreditation processes all the time. We have little time to improve our research and teaching processes",* as someone mentioned in the interview. NEAA should check whether all the external quality assurance processes it is developing are really needed for the fulfilment of its mission. What should be checked is whether all types of accreditation are essential or if some of them could not be put together as part of the same procedure. Some key stakeholders mentioned that institutional accreditation could be replaced by programme

accreditation and the Panel believes that some analysis is needed in order to rationalize the numerous accreditations activities that the Agency develops⁷.

2.3 Criteria for decisions

"Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently".

Table 4 describes the criteria for the different external quality assurance procedures of NEAA that are published on its website.

Table 4. Criteria for evaluation and accreditation NEAA

| | |
|---|---|
| Criteria for evaluation and accreditation | <ul style="list-style-type: none"> • Criteria for institutional accreditation of a higher education institutions • Criteria for programme accreditation of a professional field and a major from the regulated professions • Criteria for programme accreditation of education in education and qualification degree "doctor" • Criteria for evaluation of projects for opening and transferring of a higher education institution • Criteria for evaluation of projects for opening and transferring of basic units and/or affiliate of a higher education institution • Criteria for evaluation of projects for opening a professional field and a major from the regulated professions |
| Criteria and procedures for PAMC | Criteria for post-accreditation, monitoring and control |
| | Procedures for post-accreditation, monitoring and control |

The interpretation of criteria is based on different regulations that the Agency applies to all bodies that interact during the accreditation process:

Expert teams

- Methodological guidelines for drafting an expert team report, including a review on the implementation of the procedures required as part of the accreditation process.

Standing Committees

- Rules for carrying out a voting procedure by the Standing Committees in charge of an area of higher education (for programme accreditation of scientific specialties other than those for the regulated professions).
- Rules for carrying out programme accreditation of professional fields.
- Methodological guidelines for the awarding of grades (for institutional accreditation and programme accreditation and for the evaluation of projects for opening or transferring of HEIs, basic units and professional fields and specialties for the regulated professions).
- Methodological guidelines for drafting a Standing Committee report for the Accreditation Council (for institutional accreditation).

⁷ The accreditation activities that the Agency develops are listed in section 4.2 ESG 3.3 (*Activities*).

Accreditation Council

- Rules for carrying out a voting procedure by the Accreditation Council (for the institutional accreditation of higher schools).
- Rules for carrying out a voting procedure by the Accreditation Council (for the evaluation of projects for opening or transferring a HEI, basic units and branches and majors for the regulated professions).

The way in which accreditation decisions are taken makes it possible to take into account external views and to go beyond mere yes/no conclusions. The expert team drafts a report. This report is brought up to the Standing Committee who develops its own report including student observations and raises the accreditation decision (based on an overall grading system) to the Accreditation Council (see section 4.2 ESG 7 for a detailed description of the procedure). Nevertheless, this complex three-level structure could have adverse implications on consistency.

2.4 Processes fit for purpose

"All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them".

Experts that undertake the external quality assurance activities of NEAA are selected according to specific requirements:

1. Professional experience in education, research/art and creative/and other fields of evaluation.
2. Research and educational respect enjoyed in the academic community.
3. Organizational and management experience in academic activities.
4. Experience in evaluating higher education.
5. Recognition of the normative base regulating activities of a higher education institution and the accreditation activities.
6. Prestige of the institution where the expert works or worked.
7. Abilities for team working, detachment and objectivity and confidentiality.
8. No conflict of interests with the evaluated higher education institution.
9. Integrity in the activities of the expert group.
10. Observance of the requirements under Art. 13, paragraph 3 of NEAA's Statute.
11. Confirmed willingness and consent to participate in the procedure.

The basic rules for setting up an expert team are described in the Statute of NEAA. The expert teams have a temporary status within NEAA and their composition is approved by the Accreditation Council on the proposal of the Standing Committees and the Chairman of the Agency. When proposing experts for an expert team, the SCs draw on lists which include qualified persons nominated as explained in section 4.2 ESG 3.6 (*Independence*). Special attention is paid to the need to put together expert teams with a good balance between experts proceeding from different HEIs and scientific organizations. Over the last three years, NEAA has signed 1,317 part-time agreements with external experts who participated in external evaluation procedures.

*Protocol N°12 of the Agency*⁸, adopted by the Accreditation Council on 23 March 2006, provides for the involvement of international members in expert teams for evaluation and accreditation procedures, despite the fact that currently some accreditation process involve international experts and others do not. It is important to mention that NEAA considers an *international expert* an expatriate Bulgarian who has been abroad for a number of years, not a person from a different country who goes to Bulgaria to perform the evaluation. The Panel had the chance to meet two experts who lived in Germany for

⁸ This document regulates the involvement of international experts in the external quality assurance procedures of NEAA.

several years who participated in some accreditation procedures of the Agency. They stressed the very well-organized procedure applied by the Agency in performing the accreditations, as well as the easy accessibility of staff. On the other hand, as it is mentioned in section 4.2 ESG 3.4 (*Resources*), the very low fee served to expert teams for their evaluation work provide no incentive for experts from other European countries for participating in them.

NEAA follows a consistent policy aimed at involving students in the evaluation procedures on a regular basis. NEAA's regulations for this purpose are compiled in the document called "*Rules for students' involvement in evaluation and accreditation procedures*". The selection of the students that participate in the accreditation procedures is accomplished in partnership with the National Assembly of Students' Councils, the management staff of the HEIs and on the basis of personal contacts established between experts and students during interviews in previous evaluation and accreditation procedures.

It is important to point out that students are not formally members of the expert teams. They participate in some of the meetings of the site visit to the institution and write a separate report to the expert team - focused only on student issues - that is taken into account at the time of writing up the team's report. However, when the Panel interviewed students about the reality of their involvement, some of them stressed that their independent status gave them more freedom of operation and increased their credibility in the eyes of the students they consult.

The Panel noted also that the students involved were typically doing post-graduate studies at the Ph.D. level and that a few were almost professional accreditors because they had been employed by NEAA for 15 accreditation exercises or more.

Even though some members of the expert teams combine their academic activity with some work in professional organizations and are considered representatives of the future employers of graduates, the Panel is of opinion that the involvement of professional members in the expert teams for accreditation procedures is not undertaken on a systematic or regular basis, and therefore recommends the Agency to include them in the future as key members of basically all expert teams.

As far as the training of experts is concerned, the Agency designates a person from the corresponding Standing Committee – called the *observer*⁹ – to perform the briefing of the experts, along with the Chairman of the Standing Committee for post-accreditation monitoring and control. Besides the explanation of their duties and the provision of the documentation needed, special attention is paid to the following items during the training/briefing:

- How to assess the implementation of the recommendations from a previous accreditation;
- How to measure the efficiency of the internal system of quality assurance of the HEIs;
- Explanation of the parameters and characteristics of all criteria, including the trustworthiness of the quantitative data and indicators';
- Procedures for the meetings with the heads of the teaching units, students, etc;

Nevertheless, the training mechanisms of the Agency should be further developed, in particular when students and international experts are subjected to the briefing. The Panel suggests NEAA to include in the training sessions information on Bulgarian Higher Education, the legislation regulating it, the new curricular and methodological requirements of student-centred learning and the structural requirements of the Bologna Process. In terms of time and methodology, the Panel is of opinion that trainings should

⁹ For more information regarding the role of the "observer" please read section 4.2 ESG 3.7.

be, at least, one day long, in order to include enough time to touch upon all key issues and to combine theoretical information with case studies and in this way provide some practical experience to new members. In addition to enhancing the training sessions, NEAA should - in the view of the Panel - promote also meetings among the experts from different expert teams, for the purpose of experience-sharing and good practice dissemination. This idea was put forward by the students interviewed during the site visit, who insisted on their wish to share their know-how with their peers.

As explained in section 4.2 ESG 3.7 (*External quality assurance criteria and processes used by the agencies*), NEAA's accreditation model includes a self-evaluation report from the HEI, a site visit, a draft report by the expert team and the SC, an accreditation decision and a follow-up procedure. However, the Panel is concerned that the process for drawing up the report involves many people and requires efforts and time that could be saved if the students and international experts were considered as full members of the expert teams. In this way, the Standing Committee would receive a single and coordinated report instead of three different ones, which it needs to analyze before bringing-op the case to the Accreditation Council.

2.5 Reporting

"Reports should be published and should be written in a style, which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find".

Structure and content of the reports

NEAA's self-evaluation report explains that the accreditation reports are structured in three parts:

- a) An introduction, where some facts about the expert team are provided (resolution for its appointment, membership, meetings held and activities carried out during the site visit to the HEI, etc.);
- b) An analytical part, where judgments, evidence and recommendations on each of the criteria are included for each core area (research, teaching and management of the HEI);
- c) A conclusion of the analyses and the assessment exercise, together with a description of good practices and weaknesses of the HEI and a summary of the recommendations to the institution.

Institutional and program accreditation reports award grades reaching from "unsatisfactory" to "satisfactory", "good", and "very good", according to the fulfilment of the criteria and the evidence found by the expert teams.

Accreditation based on a grading system may present a number of advantages and should not be questioned as such. In the case of Bulgaria, however, grades seem to be very generous¹⁰, and therefore the system is geared towards domestic interpretation and not with a view to providing internationally comparable references. While NEAA may indeed fulfil in this way an important role in guiding HEI towards improvement, its role as accreditation body may in the end become somewhat unclear because of the coaching activities involved. In addition, when 2/3 of the programmes in a given area are accredited as "very good", this is far too many to be trusted outside the country or to identify real "poles of excellence", in particular in research.

¹⁰ The Panel could see that in 2007, 70% of the reports obtained a "very good" grade.

Public availability of the reports

In keeping with its responsibility for the publicity and transparency of its activities, NEAA publishes in May of each calendar year in the State Gazette a list of the accredited higher education institutions, their fundamental units, branches and majors of the regulated professions, as well as a list of the accredited scientific majors of HEIs and of the scientific organizations, together with the evaluation grades they were granted.

Nevertheless, although the accreditation decision is made public through NEAA's website and Information Bulletin, the accreditation reports themselves are not openly available. The Panel recommends that NEAA should make certain to fulfil the European Standards in this regard and should publish the full reports of all external quality assurance procedures run by the Agency.

2.6 Follow-up procedures

"Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently".

With the implementation of the amendments to the Higher Education Act of 4 June 2004, significant changes were introduced in the Bulgarian external quality assurance processes of HEIs: NEAA - apart from its functions in evaluation and accreditation- became also responsible for the post-accreditation monitoring and control of HEIs:

"The National Evaluation and Accreditation Agency shall carry out post-accreditation monitoring and control over:

- 1. The ability of the institution and its main units and branches to provide high quality of the education and scientific research through an internal system of assessment and maintenance of the quality;*
- 2. The fulfilment of the recommendations given in the assessment and accreditation.*
- 3. (...)¹¹.*

These changes in the legislation mean that during the entire period within which the decision for accreditation remains valid, accredited HEIs are subject to post-accreditation monitoring and control by NEAA, with the aim of ensuring continuous compliance of the criteria and procedures for accreditation established by the Agency. As a result of post-accreditation monitoring and control, the Agency can revoke or reject the accreditation of a HE institution.

Chapter IV. of the Statute of NEAA describes the organization of post-accreditation monitoring and control procedures, including:

1. The implementation of the internal system for assessment and maintenance of the quality of education and faculty of the HE institutions.
2. The fulfilment of the recommendations made by the Accreditation Council after HEIs evaluation and accreditation.

In order to fulfil its mandate in this new area, NEAA is assisted by a permanent commission called the Standing Committee for post-accreditation monitoring and control (SCPAMC). The Vice Chairman for Post-accreditation monitoring and control of the Agency acts also as the Vice Chairman of the Accreditation Council. In spite of the fact

¹¹ Art. 11, Higher Education Act.

that the Standing Committee for post-accreditation monitoring and control manages the follow-up procedures and draws up written statements on their outcomes, the body in charge of post-accreditation decisions (e.g. to confirm or to revoke an institutional or a program accreditation) is the Accreditation Council.

Post-accreditation monitoring and control activities are planned according to a schedule approved by the Accreditation Council:

- In case of institutional accreditations with the grade "very good", HEIs have 3 years (after the acceptance of the decision of the Accreditation Council) to submit to the Agency a report on the planned and implemented measures for the systematic maintenance and improvement of the quality of the education and the faculty for the time period until the expiration of the accreditation term. The Standing Committee for post-accreditation monitoring and control reviews the reports and submits them, together with a draft resolution, to the Accreditation Council who considers the proposal and makes the final decision.
- In case of institutional accreditations with the grade "good", the Standing Committee for post-accreditation monitoring and control requires from the HE institutions:
 - within 1 year, a report on the fulfilment of the specific recommendations during that year;
 - within 3 years, a second report on the fulfilment of the specific recommendations during that time.

The Standing Committee for post-accreditation monitoring and control considers the reports and, if necessary, can appoint an Expert Team to assess on site the fulfilment of the recommendations. The Standing Committee for post-accreditation monitoring and control then considers the reports of the HE institution and the Expert Team and submits them, together with a draft resolution, to the Accreditation Council for a final decision.

- In case of institutional accreditations with the grade "satisfactory", the Standing Committee for post-accreditation monitoring and control requires from the HE institution:
 - within 4 months, an action plan for the elimination of the weaknesses indicated in the accreditation decision; the Standing Committee approves the action plan or returns it for completion;
 - within 18 months, a report on the fulfilment of the action plan.

The Standing Committee for post-accreditation monitoring and control considers the report and, if necessary, can appoint an Expert Team to assess on site the fulfilment of the measures foreseen in the action plan. The Expert Team submits a report to the Standing Committee who considers it and prepares a written statement on the results of the assessment. The Accreditation Council considers the proposal and makes the decision.

- When the decision is a refusal to grant accreditation, it contains:
 - (a) The reasons for rejection together with recommendations whose implementation by the HEI or scientific organization is a compulsory prerequisite before a new procedure can be initiated;

(b) A deadline for actions to be undertaken for the elimination of weaknesses and for quality improvement, after whose expiration a new procedure can be requested.

NEAA maintains an information database related to follow-up procedures. Its website contains a clear description of all procedures for post-accreditation monitoring and control (http://www.neaa.government.bg/en/methodology/procedures_sank).

Even though the Panel was impressed that the Agency has developed such a comprehensive system for carrying out the monitoring of the accreditation decisions, it is also of opinion that this complex system could best be combined with other procedures - for instance, a regular monitoring of HEIs' websites or regular follow-up meetings with leaders of the HEIs.

2.7 Periodic reviews

"External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance".

NEAA carries out external quality assurance procedures on a regular and cyclical basis. The cyclical recurrence of the evaluation and accreditation procedures is regulated by the HEA, according to which the accreditation procedure is finalized with a well-founded decision of the Accreditation Council and the respective Standing Committee, which needs to contain the assessment grade and the time period of the accreditation and to stipulate the recommendations made and the deadline for their implementation.

As was already mentioned in section 4.2 ESG 2.6 (*Follow-up procedures*), the duration of the cycle depends on the grade obtained in the accreditation process.

The emphasis put on follow-up and periodic reviews in Bulgaria should be acknowledged and encouraged - even though the boundary with *coaching* might, at some stage, become difficult to draw, with NEAA so strongly involved in providing recommendations to HEI and following-up on their implementation. There may be a risk that at the next round of evaluation, NEAA finds itself in a position where it may actually have to assess the validity of its own recommendations once they are being taken over by the HEI.

2.8 System-wide analyses

"Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc".

The Higher Education Act stipulates on its Art. 88b that the National Evaluation and Accreditation Agency shall issue an Information bulletin, in which shall be published an annual report of the results of its activity. Apart from that, NEAA's internet site contains a document that describes NEAA's activities since the new Accreditation Council has been into office (<http://www.neaa.government.bg/en/publications/reports>). NEAA also develops and maintains information data system for the accreditation of higher institutions and programmes.

Reports for programme accreditation of a particular professional field deal with simultaneous evaluations of all higher education institutions which offer programmes in that professional field. In this summary report, the activities of the different HEIs in that area are compared, their comparative strengths and weaknesses are set out and NEAA formulates views for the future development of the professional field.

Consequently, it is clear that NEAA provides on a regular basis comparative analyses within certain disciplines. Yet, the wealth of data available to the Agency is not exploited to its full potential and NEAA is not proactively involved in providing the kind of strategic system reviews that might help Bulgarian higher education in identifying its strengths and weaknesses in the light of European and global trends. It is the Panel's opinion that, while NEAA is certainly fulfilling its technical role in quality assurance for Bulgarian HEIs, it is however not currently in a position to make its full strategic contribution to the development of the system as a whole with regard to European and international developments. Drawing up global reports and forecast studies as a systematic practice would help the Agency to analyze the overall Bulgarian higher education system and its progress and to explore and anticipate new trends in education.

- *Conclusion*

The Panel considers that NEAA complies substantially with Standard 3.1 of the ESG, but wishes at the same time to stress that the improvements referred to in the preceding sections should be undertaken if the Agency wants to further enhance its role in the Bulgarian and European quality assurance context.

ESG 3.2 Official status

- *Description of the Standard*

"Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate."

- *Analysis*

National level

The National Evaluation and Accreditation Agency is legally recognised as the only national body for assessment, accreditation and quality control in Bulgarian Higher Education, as established in Article 11 of the Bulgarian Higher Education Act. NEAA is required to implement its activity in compliance with this law. The Statute of the Agency constitutes its legal basis and stipulates the structure, activities, management, work organization and number of employees of the organization.

NEAA enjoys the status of a separate, independent and specialized state body for the evaluation, accreditation and monitoring of Higher Education. Its accountability is to the Council of Ministers (i.e. the Prime Minister, not the Minister of Education). The Chair of the Agency enjoys a quasi "ministerial" status.

The role of the Agency encompasses: the whole HE system (i.e. all types of HEI: public and private, universities and other types of HEI); for all its functions (i.e. higher education, research and "management"); and for all types of QA activities (i.e. evaluation, accreditation and follow-up for institutions, programmes and "projects" such as the creation of a new HEI, a new faculty or a new branch).

International level

At the international level, NEAA is also acknowledged as the competent evaluation and accreditation public body for Higher Education in Bulgaria. It is a member and co-founder of the Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEEN) and a candidate member of the European Association of Quality Assurance in Higher Education (ENQA).

NEAA has signed bilateral agreements with related foreign partner agencies - e.g. the Evaluation Agency for Research and Higher Education (AERES) in France, the Romanian Agency for quality assurance in higher education (ARACIS), the Commission du Titre d'Ingénieur (CTI) in France, the New England Association of Schools and Colleges (NEASC) in the USA - and cooperates and keeps active contacts with others organizations like the National Agency for Quality Assessment and Accreditation of Spain (ANECA), the Quality Assurance Agency (QAA) in the UK, the Accreditation Agency for Higher Education of the Republic of Albania (AAHE), the Agency for Science and Higher Education of the Republic of Croatia, the Education Accreditation National Center of Georgia, the Estonian Accreditation Centre, the Finnish Higher Education Evaluation Council (FINHEEC), the Center for Quality Assessment in Higher Education of Lithuania, the Higher Education Office of the Republic of Slovenia and the Board of Accreditation of the Higher Education of the Republic of Macedonia, among others.

- *Conclusion*

The Panel considers that NEAA complies fully with this Standard.

ESG 3.3 Activities

- *Description of the Standard*

"Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis."

- *Analysis*

Activities undertaken by the National Evaluation and Accreditation Agency are regulated by the Bulgarian Higher Education Act. The core functions of the Agency are evaluation, accreditation and control of the quality of Higher Education. NEAA performs:

- Project evaluation.
- Institutional and programme accreditation.
- Post-accreditation control and follow-up of the quality of Bulgarian Higher Education.

These three different types of external quality assurance procedures developed by the Agency correspond to the following legislative categories:

- Evaluation of projects for (a) opening or (b) transferring a higher education institution, (c) a faculty or college, (d) units and branches of higher schools, as well as for opening new programmes leading to a regulated official degree – (e) "majors" for the regulated professions or (f) professional fields.
- Institutional accreditation
- Programme accreditation of (a) professional fields, (b) "majors" in regulated professions, (c) scientific majors, (d) scientific majors for regulated professions.
- Post-accreditation monitoring and control.

The following table shows the activities carried out by the Agency in the last three years:

Table 5: Number of External Quality Assurance Procedure performed by NEAA 05-07

| External Quality Assurance Procedure | 2005 | 2006 | 2007 |
|--|-----------|-----------|------------|
| Institutional Accreditation | 3 | 38 | 6 |
| Accreditation of professional fields | 0 | 18 | 118 |
| Accreditation of majors (regulated professions) | 0 | 0 | 9 |
| Accreditation of education in scientific majors | 0 | 39 | 223 |
| Accreditation of education in scientific majors (regulated list) | 0 | 0 | 35 |
| Total | 3 | 92 | 391 |
| Evaluation of projects for opening a Higher School | 2 | 4 | 4 |
| Evaluation of projects for transformation of a higher school | 0 | 0 | 0 |
| Evaluation of projects for opening and transforming of main units and branches of higher schools | 5 | 6 | 6 |
| Evaluation of projects for opening a major in the regulated professions | 0 | 2 | 4 |
| Evaluation of projects for opening professional fields | 7 | 11 | 4 |
| Total | 14 | 23 | 18 |

As it can be seen in the Table above, during the last three years the Agency has dramatically increased its activity.

- *Conclusion*

The Panel considers that NEAA complies fully with this Standard.

ESG 3.4 Resources

- *Description of the Standard*

"Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process or processes in an effective and efficient manner, with appropriate provision for the development of their processes and procedures."

- *Analysis*

Human Resources

As far as human resources are concerned, the number of employees of NEAA reaches 46 (full-time) distributed in different structural units: Chairman and Vice chairman, Accreditation Council, Chairs of the Standing Committees, General Administration and Specialized Administration¹². All of them enjoy the status of civil servants selected by the Agency in an open contest and under its sole supervision, and are subjected to the State

¹² The distribution of staff can be seen in the organizational chart of the Agency at Section 3.4.4.

procedures for promotion, accountability and training as other civil servants of other Bulgarian public institutions.

The training of the staff is provided by the Government and includes English, computer skills, human resources and other management courses. In the past years, the Agency sent three members of the staff abroad to attend a course on European legislation, but it seems to remain an isolated initiative. In the Panel's opinion, NEAA employs very professional, committed and competent staff supporting the work of the Standing Committees. Human resources of the Agency are one of the most valuable strengths of the institution, and therefore special attention must be given to ensuring that proper opportunities exist for developing and extending the staff's professional capacity.

As was mentioned during the interviews, staff rotation at NEAA is very limited. Most of the staff apart from the Chairman and the Vice-chairman joined the Agency when it was created and have worked there ever since. This has resulted in very static gender and age distributions in the various units: men in their fifties or more about fill the Accreditation Council and Standing Committees, while women under this age staff the General and Specialized Administrations. NEAA should consider it a high priority to change the composition of the Council and the Committees so that distinctively more members represent the next generation of academics and that more women are involved. This must be the approach to follow if NEAA wants to succeed in continuing its innovative work in quality assurance.

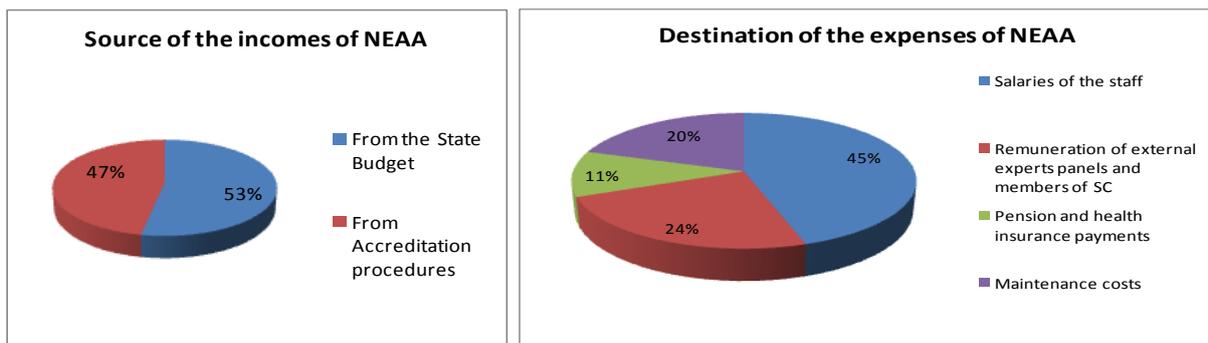
Financial resources

Regarding economic resources, NEAA is financed by the State budget and by its own income from its accreditation and evaluation activities. The financing of the Agency is specified in its Statute as follows: "The Agency is a second-level spending unit of budget credits with respect to the Minister of Education and Science". The total budget for 2007 reached the figure of 1.026.712 levs (approximately 525.000 Euros), and seems to be just enough to cover the functioning costs of the Agency.

The Public Internal Control Agency inspects the accounts of NEAA on a regular basis, as a subordinate distributor of budget credits of the national budget - in conformity with the Law on the National Budget of the Republic of Bulgaria for the relevant fiscal year.

The financial policy of NEAA is specified in the internal quality assurance system of the Agency that includes a system for financial management and control of NEAA. There are internal rules for the salaries, for the organization of public procurement contracts by NEAA and for business trips.

The following pie charts illustrate the sources of NEAA's incomes and the destination of its expenses during the last three years. They show that almost half of the income of the Agency comes from the Higher Education Institutions and 45% of the expenses go to the salaries of the staff.



Although the budget is broken down by income sources and by cost categories, the Panel is unaware of the exact distribution of the budget between the different accreditation activities of the Agency. Both the budget and the annual work plan appear to be more compilations of the various sectoral activities than strategic tools for the orientation of the Agency.

It is important to draw attention to the low fee that NEAA pays to the members of the expert teams and the students that participate in the accreditation processes. It is the Panel's opinion that this constitutes a risk for the Agency, since the best qualified Bulgarian experts may not be attracted to participate in the accreditation procedures. At the international level, low fees will be an important obstacle to the recruitment of foreign experts for the assessment teams. NEAA should be aware of the importance of this concern and should establish ways for the reduction of this threat.

- *Conclusion*

The Panel considers that NEAA complies substantially with this Standard, but that there is nonetheless significant room for improvement in this area.

ESG 3.5 Mission statement

- *Description of the Standard*

"Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement."

- *Analysis*

The mission of the National Evaluation and Accreditation Agency, as defined in the Higher Education Act, is to *"contribute to quality enhancement of Higher Education through cyclical institutional and programme evaluation and accreditation of higher education institutions in Bulgaria, through evaluation of projects for opening new higher education institutions and their basic units, as well as through post-accreditation, monitoring and control, providing independence and transparency of the procedures and high competence of the Bulgarian and foreign experts, participating in them"*. This statement is publicly available through the Agency's website.

NEAA has defined its Strategic Priorities for the period 2007 – 2010 as follows:

1. To actively underpin the national policy for higher education quality enhancement in Bulgaria
2. To really contribute to the development of higher education and research at higher education institutions while respecting the principles of transparency and competition.
3. To guarantee objective evaluation grades of the higher education institutions and good recommendations for their enhancement by assuring the high quality of the evaluation, accreditation and post-accreditation monitoring processes and procedures.
4. To support the harmonization of processes and activities of NEAA with those of the European Network of Quality Assurance Agencies (ENQA) and to foster effective co-operation with related QA agencies in the Member States of the European Union and in the Balkan region.

These strategic priorities determine a set of goals to be achieved by the Agency, which are publicly available through NEAA's website. Nevertheless, the above-mentioned priorities do not clearly set out the way in which the mission is translated into a clear policy and is then implemented in practice. The Panel believes that even though the Agency counts with action plans – which consists mainly in a schedule for programme

accreditation and post-accreditation monitoring and control activities - overall annual action plans are needed in order to set out the range of activities that NEAA will carry out every year and their linkage with the strategic priorities. Such annual action plans, as prerequisites for accountability, would gather a description of the assessment and accreditation activities of the Agency, the institutional activities undertaken with different stakeholders (higher education institutions, Ministries, international agencies, etc.) and other activities of NEAA to be achieved that year. They should preferably be part of a multiannual planning exercise.

- *Conclusion*

The Panel considers that NEAA complies substantially with this Standard.

ESG 3.6 Independence

- *Description of the Standard*

"Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders."

- *Analysis*

Although the independence of NEAA is not explicitly referred to when describing the Agency in the Higher Education Act, its operational autonomy is legally guaranteed in the section of the Act which establishes the division of responsibilities between the different stakeholders in Higher Education, including the tasks to be carried out by the Agency.

The independence of the institution was commended by all HEIs and professional organizations' stakeholders during the site visit. They mentioned that NEAA is one of few institutions in Bulgaria that offer real guarantees of impartiality and autonomy with respect to the political power. The independence of the Agency was also highlighted by the representatives of the Government and the members of the Commission for Education of the Parliament: they think that the independence of the Agency is guaranteed to a degree that allows it to bear autonomous responsibility for assessments that cannot be influenced by third parties.

Table 6 describes the nomination and appointing mechanisms of the members of the governing bodies of NEAA, its Standing Committees and its expert teams.

Table 6. Nomination and Appointment at NEAA.

| Body/ Structure | Nominated by | Elected by | Appointed by | Term of office, Replacement, Dismissal |
|---|--|---|--|---|
| Accreditation Council | Minister of Education and Science (4 nominations for 2 positions); | | The Prime Minister of the Republic of Bulgaria | No more than one six-year-term of office ½ of the membership body is renewed every three years by a randomized selection; The decision on dismissal of a member of the Accreditation Council is made by secret ballot and is submitted for approval by the Prime Minister |
| | Academic Councils of HEIs | The Rectors' Conference (12 nominations for 6 positions); | | |
| | Bulgarian Academy of Science (2 nominations for 1 position); | | | |
| | Academy of Agrarian Sciences (2 nominations for 1 position); | | | |
| Chairman of the Accreditation Council | Minister of Education and Science | | | |
| Standing Committees by Area of higher education; Standing Committee on post-accreditation, monitoring and control | Accreditation Council; Higher Education Institutions | Accreditation Council | Chairman of the Accreditation Council | Three-year term of office; Unlimited number of mandates; The decision on the dismissal a member is made by the AC by secret ballot. |
| Nomination of experts | Standing Committees; Higher Education Institutions | Accreditation Council | | Adding to a bank of experts |
| Setting up Expert teams | Standing Committees; Chairman of the Accreditation Council | Accreditation Council | Chairman of the Accreditation Council | Term of office of an expert team – 3 months |

In the light of the information shown in the Table above, the Panel agreed that all precautions were being taken, but that it would be necessary to formally capture in the Statute or in the law the need for members of the main bodies of the Agency to be appointed on the basis of their personal capacities and experience, in order to safeguard the Agency's independence in the longer term – even though no real threat seems to have existed since its inception.

As far as the nomination and appointment of experts are concerned, departments of HEIs nominate the candidates to be approved by the General Board of the University and later by the Rector. At the final stage, the appointment of the experts is performed by the Accreditation Council of the National Evaluation and Accreditation Agency. This procedure for the selection of external experts is not formally undertaken autonomously from HEIs, and the Panel recommends that the Agency should consider new ways to recruit its experts, e.g. through open calls for experts through its website.

In spite of the previous remarks, the division of responsibilities between the different decision-making bodies in the accreditation process (expert teams » Standing Committee » Accreditation Council) offers real guarantees that the outcomes of the quality assurance processes are carried out independently.

There is a wealth of technical rules aimed at guaranteeing that experts have no vested interest in the HEI or programme/project they evaluate. Art.3 of the Code of Ethics of the

Agency establishes that *"the external quality assurance is carried out on the grounds of values such as legality, impartiality and conscientiousness, independence, objectivity and honesty, competence, transparency, responsibility, confidentiality and communication"*. To prevent a conflict of interests with the HEIs and following NEAA's Statute, the members of the expert teams must not be representatives of the evaluated institutions, and must not teach or have taught in them or in their branches in the 18 months preceding the initiation of the accreditation or evaluation procedure.

The Panel concludes that the independence of NEAA is well documented with reference to the legal status of NEAA; the composition of its main bodies; the establishment of criteria and procedures and the selection of experts; the avoidance of external interference in decision making about outcomes. There are, nonetheless, a small number of potentially weaker points that are worth addressing: the Agency's own internal regulation needs to be approved by the Ministry after being adopted by the Accreditation Council; the appointment of government nominees - that are in effect qualified academics rather than party politicians - is current practice but is not guaranteed in law; the ministry may ask NEAA to examine the need to revoke an accreditation (but may not decide by itself to revoke an accreditation; this possibility has not been used hitherto);

Additionally, it is important to remark that NEAA's profile is highly "academic", since all key persons are or were respected university professors or academicians. This may over time lead to two possible drifts. One is that of in-breeding - in spite of all the efforts to prevent it formally - given the small proportion of foreign members and young evaluators and the small size of the higher education system where everyone knows everyone else in his/her area. The other is the risk of "academism" exclusive of other influences (there is not a single non-academic professional on NEAA's governing bodies - as explained in *section ESG 2.4 Processes fit for purpose*. This implies that the actual degree of independence of NEAA from academia may be less than the desirable one.

- *Conclusion*

Overall, the Panel nonetheless considers that NEAA complies substantially with this Standard.

ESG 3.7 External quality assurance criteria and processes used by the agencies

- *Description of the Standard*

"The processes, criteria and procedures used by the Agency should be pre-defined and publicly available. These processes will normally be expected to include: a self-assessment or equivalent procedure by the subject of the quality assurance process; an external assessment by a group of experts, including, as appropriate, a student member(s) and site visits as decided by the Agency; publication of a report including any decisions, recommendations or other formal outcomes; a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report. "

- *Analysis*

The methodology for evaluation and accreditation applied in Bulgaria is in line with the basic principles of the ESG, particularly with respect to the steps to be followed from self-evaluation to external evaluation and formal decision-making. The process includes:

- (a) A self-evaluation report by HEIs, based on the list of criteria of NEAA;
- (b) An external evaluation by an expert team, with a site visit and an evaluation report;

- (c) A summary report of the Standing Committee on the basis of the expert team's report (plus the student report and, where applicable, the report provided by a foreign expert);
- (d) A formal decision, by the Accreditation Council or the relevant Standing Committee, depending on the evaluation and accreditation procedure.
- (e) A structured follow-up procedure which includes control over the implementation of the recommendations made.

The documents "*Procedures for institutional accreditation. Documentation for execution of the procedures*", "*Procedures for programme accreditation*" and "*Procedures for project evaluation*" published on NEAA's website clearly describe the entire process of external quality assurance used by the Agency. Criteria for institutional and programme accreditation are also pre-defined and made public in the methodology section of the website.

In order to assist HEIs under evaluation in drafting the self-evaluation report, NEAA has published methodological guidelines in the Information Bulletin of the Agency. Leaders from HEIs interviewed underlined their satisfaction with the accessibility of NEAA's staff during the self-evaluation process (by means of e.g. meetings, seminars at local and regional level, etc.).

The complete activity of the expert team – nomination, selection, carrying out of the site visit, drafting of the report - is regulated by means of different documents. The site visits include students on a regular basis as well as international experts in some cases, as explained in section 4.2 *ESG 3.1 (Process fit for purpose)*. Additionally, the Agency provides another person to the accreditation process – called the *observer*. The observer carries out the briefing of the team and takes part in the most important meetings at the institutions under evaluation as well as in the Expert team discussions. The observer belongs to the corresponding Standing Committee and his/her duty is to assure that the process is conducted according to NEAA's standards.

Rules for involving students and postgraduates in the procedures for evaluation and accreditation have been drafted by NEAA and are publicly available in the Information Bulletin. Currently, students are not considered members of the expert teams, although several stakeholders have expressed their interest for their integration as full members in the future. Students prepare a report that is taken into account in the accreditation process by the Standing Committees and by the Accreditation Council. There is no mechanism in power that guarantees the consideration of the student parallel report in drafting the final report. Practically, the integration of the student perspective in the final report depends on the approach taken by the respective Standing Committee.

After the site visit, the expert team drafts its report, considering students' contribution on aspects such as the learning process and the quality of facilities and student services. This report is then passed up to the corresponding Standing Committee who drafts its own report - different from the one submitted by the expert team. In the case of institutional accreditation or programme accreditation for regulated professions, the report from the relevant Standing Committee is passed on to the Accreditation Council for the final decision. Thus, it is clear that the Agency has the final responsibility for its decisions.

Even though the procedure leading to the final accreditation decision is based on consensus and requires the agreement of all bodies involved in the process, the Panel is of opinion that the decision-making mechanism of the Agency could be made simpler and lighter without losing any of the current guarantees embodied in it (e.g. by way of integrating all the reports in a single, harmonized one).

NEAA publishes through its website and its Information Bulletin the outcomes of all its procedures (i.e. all accreditation decisions), but the reports upon which they are based are not available. This should be revisited by the Agency, as was already mentioned in section 4.2 ESG 2.5 *Reporting*, in order to make the full information available to users and stakeholders. The fact that decisions come with a grade (very good, good, fair, etc) does not reduce the need to make off for this relative weakness.

The follow-up procedures – as described in section 3.1 ESG 2.6 - receive particular attention through the work of the Standing Committee for Post-accreditation monitoring and control, which enjoys high visibility and status in the Agency's organisation and activities.

NEAA's accreditation decisions are individual administrative Acts which may be appealed by going to the Administrative Court of First Instance in Sofia, in compliance with the Higher Education Act and the Administrative Procedure Code. The legal procedure is double instanced, which means that the First Instance's decision could be appealed by going to the Supreme Administrative Court. The Decision of the Supreme Court is final and could not be subject of any further appeal. But it is important to point out that in case the Court overrides the appealed decision, the procedure is returned to NEAA for a new consideration of the case, in the light of the Court's interpretation of the law. NEAA's new decision could again be appealed, in compliance with the Administrative Procedure Code.

- *Conclusion*

The Panel considers that NEAA complies substantially with this Standard.

ESG 3.8 Accountability Procedures

- *Description of the Standard*

"Agencies should have in place procedures for their own accountability."

- *Analysis*

NEAA's internal quality assurance is the responsibility of the Accreditation Council and its Chairman but draws on the opinion of all structural units of the Agency. The Commission on quality assurance of the Agency and the System for quality assurance of the National Evaluation and Accreditation Agency constitute NEAA's main instruments for the assurance of the quality of its procedures of external evaluation, accreditation and post-accreditation monitoring and control. The system is publicly available through NEAA's website and consists of four major subsystems that interact with the outer environment as shown in the following chart:



The efficiency of the "System of quality assurance in the activities of NEAA" is discussed, analyzed and assessed on a regular basis in order to monitor the improvements accomplished.

According to the Agency's Statute, the drafting, implementation and functioning of the "System of quality assurance in the activities of NEAA" is within the competence of the Secretary General of NEAA¹³. The Agency uses this system to harmonise the European external quality assurance standards with its own standards for quality assurance.

NEAA is required to provide an annual report to the competent state authorities about administrative and financial issues, but is not required to produce to any national body like Parliament or Government an overall, future-oriented report on its activities and lessons learnt. The National Audit Office of the Republic of Bulgaria carries out a cyclical (every three years) independent audit of NEAA. The final audit report of 25 June 2005

¹³ Currently, since the position of the Secretary General is vacant, is the Commission on quality assurance the one in charge of watching over the quality assurance system.

noted that the criteria and evaluation and accreditation system worked out by NEAA correspond to the European practices and expectations.

As far as internal and external feedback mechanisms are concerned, the Agency has designed an instrument, called CORRECTOR-NEAA, which is described in the following Table:

Table 7. CORRECTOR-NEAA – mechanisms for collecting feedback for improving NEAA Activity

| | | |
|--|---|--|
| Internal relations for feedback from the administration, Standing Commissions and Accreditation Council | Specialized administration | Offers an opinion on the effectiveness of the procedures of accreditation and evaluation of projects and on the need for changes and improvements in the methodology used - Statute, art. 17, par. 2, p. 5; Discussions at weekly planning meetings on the procedures of evaluation and accreditation at NEAA |
| | Standing Commissions send to AC: | Produce information reports on the decisions taken in line with art.88a, par.4, p.1 of HEA on the procedures for programme accreditation of professional fields, programme accreditation of scientific majors, on evaluation of projects for opening professional fields at Heist Produce summary reports on programme accreditation procedures of professional fields with regard to the future development of the respective professional field |
| | Members of AC and SC and Secretary General present to: | Information in written or oral form on meetings or visits at institutions, connected to Heist or at other public institutions Written reports on executed missions (e.g. abroad) |
| External relations for feedback from experts and institutions with the aim of improving quality | External experts | NEAA surveys the opinion of members of expert teams |
| | Students in expert teams | NEAA surveys the opinion of students, members of expert groups visiting Heist |
| | International experts | NEAA encourages international experts who are members of expert teams to express their opinion on the evaluation and accreditation procedures carried out by the Agency |
| | Higher schools | NEAA conveys surveys at Hess which have been object of evaluation procedures |
| | Organizations and physical persons from the system of HE | NEAA surveys the opinion of stakeholders, including institutions in the system of HE (see Survey of students' participation at the website of NEAA) |
| Internal mechanism for change by means of which NEAA reacts to internal and external recommendations on improving quality | Specialized Administration | In line with art. 17, par. 2, p. 6 of Statute of NEAA, the specialized administration makes proposals for improving the effectiveness of the evaluation and accreditation work at the Agency |
| | Standing Commissions | AC sends to Standing Commissions drafts of documents that are to be adopted by NEAA – they are discussed and proposals for improvements are made |
| | Rectors' Council | AC sends to Rectors' Council drafts of documents that are to be adopted by NEAA – they are discussed and proposals for improvements are made |
| | Leadership of HEIs | AC sends to the leaders of HSs drafts of documents that are to be adopted by NEAA – they are discussed and proposals for improvements are made |
| | International experts | NEAA encourages international experts who are members of expert teams to express their opinion on the evaluation and accreditation procedures carried out by the Agency |
| Survey, analysis and improvement of activities | Commission on IQA | This is executed on the basis of the gathered opinions and recommendations, coming from stakeholders. Every two months the Commission analyses the data and makes recommendations for correcting specific aspects of activities to the AC; AC discusses and approves them, after which they are implemented |

Overall, the mechanisms used for CORRECTOR-NEAA appear to be reasonably comprehensive – at least with respect to the HE community. It should however be mentioned that during the interview conducted with students who have participated in external quality assurance processes, they offered to share with NEAA their ideas about how to further improve the procedures in a formal way.

Another important observation is that NEAA's accountability is currently focused on HEIs. Although NEAA's role and authority seems to be widely accepted by the higher education community, its accountability towards society at large is not sufficiently provided for.

NEAA's contribution to the enhancement of quality in Higher Education is not yet properly acknowledged in Bulgarian media. The Agency is fully aware of this (which was mentioned as an area of concern by all levels of staff during the interviews) and has signalled its intention to address this issue as a strategic priority in the near future.

- *Conclusion*

The Panel considers that NEAA complies substantially with this Standard.

5. Conclusion: NEAA's compliance with the ESG

5.1. Summary of strengths and areas for improvement

Strengths

1. NEAA is the sole organisation responsible for quality assurance in the whole Bulgarian higher education and research system. It is recognized as a separate, independent and specialized state body and its authority is guaranteed by law.
2. NEAA has a clear and focused mission statement.
3. NEAA employs highly professional, committed and competent staff that ensures that the accreditation process is carried out efficiently.
4. NEAA's independence from Government appears to be protected in laws and regulations in every possible respect and is respected in practice.
5. Programme and institutional accreditation usually follow the stages which are expected as good practice in the ESG.
6. NEAA has defined well-structured criteria and procedures for evaluation and accreditation and these are publicly available before the external quality procedure takes place.
7. Follow-up procedures, monitoring and control activities are particularly well developed.
8. Periodic reviews of the institutions and programmes are carried out on a regular basis.
9. NEAA has engineered a system for student involvement in the external quality procedures on a regular basis not foreseen by law.
10. The Agency has in place an adequate technical system for internal quality assurance with regard to its concrete tasks.
11. NEAA has succeeded in developing better quality assurance systems at the HEIs.
12. The international relations maintained with partner agencies allow NEAA to be part of the European quality assurance community in higher education.

Areas for improvement

1. NEAA would benefit from defining annual action plans. These plans should include, apart from a description on the different evaluation and accreditation activities of the Agency, references on the conditions required for Bulgarian higher education and research to achieve full integration into the European context.
2. A more strategic definition and management of the budget, specifying the costs of the different accreditation activities, would allow NEAA to take on a more strategic role in the evaluation of Bulgarian higher education. Fees paid to the external experts need to be reviewed, especially to give an incentive to international experts from abroad.

3. It may also be important for the future of NEAA to seek a better gender balance and to involve a greater proportion of persons from the next generation and from more diverse backgrounds (including professionals) in decision-making bodies.
4. Student participating in expert teams should have the status of full members (not just that of external advisers to the expert team reporting on a limited number of aspects). The same applies with respect to foreign experts and professionals. Special attention must be paid to include the latter.
5. The process of drawing up the accreditation reports could be made less burdensome: the reports drawn up by the expert team, the student, the international expert, the Standing Committee and the Accreditation Council should be consolidated in a single procedure and document. This would also facilitate their publication.
6. NEAA should take a closer look at the requirement to publish all reports and should find a way to put more information at the disposal of users and stakeholders.
7. The training of external experts should be improved. More efforts should be made to train staff and experts about the EHEA and to expose them to European/international counterparts.
8. The system of awarding accreditation grades – very good, good, satisfactory – offers interesting possibilities but needs to be used with caution (less generously) if it is to keep (or to restore) its credibility. It should be reviewed in order to generate more appropriate differentiation and to enhance its international readability and credibility.
9. NEAA should also pay closer attention to its role in providing system-wide analyses for the overall improvement of Bulgarian higher education and its optimal insertion in the EHEA.
10. A related need is to check whether all the various external quality assurance procedures that the Agency develops are really essential for the enhancement of the quality in Bulgarian Higher Education. Programme and institutional accreditation could be merged in the same process and pilot procedures could be launched in order to fine-tune new procedures before they are generalised.
11. NEAA would benefit from inviting HEIs, students and professional organizations to join-in during the design stage of external quality assurance procedures.
12. Public visibility and recognition of the Agency should be enhanced. Wider debates on quality assurance issues should be generated by NEAA in order to achieve better understanding on its role in the HE spectrum and to raise the level of ownership of the stakeholders over its actions.

5.2. Final statement

In the light of the documentation and oral evidence provided during the site visit, the Review Panel is satisfied that in the performance of its functions, NEAA is in substantial compliance with the ENQA Membership Criteria and with the Standards and Guidelines for Quality Assurance in the European Higher Education Area.

The Panel therefore recommends to the Board of ENQA that NEAA should be awarded Full membership for a period of five years. At the same time, it may be requested to provide before that date a progress report with respect to the various weaker points referred to above.

6. Annexes

6.1. Terms of reference (ToRs) for the external review

The sole purpose of the review is to establish the extent to which the National Evaluation and Accreditation Agency (NEAA) complies with European Standards and Guidelines (ESG) for Quality Assurance in European Higher Education Area (EHEA). The aim of review is to fulfill the requirements for membership in the European Association for Quality Assurance in Higher Education (ENQA). Regarding the above the review will be Type A.

In fulfilling this purpose the review should observe the following schedule, as agreed with ANECA (the appointed coordinator of the review by ENQA):

1. Nomination and appointment of a panel of reviewers – by March 2008 (to be approved by ENQA).
2. Production of a self-evaluation report by NEAA – by 1 May 2008.
3. On-site visit of the panel of reviewers – in the period of 15-20 June 2008 (to be approved ENQA/ANECA).
4. Review panel's report after the site visit – to be specified.
5. Consideration of the review report and final decision by ENQA – to be specified.

These Terms of references has been approved by the NEAA Accreditation Council (14 February 2008) and approved by the Board of ENQA (3 March 2008).

According to the ToRs, ANECA has defined the following external review procedure.

1. The Review Process

The process will be designed in the light of the ENQA policy on "ENQA-organized external reviews of member agencies" (www.enqa.eu). ENQA delegated this aspect on ANECA.

The evaluation process will consist of the following steps:

1. Definition of the Terms of Reference (ToR) by NEAA and ANECA.
2. Approval the ToR by the Board of ENQA.
3. Nomination and appointment of the review panel by ANECA after the approval by the Board of ENQA.
4. Self-evaluation by ANECA including the preparation of a self-evaluation report by NEAA.
5. A site visit by the panel of reviewers to ANECA.
6. Preparation and completion of the external report by the external panel.
7. Final decision by the Board of ENQA.
8. Publication of the reports.

2. The Review Panel

A review panel will consist of six members: 2 representative of higher education institutions, 2 quality assurance experts, a student member and a secretary of ANECA. The reviewers will have to sign a non-conflict of interest statement as regards the NEAA review.

ANECA has contacted with:

1. Prof. Francisco Marcellán – Chair. Full Professor, Universidad Carlos III de Madrid. Ex director of ANECA.
2. Prof. Iordanka Naydenova Kouzmanova – member. Ex-Rector of Agricultural University – Plovdiv.
3. Prof. Guy Haug – member. European expert in higher education policies, cooperation and evaluation.
4. Prof. Christian Thune – member. He is Vice-Chair of the Danish accreditation board.

5. Mr. Viorel Proteasa – member. Representative of the ESU.
6. Mrs. María Becerro – secretary. Technician of the Institutional and International Relations unit of ANECA.

3. Self-evaluation Report

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

- Self-evaluation is organised as a project with a clearly defined schedule.
- The self-evaluation report should contain: background and description of the current situation of the Agency, analysis and appraisal of the current situation, a summary of the Bulgarian university system, a description of the self-evaluation process, proposals for improvement and measures already planned; a summary of perceived strengths and weaknesses.

4. A site visit

The review panel will draw up and publish a schedule of the site visit. NEAA shall be given at least one month's notice of the site visit schedule in order to properly organize the requested interviews. The schedule will include an indicate timetable of the meetings.

The site visit will close with an oral presentation and discussion of the main findings of the evaluation.

5. Preparation and completion of the evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the expert panel. It will be necessary to provide a clear rationale for its findings. A draft will be submitted for comment to NEAA with four weeks of the site visit for comment on factual accuracy.

After the comments, the final report will be finalized within two months of the site visit and will not exceed 40 pages in length. It will be send to ANECA.

6. Final decision by the Board of ENQA

The Board of ENQA analyses the final report and take a decision with about the evaluation of the Agency.

ENQA will communicate the decision to the NEAA and make it public on its website.

7. Publication of the Report

The review report and the follow-up plans agreed upon will be published on NEAA Website.

8. Budget

The NEAA shall pay the following related fees:

- Chair 5.000 €.
- Review Secretary 5.000 €.
- Other panel members 3.000 € (4 members).
- Travel, subsistence per dyer and accommodation (approximate) 7.000 €.

This gives a total indicate cost of 29.000 € for the review. In the case that the allowances for travel and subsistence expenses are exceeded, NEAA will cover any additional costs after the completion of the review.

6.2. Agenda of the external review

Day One – 17 June

| Session | Time | Group |
|---------|---------------|--|
| S 1 | 8.30 – 9.45 | Representatives of the management team of NEAA 1. Prof. DSc Ivan Panayotov – President of NEAA 2. Prof. DSc Danail Danailov – Vice-President of NEAA 3. Prof. Dr. Todor Shopov – International Relations Councillor 4. Mr. Atanas Georgiev – Director of Administrative, Financial, Legal and IT Service 5. Mr. Krum Angelov – Chief Accountant 6. Mrs. Stanka Stanoeva - Human Resources Officer 7. Mr. Kaloyan Pargov – International Relations and Protocol Councillors 8. Mrs. Anelia Vasileva –Legal Councillor |
| | | Panel Review |
| S 2 | 10.30 – 11.45 | Specialized Administration: 1. Anna Sofiyanska – Chief expert, Standing Committee on healthcare and sports 2. Asenka Tzonkova – Chief expert, SC on technical sciences and military science 3. Valentina Mitreva – Chief expert, SC on technical sciences and military science 4. Krasimira Georgieva – Chief expert, SC on economic sciences and management 5. Lyubomira Boneva – Chief expert, SC on agrarian sciences and veterinary medicine 6. Mariela Aleksieva – Chief expert, SC on Humanitarian sciences and arts 7. Minka Slavcheva-Staikova – Chief expert, SC on natural sciences, mathematics and computing 8. Rositzta Valtcheva – Chief expert, SC on social sciences, law and national security 9. Stoyanka Kireva – Chief expert, SC on pedagogical sciences, music and dance arts and Director of the Specialized Administration |
| | | Panel Review |
| S 3 | 12.00 – 12.30 | Chairmen of Standing Committees of NEAA: 1. Akad. Evgeni Golovinski – SC on natural sciences, mathematics and computing 2. Prof. DSc Ivan Chorbadjiiski – SC on technical sciences and military science 3. Prof. DSc Ivan Stoyanov – SC on humanitarian sciences and arts 4. Prof. DSc Doncho Gradev – SC on social sciences, law and national security 5. Prof. Stanka Tonkova – SC on economic sciences and management 6. Prof. Dr. Georgi Bigkov – SC on pedagogical sciences, music and dance arts 7. Prof. DSc Anna Belcheva – SC on healthcare and sports 8. Assoc. Prof. Ivan Vurlyakov – SC on agrarian sciences and veterinary medicine |
| | 12.30 – 13.30 | Panel Review and lunch |
| S 4 | 13.45 – 14.30 | Members of Accreditation Council of NEAA: 1. Acad. Ivan Radev 2. Prof. DSc Atanas Atanasov 3. Prof. DSc Nikola Balabanov 4. Prof. DSc Dimitar Braikov 5. Prof. Dr. Iliya Gyudzhenov 6. Prof. DSc Dimitar Yonchev 7. Prof. DSc Jordan Kalaikov 8. Prof. DSc Nikolai Nikolaev 9. Prof. DSc Ivan Simeonov 10. Assoc. Prof. Dinko Dinkov 11. Assoc. Prof. Eng. Marko Todorov |
| | | Panel Review |
| S 5 | 15.00 – 15.45 | Members of Standing Committees of NEAA: 1. Acad. Vassil Golemski – SC on natural sciences, mathematics and computing 2. Prof. DSc Chavdar Popov – SC on humanitarian sciences and arts 3. Assoc. Prof. Maya Ryazkova – SC on healthcare and sports 4. Prof. DSc Dimitar Dimitrov – SC on social sciences, law and national security 5. Prof. Dr. Petko Notov – SC on technical sciences and military science 6. Prof. Dr. Stanyo Stanev – SC on pedagogical sciences, music and dance arts 7. Assoc. Prof. Georgi Trenchev – SC on agrarian sciences and veterinary medicine |
| | | Panel Review |
| S 6 | 16.00 – 16.45 | External experts of NEAA: 1. Prof. Dr. Dimitar Djerov – University of Medicine, Sofia, SC on healthcare and sports 2. Assoc. Prof. Ivan Stoychev – University of National and World Economy – SC on economic |

| | | |
|--|---------------|--|
| | | <p>sciences and management</p> <p>3. Assoc. Prof. Veska Shosheva – Trakia University – SC on social sciences, law and national security</p> <p>4. Assoc. Prof. Rumen Tomov – University of Forestry – SC on agrarian sciences and veterinary medicine</p> <p>5. Assoc. Prof. Violeta Vaneva – Rousse University – SC on pedagogical sciences, music and dance arts</p> <p>6. Prof. DSc Nikolai Kolev – Technical University of Sofia – SC on technical sciences and military science</p> <p>7. Assoc. Prof. Georgi Donev – South-West University “Neofit Rilski” – SC on humanitarian sciences and arts</p> <p>8. Prof. DSc Lyubomir Lilov – University of Sofia “St. Kl. Ohridski” – SC on natural sciences, mathematics and computing</p> <p><i>international experts:</i></p> <p>9. Prof. Dr. Gerd-Joachim Krauss – Martin-Luther-University, Halle, Germany</p> <p>10. Prof. Dr. Michail Davidoff – University of Hamburg, Germany</p> |
| | 16.45 – 19.00 | Panel Review meeting , end of day one |

Day two – 18 June

| Session | Time | Group |
|---------|---------------|--|
| S 7 | 8.30 – 9.00 | <p>Undergraduates and doctoral students who have participated in evaluation and accreditation procedures¹⁴:</p> <p>Doctoral students</p> <p>1. Mr. VasSil Panayotov Iliev – University of Chemical Technology and Metallurgy, Sofia</p> <p>2. Mr. Rad Stanev – Technical University of Sofia</p> <p>3. Mr. Kiril Valentinov Yankulov – Agriculture University, Plovdiv</p> <p>4. Mr. Dragomir Stefanov – University of National and World Economy, Sofia</p> <p>5. Mr. Georgi Tomchev Tomov – Medical University – Plovdiv</p> <p>Students</p> <p>6. Miss Maria Savkova Georgieva – Sofia University</p> <p>7. Mr. Borislav Dimitrov Sandov – Sofia University</p> <p>8. Christo Boikov Panchev – Sofia University</p> |
| | | Panel Review |
| S 8 | 9.15 – 10.00 | <p>Representatives of Parliament and Ministry of Education and Science:</p> <p>1. Mrs. Valentina Bogdanova – Deputy-Chair of Parliamentary Commission on Education and Science</p> <p>2. Mrs. Tatjana Kalkanova – Member of Parliamentary Commission on Education and Science</p> <p>3. Assoc. Prof. Vanya Dobрева – Deputy Minister of Education and Science</p> <p>4. Mrs. Maria Fartunova – Director of Higher Education Policy at Ministry of Education and Science</p> |
| | | Panel Review |
| S 9 | 10.30 – 11.00 | <p>Representatives of institutions and organizations stakeholders in higher education in Bulgaria:</p> <p>1. Acad. Petar Kenderov – Chairman of Presidium of Supreme Attestation Commission</p> <p>2. Acad. Vassil Sgurev – Chairman of Federation of scientific-technical unions in Bulgaria</p> <p>3. Prof. Dr. Damyan Damyanov – Chairman of Union of Scientists in Republic of Bulgaria</p> <p>4. Prof. Dr. Trifon Michailov – High Medical Council of Ministry of Health, representative of Bulgarian Union of Dentists</p> <p>5. Assoc. Prof. Angel Georgiev – Deputy Minister of State Administration and Administrative Reform</p> <p>6. Assoc. Prof. Lilyana Valtcheva – Chair of National Trade Union of Higher Education</p> |

¹⁴ The panel arranged a parallel meeting with National Student Unions of Bulgaria, but, unfortunately, the representatives of the National Assembly of Student Councils – the student body officially institutionalised through the Higher Education Act did not participate.

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| | | and Science 7. Mrs. Dora Yankova – Chair of National Union of Municipalities in Republic of Bulgaria 8. Prof. Dr. Naum Yakimov – Representative of the Management Team of Bulgarian Academy of Sciences 9. Prof. Dr. Mila Vlaskovska – National Consultant on Pharmacology |
| | | Panel Review |
| S 10 | 11.15 – 12.00 | Rectors' Conference: 1. Prof. Dr. Borislav Borisov – Chairman of Rectors' Conference 2. Prof. Dr. Vladimir Ovcharov – Chairman of Rectors of Medial Universities in Bulgaria /1998-2008/ |
| | 12.00 – 13.15 | Panel Review meeting, lunch |
| S 11 | 13.30 – 14.00 | Rectors of Higher Schools 1. Prof. DSc Ivan Mirchev – South-Western University, Blagoevgrad 2. Prof. DSc Margarita Georgieva – University of Shumen 3. Prof. DSc Anna Nedyalkova – Varna Free University 4. Assoc. Prof. Boris Stefanov – University of Chemical Technology and Metallurgy, Sofia 5. Prof. DSc Ivan Stankov – Trakia University, Stara Zagora 6. Prof. Dr. Anelia Klisarova – Medical University, Varna 7. Prof. DSc Plamen Legkostup – University of Veliko Turnovo 8. Assoc. Prof. Dimitar Dimitrov – Higher School "Agricultural college", Plovdiv 9. Prof. DSc. Stoyan Denchev – State University for Library Studies and Information Technologies, Sofia 10. Prof. DSc. Ivanka Lecheva – Agrarian University, Plovdiv 11. Prof. Dr. Rumens Markov – Academy of Ministry of Interior |
| | | Panel Review |
| S 12 | 14.30 – 15.15 | Members of SC on Post-accreditation Monitoring and Control and SC on Internal Quality Assurance: IQA-NEAA 1. Prof. DSc. Yosif Iliev –Deputy President of NEAA until May 16, 2008, engaged with Post Accreditation Monitoring and Control 2. Assoc. Prof. Dr. Stanka Velichkova – Chairwoman of SC on Post-accreditation Monitoring and Control 3. Assoc. Prof. Dr. Galin Tzokov - IQA NEAA 4. Assoc. Prof. Dimitar Todorovski – IQA NEAA 5. Assoc. Prof, Dimitar Chakarov – IQA NEAA 6. Mrs. Anita Darvenyakova, Senior Expert, SC on Post-accreditation Monitoring and Control |
| | | Panel Review |

6.3. Correlation between NEAA standards for institutional accreditation and ESG standards of part 1.

| Harmonisation of NEAA'S criteria for institutional accreditation with part 1 of esg (Appendix 6 of IQA-NEAA) | | | |
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| ENQA standards | NEAA criteria | Content (characteristics) of NEAA criteria | |
| 2.3.1. Policies and procedures for QA | Policy and related procedures for QA and standards for programmes and degrees awarded | 1.1. HEI executes teaching in accordance with its educational mission, aims and objectives | |
| | Relations between the education process and research at HEI | 2.1. HS organizes, supports and develops research (artistic) activity of academic staff | 2.1.2. Organises teaching in the respective educational levels (specialist, bachelor, master, doctor), forms (full-time, part-time, distance) and for qualification in accord with its aims, objectives and capacity |
| | | 2.2. HEI organizes, supports and develops research (artistic) activity of undergraduate and graduate students | 2.1.1. Ensures the involvement of teachers in research, artistic and other projects in the structural sections of the HEI and its other research units (institutes, sectors, departments, laboratories, groups, etc.) |
| | | 2.3. HEI disseminates and applies the results of research (artistic) activity in science and practice | 2.2.2. Periodically analyses and discusses the results of undergraduates' and graduates' participation in research and artistic projects |
| | Institutions declare willingness to develop a culture, recognizing the importance of quality and its assurance and develop and implement a strategy for cultivating quality | 1.4. HEI builds a system for observation, evaluation, support and improvement of quality of teaching | 2.3.3. Implements results of research (artistic) activity in the teaching process |
| 1.4.1. Structures are created and internal normative documents (regulations, instructions, etc.) are developed for the functioning of the system – from the acceptance of students to their professional realization | | | |
| Strategy, policy and procedures should have an official status, should be announced and accessible and should involve students and other stakeholders | 1.1. HEI executes teaching in accord with its educational policy | 1.4.2. Periodically evaluates the results of the functioning of the system, including internal and external audits; takes measures for its improvement | |
| | | 1.1.1. Has documented mission statement, aims and objectives, which are publicized and used for the development of the policy of HEI directed to the needs of society at regional and national level | |
| 2.3.2. Approval, monitoring and periodic review of programmes and degrees awarded | 1.2. HS performs procedures for developing, approving, observing and renewing the educational documentation (qualification descriptions, curricula, syllabi) | 1.2.1. Creates a procedure for developing and adopting educational documentation for all educational levels and forms | |
| | | 1.2.2. Periodically analyses and renews the current educational documentation, taking into account students' opinion and the opinion of the employers | |
| 2.3.3. Assessment of students | 1.3. HS develops and publicizes systems (rules and procedures) for measuring and assessing students' knowledge and skills for accumulation and transfer of credits | 1.3.1. Creates an organisation for the functioning of the system | |
| | | 1.3.2. Periodically evaluates and publicizes the results of the functioning of the system, taking into accounts students' opinion | |

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| 2.3.4. QA of teaching staff | HE Institutions should have means of ensuring that the teaching staff be qualified | 3.2. HS ensures professional level, qualification and development of academic staff | 3.2.1. Builds and organization (structures and normative base) for sustaining and developing professional qualification and academic career of teaching staff appointed |
| | | | 3.2.2. Ensures the normative minimum of habilitated teachers appointed |
| | | | 3.2.3. Ensures internal mobility of academic staff with regard to meeting academic standards of educational disciplines |
| | | | 3.2.4. Ensures continuity of teaching staff, including formation of doctoral students and postdoctoral students |
| | | 2.1. HS organizes, supports and develops research (artistic) activity of academic staff | 2.1.1. Ensures the involvement of teachers in research and artistic projects in basic units of HEI and other research sectors (institutes, departments, laboratories, groups, etc.) 2.1.2. Supports research (artistic) activity of academic staff: <ul style="list-style-type: none"> • For publication on paper and electronically (monographs, studies, articles), textbooks, forums at national and international level • For typical creative, artistic, sports activities |
| | | | 2.1.3. Periodically analyses and evaluates the results of research and artistic activity and formulates priorities 2.1.4. Ensures opportunities and creates stimuli for publishing the results of research and artistic activities (has its own publishing facility, permanent contracts with external publishers, servers and domains for online publishing, etc) and for typical creative, artistic and sports activities |
| 3.4. HS carries out full-scale cooperation with other HEIs and organizations at national and international level | 3.4.2. Teachers' participation in national and international research and educational projects is supported and encouraged | | |
| 2.3. HEI disseminates and applies the results of research (artistic) activity in science and practice | 2.3.5. Protects intellectual property in the research and artistic area | | |
| 2.3.5. Resources for teaching and services for students | HEI should ensure adequate resources supporting the teaching of students suitable for each programme | 3.3. HEI manages and develops material and information resources necessary for the teaching, research and artistic activities | 3.3.1. Develops and sustains material resources and facilities for teaching and research in accord with specific nature of HEI: <ul style="list-style-type: none"> • Lecture halls and laboratories for the teaching process • Laboratories and research equipment for research • Other specific facilities for teaching and research (clinics, test fields, farms, sports halls and grounds, workshops, etc.) |
| | | | 3.3.2. Develops and improves ICT for teaching and research in accord with the specific nature of HEI: <ul style="list-style-type: none"> • Libraries • Computer equipment • Information centres • Computer system for management of administrative work and teaching • Distance education centre (in the case of accreditation of distance education programmes) |

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| | | 3.4. HEI carries out full-scale cooperation with other HEIs in the country and abroad | 3.4.1. Develops an organization for sustaining and developing cooperation with other HEIs and organisations 3.4.3. Supports and expands the exchange of teachers and students with other HEIs and organizations for the purpose of research, artistic work and for the expansion of the profile of teaching, including joint projects with foreign universities, etc. |
| | | 1.5. HEI creates conditions for involving students in teaching and professional realization (career development) | 1.5.1. Sustains educational contacts between HEIs (teachers and students) and secondary schools (teachers and students) 1.5.2. Creates organization for attracting, accepting and adapting Bulgarian and foreign students and postgraduates 1.5.3. Creates conditions for informing and orientating students with regard to the opportunities for career development the HEI provides 1.5.4. Ensures free access to administrative services, libraries, further language and computer studies, sports facilities, creative capabilities 1.5.5. Creates conditions for supporting education and integration of socially deprived students 1.5.6. Supports contacts with employers and develops forms for preparing the career development of graduates (courses, internships, career development centres, etc.) |
| | | 2.2. HEI organizes, sustains and develops research (artistic) activity of undergraduates and graduates | 2.2.1. Establishes forms for involvement and support of undergraduates and graduates in the execution of research and artistic projects and participation in national and international scientific for a 2.2.2. Periodically analyses and discusses the results of the participation of students in research and artistic projects |
| | | 2.3. HEI disseminates and applies the results of research (artistic) activity in science and practice | 2.3.3. Includes results of research (artistic) activity in the educational process 2.3.6. Ensures additional financing at national and international level, coming from research and artistic activities |
| | | 3.4. HEI carries out full-scale cooperation with other HEIs and organizations in the country and abroad | 3.4.2. Supports and expands teachers' participation in national and international educational and research projects |
| 2.3.6. Information systems | HEIs should collect, analyse and use the necessary information for effective management of programmes and other activities | 3.1. HEI has a whole organization for managing research and teaching activities | 3.1.1. Builds an organizational structure for management: elaborated and published codes of rule for the HEI and its sectors 3.1.2. Periodically discusses effectiveness of organizational structures with regard to the further development of the HEI 3.1.3. Develops procedures and adopts activities in connection with the results of institutional and programme accreditation and other independent internal and external reviews |

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| 2.3.7. Public information | HEIs should publish regularly up-to-date, unbiased, objective information (quantitative and qualitative) about its programmes and degrees awarded | 1.1. HEI performs teaching in accord with its educational mission, aims and objectives | 1.1.1. Has a documented mission statement, aims and objectives, which are publicly stated and are used by the HEI as a basis for the development of educational policy centered on the needs of society at regional and national level |
| | | 2.3. HEI disseminates and applies the results of research (artistic) activity in science and practice | 2.3.1. Creates conditions (administrative, organizational, financial, etc.) for the dissemination of results of research and artistic activities with social, scientific and applied value |
| | | | 2.3.2. Supports the organization of and participation in scientific and artistic for a at national and international level for the presentation of the results of research and artistic activity |
| | | | 2.3.4. Supports contracts with external partners with the aim to apply the results of research and artistic activity |