

Report of the Panel appointed to undertake a review of the National Evaluation and Accreditation Agency (NEAA) of the Republic of Bulgaria for the purposes of renewal of full membership of the European Association for Quality Assurance in Higher Education (ENQA)

23 March, 2014

Executive Summary

This is the report of the review of the National Evaluation and Accreditation Agency (NEAA) of the Republic of Bulgaria undertaken in February, 2014, for the purpose of determining whether NEAA meets the criteria for renewal of full membership of the European Association for Quality Assurance in Higher Education (ENQA).

The report describes:

- the background and context for the review
- how the review was carried out
- the place of the Agency in Bulgaria's quality assurance structure for HE and the Agency's main functions
- the Panel's assessment of the engagement of the Agency with the ENQA membership provisions/European Standards and Guidelines and its conclusions
- the Panel's general observations and recommendations for development.

Glossary of terms	
AC	Accreditation Council of NEAA
AERES	Evaluation Agency for Research and Higher Education
AFDASRB	Act for the development of academic staff in the Republic of Bulgaria
APCL	Accreditation of prior certificated learning
APL	Accreditation of prior learning
ARACIS	Romanian agency for quality assurance in higher education
BSC	Balanced scorecard
CEENQA/CEEN	Central and Eastern European Network of Quality Assurance Agencies in Higher Education
CIPP	Context, input, process, product
CNE	French National Evaluation Committee (AERES)
ECTS	European Credit Transfer and Accumulation System
EHEA	European Higher Education Area
ENIC - NARIC	European Network of Information Centres - National Academic Recognition Information Centres
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	European Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students' Union
EUA	European University Association
FQ-EHEA	The Framework for Qualifications of the European Higher Education Area
HEA	Higher Education Act
HEI	Higher Education Institution
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IQA	Internal Quality Assurance
NASC	National Assembly of Students' Councils
NEAA	National Evaluation and Accreditation Agency of the Republic of Bulgaria
NEASC	New England Association of Schools and Colleges
R&D	Research and development
SC	Standing Committees of NEAA
SEE	South-Eastern Europe
SG	Secretary General of NEAA
SWOT	Strengths, weaknesses, opportunities, threats
NEAA website: http://www.neaa.government.bg/en	

Background and outline of the review process

1. The Statutes of ENQA require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions.

In November 2004, the General Assembly of ENQA agreed that the third part of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should be incorporated into the membership provisions of its (then) Regulations (now Statutes). Substantial compliance with the ESG thus became the principal criterion for membership of ENQA. The ESG were subsequently adopted at the Bergen ministerial meeting of the Bologna Process in 2005.

The third part of the ESG covers the approach to be taken to the cyclical external reviews of quality assurance and accreditation agencies. This external review of NEAA was conducted in line with the process described in the ESG (third edition) and in the accompanying ENQA Guidelines for external reviews of quality assurance agencies in the European Higher Education Area and in accordance with the timeline set out in the Terms of Reference determined for this particular review.

Purpose and initiation of the review process

2. NEAA was last evaluated for the purpose of acquiring ENQA membership in July, 2008, with a positive decision taken by the ENQA Board. Therefore, in accordance with ENQA standard requirements, NEAA was due to undergo a new evaluation process for the purpose of extending its membership in ENQA, which also serves as an indicator for registration in EQAR. Following NEAA's application to ENQA to initiate this process, ENQA established an evaluation Panel, the composition of which met standard ENQA practice and which was duly briefed by ENQA prior to the Panel site visit to NEAA in Sofia, Bulgaria.

Membership of the Panel

3. The members of the Panel appointed by ENQA to undertake the review were:

Peter Findlay, (*Chair of the Panel*), Assistant Director, Reviews Group, Quality Assurance Agency for Higher Education (QAA), (UK)

Paul Mitchell, (*Secretary to the Panel*), Director of Mega Mitchell Consulting Ltd., (UK)

Oxana Matveeva, Deputy Head, Accreditation Office, National Centre for Public Accreditation (NCPA), (Russia)

Jean-Marc Rapp, (*EUA nomination*), Professor at the University of Lausanne Law Faculty, Director of the Business Law Centre (CEDIDAC), (Switzerland)

Liliya Ivanova, (*ESU nomination*), ESU Executive Committee member (2012-2013), Master in International Economic Relations at the University of National and World Economy, (Bulgaria)

Terms of Reference for the Review

4. ENQA has identified two types of external review which may be undertaken for the purpose of seeking membership:

- **Type A** - the sole purpose of which is to fulfil the periodic external review requirement for ENQA membership
- **Type B** - a review which has a number of purposes, only one of which is to fulfil the periodic external review requirement of ENQA membership.

This review was a **Type A** review, and evaluates how, and to what extent, NEAA fulfils the criteria for full ENQA membership and thus the Standards and Guidelines for Quality Assurance in the European Higher Education Area. The review was co-ordinated by ENQA itself at the invitation of NEAA.

Approach and Procedure

5. The review was carried out using a process designed and managed by the Panel following established ENQA practice, independently of NEAA. The Panel sought to conduct the review in a manner that was not only professional and courteous, but also constructively searching and challenging. NEAA produced a self-evaluation report and the Panel also sought further supporting documentation following its initial analysis of the self-evaluation. The Panel conducted a site visit to explore further the content of the self-evaluation and to clarify points at issue. Finally, the review panel produced the present final report on the basis of the self-evaluation report, the site visit and its findings. As part of the process, the Panel has provided an opportunity for NEAA to comment on the factual accuracy of the draft report.

In fulfilling the purposes of the review, the Panel has:

- considered the broad professional and political contexts within which NEAA operates
- considered a self-evaluation document prepared by NEAA, a range of supporting documents and web-based materials submitted in advance of the site visit (Appendix 2)
- considered additional documentation relevant to the Panel's lines of enquiry during the site visit (Appendix 2)
- conducted a two-day visit to NEAA (6 – 7 February 2014), at NEAA's headquarters in Sofia, Bulgaria (Appendix 1)
- met a range of stakeholders (from categories selected by the Panel) (Appendix 1), representative of all NEAA's operations, including:
 - President of the Council, Vice-President, immediate past-President and Secretary General
 - A sample of Chairmen of NEAA's Standing Committees
 - A sample of external experts who have acted in different NEAA procedures
 - A representative of the Ministry of Education
 - A sample of senior representatives from HEIs
 - A cross section of NEAA's professional administrative staff
 - NEAA staff who prepared the self-evaluation
 - Members of NEAA's Quality Assurance Standing Committee
 - A sample of undergraduate and postgraduate students with experience of NEAA's quality assurance procedures
 - Sample of stakeholders from civic society and employer/professional bodies.

Self-evaluation document

6. The self-evaluation document submitted by NEAA (2013) comprised an account of the following principal areas:

- **Foreword** (by NEAA's President)
- **National Evaluation and Accreditation Agency in the system of Bulgarian academic institutions**

- **Description and evaluation of Agency activity in the light of quality standards in the European Higher Education Area**
(Compliance with European standards regarding external quality agencies (Part 3 of ESG) and with European standards regarding external quality assurance of higher education (Part 2 of ESG))
- **Appendices**
 - Appendix A: Financial resources
 - Appendix B: Organisation chart
 - Appendix C: The Corrector-NEAA system
 - Appendix D: Abbreviations used in the report

7. The document had been circulated in draft to NEAA staff and signed off by Council members; there had been some stakeholder input in the later stages of preparation. As a tool for self improvement, the Panel considered the self-evaluation document to be weak. It focused primarily on NEAA's role in implementing the various laws and regulations in force underpinning an extremely intensive accreditation system, with very little reflection on NEAA's capacity for shaping, interpreting, influencing and learning from the application of these procedures and for delivering enhancement. The Panel therefore felt that the unique opportunity presented through undertaking a self-evaluation had not been fully taken up. The SER would have been strengthened had it contained greater evidence of a capacity for self-reflection and a more meaningful analysis of the organisation's future direction and strategy. The SER was not well-referenced in relation to supporting documentation, either through appendices, through electronic media or web references. (The Agency's website was not fully up to date). In order to complete its task, the Panel had to seek additional basic documentation both before and during the site visit; this significantly slowed the Panel's programme of work.

Higher education system in the Republic of Bulgaria

8. The Panel heard that Bulgaria is a country in which there is a strong national commitment to higher education in all its forms and levels. The main purpose of the HE system is to develop highly qualified manpower for the benefit of Bulgarian society, as well as to foster the development of research and culture. In quantitative terms, the aim is that by 2020, 30% of employees should hold a degree and 90 % of them should have a job related to their field of study.

9. The State sets the broad conditions for access to the Bulgarian higher education system and sets the broad framework for its development. Government therefore:

- develops and implements national policy for the development of higher education and safeguards the academic autonomy of higher education
- ensures that appropriate quality of provision is maintained in both teaching and research
- subsidises the education of students in state universities
- creates and maintains a system for providing loans to students for the payment of tuition fees
- provides property to the state higher schools and provides tax and other incentives for all higher schools in support of their activities
- defines the conditions for state recognition of awards issued by the higher schools in Bulgaria and from abroad
- devolves delegated authority for quality and standards to the National Evaluation and Accreditation Agency

10. Bulgarian higher schools have adopted an educational model which maps to the reforms within the EHEA. At present, higher education in Bulgaria consists of three types of institution:

- Universities, which offer courses across a wide range of fields, such as humanities, environmental, public and technical programmes
- Specialized institutions of higher education
- Individual colleges.

These three categories of institution can be found in both the public and private sectors. In the second half of 2013, the system of Bulgarian university education comprised 51 institutions as follows:

- 42 universities and higher schools (36 public and 6 private)
- 9 individual colleges (8 private and one state owned).

Seven universities in Bulgaria operate with more than 15,000 students. In 7 education institutions, the capacity is for fewer than 1,500 students and in 28 education institutions it is below 5,000 students. More than 40% of higher schools and students studying in Bulgaria are concentrated in the capital city, Sofia.

11. Higher schools have been established in almost all the population centres of the country's six regions and 10 higher schools have established branch operations in other population centres outside their own immediate region. This model of widely distributed higher education institutions across the country accelerated further after the adoption of the Higher Education Act in 1995. The highly devolved model provides access to higher education in more remote and/or less-developed regions, where the standard of living of the population

seriously constrains mobility and access to the 7 established major universities of the country. The social function of some of the smaller higher schools and/or their affiliated units has been further enhanced in recent years by state investment in the development of distance learning in higher education. The Panel was told that in the case of the traditional institutions of higher education, the institutions largely operate at full capacity, although nationally there is a declining demographic amongst 18 year olds.

12. Overall analysis of the higher schools network in the country indicates some major trends. The South-western region has the most concentrated network of higher schools, where there are 22 higher schools (43 % of their total number in Bulgaria in the city of Sofia), followed by South-central region (with 7 higher schools in the city of Plovdiv), and North-eastern (with 5 higher schools in the city of Varna). Private higher schools operate in accordance with market forces, with each looking for a niche market for the training of specialists. Many of the higher schools share a relatively narrow specialization (for example business and law), which can lead both to inefficient use of resources (through duplication), but which can also stimulate constructive competition between higher education institutions.

Establishment and development of NEAA

13. The Panel was informed that the purposes of external evaluation and accreditation undertaken by NEAA are twofold:

- firstly to promote higher education, to develop its potential and to improve and maintain the quality of education and to support quality enhancement
- Secondly to use the outputs from accreditation in the formation of Government policy towards the higher schools.

14. The legal framework underpinning Bulgarian higher education was revised with the adoption of the Higher Education Act (HEA) in 1995. This came six years after the introduction of major democratic and social change in Bulgaria. This law, determined the overall functions, structure and responsibilities of NEAA, and required the Agency to develop overall principles for evaluation and accreditation and to devise specific criteria and procedures both for institutional and programme accreditation and also for assessing proposals for the opening and/or re-structuring of higher schools.

15. Following the further amendment of the HEA with effect from April, 2004, NEAA was tasked to perform the functions of a specialized agency for the evaluation, accreditation and quality control of the activities of the higher schools, together with responsibility for system-wide monitoring and control – the latter constituting a new activity for NEAA.

16. The HEA thus provides the broad legal framework for the implementation of procedures for the evaluation of projects, for opening new professional fields and for programme accreditation; a special order was introduced for the implementation of procedures for evaluating proposals and programmes from the regulated professions. Following further amendments to the HEA in August 2011, NEAA was given a stronger legal framework with which to regulate the quality of higher education through the granting of the right to sanction higher education institutions failing to implement recommendations from institutional and programme accreditation. In 2012, the Statutes of NEAA were further amended and supplemented to reflect developments within the EHEA.

17. In 2010, the Act for the Development of Academic Staff in the Republic of Bulgaria (AFDASRB) came into force. This law is the principal driver for regulating the career development of university teachers and scientists across the country as a whole. NEAA has no powers directly conferred by the AFDASRB, but there are indirect functions, insofar as analysis of institutional activity in support of the development of academic staff features prominently in NEAA's accreditation criteria. This places NEAA indirectly in the position of a monitoring body for the quality of academic staff development across higher education and also across the units of the Bulgarian Academy of Sciences, Agricultural Academy and the other entities of scientific activity in Bulgaria.

Priorities and activities of the Agency

18. NEAA has established its own strategic priorities and objectives, reflecting national needs; these are expressed in its strategic plan for 2008-2014. NEAA states that a key strand is national articulation with European higher education policy, and particular attention is being paid to the harmonisation of the activities of NEAA with the requirements of the Bologna process and the alignment of the Bulgarian higher education system with the framework of EHEA.

19. NEAA currently carries out the following types of procedure:

- Procedures for institutional accreditation
- Procedures for programme accreditation of programmes from the regulated professions
- Procedures for programme accreditation of programmes outside the regulated professions
- Procedures for programme accreditation of courses delivered by distance learning.
- Procedures for the evaluation and accreditation of PhD programmes.
- Procedures for the evaluation of proposals for the opening or reorganisation of a higher school
- Procedures for post-accreditation monitoring

20. The table below summarises the activities carried out by the Agency in the period 2009 – 2013

External quality assurance procedure	2009	2010	2011	2012	2013*
Institutional accreditation	2	1	1	23	15
Programme accreditation of professional fields	21	46	17	5	83
Programme accreditation of degree programmes in regulated professions	17	30	24	2	6
Programme accreditation of doctoral degree programmes	359	501	503	248	118
Total	399	578	545	288	222
Evaluation of new projects for restructuring of higher schools	1	4	2	1	1
Evaluation of new projects for opening and restructuring of basic units and branches of higher schools	3	-	5	1	1
Evaluation of new projects for opening a degree programme in regulated professions	-	7	3	1	-
Evaluation of new projects for opening professional fields	4	3	3	-	11

Total		8	14	13	3	13
Post-accreditation monitoring of quality	Institutional accreditation	30	9	4	3	-
	Internal quality assurance systems of HEIs	26	7	4	3	-
	Programme accreditation of professional fields	9	141	108	86	42
	New project	1	3	-	-	-
Total		66	160	116	92	42
Procedures for change of educational capacity		15	27	40	11	4

**As at September 2013*

It is difficult for the Agency to regulate the flow of business coming to it, in terms of the volume of incoming requests. Much of its activity is triggered by the legacy of timescales from previous accreditations and by decisions made by individual HEIs in relation to proposed changes to the scale or range of their activities, including decisions to offer new or revised programmes.

The total number of procedures for institutional and programme accreditation in the period 2009 to 2013 has varied annually. The busiest year in the period was 2010, with a total number of 578 procedures; 2012 and 2013 were less busy in number of individual procedures, reflecting commencement of the new cycle of the procedures for institutional accreditations. Management of this uneven pattern of demand has been very challenging for NEAA.

21. NEAA has made a series of recent changes in its work model and in systems connected with the assessment and accreditation of institutions and programmes. These include:

- New criteria for the evaluation of proposals for the opening and reorganisation of higher schools and basic units and for opening professional programmes from the regulated professions; new criteria for programme accreditation of training in the educational and scientific degree of "Doctor"; and new criteria for distance learning
- Voting rules under the procedures for evaluation and accreditation have been adopted by the Council, as well as internal rules for imposing sanctions on higher schools as required by the HEA
- Revision of the criteria system for evaluation and for institutional and programme accreditation
- Increased focus has been placed on the evaluation of research activities, (also reflecting a concern expressed to the Panel by some research-intensive universities).

22. Following completion of a first full round of national evaluations, a new system for the evaluation and accreditation of higher education was introduced in June 2011, which includes a more detailed grading structure, intended to differentiate more sharply between the various higher schools. At the time of the review, 70% of programmes had been granted accreditation under the new system. Four areas of activity in the higher school are subject to evaluation. They are: educational activities, research, management, and competitiveness of

the higher school. The new grading system is based on a scale from one to ten. The aggregated final assessment is the product of a number of measured indicators, each of which has its specific value.

23. NEAA operates a complex system for determining periods of accreditation, at both institutional and programme level. For example, following consideration of a report on institutional or programme accreditation, the Agency determines the period of accreditation, according to a scale ranging from 0 to 10. The period of validity of the accreditation varies, depending on the assessment, as follows:

- six years with an evaluation grade of 9.00 to 10;
- five years with an evaluation grade of 7.00 to 8.99;
- four years with an evaluation grade of 5.00 to 6.99;
- three years with an evaluation grade of 4.00 to 4.99.

In the case of an assessment ranging from 0 to 3.99, accreditation is not awarded. Revocation of institutional accreditation can be made when a higher school has received an assessment from 0 to 3.99 in one or several of the following criteria:

- Presence and status of an internal quality assurance system
- Profile and qualifications of academic staff
- Logistic provision of the training process.

24. Similar calibrated gradings apply to other areas of evaluation activity. For example, at subject level, an evaluation grade of less than 4.00 in one or more of the following criteria will prompt a negative assessment for programme accreditation:

- Training documentation and the educational process
- Profile and qualifications of the academic staff
- Logistical and information base, customized for training

Higher schools with an assessment in programme accreditation from 4.00 to 4.99 have the right to teach only to the level of "Bachelor" in the relevant field or specialty from the regulated professions. When awarded an evaluation grade from 5.00 to 10.00 at programme accreditation, higher schools have the right to teach to the levels of "Bachelor" and "Master". Higher schools and organizations may conduct training for the degree of PhD if they have received an evaluation grade from 8.00 to 10.00.

25. Proposals for the opening of higher schools, as well as for new faculties, affiliates, colleges and professional fields and specializations from the regulated professions are assigned an overall positive or negative assessment. When the assessment is positive, the validity of accreditation is for a period of 2 to 3 years, after which follows a regular accreditation; in the case of a negative assessment, revocation of accreditation is made. In all cases of accreditation revocation the Agency formulates clear reasons, based on clear criteria.

26. Higher schools, having received accreditation, may carry out training of undergraduate and postgraduate students under agreements for joint training activities with foreign universities; the foreign higher schools must meet the following two conditions:

- Be accredited by an agency which is a member of the European Association for Quality Assurance in higher education (ENQA) and/or entered in the European quality assurance register for higher education (EQAR)

- Have accreditation under the relevant national legislation in order to participate in transnational collaboration

NEAA Structure

27. The overall functions and structure of NEAA are set in Articles 86 and 87 of the HEA. The governing authorities of the Agency are its Accreditation Council and its President (Chairman). The Accreditation Council consists of a Chairman and 10 members – professors and associate professors from areas of higher education, one of whom is also the vice president responsible for post-accreditation monitoring and control. The Council comprises:

- Six representatives of higher schools
- One representative of the Bulgarian Academy of Sciences and one representative of the Agricultural Academy
- Two representatives of the Ministry of Education and Science.

The President of NEAA represents the agency and oversees its activities. He/she is appointed by the Prime Minister on a full-time basis, on the nomination of the Minister of Education and Science.

NEAA Standing Committees

28. The Accreditation Council delegates much of its detailed work to nine Standing Committees - eight covering specific subject areas of higher education and one covering overall post-accreditation monitoring and control. The committees each consist of 3 to 7 members, one of whom acts as the Chairman. Members of the committees are appointed for a 3-year term of office by the President of the Accreditation Council. Appointments are renewable for a second term (only).

The current Standing Committees are:

- Pedagogical Sciences
- Humanities and Arts
- Social and Legal Sciences and National Security
- Economic Sciences and Management
- Natural Sciences, Mathematics and Computer Science
- Technical Sciences and Military Science
- Agricultural Sciences and Veterinary Medicine
- Healthcare and Sport
- Post-accreditation Monitoring and Control.

29. The Chairs of Standing Committees are appointed on a full-time basis, with their members on part-time contracts. The Standing Committees oversee the procedures for: programme accreditation of professional fields; programme accreditation of scientific disciplines outside those of the regulated professions; and evaluation of projects for opening new professional fields. The Standing Committees submit for approval to the President of the Accreditation Council the composition and tasks of the expert groups performing procedures for institutional and programme accreditation. They monitor the work of the expert groups and appoint a specific member of the Standing Committee to monitor each procedure.

30. The Standing Committee on Post-Accreditation Monitoring and Control:

- Submits for approval by the Accreditation Council individual timetables for post-accreditation monitoring and control

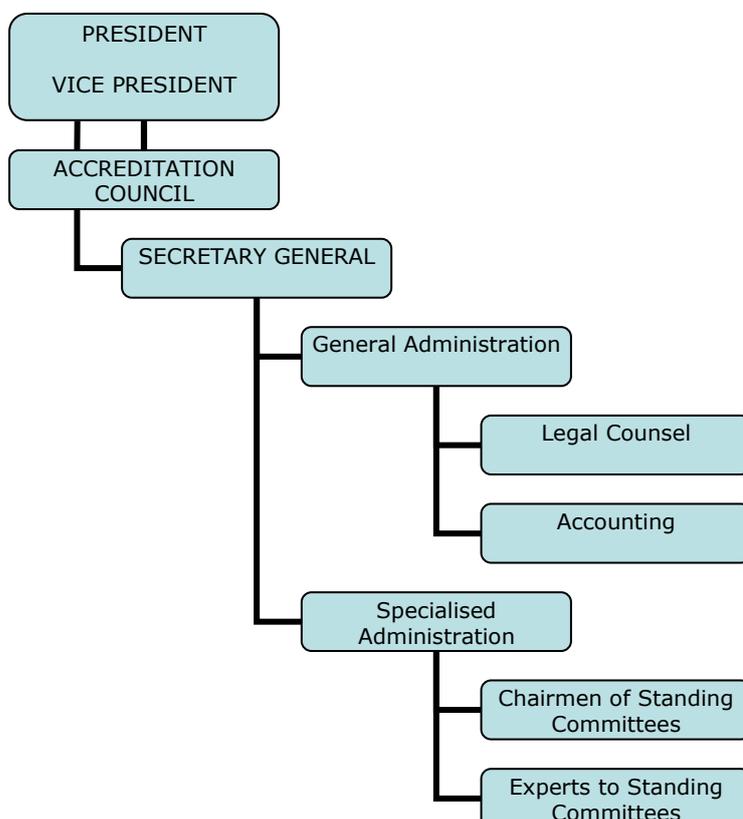
- Submits for approval by the Accreditation Council the composition and tasks of the expert groups, in accordance with the nature and content of the procedure for post-accreditation monitoring and control
- Oversees the work of the expert groups and on the basis of their reports draws up protocols for the checks carried out
- Prepares and after consultation with the Vice President, presents to the Accreditation Council, reports on the results of post-accreditation monitoring and control
- Organizes and conducts the training of experts in the field of Post-accreditation monitoring and control

31. The Accreditation Council, on the proposal of the relevant Standing Committee approves the composition and terms of reference for short-life expert groups. The members of the expert group make on site visits to the higher education institutions under evaluation and draw up a report to the appropriate Standing Committee. The expert group comprises academic peers together with undergraduate or postgraduate students; it can sometimes include an international expert.

In cases of institutional failure to implement the required improvements within the specified period or on a proposal from the Minister of Education and Science for withdrawal of accreditation, the Standing Committee may make a recommendation to the Accreditation Council to withdraw the relevant institutional or programme accreditation. The Panel noted that the provision for direct reference by the Minister for Education and Science had never been invoked.

Management Structure of NEAA

32. The management structure is set out in diagrammatic form below:



The general and specialised underpinning administration comprises ten full-time officers and eight part-time staff.

External contacts

33. NEAA maintains effective working links in developing and cascading policy with:

- the Bulgarian Ministry of Education and Science,
- the Bulgarian Council of Rectors,
- national representatives of Student Councils and of other student organizations.
- Officers of the Bulgarian Academy of Sciences, of the Agricultural Academy and other research organisations.

Update on 2008 Review

34. In its 2008 report on NEAA, the ENQA review team highlighted a number of areas for development. Below is a chart setting out the Panel's assessment of progress made in key areas since 2008:

2008 Report: areas for improvement		NEAA follow up (as at January, 2014)
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.	Achieved. Annual planning has been introduced. The Panel has reviewed NEAA's current annual plans. It considers these to be adequate for current purposes, but with scope for further development and sophistication, designed to capture external factors impacting on NEAA's work
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.	In progress. Financial analyses presented to the Panel reflecting programme based activity, demonstrate an increased awareness of costs. The Agency is under considerable financial pressure, driven by the volume (and to some extent the complexity) of the accreditation processes which it undertakes. Further progress needs to be made on funding provision for the involvement of international experts.
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	In progress. An improved gender balance has been achieved (e.g. total Standing

	<p>from the next generation and from more diverse backgrounds (including professionals) in decision-making bodies.</p>	<p>Committee membership now comprises 30 men and 22 women). The full time administration is entirely female. Age structure however remains significantly skewed towards the 50-60+ age ranges. Membership of the Agency's Council remains confined to members of the Professoriate and could with benefit be further reviewed. Increased involvement of employers and civic society in both its deliberations and activities has yet to be fully achieved.</p>
4	<p>Students 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.</p>	<p>Partly Achieved. Since the last report, an amendment has been made to accord full status to student team members. The Panel heard however of some instances where Standing Committees had opted to deploy student members in a slightly different way. The Panel urges NEAA to issue to its Standing Committees unequivocal, standardised requirements on this topic for the avoidance of doubt.</p> <p>Foreign experts and other constituencies (e.g. business, professional bodies and employers) are not yet fully integrated into NEAA's procedures and activities (see discussion under Standard 2.4).</p>
5	<p>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.</p>	<p>Achieved. All inputs are now consolidated in a single procedure and document.</p>

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.	Not achieved. See Para. 56
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.	Achieved. Since the last report, NEAA has enhanced the quality of its training. New Reviewers are now thoroughly inducted in the process and periodic training and updating sessions are arranged. New reviewers are assigned a mentor.
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.	Achieved. NEAA has now adopted a more finely differentiated grading scheme. The cost/benefit analysis of this fine-grained level of scrutiny has yet to be fully assessed.
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.	In progress. See Para. 60
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.	In progress See Paras. 63-64 (and recommendation)
11	NEAA would benefit from inviting HEIs, students and professional organizations to join in during the design stage of external quality assurance procedures.	In progress University managers interviewed by the Panel confirmed their increased institutional involvement in the planning and roll out of QA 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.	In progress See Para. 52

35. The Panel's overall assessment is that NEAA has responded appropriately to many of the recommendations contained in the 2008 ENQA report, but that further work still needs to be done in some areas to carry these through to satisfactory completion.

NEAA compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

ESG Part 2: European standards and guidelines for the external quality assurance of higher education

ESG 2.1 Use of internal quality assurance procedures (ENQA Criterion 1)

Standard:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Guidelines:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

NEAA compliance

36. The HEA requires every higher school in Bulgaria to develop and implement an internal system for quality assurance and management, including provision for student feedback. NEAA procedures include criteria and indicators for the evaluation of established systems for monitoring, evaluation, maintenance and improvement of quality. NEAA's procedures for institutional post-accreditation monitoring and control similarly assess the development and maintenance of internal quality assurance systems in the higher education institutions. Following the successful completion by NEAA of two major cycles of institutional and programme accreditation, it has confirmed that each higher school has in place a functioning internal quality assurance system.

37. The Panel has confirmed that the starting point for NEAA's institutional review processes is based firmly on the institutions' self-evaluations of their own processes. The Panel has examined and explored NEAA's institutional review processes, mapped against the ESG, and confirms that these are effective in testing and challenging institutions' internal quality assurance policies and their procedures for managing quality and standards.

The Panel also noted 17 HE institutions in Bulgaria have achieved the award of quality certificate ISO 9001, a helpful additional indicator of the health of the relevant institutions' management systems.

38. The Panel therefore confirms that the external quality assurance procedures that NEAA uses, take into account fully the effectiveness of the internal processes described in Part 1 of the ESG.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

ESG 2.2 Development of external quality assurance processes
(ENQA Criterion 1 cont.)

Standard:

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.

Guidelines:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

NEAA compliance

39. The procedures for external quality assurance developed by NEAA are publicly available on the Agency's website. Whenever replacement or a significant revision of a procedure is proposed, this will be first discussed with the higher education institutions, relevant sector organizations, experts in the field and the Ministry. Any significant adjustments to the criteria and procedures are normally discussed with the Council of Rectors, but the final decision is nevertheless taken by NEAA.

40. The different types of procedures for evaluation and accreditation, developed and applied by NEAA include clear descriptions of the different activities associated with each procedure and of the various participants involved at each stage. The documents are publicly available on the Agency's website. Whenever changes are formally agreed, users are notified - by letter and copies of the relevant documents, so they can be aware of any changes. Officers of the Agency are expected to act in an advisory role to staff in higher education institutions, regarding all aspects of external evaluation and accreditation.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

**ESG 2.3 Criteria for decisions
(ENQA Criterion 1 cont.)**

Standard:

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

Guidelines:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

NEAA compliance

41. Evaluation, accreditation and monitoring activities are carried out in accordance with uniform criteria, which are published on the Agency's website as follows:

- Criteria for institutional accreditation of higher education institutions.
- Criteria for programme accreditation of a professional field and a major from the regulated professions.
- Criteria for programme accreditation of the training in educational and scientific degree of "Doctor".
- Criteria for evaluation of projects for opening and transformation of a higher school.
- Criteria for evaluation of projects for opening and transformation of basic units and/or an affiliate of a higher school.
- Criteria for evaluation of projects for opening of a professional field and a major from regulated professions.
- Criteria for evaluation of specializations in distance learning.
- Criteria for amendment to capacity.
- Criteria for post-accreditation monitoring
- Procedures for post-accreditation monitoring

42. Consistency in the interpretation and application of the criteria is achieved through:

- The training of expert groups,
- Professional oversight of expert groups by individual nominated Council members and by trained NEAA staff
- Regular dialogue between the Accreditation Council and the Standing Committees, with periodic consideration of specific case studies,
- Availability of clear guidance and rules, according to which the procedures for assessment and accreditation are carried out
- For expert teams, provision of methodological guidelines for the preparation of a report by the expert group
- For Standing Committees, provision of:

- Rules for the conduct of voting procedures by the standing committees in areas of higher education for programme accreditation outside those from the regulated professions.
 - Rules for the conduct of programme accreditation of professional fields.
 - Methodological explanations for the determination of assessments for institutional and programme accreditation, for the evaluation of projects for opening or transformation of higher schools, basic units and professional fields and majors from the regulated professions.
 - Methodological guidelines for the preparation of a report by the Standing Commission to the Accreditation Council (for institutional accreditation).
- For Accreditation Council, provision of:
 - Rules for the conduct of a voting procedure by the Accreditation Council for institutional accreditation of higher education institutions.
 - Rules for the conduct of voting procedures by the Accreditation Council in the evaluation of projects for the opening and transformation of a higher education institution, basic units and affiliates of a higher school and majors from the regulated professions.

Chairmen of Standing Committees have a key moderating role across their specialist area. Institutions also have the right to comment on any factual inaccuracy and other discrepancies in the report. This opinion is submitted to the Agency before any final decision is taken.

43. NEAA's procedures and criteria are well-documented. NEAA's Council maintains an effective overview of its operations and has arrangements in place to ensure consistency.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

**ESG 2.4 Processes fit for purpose
(ENQA Criterion 1 cont.)**

Standard:

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

Guidelines:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task
- the exercise of care in the selection of experts
- the provision of appropriate briefing or training for experts
- the use of international experts
- participation of students
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

NEAA compliance

44. The basic rules for the formation of expert groups are set out in the Statute regulating the activities of NEAA. Expert groups have temporary status and their composition is approved by the Accreditation Council on the nomination of the Standing Committees and by the President of the Council. Special attention is paid to the need for a good balance within teams, to include members who have professional experience from, and professional commitment to different higher education institutions and scientific organizations.

45. In the Statute for the activity of NEAA (art. 13, paragraph 3), experts can be Bulgarian and/or foreign individuals, including representatives of professional organizations and associations of employers, as well as students and PhD students. International experts are invited normally when the institutions undergoing accreditation, request them. The desire of the Accreditation Council to include more international experts in its work presents some challenges attributed to the relatively low fees which are paid and which do not attract many qualified European experts.

46. Experts appointed to carry out quality assurance activities for NEAA are selected according to the following specific criteria:

- Professional experience in higher education
- Credibility of the expert in the academic community – as a teacher and as a researcher
- Managerial experience in higher education

- Experience in the evaluation of higher education institutions, including outside NEAA (scientific projects and programmes, educational initiatives, etc.)
- Knowledge of the legal basis regulating an HEI's activities and academic work
- Standing of the institution in which the expert works or has worked
- Ability to work as part of a team and to exercise impartiality, objectivity, confidentiality, constructiveness and a business-like approach to work
- Absence of any conflict of interest with the institution under review
- Ability to integrate with the activities of the expert group
- Compliance with the requirements of art. 13, paragraph 3 of NEAA Statutes
- Confirmed willingness and consent for participation in the procedure

47. NEAA involves students and doctoral students in the work of expert teams. It has developed special "Rules for the participation of students and PhD students in procedures for evaluation and accreditation". The selection of student experts is carried out in partnership with the national student council organisations, the managements of higher schools and on the basis of established personal contacts of the expert groups with representatives of the students during assessment visits. Students are now fully official members of expert groups. There remains, however, some unevenness in the involvement of students in all aspects of the experts' work. In particular, it was noted that students did not have the same level of participation in training events, and student membership of the Standing Committees was not consistent.

48. The training of experts is considered to be an essential part of the Agency's work. NEAA appoints a member from the relevant standing committee, who is tasked with the function of a mentor. He/she normally instructs experts together with the Chairman of the Standing Committee. Besides explaining their duties and providing the necessary information, special attention is paid to the following aspects during briefing and preparation for an onsite visit to an institution:

- Advance familiarisation with the documentation provided by the higher education institution
- Clarification of their role and powers as an inspection body and understanding the parameters
- Focusing the experts' attention on the need to verify that recommendations from any previous accreditation have been implemented
- Drawing the attention of the experts to their obligation to examine and evaluate the effectiveness of the internal quality assurance system in the higher education institution or scientific organisation concerned
- Clarification of all indicators and characteristics of all criteria, including the reliability of numerical indicators and parameters
- Emphasis on meetings with the heads of teaching unit(s), students and PhD students
- Preparing for meetings with employers and other stakeholders.

49. Workshops are held for experts assessing the same discipline or professional field. This type of event provides an opportunity for experts to share their experiences and to comment on the overall development of a professional field. At these workshops they harmonise their approaches in the application of the criteria and procedures and discuss specific case studies.

50. Training sessions for experts are conducted periodically. In 2013 training was conducted for experts in connection with distance learning in a range of different cities (Sofia, Plovdiv, Varna, Rousse, Veliko, Turnovo, etc.) During training, experts consider all key aspects of their function and the training combines theory with specific examples. In this way practical experience for the new members of the expert groups is provided. The Panel was informed that this activity is welcomed with great interest by the experts, academic managers and teachers, who use the opportunity to exchange ideas and share facts related to the current activities relating to the accreditation and internal quality assurance.

51. The model of accreditation adopted by NEAA includes a self-evaluation report from the institutions in higher education, an onsite visit and a report from the expert group, an accreditation decision and follow-up procedures for post-accreditation monitoring of the implementation of the recommendations made. The Panel heard that some procedures did not always fit entirely seamlessly with the activities of research-intensive institutions.

52. The panel would recommend that NEAA should accelerate the development of strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in the design, implementation and monitoring of its procedures. NEAA should also consider how the outputs from its review activities can be further focused to support system-wide institutional quality improvement and enhancement.

Panel judgement:

Substantially compliant.

Panel Recommendations:

- That NEAA develop strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in its procedures. The enhancement agenda would benefit from greater exposure to good international practice through the routine involvement of international experts in NEAA assessment activity
- That NEAA consider how the outputs from its review activities can be further focused to support system-wide institutional quality improvement and enhancement.
- That NEAA further strengthen the involvement of students and representatives of professional bodies as full participants in all stages of the accreditation process.
- That NEAA should seek to ensure greater consistency in its involvement of students, in particular with regard to experts' training and their participation in the work of Standing Committees.

**ESG 2.5 Reporting
(ENQA Criterion 1 cont.)**

Standard:

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.

Guidelines:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership.

Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations.

There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.

Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

NEAA compliance

53. The NEAA's Accreditation reports are normally structured around three main components:

- Introduction - comprises facts concerning formation and activities of the expert group (formation, composition, meetings and activities during the visit in the higher school, etc.).
- Contents and discussion part – comprises evidence, findings and recommendations according to the various criteria, grouped into four areas of activity (educational activities, research, management, and competitiveness).
- Conclusion - presents examples of best practice, indication of weaknesses and areas for improvement and a summary of the recommendations

54. According to the self evaluation, and the Agency's guidelines, in the preparation of the report, there is a requirement that the main conclusions and analyses should be supported by the relevant facts and evidence. Each report should therefore contain supporting information on all indicators relating to the criteria set. The report should be written in a way that makes them accessible and understandable - and not only for academic staff, but to other stakeholders in the system of science, education and culture. The information on which the report is based must be correct, comparable and reasonable. It is acceptable to use not only internal institutional, but also to draw on public sources, such as official reports of the Ministry of Education and Science, registers, public information, data of the National Institute of Statistics, official websites and portals, etc.

55. In May of each year, NEAA publishes in the State Gazette a list of accredited institutions of higher education, their basic units, affiliates and majors from the regulated professions, and also a list of accredited scientific disciplines in higher education institutions and scientific organizations, together with the scores which they have received. The Panel heard that an overview report would be routinely

prepared on completion of the review of an individual area of study; three such reports were presently in preparation.

56. Very limited information is made available to the public through the website of NEAA and the website of the Ministry of Education and Science. These information sources simply give the accreditation outcome and the grade achieved by an institution. Higher education institutions and scientific organizations similarly publish lists of accredited programmes and professional fields on their websites. The review team established that no other public information deriving from the accreditation review process is made available. It was evident that full and informative reports on individual institutions and programmes are not published, and on enquiry the Panel understood that it was not the policy of NEAA to publish such reports.

Panel judgement:

Non-compliant

Panel Recommendation

That NEAA, institutional representative bodies and the Ministry of Education and Science review the current policy of not publishing reports in full and as a priority take the necessary measures to resolve this major deviation from the ESG.

**ESG 2.6 Follow up-procedures
(ENQA Criterion 1 cont.)**

Standard:

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.

Guidelines:

Quality assurance is not principally about individual external scrutiny events: it should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

NEAA compliance

57. Amendments to the Higher Education Act of 2011 and to the Statutes of NEAA in 2012 have broadened the scope of activities which the Accreditation Council undertakes in the context of Post-Accreditation Monitoring and Control. After relevant expert review and evaluation, the Accreditation Council may now:

- withdraw accreditation of an HEI, if a serious breach of the Higher Education Act or a failure to implement the recommendations on the profile and qualifications of academic staff and/or logistic provision and/or academic records is found
- reduce educational capacity of the higher school in the case of failure to implement the recommendations on the profile and qualifications of academic staff and/or logistic provision
- reduce the duration of the period of accreditation of the institution and its programmes in case of incorrect implementation or execution of recommendations by the Accreditation Council on in applying the internal quality assurance system of training and academic staff.

58. Procedures on Post-accreditation monitoring are described in Section four of the Statute of NEAA. To fulfil its obligation in this new area, NEAA is assisted by a Standing Committee on Post-Accreditation Monitoring. The Vice-Chairman on post-accreditation monitoring is also the Vice President of the Accreditation Council. The ultimate authority responsible for decisions on post-accreditation monitoring (for awarding or revocation of institutional or programme accreditation), is the Accreditation Council itself.

Activities of post-accreditation monitoring are planned according to a schedule, validated by the Accreditation Council. NEAA operates a calibrated risk-based approach to follow up and review as indicated in the table below. If an accredited institution has received an evaluation grade below 5.00, it is required to prepare an action plan for the removal of weaknesses and correcting the most essential drawbacks in management, educational activities and academic staff development. The implementation of the action plan is reported to the respective Standing Committee.

Table: Post-accreditation actions depending on the assessment and validity period of institutional accreditation

Evaluation grade	Period in which a procedure of follow up is applied	Actions of the higher school	Actions of the SC on follow up	Actions of the Accreditation Council
9.00 -10	4 Years	<ul style="list-style-type: none"> Prepares and submits a report on the implementation of the recommendations. Prepares and submits a report on the implementation of the internal quality assurance system of training and academic staff. 	Considers the reports and submits to the Accreditation Council a draft decision.	Examines the proposal of SC on PAMC and decides on it.
7.00 -8,99	3 Years	<ul style="list-style-type: none"> Prepares and submits a report on the implementation of the recommendations. Prepares and submits a report on the implementation of the internal quality assurance system of training and academic staff. 	Considers the report and submits to the Accreditation Council a draft decision.	
5.00 -6,99	1 Year	<ul style="list-style-type: none"> A first report on the implementation of the recommendations. A second report on the implementation of the recommendations. Prepare and submit a report on the implementation of the internal quality assurance system of training and academic staff. 	<ul style="list-style-type: none"> Considers the first report. Defines an expert group, which performs on the spot check and prepares a report. Examines the report of EG and draws up findings. Submits a draft for a decision by the AC. 	
4.00 -4,99	4 Months	<ul style="list-style-type: none"> Establishes a programme of measures for the removal of the identified deficiencies weaknesses and inconsistencies. Prepare a report on the implementation of the measures under the programme. Prepare a report on the implementation of the internal quality assurance system of training and academic staff. 	<ul style="list-style-type: none"> Approves the programme or returns it for adjustment Considers the reports and determines the expert group which performs on the spot check and drafts a report Studies the report of the expert group and draws up findings. If case of infringement found out submits a proposal to the AC for the withdrawal of accreditation. 	
	18 Months			
Revocation of institutional accreditation	2 months 12th month after submitting the action plan in the Agency 18th month	<ul style="list-style-type: none"> Draws up an action plan for a period of 18 months for the removal of the weaknesses in the revocation decision. Submits a report on the implementation of the plan to NEAA. Submits a report on the implementation of the action 	<ul style="list-style-type: none"> Approves the action plan or returns it for adjustment with motivated recommendations. Considers the reports, approves or disapproves them and determines an 	

		plan.	expert group. • Examines the report of EG and draws up findings. • Submits a draft for a decision by the AC.	
Proposal of the Minister of Education and science for the withdrawal of accreditation			• SC considers the proposal forwarded to them by the Chairman of NEAA, carries out an on spot check and draws up a protocol. • On the basis of the findings may offer t the AC a withdrawal of accreditation.	In case of a submitted proposal for withdrawal of accreditation the AC prepares a well-grounded decision 'for' or 'against' decision

In case of revocation of accreditation, the decision contains:

- Grounds for revocation of accreditation together with recommendations on the performance of higher school or scientific organization whose implementation is obligatory for the opening of a new procedure;
- Deadline for action to be taken to correct deficiencies and improve quality, which may not be longer than 18 months.

These post-accreditation monitoring procedures together constitute a comprehensive system for the follow-up of review judgements and recommendations made by the Agency in its accreditation processes. The Panel reviewed the effectiveness of the monitoring of the action plans and discussed it with external representatives; it believes that NEAA's monitoring is effectively carried out.

Panel judgement:

Fully compliant

Panel Recommendations

That NEAA consider how the wealth of sector information gathered through its follow-up procedures can be deployed to support system wide quality enhancement.

**ESG 2.7 Periodic reviews
(ENQA Criterion 1 cont.)****Standard:**

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.

Guidelines:

Quality assurance is not a static but a dynamic process. It should be continuous and not 'once in a lifetime'. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

NEAA compliance

59. As indicated in the preceding section, NEAA has implemented procedures for external quality evaluation at regular and appropriate intervals, with some flexibility proportionate to risk. Cyclicity of review is maintained by NEAA, although the timescales for different types of accreditation (programme and institutional) may vary.

The cycle of procedures for assessment and accreditation are governed by the law on higher education. Each individual accreditation ends with a decision by the Accreditation Council, which in turn specifies the period of accreditation and the period for implementation of any recommendations.

Panel judgement:

Fully compliant

Panel Recommendations

None.

**ESG 2.8 System-wide analysis
(ENQA Criterion 1 cont.)**

Standard:

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

Guidelines:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

NEAA compliance

60. NEAA publishes an annual report on its activities which includes a limited amount of statistical analysis. It has also published a Bulletin from time to time, but it appeared that this had recently fallen into abeyance. The Agency's website had not been updated for some time and while there was a stated intention to redesign the web pages, they were not in the present form helpful in providing current information regarding the work of NEAA, or wider information regarding the higher education sector. NEAA informed the Panel that its current participation in the project "Electronic and Information Systems" would in future strengthen its web processes and would provide for a stronger range of analytical information on its website. However there was currently little evidence of progress in this direction.

The panel recognised that, given the intensity of the workload required to support its current assessment and accreditation activities, NEAA's capacity for system-wide analysis is severely constrained. Nevertheless this area of its activity was found to be markedly underdeveloped.

Panel judgement:

Partially compliant

Panel Recommendations

- The Panel recognises the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realise its potential, the Agency discuss with its stakeholders options to increase both its resources and the cost-effectiveness of its activities (see below). The additional resource thus gained could then be directed to increase the volume of system-wide analysis and quality enhancement activity which NEAA can undertake. NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity.

ESG Part 3: European standards and guidelines for external quality assurance agencies

ESG 3.1 Use of external quality assurance procedures for higher education (ENQA Criterion 1 cont.)

Standard:

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

Guidelines:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

NEAA compliance

61. The Panel's assessment of NEAA's compliance with Part 2 of the ESG is described in detail in the preceding part of the report.

The Panel found a mixed pattern of compliance with the standards in Part 2, but in making an overall evaluation it can confirm that NEAA's processes and procedures are based on, and are substantially compliant with Part 2 of the ESG.

Panel judgement:

Substantially compliant.

Panel Recommendations

None.

**ESG 3.2 Official status
(ENQA Criterion 2)**

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.

NEAA compliance

62. NEAA is recognized in law as the sole authority for the assessment, accreditation and quality assurance of Bulgarian higher education under Article 11 of the Higher Education Act of the Republic of Bulgaria. NEAA carries out its activities in accordance with this law. The Statute for the activities of the Agency is the legal basis for its activities. It prescribes structures, activities, the model of governance, and the broad organization of NEAA's work.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

**ESG 3.3 Activities
(ENQA Criterion 1 cont.)**

Standard:

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

Guidelines:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

NEAA compliance

63. The functions and powers of the NEAA are governed by the Higher Education Act. The core functions of the Agency are the evaluation, accreditation and control of the quality of higher education. NEAA carries out these functions through the following activity cycles:

- Evaluation of projects for the opening and transformation of a higher school
- Evaluation of projects for the opening and transformation of basic units of a higher school and/or an affiliate
- Evaluation of projects for opening a professional field and majors from the regulated profession in the higher school
- Institutional accreditation of higher education institutions
- Programme accreditation of a professional field and a major from the regulated profession in a school of higher education
- Program accreditation of PhD programmes
- Evaluation of distance learning in a professional field
- Procedures for amending the educational capacity of a higher school, professional field or a major from the regulated professions
- Post-accreditation monitoring of the quality of Bulgarian higher education institutions.

64. Criteria and methodologies for operation of all procedures listed have been developed, tested and implemented. They are applied consistently across all higher education institutions.

**Panel judgement:
Fully compliant**

Panel Recommendation

- NEAA operates a comprehensive and complex set of external quality assurance procedures determined by statute. It is open for discussion as to whether the combined weight of these procedures is really the optimum mechanism for the maintenance and enhancement of quality in Bulgarian Higher Education. It was suggested to the Panel that programme-level and institutional-level accreditation may in future be merged into a single

process. It is recommended that this positive opportunity be further reviewed by NEAA in consultation with Government and HE stakeholders.

ESG 3.4 Resources

(ENQA Criterion 3)

Standard:

Agencies should have adequate and proportionate resources, both human and financial, to enable them to organise and run their external quality assurance process (es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures (*and staff*) (*Addition by ENQA for ENQA criterion*)

NEAA compliance

65. NEAA is funded both through the state budget and through its own earnings from accreditation fees. Financing of the Agency is defined in its Statute of activities as follows: "The Agency is a subordinate distributor to the Ministry of Education and Science". The total budget by 30.09.2013 amounts to 1,156,805 BGN (594,000 Euros). Although this covered the basic operating costs of the Agency, the Panel heard (and observed) that the financial position was very tight and had forced the Agency to focus entirely on core activity. The Agency seeks to augment its budget through project financing from structural funds and other sources and through financing from international partnership in evaluation and accreditation procedures and consultancy. NEAA is subject to periodic external financial audit.

66. The level of human resources supporting NEAA's work is as follows:

- Chair and members of the Accreditation Council (10 members, appointed on a renewable 3 year basis)
- Chairs of standing committees (8 standing committees in areas of higher education and 1 Standing Committee on PAMC)
- Members of the standing committees (total number of 52, on a renewable 3 year part-time basis)
- External experts, academic specialists from professional fields and scientific disciplines (total number of 700 per year)
- Students and PhD student assessors (total number of about 63 a year - on average 30 students and 33 PhD students)
- Consultants for employment of the graduates (eminent specialists and experts from the practice (total number of about 10 - 15 a year).
- Expert staff of officers to the specialized administration, who assist the activity of the Accreditation Council and Standing committees
- Administrative staff of the general administration to NEAA

67. The number of full-time contract employees is regulated in the Statute for the activity of NEAA, endorsed by the Council of Ministers. It amounts to 30, distributed in individual structural units as follows:

- Chairman (President)
- Vice Chairman
- Members of Accreditation Council
- Chairmen of Standing Committees
- Members of specialised administration
- Members of general administration

The Chairman, vice chairman, members of the Accreditation Council and Chairs of the standing committees are individuals with an academic rank and PhD degrees and specialists in their educational and scientific field.

68. The majority of employees of the general and specialised administration have the status of civil servants. They are appointed to the Agency after a competition and their job descriptions are related to the main activities of the Agency. Their current work is ruled by state procedures for promotion, accountability and training, as for other civil servants in government institutions in Bulgaria. Employees of the specialized administration are experts in the area of the Standing Committee with which they work. Since the last ENQA report, staffing budgets in this area have been reduced – the number of civil servant grade posts has been reduced, although overall headcount remains similar due to an increase in contract staff. The Agency's work is assisted by 8 employees (part-time) and two auxiliary technical personnel on full-time contracts.

69. Employee training is funded by the Agency's budget and includes courses in foreign languages, computer skills and other appropriate courses. The Panel was informed that NEAA recognises that the human resources of the Agency are one of the most valuable and powerful aspects of the institution and pays special attention to ensure appropriate opportunities for the development and expansion of the staff's professional capacity. Staff confirmed to the Panel that there was appropriate access available for further training.

70. The Agency rents appropriate and accessible accommodation in Sofia.

71. NEAA undertakes and monitors a wide range of assessment activity and through its complex grading structure, makes accreditation decisions to a high degree of granularity. A full programme of accreditation at both programme and institutional level presents NEAA with an extremely heavy workload. Much of the volume and sequencing of its annual programme of work is also determined externally by institutional stakeholders. The Panel concurs in the view that NEAA has sufficient resources to support its current operations in their current format. The Panel can also confirm NEAA's commitment to the ongoing personal and professional development of its staff and reviewers, which are key resources. The Panel would however suggest that the pressure on resources has severely limited the capacity of NEAA as an agent for change and as an engine for quality enhancement as evidenced by the lack of any significant sector-wide analysis. The current role of NEAA is based primarily on regulation, monitoring and compliance. Further investment would allow it to make a significantly greater contribution to quality enhancement.

Panel judgement:

Partially compliant.

Panel Recommendations

NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity.

**ESG 3.5 Mission statement
(ENQA Criterion 4)**

Standard:

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

Guidelines:

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

NEAA compliance

72. The Mission of NEAA is defined in the Higher Education Act as follows:

"NEAA contributes to the enhancement of the quality of higher education through periodic institutional and programme evaluation and accreditation of higher education institutions in Bulgaria, through evaluation of projects for opening new institutions of higher education and their basic units, as well as through post-accreditation monitoring and control."

The text of the mission statement is publicly available on the website of the Agency. The Panel heard that the President, Council members and Agency staff were conscious of the mission of the institution and of their responsibilities, whilst at the same time strictly observing the principle of academic autonomy of the universities and research organizations themselves.

73. NEAA has adopted strategic priorities as follows:

- The Agency assists actively in the development and implementation of a national policy for quality assurance of higher education in Bulgaria.
- The Agency contributes to the development of higher education and research in the institutions of higher education, on the basis of the principles of transparency and competition.
- Through its activities NEAA ensures the evaluation of higher schools and provides signposts for their progress on the implementation of quality processes and activities in the evaluation, accreditation and post-accreditation monitoring control.
- NEAA contributes to harmonising processes and activities, as well as the whole system of Bulgarian higher education, with the standards and rules, valid in the European network of agencies for quality assurance (ENQA).
- The Agency develops effective cooperation with related agencies to ensure the quality of the member states of the European Union and from the Balkan region.

74. These strategic priorities are reflected in NEAA's strategic plan for 2009-14. The Panel heard that a new strategic plan for 2015-17 was in preparation, linked to current funding prospects and planned activity. The Panel was unable to access a number of source documents relating to these planning objectives. It recommends the publication of a strategic plan which sets the main goals and objectives over a stated period of time. During the annual planning process, the strategic plan should be used as the basis for developing a (published) annual operating plan.

Panel judgement:

Substantially compliant.

Panel Recommendation

- The Agency operates in accordance with a strategic plan, currently under revision. Annual activity plans are derived from the strategy. The Panel was unable to access a number of source documents, but recommends the publication of a strategic plan which sets out the main goals and objectives over a stated period of time. During the annual planning process, the strategic plan should be used as the basis for developing a (published) annual operating plan.

ESG 3.6 Independence (ENQA Criterion 5)

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.

Guidelines:

An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and Governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts)
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from Governments, higher education institutions, and organs of political influence
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

NEAA compliance

75. NEAA has operational independence in its activities. Its functional independence is legally guaranteed in the law, which sets out the division of responsibilities as between the different players in higher education, including the tasks to be undertaken by the Agency. Changes in the Statute regulating the activities of NEAA are made on the proposal of the Accreditation Council itself and are approved by the Council of Ministers of the Republic of Bulgaria.

76. NEAA is structured so as to safeguard its independence. NEAA is the only body in the country that can revoke institutional or programme accreditation. The Minister of Education technically has the right to request withdrawal of accreditation (a right never exercised), but this decision on withdrawal may be made only by NEAA.

The table below describes the mechanisms for the selection and appointment of the members of Accreditation Council to NEAA, its standing committees and expert groups.

Selection and appointments in NEAA

Body/structure	Nominated by	Selected by	Appointed by	Mandate, renewal, dismissal
Accreditation Council	Minister of Education	Education (4 nominations for 2 positions)	Prime Minister of Republic of Bulgaria	One single mandate of 6 years Every 3 years ½ of members are renewed by drawing lots Decision on dismissal is taken by secret voting and it offered to the Prime Minister
	Academic councils of HEIs	Rectors' Conference (12 nominations for 6 positions)		
	Bulgarian Academy of Sciences	(2 nominations for 1 position)		
	Bulgarian Academy of Economics	(2 nominations for 1 position)		

Chair of AC	Minister of education			
Standing Committees on areas of knowledge	AC	AC	Chair of AC	Length of mandate of 3 years
SC on post-accreditation monitoring of quality	HEIs			Unlimited number of mandates
				Decision on dismissal is taken by secret voting and it offered to the Prime Minister
Nomination of experts	SC HEIs	AC	SC	Inclusion in a bank of experts
Formation of expert teams	SC	AC	Chair of AC	Time period for work of expert team – 3 months
	Chair of AC			

77. NEAA has the status of a separate, independent (autonomous) and specialized state body for the accreditation, monitoring and quality control of Bulgarian higher education. Its composition is based on nominations from academia and institutions. Nominations for appointment to the Accreditation Council and Standing committees are based on personal ability, experience and sector support. All members of the Accreditation Council and standing committees are respected lecturers and research workers. Although the pool of nominations is made through institutions, the final decision on the appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken entirely within NEAA, according to the published procedures. Since 2013 an opportunity has been offered on the Agency's website for professors, specialists on the practice, postgraduate students and students to apply directly to become experts. This procedure is to be held annually from January 2014.

To avoid conflicts of interest with the institutions of higher education and observing the Statute of NEAA, members of the expert groups must not be members of the institution and must not teach or have taught in it or its affiliates 18 months before the beginning of the evaluation and accreditation processes.

Independence of evaluation is referred to in Article 3 of the Code of Ethics to NEAA, which reads as follows: "external quality assurance is carried out on the basis of values such as legality, impartiality and awareness as well, independence, objectivity and integrity, transparency, competence, responsibility, confidentiality and communication". The Panel heard that NEAA operates an Ethics Committee designed to support the integrity of its operations

78. It was clear to the Panel that the close involvement of government in the appointment of members of the NEAA Commission, together with the appointment through the Commission of the Chairs of the Standing Committees, meant that a complete independence from political influence could not be demonstrated by NEAA. Nevertheless, the Panel concluded that a high level of independence was in fact achieved by virtue of the Agency's legal status; through the overall composition of its governing bodies; through its independence in developing criteria and procedures and in the selection of experts; and through its complete independence in decision making.

Panel judgement:

Substantially compliant

Panel Recommendations

None.

ESG 3.7 External quality assurance criteria and processes used by the agencies (ENQA Criterion 6)

Standard:

The processes, criteria and procedures used by agencies 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, 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.

Guidelines:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences, should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

NEAA compliance

79. NEAA's procedures involve

- Preparation of a self-evaluation report by a higher school or scientific organization prepared in response to criteria publicly available and pre-defined by NEAA.
- An external evaluation by an expert group which includes a site visit.
- An evaluation report, which includes mandatory input from students (both from those attached to the Team and those from within the institution)
- The report is discussed and approved at a meeting of the Standing Committee with the participation of the expert group on the relevant procedure.
- The report is submitted to the higher school or scientific organization for factual corrections.
- The higher school or scientific organization draws up a response
- On the basis of these documents and the report of the expert involved with the procedure a decision is made by the Accreditation Council or the standing committee depending on the content of the evaluation and accreditation procedure. Decisions include verbal and numerical evaluation. Numeric evaluation is from 0 to 10 for institutional and programme accreditation and positive or negative for the evaluation of a project and for the evaluation of distance learning centres.
- Subsequent monitoring is carried out through the post-accreditation monitoring and control procedures over defined periods.

80. The Agency has compiled, approved and released Rules of engagement for students and PhD students in the evaluation and accreditation procedures. These rules are prerequisites for involving students and postgraduate students in a wide number of procedures and reporting their opinion on the education products' quality.

81. The Agency's Quality Assurance Committee can sometimes mediate in cases of disagreement between NEAA and a reviewed institution. Technically under Bulgarian law, NEAA is an independent institution and its decisions can only formally be appealed against or challenged before the Administrative Court in the city of Sofia in the first instance and subsequently before the Supreme Administrative Court. The Court may take one of the following actions - to void the decision; to cancel the decision in whole or in part, or to reject the appeal. If NEAA's judgement is declared void or cancelled, the Court returns the case file back to NEAA with mandatory rulings on the legal aspects. The losing party can appeal to the Supreme Administrative Court. The decision of the Supreme Administrative Court is final. When, as a result of judicial dispute the file of the procedure is returned to NEAA for new proceedings, the Accreditation Council or the standing committee in area of higher education provides a new decision, which is subject to appeal in the same way. The Panel has reviewed the operation of the Appeals system within the context of the Administrative Court and Bulgarian law, and believes it to be operating effectively.

The issue of publication of reports is discussed in Para. 56.

Panel judgement:

Substantially compliant.

Panel Recommendations:

- Since the last, report, an amendment has been made to accord full status to student team members. The Panel heard however of some instances where Standing Committees had opted to deploy student members in a slightly different way. The Panel urges NEAA to issue consistent guidance on this policy, for the avoidance of doubt.

**ESG 3.8 Accountability procedures
(ENQA Criterion 7)**

Standard:

Agencies should have in place procedures for their own accountability.

Guidelines:

These procedures are expected to include the following:

- 1 A published policy for the assurance of the quality of the agency itself, made available on its website.
- 2 Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/Board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
- 3 A mandatory cyclical external review of the agency's activities at least once every five years.

NEAA compliance

82. The Accreditation Council itself and its Chairman are primarily accountable for its operation. The Council is careful to take into account the views of most major stakeholders.

The Panel heard about NEAA's internal quality assurance system, called the 'Corrector System'. A Committee for Quality Assurance oversees this system. The system provides data on the effectiveness of the external evaluation procedures, of accreditation and of staff and experts' work. The system is described on the website of NEAA and consists of four major subsystems, which interact with the external environment. Outputs are discussed, analysed and evaluated regularly by the Committee on Quality Assurance and by the Accreditation Council itself. Where deemed appropriate, corrective action for improvement of the system is undertaken. The Agency also seeks to operate a balanced score card approach for monitoring its overall effectiveness and its strategic priorities. The major elements of the strategic card aim to boost the Agency's positive characteristics and to reduce the areas in which the Agency is in need of improvement.

In addition to the internal quality assurance system of the Agency, audits of the National Audit Office, audits of the Inspectorates to the Council of Ministers and Ministry of Education and Science are performed. Financial audits are carried out separately.

83. As discussed previously, the Panel has reviewed documentation indicating that:

- NEAA's processes reflect very clearly its mission and objectives for quality assurance
- The Agency applies no-conflict-of-interest mechanisms with respect to the appointment and activities of external experts
- NEAA maintains reliable training and updating mechanisms to ensure the quality of all activities performed by external experts

84. The panel has however been unable to identify evidence of consistent processes and outputs for:

- feedback from reviewers, officers and higher education providers on the performance of reviewers during review
- internal feedback from officials and reviewers working within the agency
- feedback from institutions and other stakeholders

These potentially comprise a wide range of sources to inform improvement and development.

The Agency submits itself to cyclical external review at least once every five years through its ENQA membership.

Panel judgement:

Substantially compliant.

Panel Recommendation

- That the Agency takes further steps to introduce a comprehensive system for feedback on its own activities.

ENQA Criterion 8

- i. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgments and decisions are reached in a consistent manner, even if the judgments are formed by different groups;
- ii. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the agency;
- iii. The agency is willing to contribute actively to the aims of ENQA.

NEAA compliance**Management and consistency**

85. NEAA's policies and procedures are described fully in its publications and it is governed by these procedures in all of its actions and decision-making processes; they provide the reference point for internal and external stakeholders alike. The Panel considers that NEAA has in place robust internal quality control mechanisms which ensure that judgements and decisions are consistently made. The quality of its work is overseen by the Commission and managed by professional staff (see also 3.8 above)

Appeals procedures

86. Appeals procedures are discussed under Standard 3.7.

Involvement with ENQA

87. NEAA is fully committed to internationalisation. In the past 5 years, NEAA has sought to build its profile and reach throughout Europe through partnership with foreign public authorities with expertise in the European area of higher education. One of the main objectives of this policy is to underpin NEAA's capacity for implementation of the "Standards and guidelines for quality assurance in the European area of higher education". An international profile also confirms NEAA's role as the national authority for the evaluation of the quality of higher education in the Republic of Bulgaria.

It has been in full membership of ENQA since 2008. During the period 2009 – 2013, representatives of NEAA have participated in 14 international events organised by ENQA, hosted an ENQA Board meeting in February 2013 and been involved in a number of ENQA research projects.

NEAA has been a full member the European Quality Assurance Register for Higher Education (EQAR) since 2009. NEAA is a co-founder of the Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEEN) and actively participates in its activities. A representative of NEAA is a member of the Board of Management of CEEN. The Agency has official relations with many other international institutions and has concluded bilateral agreements on mutual assistance with six agencies for quality assurance of higher education.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

Aspects of good practice

88. In addition to examining NEAA's compliance with the ESG, this review has also identified a number of features of good practice in the Agency's work. These include:

- NEAA has a strong national profile as 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, its authority is guaranteed by law and its integrity is widely recognised and respected.
- criteria and procedures for evaluation and accreditation are well-defined and well-developed
- Follow-up procedures for evaluation and accreditation, monitoring and control activities are particularly well-developed.
- Individual members of the Agency's Council perform a key role in monitoring and developing the work of the Standing Committees and their review groups.
- The work of the Standing Committees is thorough and well-balanced, and perform a key moderating function in regard to their management of the expert panels

Summary of recommendations

89. The Panel makes a number of specific recommendations to NEAA:

These include:

- That NEAA develop strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in its procedures. The enhancement agenda would benefit from greater exposure to good international practice through the routine involvement of international experts in NEAA assessment activity
- That NEAA consider how the outputs from its review activities can be further focused to support system-wide institutional quality improvement and enhancement.
- That NEAA further strengthen the involvement of students and representatives of professional bodies as full participants in all stages of the accreditation process.
- That NEAA should seek to ensure greater consistency in its involvement of students, in particular with regard to experts' training and participation in the work of Standing Committees
- That NEAA, institutional representative bodies and the Ministry of Education and Science review the current policy of not publishing reports in full and as a priority take the necessary measures to resolve this major deviation from the ESG.
- That NEAA consider how the wealth of sector information gathered through its follow-up procedures can be deployed to support system wide quality enhancement.
- The Panel recognises the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realise its potential, the Agency discuss with its stakeholders options to increase both its resources and the cost-effectiveness of its activities (see below). The additional resource thus gained could then be directed to

increase the volume of system-wide analysis and quality enhancement activity which NEAA can undertake.

- NEAA operates a comprehensive and complex set of external quality assurance procedures determined by statute. It is open for discussion as to whether the combined weight of these procedures is really the optimum mechanism for the maintenance and enhancement of quality in Bulgarian Higher Education. It was suggested to the Panel that programme-level and institutional-level accreditation could be merged into a single process. It is recommended that this be further reviewed by NEAA in consultation with Government and HE stakeholders.
- NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity.
- The Agency operates in accordance with a strategic plan, currently under revision. Annual activity plans are derived from the strategy. The Panel was unable to access a number of source documents, but recommends the publication of a strategic plan which sets out the main goals and objectives over a stated period of time. During the annual planning process, the strategic plan should be used as the basis for developing a (published) annual operating plan.
- Since the last report, an amendment has been made to accord full status to student team members. The Panel heard however of some instances where Standing Committees had opted to deploy student members in a slightly different way. The Panel urges NEAA to issue consistent guidance on this topic for the avoidance of doubt.
- That the Agency takes further steps to introduce a comprehensive system for feedback on its own activities.

90. The Panel makes a number of general recommendations to NEAA. These include:

i. NEAA is a relatively small organisation conducting a high volume of accreditation activity. The organisation is currently very task-based and administratively focused. Stakeholders are not well served by the low level of system-level analysis and commentary carried out by NEAA. Some investment and/or re-balancing of resources is required so as to facilitate increased sector analysis supporting quality improvement. Whilst the Panel recognises the significant financial pressures and the volume of procedure-driven activity currently faced by the Agency, the Panel recommends that the Agency discuss with its stakeholders options for creating resource to increase its capacity to undertake system-wide analysis in support of quality enhancement activity. A move to more integrated systems of accreditation would support this development.

ii. NEAA's stakeholder profile outside the higher education sector is limited. NEAA should take steps to deepen the involvement of civil society, in particular of the employment sector, in its activities. In parallel, it needs to develop an approach to effective cross-sector communication, which takes account of the needs of all stakeholders.

iii. The Agency's finances are under considerable pressure. This situation is further exacerbated by an inability to carry forward year end surpluses and by a mismatch with stakeholder payment schedules. Future funding strategies should

be developed and agreed with the Ministry and some operational funding issues resolved.

Summary of NEAA's performance against the ENQA membership criteria

91. The criteria where **full compliance** has been achieved are:

ENQA criterion 1, sub-criterion (ESG 2.1): Use of internal quality assurance procedures

ENQA criterion 1, sub-criterion (ESG 2.2): Development of external quality assurance processes.

ENQA criterion 1, sub-criterion (ESG 2.3): Criteria for decisions

ENQA criterion 1, sub-criterion (ESG 2.6): Follow-up procedures

ENQA criterion 1, sub-criterion (ESG 2.7): Periodic reviews

ENQA criterion 1, sub-criterion (ESG 3.3): Activities

ENQA criterion 2, (ESG 3.2): Official status

ENQA criterion 8 (miscellaneous)

The criteria where **substantial compliance** has been achieved are:

ENQA criterion 1, sub-criterion (ESG 2.4): Processes fit for purpose

ENQA criterion 1 (overall) (ESG 3.1): Use of external quality assurance procedures for higher education

ENQA criterion 4 (ESG 3.5): Mission statement

ENQA criterion 5 (ESG 3.6): Independence

ENQA criterion 6 (ESG 3.7): External quality assurance criteria and processes used by the agencies

ENQA criterion 7 (ESG 3.8): Accountability procedures

The criteria where **partial compliance** has been achieved are:

ENQA Criterion 1, sub-criterion (ESG 2.8): System-wide analyses

ENQA criterion 3 (ESG 3.4): Resources

The sub-criterion where **compliance** has not been achieved is:

ENQA criterion 1, sub-criterion (ESG 2.5): Reporting

Overall conclusion

92. Since the 2008 review, NEAA's range of activities has continued to grow both in size and complexity. Progress has been, and continues to be made (albeit at differing speeds) on the recommendations from the 2008 Report.

In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, NEAA remains in substantial compliance with the ENQA Membership Provisions.

The Panel therefore recommends to the Board of ENQA that NEAA should have its Full Membership of ENQA confirmed for a further period of five years. The Panel recommends that a further progress report should be sought from NEAA in September 2015.

APPENDIX 1

Site visit to NEAA: 6 – 7 February 2014

Schedule of meetings

Venue: Floor 4, Block 5,
125, Tsarigradsko Shose Blvd., Sofia

Day 1 Thursday 6 February, 2014		
Time	Event	Personnel
Session 1 8.45 – 9.15	Meeting with NEAA staff who prepared self evaluation	<ul style="list-style-type: none"> - Prof. Vera Boneva (Chairman of Working Group) - Prof. Velizara Pencheva (Secretary of Working Group) - Mila Penelova (Secretary General) - Prof. Todor Shopov (International Relations)
Session 2 9.15-10.15	Introduction to NEAA, its strategy, activities and management.	<ul style="list-style-type: none"> - Prof. Boyan Byolchev (President) - Prof. Ilia Gjudjenov (Vice-President) - Mila Penelova (Secretary General) - Prof. Ivan Panayotov (immediate past-President) <p>Members of the Accreditation Council:</p> <ul style="list-style-type: none"> - Prof. Valeria Fol - Prof. Angel Popov - Prof. Ivan Varliakov
10.15-10.30	Private meeting of Panel	
Session 3 10.30-11.30	Meeting with Chairmen of NEAA's Standing Committees: (role and operation of Standing Committees)	<ul style="list-style-type: none"> - Prof. Emilia Vassileva (Pedagogy) - Prof. Stanka Velichkova (Post-accreditation monitoring) - Prof. Racho Ivanov (Technology) - Prof. Borislav Slavov (Natural Science)
11.30-11.45	Private meeting of Panel	
Session 4 11.45-12.30	Meeting with responsible Ministry staff	- Ivana Radanova (Deputy Director, HE)
12.30-12.45	Private meeting of Panel	
12.45-13.45	Private lunch	
Session 5 13.45-14.45	Meeting with members of NEAA's professional administrative	<ul style="list-style-type: none"> - Mrs. Stoyinka Kireva (Director, Specialized Administration) - Mrs. Snejana Vladimirova (Head Accountant) - Ms. Kamelia Kostova (Internal Lawyer) - Ms. Mariela Alexieva (expert; Humanities and Arts)

	staff	- Ms. Kristina Dedikova (expert) - Prof. Todor Shopov (International Relations)
14.45-15.00	Private meeting of Panel	
Session 6 15.00-16.15	External experts, who have acted in various NEAA procedures	- Prof. Galin Tzokov - Prof. Seferin Mirchev - Prof. Prof. Angel Petrov - Prof Ivan Bozhkov
16.15-17.00	Private meeting of Panel	
	Private dinner and panel discussion	

Day 2 Friday 7 February, 2014		
Time	Event	Panel meeting with:
Session 7 9.00-10.00	Meeting with senior representatives from Universities	Chairman of the Council of Rectors - Prof. Vanjo Mitev Representatives of Universities: <i>State Universities:</i> - Prof. Marin Hristov - Prof. Hristo Beloiev - Prof. Plamen Legkostup. - Prof Anastas Gerdjиков <i>Private Universities:</i> - Prof. Grigorij Vazov - Prof. Ruslan Penchev - Prof. Vassil Zhechev - Prof. Mihail Iliev - Prof Anna Nedyalkova
10.00-10.15	Private meeting of Panel	

Session 8 10.15-11.15	Meeting with student union representatives and undergraduate and postgraduate students with experience of NEAA's quality assurance procedures	<ul style="list-style-type: none"> - Mr. Christian Daskolov (Secretary General, National Students Union) - Mr. Georgi Michev (student) - Mr. Mario Terziev (student) - Mr. Kiril Yankulov (PhD student) - Mr. Stefan Kinov (PhD student) - Mr. Lubmir Bogdanov (PhD student)
11.15-11.30	Private meeting of Panel	
Session 9 11.30-12.30	Meeting with employer association, professional organisation and civic society stakeholders	<ul style="list-style-type: none"> - Prof. Emil Mingov (Ministry of Labour) - Prof. Lazar Gruev (President of the Supreme Court of Cassation) - Acad. Stefan Vodenicharov (Bulgarian Academy of Science) - Acad. Damian Damianov (Union of Scientists in Bulgaria)
Session 10 13.30-14.30	Meeting with members of Quality Assurance Standing Committee of NEAA	<ul style="list-style-type: none"> - Vanya Novakova , Council for Administrative Reform, Council of Ministers - Mrs Liliana Valcheva, Trade Union President, Education and Science - Prof. Georgi Shivarov,, Vice-President, Bulgarian Industrial Association
14.30-15.00	Clarification meeting	- Mrs. Stoyanka Kireva, Director of the Specialized Administration Directorate of NEAA
15.00-15.30	Private meeting of Panel	
Session 11 15.30-16.00	Meeting with President and Secretary General to clarify any outstanding issues	<ul style="list-style-type: none"> - Prof. Boyan Byolchev (President) - Prof. Ilia Gjudjenov (Vice-President) - Prof. Todor Shopov (international Relations)
16.00-17.00	Private meeting of Panel	
17.00	Closing meeting	<ul style="list-style-type: none"> - Prof. Boyan Byolchev (President) - Prof. Ilia Gjudjenov (Vice-President) - Prof. Todor Shopov (international Relations)

APPENDIX 2

DOCUMENTARY EVIDENCE	
1. Documents submitted in advance	
NEAA Self Evaluation Report (SER) dated 2013	
2. Further documents/information requested and provided in advance:	
	Higher Education Act 1995 (with amendments to 2013)
	Extracts (in translation) from Statute of NEAA (Rules of Procedure of the National Evaluation and Accreditation Agency), (2005, as amended to 2013)
	Criteria system for programme accreditation of professional fields and majors from the regulated professions (NEAA, 2011)
	Criteria for opening of a new HEI or transformation of HEI (NEAA)
	Guidelines and Criteria for evaluation of distance learning in a professional field (NEAA)
	Progress report to ENQA Chair, following 2008 ENQA review (2010)
3. Further documents made available during visit:	
	Updates on NEAA's response to 2008 ENQA report
	Specimen annual reports to Ministry 2013
	NEAA's Strategic Plan 2009-14 and Annual Plan
	Sample accreditation reports at programme and institutional level, with documentation tracking inputs and outputs from such reviews and their consideration by Standing committees and by NEAA
	Information on NEAA staff development and training activity.
	Ethics Committee; terms of reference
	Quality Assurance Committee: membership, constitution, procedures, rules and terms of reference; reports to NEAA Council
	Explanatory note on membership of Standing Committees and Expert Groups in regard to Articles of NEAA
4. NEAA website	http://www.neaa.government.bg/en