

ENQA AGENCY REVIEW

# NATIONAL EVALUATION AND ACCREDITATION AGENCY (NEAA)

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## EXECUTIVE SUMMARY

The National Evaluation and Accreditation Agency (NEAA) was reviewed against the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015)* following the methodology described in the *Guidelines for ENQA Agency Reviews*. The review process was also informed by *Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*. This report is based on the external review and it analyses the extent to which NEAA complies with the ESG 2015. The review was initiated by NEAA and it was carried out from February 2022 to January 2023 including a site-visit to NEAA from 27 - 29 September 2022. The purpose of the review is the renewal of NEAA's membership in the European Association for Quality Assurance in Higher Education (ENQA) and renewal of registration in the European Quality Assurance Register for Higher Education (EQAR). NEAA has been an ENQA member since 2008 with a short intermission. It has been an EQAR listed agency since 2018. This is the fourth external review of the agency.

NEAA is the only officially recognised external quality assurance agency operating in Bulgaria. It was established in 1995 as an independent state body with responsibility for EQA activities at Bulgarian public and private HEIs. NEAA's mission is to encourage HEIs in assuring and enhancing the quality of education they offer by sustaining high academic standards and good education traditions in Bulgaria. It conducts institutional and programme accreditations, post-accreditation monitoring and control, evaluation of projects, assessment of distance learning offers and reviews for altering the capacity of HEIs. All these procedures are covered in this review insofar as they are implemented in Bulgaria. In accordance with the recent changes in the legislative framework NEAA is allowed to conduct EQA procedures outside Bulgaria but has not yet conducted any international activities. NEAA has not the formal vision published on the website.

As the only national agency in Bulgaria responsible for EQA activities, NEAA has a crucial role in supporting the enhancement of Bulgarian HEIs. In achieving that goal, the agency has made significant efforts into ensuring that its work and activities align with EU policies related to quality in HE, especially the ESG. The review panel recognizes the efforts made by the agency to increase the efficiency, objectivity and relevance of its processes and to successfully respond to the recommendations from its 2017 ENQA review. However, the panel believes that there is still some room for improvement, especially in relation to the involvement of different groups of stakeholders in the agency's governing body, further streamlining the huge number of EQA procedures, strengthening financial and human resources and the agency's IQA system, strengthening the training of experts and ensuring that HEIs have the possibility to appeal the outcomes of procedures before taking legal action.

The panel thoroughly analysed and discussed the self-assessment report, the additional evidence requested by the panel and provided by NEAA, information and evidence collected during site-visit and interviews with a wide range of stakeholders. It concluded that NEAA complies with ESG as follows:

- compliance is achieved in ESG 2.1., 2.2., 2.3, 2.4., 2.5., 2.6., 2.7., 3.2., 3.3., 3.4. and 3.7.
- partial compliance is achieved in ESG 3.1., 3.5. and 3.6.

Recommendations have been made under the standards ESG 3.1., 3.3., 3.5., 3.6., 2.3., 2.4. and 2.7. Commendations have been made under the standards ESG 2.1. and 3.1. in relation to the NEAA's support to HEIs in developing their own IQA criteria and processes and in relation to the establishment of the Advisory Council with the representatives of the various employers' organisations.

The review panel concluded that, overall, NEAA is **compliant with ESG**.

# INTRODUCTION

This report analyses the compliance of National Evaluation and Accreditation Agency (Национална агенция за оценяване и акредитация), NEAA, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted from February 2022 to January 2023. The review was conducted for the purpose of renewal of NEAA's membership in the European Association for Quality Assurance in Higher Education (ENQA) and renewal of registration in the European Quality Assurance Register for Higher Education (EQAR).

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

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

As this is NEAA's fourth review (third coordinated by ENQA), the panel was expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

NEAA underwent an external review coordinated by the National Agency for Quality Assessment and Accreditation (ANECA) in 2008. NEAA used ANECA's review report to apply for ENQA membership and it became an ENQA member in 2008. In 2014 NEAA underwent an external review coordinated by ENQA but, based on the final review report, the Board concluded that the level of compliance of some membership criteria is not sufficient to renew the agency's full membership. The Board decided to designate NEAA as "ENQA Full member under review" for a period of two years. A year later, NEAA underwent a partial external review coordinated by ENQA and, as a result of the partial review process, it was successful in renewing its full ENQA membership. In 2017 NEAA underwent an external review coordinated by ENQA and the Board reconfirmed the status of NEAA as a full ENQA member.

NEAA was registered in EQAR from 2009 to 2013. Renewal of registration in EQAR took place in 2018.

### SCOPE OF THE REVIEW

The Terms of Reference (ToR) for the review include the following external EQA activities of NEAA to be addressed:

- 1) Institutional accreditation (Art. 77, para. 2, HEA)
- 2) Programme accreditation (Art. 78 para. 3, HEA), including:
  - accreditation of professional fields
  - majors from the regulated professions
  - doctoral programmes
- 3) Post-Accreditation Monitoring and Control (PAMC) procedure

- 4) Evaluation of projects (Art. 81, para. 6, HEA) for:
  - the establishment of new higher education institutions
  - transformation of higher education institutions
  - transformation of institutions' primary units
  - opening of new EQD from the regulated professions
  - opening of new professional fields
  - opening of new study programme
- 5) Reviews for altering the capacity of a higher education institution
- 6) Assessment of distance learning offers

## MAIN FINDINGS OF THE 2017 REVIEW

NEAA underwent a previous review against ESG in 2017. The review was carried out by ENQA. The judgements were as follows (Table 1):

ESG	Level of compliance
ESG 3.1. Activities, policies and processes for quality assurance	<b>Substantially</b>
ESG 3.2. Official status	<b>Fully</b>
ESG 3.3. Independence	<b>Fully</b>
ESG 3.4. Thematic analysis	<b>Fully</b>
ESG 3.5. Resources	<b>Substantially</b>
ESG 3.6. Internal quality assurance and professional conduct	<b>Fully</b>
ESG 3.7. Cyclical external review of agencies	<b>Fully</b>
ESG 2.1. Consideration of internal quality assurance	<b>Fully</b>
ESG 2.2. Designing methodologies fit for purpose	<b>Fully</b>
ESG 2.3. Implementing processes	<b>Fully</b>
ESG 2.4. Peer-review experts	<b>Substantially</b>
ESG 2.5. Criteria for outcomes	<b>Fully</b>
ESG 2.6. Reporting	<b>Substantially</b>
ESG 2.7. Complaints and Appeals	<b>Substantially</b>

The 2017 review also made 6 recommendations to NEAA under following standards: ESG 3.1., ESG 3.5., ESG 2.4., ESG 2.6. and ESG 2.7. The recommendations appear at the start of the relevant ESG.

In 2020, NEAA submitted to ENQA the follow-up report on its implementation of the recommendations. The ENQA Board approved the report and noted the progress that has been made. At the same time the Board emphasised the need to pay further attention to the standard 3.1. where the review panel called for further streamlining of resources and operations, reflecting the agency's mission.

In 2018 the Register Committee approved NEAA's application for inclusion on the EQAR but considered that NEAA only achieved partial compliance with the following standards: ESG 2.6. (Reporting), ESG 2.7. (Complaints and Appeals) and ESG 3.1. (Activities, policies and processes for quality assurance).

## REVIEW PROCESS

The 2022 external review of NEAA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of NEAA was appointed by ENQA and composed of the following members:

- Fiona Crozier (Chair), Independent Consultant, former Head of International at Quality Assurance Agency for Higher Education (QAA), UK - quality assurance professional (ENQA nominee);
- Sandra Bezjak (Secretary), Acting Director, Agency for Science and Higher Education, Croatia - quality assurance professional (ENQA nominee);
- Jordi Villà i Freixa, Full Professor, Department of Bioscience, Universitat de Vic, Universitat Central de Catalunya, Spain – academic (EUA nominee);
- Damir Solak, PhD Student in Financial Law and Financial Sciences, Masaryk University, Czech Republic – member of the European Students' Union Quality Assurance Students Expert Pool (ESU nominee).

Alexis Fábregas Almirall, Project Officer, acted as the review coordinator.

The review panel received NEAA's self-assessment report (SAR) at the beginning of July 2022. On 25 July 2022 the panel and the ENQA coordinator held an online briefing meeting to discuss the SAR and review process. Representatives from EQAR also joined the meeting to inform the panel about the Register Committee's consideration of and conclusion on the previous NEAA application for inclusion in the Register with special focus on issues which should be addressed in the review process. The review panel carefully studied the SAR, its annexes and NEAA's review report from 2017 and defined a list of additional documentation which was requested from NEAA. This was provided to the panel one month prior to the site-visit. On 19 September, the review panel held an online kick off meeting, discussed lines of enquiry, and defined priority themes to be discussed more deeply during the site visit. The pre-visit meeting with the NEAA resource person was held the same day as the panel's kick off meeting.

The site-visit took place from 27-29 September 2022 during which the review panel had intensive discussions and finally agreed on judgments, recommendations, suggestions and commendations. All decisions were reached by consensus. Based on the panel members' preliminary reflections, the secretary produced the first draft of the review report. The draft was completed and circulated among panel members. The final version of the review report was produced one month after the site-visit

and was screened by ENQA coordinator. The report was sent to NEAA for factual accuracy in December 2022.

### **Self-assessment report**

As an essential part of the review process, NEAA produced a self-assessment report (SAR). The SAR was written in accordance with ENQA's guide of content for the SAR and it provided the review panel with the initial information on NEAA's compliance with ESG part II and part III for each type of activity, including reflection on the improvements from the previous cycle and future challenges. It also provided the panel with information on the overall work of NEAA, its history and profile and the overview of the Bulgarian HE system with the special focus on the recent legal changes which have impacted on NEAA's work and quality assurance activities.

The preparation of the SAR was carried out in three stages: the first stage included an in-depth analysis of NEAA's work by Standing Committee (SC) expert groups and with the collection of feedback from NEAA's units. The second stage included collection of information from NEAA's stakeholders and appointment of the working group which drafted the SAR. The third stage included consideration of the initial version of the SAR at meetings of the Accreditation Council (AC), the Committee on Quality Assurance (CQA) and the Advisory Council.

Links to essential documentation were embedded in the SAR. The SAR has been published on NEAA's web page.

### **Site visit**

The site-visit programme was prepared by the review secretary in cooperation with the review chair. The draft site-visit programme was sent to NEAA and it was accepted without any suggestion for changes.

The site-visit was held at NEAA's premises in Sofia from 27-29 September 2022. During these three days the review panel had the opportunity to meet a large number of NEAA's internal and external stakeholders including its President, Senior Management Team and key staff as well as representatives of various advisory and auxiliary bodies and representatives of HEIs, employers, students etc. All meetings ran smoothly and to schedule.

The review panel would like to thank the NEAA for the smooth organisation of the site visit and the interviewees for the open and transparent discussion. The review panel would especially like to thank the president of NEAA for being at the disposal of the review team at all times, the interpreters for excellent services provided at all meetings and the ENQA coordinator for overall support during the whole review process.

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

### **HIGHER EDUCATION SYSTEM**

The system of higher education (HE) in the Republic of Bulgaria (Bulgaria) is regulated by the main law named *The Higher Education Act* (HEA). HEA was adopted by the Bulgarian Parliament (National Assembly) in 1995. By adoption of HEA, Bulgaria was among the first European countries which introduced a three-cycle scheme (bachelor, master and PhD), ECTS credits, diploma supplement and, in general, started with the implementation of Bologna tools. The students' admission process has been standardised and equalised for both Bulgarian and EU citizens as well as procedures of opening of branches of foreign HEIs in Bulgaria. The National Qualification Framework of Bulgaria which



includes nine levels of qualifications was adopted in 2012 in accordance with the European Qualification Framework.

Over the years, the HEA has been subject to numerous revisions and amendments. The changes to the HEA were determined by the need to improve the quality of HE in the national context as well as by the European policies. The latest reform of the HEA in 2020 has been implemented in order to achieve following educational goals: better preparation for the labour market and increase of the employability of graduates; personal development; development of modern theoretical and practical knowledge with better linkage between HE and science and development of active citizenships by expanding access to HE and creating equal opportunities for all citizens to participate in HE.

In addition to the HEA which regulates the HE system, an important role in the state policy is played by *The Strategy for development of Higher Education in the Republic of Bulgaria for the period 2021-2030*. The Strategy was recently adopted by the National Assembly and it defines the main priorities for the development of the HE system in Bulgaria. As a part of overall policy changes, the *National Map of Higher Education in the Republic of Bulgaria* was also adopted in 2021 with the goal to improve the network of HEIs in accordance with the regional needs as well as for the better future planning of admission process at the public HEIs. State funding of HE system has also been updated and result-based model of funding of HEIs has been introduced. The model of funding is based on complex evaluation of the quality of education and alignment with the labour market needs.

The HE system in Bulgaria consists of 52 HEIs, out of which 38 are public and 14 are private, including 30 universities which provide training in a wide range of specialities from 52 professional fields in the humanities, natural, social and technical sciences, 19 specialised HEIs and 3 independent colleges. HEIs are distributed in six regions of Bulgaria with most universities concentrated in the South-Western region which includes the capital.

According to data from the National Statistical Institute, the overall number of HE graduates in 2021 was 46 135. The relative share of the population aged 30-34 with completed HE in 2021 was 32, 6% which is close to the national goal of 36% of HE graduates in this age group. The majority graduated in the following 5 fields: business and administration, education, social sciences and humanities, technical sciences and healthcare. There is a trend of decreasing the number of HE graduates in business and administration and social sciences and humanities, and increasing the number of graduates in education, technical sciences and healthcare which is the result of measures taken by the state. In the last two years, unemployment among HE graduates has increased which is the result of socio-economic circumstances caused by COVID-19.

The recent changes to HEA were adopted in 2020 and among a number of adopted amendments some of them directly relate to the work of NEAA. Main changes are as follows:

- simplification of institutional accreditation by introducing subsequent institutional accreditation (in addition to initial institutional accreditation);
- enhancing the process of programme accreditation (professional fields and majors from regulated professions) by more objective evaluation achieved by simultaneous conduct of programme accreditation at all HEIs providing training in specialities within the same professional field and assessment which uses weighting coefficients whereas criterion “research and artistic activity” has the greatest relative weight;
- non-compliance in the post-accreditation monitoring and control may result in the revoke of institutional or programme accreditation;
- only teachers with the employment contract can be calculated as an accreditation requirement;
- NEAA is allowed to conduct evaluation of the foreign HEIs abroad;

- accreditation may be carried out by electronic means;
- AC has become the only competent body to issue accreditation decisions;
- changes to the Statute of NEAA (SNEAA).

## QUALITY ASSURANCE

National Evaluation and Accreditation Agency (NEAA) is the only national institution responsible for carrying out EQA activities in Bulgaria. NEAA and its activities encourage the development of IQA activities at HEIs in Bulgaria. It is also the central institution which gathers various stakeholders (academics, students, employers' representatives etc.) who participate in NEAA's EQA activities or are members of various NEAA's bodies with the goal to encourage the enhancement of the quality of HE system in Bulgaria.

NEAA's core EQA activities are institutional and programme accreditation. With recently adopted amendments of HEA, institutional accreditation will be differentiated as initial institutional accreditation for the new HEIs and subsequent institutional accreditation for already existing and accredited HEIs. The idea is to simplify subsequent institutional accreditation and to put more focus on the programme accreditation such as accreditation of professional fields and majors from regulated professions. Programme accreditation of a professional field and majors from regulated professions is to be performed simultaneously at all HEIs which conduct programmes within the same field. The third type of programme accreditation is accreditation of doctoral programmes which has been conducted separately from the accreditation of professional fields. Upon completion of institutional and programme accreditation, NEAA conducts post-accreditation monitoring and control.

In addition to institutional and programme accreditation, NEAA conducts evaluation of projects for opening and transformation of HEI, faculties, branches and colleges within HEIs as well as evaluation of projects for opening of professional fields and specialisations within regulated professions. In a case when HEI is proposing the change of institutional capacity, NEAA conducts the procedure for altering the capacity of a HEI. It also carries out assessment of distance learning.

## NATIONAL EVALUATION AND ACCREDITATION AGENCY (NEAA)

National Evaluation and Accreditation Agency (NEAA) was established in 1995 with the pursuance of the Higher Education Act (HEA), passed by the National Assembly. The Statute of NEAA (SNEAA) was approved by the Decree of the Council of Ministers in 1996. In the same year, the first composition of the Accreditation Council (AC) started with its work. In the process of establishment of NEAA and development of main documents, the AC was guided by international experience and best practice, correlating them with specifics and tradition of Bulgarian HE. NEAA's staff was also employed in that year. The participation of NEAA in the PHARE-BG project contributed to the development of necessary methodology and documentation.

As already mentioned, the HEA has been revised over the years. With the enforcement of the amendments to the HEA in 2004, NEAA became an independent, specialised state body for evaluations, accreditations and post-accreditation monitoring and quality control of Bulgarian private and public HEIs. In accordance with the HEA, external evaluation and accreditation has the dual purpose of stimulating the HEIs to enhance their potential and increasing and maintaining the proper quality of the education offered by them, while the outcomes are taken into consideration by the government as it develops policy in relation to HE. NEAA's obligations and rights are regulated by the HEA but also by the Act on Development of the Academic Staff in the Republic of Bulgaria, the unified state requirement for the majors from the regulated professions.

NEAA is very committed to European cooperation and its membership in ENQA is of great importance. NEAA has come a long way in its development together with other partner agencies. NEAA is also a member of CEENQA and is listed in EQAR. It has cooperation agreements with other agencies (for example, ARACIS in Romania and PKA in Poland).

## NEAA'S ORGANISATION/STRUCTURE

NEAA's organisation and governance are defined by the HEA. Its Statute (SNEAA) stipulates the manner of the governance and structure of NEAA. The Governing bodies are Accreditation Council (AC) and its Chairperson who is also the President of the Agency. AC is composed of the Chairperson and 10 members, who are persons with the academic title in HE areas. One of the members is Vice-President for Post-Accreditation Monitoring and Control.

AC establishes 8 Standing Committees across HE disciplines (SCHEA) and 1 Standing Committee for Post-Accreditation Monitoring and Control (SCPAMC). Each SC consists of up to 9 members including student/PhD and employer representatives.

Pursuant to the amendments of the HEA, AC has become the only competent decision-making body which decides on the outcomes of all EQA procedures carried out by NEAA. SCs propose the composition of panel members to AC for their approval, control the work of panel members and prepare reports for AC. However, AC is not bound by these and may decide not to accept the findings of an SC if they are not in accordance with the evidence. AC may return the report to the SC with instructions for revision.

SCPAMC implements post-accreditation monitoring procedures with a view to ensuring high quality education and research, the implementation of the recommendations made during evaluation and accreditation processes and compliance with the capacity of the professional fields and of the specialisms from regulated professions.

The Advisory Council, the Quality Assurance Committee, the Appeals Committee and the Ethics Committee have been established as auxiliary and advisory bodies to AC. AC may also establish other auxiliary and advisory bodies.

The Advisory Council assists the AC in matters related to: students' professional training and employment potential on the domestic and European job markets; trends in the development of HE; improvement of NEAA's communication, cooperation and interaction with professional and branch organisations and other issues raised by the AC.

The Quality Assurance Committee (CQA) is an auxiliary body to the AC for monitoring, maintaining, and improving the quality of the agency's activities, in accordance with the ESG. The powers of the CQA are regulated in the SNEAA and are specified in a separate document – *Rules for the activity of NEAA's Committee for quality assurance*. The CQA aims to periodically analyse the need to update NEAA's regulatory framework in line with the application of the ESG. It also focuses on monitoring the mechanisms for ensuring independence, publicity, transparency, and accountability of the accreditation process, for considering the opinion of students / doctoral students on the quality of education, and for avoiding conflicts of interest.

The Complaints Committee is an advisory body which conducts the following tasks in accordance with the SNEAA:

- To review complaints and notifications for violations during external QA procedures and formulate opinions on the above, which opinions do not affect the validity of the AC's decisions, respectively those of the Agency's SCs;

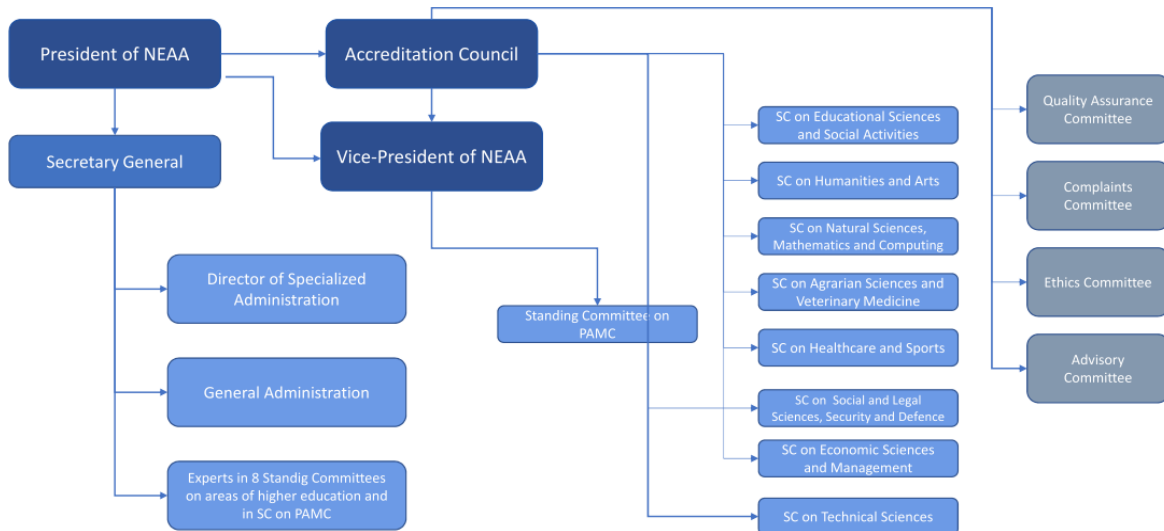
- To review complaints and notifications by members of the academic staff, students and doctoral students in HEIs and SOs and formulate opinions and recommendations thereof in case of:
  - Discrepancies between the HEI's publicly declared policies for assurance of education quality and the actual educational process;
  - Disrespect for student opinions concerning the organisation and operation of the internal system for assessing and maintaining quality of education.

The Ethics Committee's tasks are to monitor the compliance with the rules of the Code of Ethics of NEAA by performing inspections and taking decisions in case of warnings issued. Its other functions are to assist the President of NEAA in the implementation of the Counter-Corruption and Unlawfully Acquired Assets Forfeiture Act, to prepare reports on the ethical behaviour and culture of NEAA's employees and to make recommendations for their improvement.

The composition and the appointment procedure of all bodies mentioned above is in more details described under the relevant ESG standards.

The President of NEAA represents the agency and manages its activities. The AC and the President of the agency are assisted by the agency's administration. The administrative management is carried out by the Secretary General appointed by the President of the Agency. The administrative services are performed under general and specialised administration. The General Administration consists of two executive structures: Legal Advisor and Accounting. The specialised administration is organised in the Directorate "Evaluation, Accreditation and Post-Accreditation Monitoring and Control".

*Scheme 1. The structure and relationship between NEAA units:*



## NEAA'S FUNCTIONS, ACTIVITIES AND PROCEDURES

### *External QA activities*

#### 1) Institutional accreditation (Art. 77, para. 2, HEA)

In accordance with the amendments to the HEA adopted in 2020 two procedures for institutional accreditation have been developed: initial institutional accreditation for newly opened HEI or transformed HEI and subsequent institutional accreditation for HEI with already granted accreditation. The outcome of institutional accreditation might be accreditation of the HEI or rejection of the accreditation. Validity of the institutional accreditation is 6 years and does not depend on the grade obtained in the accreditation.

#### 2) Programme accreditation (Art. 78 para. 3, HEA), including:

- accreditation of professional fields
- majors from the regulated professions
- doctoral programmes

Programme accreditation is based on the evaluation of the quality of education in a particular professional field, a specialism from the regulated profession or doctoral programmes. Pursuant to the amendments to the HEA adopted in 2020, the programme accreditation of a particular professional field must be carried out simultaneously for all HEIs providing training in specialisms within the field. The outcome of the programme accreditation might be accreditation of the programme or rejection of the accreditation. The validity of programme accreditation is 4 years.

#### 3) Post-Accreditation Monitoring and Control (PAMC) procedure

PAMC is applied depending on the grade received in case of institutional accreditation and programme accreditation of professional fields/majors from regulated professions. Amendments to the HEA adopted in 2020 give the possibility for the following results of PAMC procedure: revocation of accreditation, reduction of accreditation grade or reduction of educational capacity of HEI.

#### 4) Evaluation of projects (Art. 81, para. 6, HEA) for:

- the establishment of new HEIs
- transformation of HEIs
- transformation of institutions' primary units
- opening of new EQD major from the regulated professions
- opening of new professional fields
- opening of new study programme

NEAA implements evaluation projects with the aim to ensuring the quality of newly established or transformed HEI basic unit or faculties, branches and colleges within HEIs and ensuring the quality of newly established professional fields and majors from the regulated professions. The opening of new study programmes initially requires only a notification letter from the respective HEI and these new programmes are evaluated later in the frame of programme accreditation.

#### 5) Reviews for altering the capacity of a higher education institution

As a part of institutional accreditation procedure, NEAA determines the institutional capacity of HEI. Upon the request for changing the institutional capacity of HEI, NEAA conducts a review procedure for altering the capacity of a HEI.

## 6) Assessment of distance learning offers

NEAA carries out a procedure for evaluation of distance learning. The evaluation can be carried out within the institutional accreditation or by using an independent procedure upon the request of HEI within the period of already granted accreditation.

### *Cross-border QA activities*

Pursuant to the amendment of the HEA adopted in 2020, NEAA is allowed to conduct institutional and/or programme accreditation in a foreign country upon the request of a foreign HEI. Accreditation is to be conducted in accordance with ESG and NEAA is currently preparing to start with the effective conducting of such procedures.

### *International cooperation*

Internationalisation is one of the main NEAA's goals and it can be seen in several ways. As already stated NEAA is a member of ENQA and CEENQA and is listed in EQAR. NEAA's representatives regularly participate at the meetings of ENQA and CEENQA and other international events. They also participate in the international exchange of experts among the agencies. Since 2018, NEAA has participated in the following international projects: Effective involvement of Stakeholders in External Quality Assurance Activities-ESQA, Bologna Peer support Group on Quality Assurance-Activity C, Implementation of Social Inclusion, Tolerance, Acceptance, and Realisation for all students (START).

## NEAA'S FUNDING

NEAA is financed from the state budget and from its own revenues – fees from accreditation activities, revenues from national/international projects, as well as from other sources related to NEAA's activities. The President manages the finances of NEAA and submits the budget for approval by the AC. NEAA is obliged to administer its revenues from accreditation, evaluation and PAMC procedures and from other activities specified above. NEAA's financial policy is regulated by the national Financial Management and Control System which provides transparency and suitability of all financial transactions.

In the period 2018-2021, the revenues from the HEIs amounted to 60-70% of the total revenues of NEAA. The largest share was accumulated from programme accreditations, especially doctoral programmes accreditation. In regard to expenditure, NEAA spends funds on remuneration (for employees) and on current maintenance.

*Table 2. Actual expenditure of NEAA for the period 2018-2021*

Actual expenditure for the period 2018 – 2021	
Fiscal year	Actual expenditure
2018	BGN 1 285 394
2019	BGN 1 481 520
2020	BGN 1 333 915
2021	BGN 1 294 238
Total for the period 2018 – 2021	BGN 5 395 067

Table 3. Revenue/expenditure – 2021

2021 Revenue			2021 Expenditure		
Indicators	Excerpt	Relative share of the total amount	Indicators	Excerpt	Relative share of the total amount
<b>Subsidies</b>	BGN 459138	35.48	<b>Remuneration and social security</b>	BGN 1199896	92.71
<b>Accreditation fees</b>	BGN 835100	64.52	<b>Running expenses</b>	BGN 94342	7.29
<b>Total</b>	BGN 1294238	100	<b>Total</b>	BGN 1294238	100
	€ 661 733			€ 661 733	

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

## ESG PART 3: QUALITY ASSURANCE AGENCIES

### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

#### 2017 review recommendation

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

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

#### Evidence

NEAA's mission is presented in the SAR and published on its website. NEAA's mission is to encourage HEIs to assure and improve the quality of education they offer by maintaining high academic standards and good educational traditions in Bulgaria.

In fulfilling its mission, NEAA relies on the purpose of accreditation clearly stated in the HEA that accreditation is a recognition of the right of HEIs to provide higher education in education and qualification degrees in certain areas, professional fields and the majors from the regulated professions by evaluating the quality of the activities.

No vision statement is made available on the website; nor in the SAR or any other documentation viewed by the panel.

NEAA defines its strategic goals as part of its Development Strategy for the 2018-2023 period. The Strategy is also available via the agency's website and defines six strategic goals which, among others, include the following „Enhancing the accreditation model and improving the assessment of HEIs in line with ESG... “and „Improving the quality culture in the HE system in Bulgaria”.



NEAA has also defined and published an Action plan for the implementation of the Development Strategy for the period 2018-2023.

#### External QA activities

The SAR states that NEAA regularly conducts various types of EQA activities in accordance with its mission, strategy and action plan. NEAA's core EQA activities are institutional and programme accreditation. Programme accreditation differs as programme accreditation of professional fields, majors from regulated professions and doctoral programmes.

NEAA also carries out other types of external QA activities such as projects for opening and transformation of HEIs, for opening and transformation of faculties, branches and colleges in HEIs and for opening of professional fields and majors from the regulated procedures.

NEAA carries out procedures for altering the capacity, procedures for evaluation of distance learning and procedures of post-accreditation monitoring and control.

During the site visit, the review panel raised a question about the accreditation of new study programmes and it was clarified that NEAA does not conduct such accreditations: the opening of new study programmes requires only a notification letter from the respective HEI and the new programmes are accredited in the later stage as a programme accreditation of a specific professional field.

According to data provided in the SAR, NEAA has conducted a huge number of various types of EQA procedures since the previous ENQA review process in 2017. The total number of completed procedures per year in the period 2018-2021 was as follows (Table 4.):

	2018	2019	2020	2021
EQA procedures	519	548	439	542

The largest percentages of these completed procedures were programme accreditations of doctoral programmes and programme accreditations of professional fields. There were also several other types of EQA procedures completed. The number of completed EQA procedures in the period 2018-2021 was as follows (Table 5):

	2018	2019	2020	2021
Institutional accreditation	17	13	7	3
Programme accreditation of professional fields	50	88	61	83
Programme accreditation of majors from the regulated professions	33	15	8	12
Programme accreditation of doctoral programmes	288	343	284	345
Projects for establishment/transformation of HEI	2	2	0	0
Projects for opening/transformation of institutions' primary unit	2	2	1	1

Projects for opening a speciality from the regulated profession	1	5	5	3
Projects for opening a professional field	4	2	3	9
Review for altering the capacity (institutional and of professional fields)	4	6	11	7
Evaluation of distance learning offers	7	4	3	5
PAMC	111	68	56	74

In accordance with the recent amendments in the HEA, NEAA has been provided, for the first time, with the option to carry out EQA activities of foreign HEIs. This option is further developed in the SNEAA. Although several foreign HEIs, mainly from former Soviet republics, mostly Ukraine, but also from the Republic of Kazakhstan and the Republic of Armenia, have expressed their interest, NEAA has not performed EQA activities abroad yet.

During the site visit, the review panel initiated a discussion about the cross-border offer of study programmes and their accreditation. It was clarified that foreign HEIs which are planning to offer their study programmes in Bulgaria have to undergo accreditation procedures conducted by NEAA. However, it is not mandatory for Bulgarian HEIs which offer study programmes abroad to be accredited by NEAA. It was also explained that there are some challenges with the accreditation of joint programmes offered by Bulgarian and foreign HEIs but NEAA has not yet started to implement such accreditation in accordance with the European Approach for Quality Assurance of Joint programmes.

Although the SAR states that NEAA, in accordance with the HEA, may also establish advisory units to assist HEIs, it does not conduct consultancy activities.

#### *Stakeholder involvement*

The governance of NEAA and its functions are prescribed by the HEA and the SNEAA. The main governing body is the AC, the chair of which is the President of NEAA. The Vice-president of NEAA is also Chairperson of the PAMC.

The SAR explains that, as a response to the 2017 ENQA review recommendation, NEAA has greatly improved its relations with the stakeholders in several ways. Firstly, it has expanded the direct participation of stakeholders in its work. Representatives of students and employers are now included in the Expert Groups (EG), and the SCs including SCPAMC. Also, an Advisory Council of employers' representatives has been established. Secondly, NEAA organises seminars, meetings and conferences with stakeholders. Thirdly, NEAA conducted an opinion poll among employers in Northern Bulgaria. Also, NEAA participated in the ESQA project "Involvement Stakeholders in external QA activities" based on which the AC took some decisions regarding the introduction of some practical measures for implementing more active engagement of stakeholders in EQA procedures.

During the meeting with NEAA's management staff, the panel heard that one of the main improvements is the increased possibility of including more students and other stakeholders in the EQA processes.

The composition of the AC is prescribed by the HEA and by the SNEAA and is still composed only of persons with the academic title in HE disciplines and it includes a Chairperson and 10 members: 6 representatives of the Council of Rectors, 1 representative of the Bulgarian Academy of Science (BAS), 1 representative of the Agricultural Academy (AA) and 2 representatives from the Ministry of Education and Science (MES). The AC does not include student or employer representatives. During their meeting with the panel, students expressed their opinion that one of the weaknesses is that the students' representative is not a member of the AC and therefore "the voice of students is not heard". Students also told the panel that there is "no communication among the students from the different SCs".

The representatives of various stakeholders' groups are included in other NEAA's advisory and auxiliary bodies which are established in accordance with the HEA. The AC establishes 8 Standing Committees across HE disciplines (SCHEA) and 1 Standing Committee for Post-Accreditation Monitoring and Control (SCPAMC). Each of them includes a student/PhD and employers' representative. The SAR explains that one of the changes since the last ENQA review was the fact that employers' representatives have become the members of SCs.

The Advisory Council has 5-9 members and it engages representatives mainly of external stakeholder groups – branch organisations, employers' associations and students.

The Quality Assurance Committee (CQA) is constituted of 19 members representing all interested parties: 3 representatives of the AC, 1 representative of the SCs, 4 representatives of HEIs, 2 representatives of scientific organisations, 3 representatives of employers – national industry organisations, 3 representatives of students/PhD students, 1 representative of the MES, 1 representative of NEAA's administration and 1 representative of trade/workers' unions.

The Complaints Committee includes 3 academics nominated by the National Syndicate "Higher Education and Science", 1 representative of NEAA and 1 student.

The Ethics Committee is constituted of three members, one of which has a degree in law, and the chairperson is a member of the AC. The students' representatives are not included.

Stakeholders are also involved in the composition of the EGs. Pursuant to the information provided in SAR each EG consists of 5-7 experts including 1 student member. The SAR also states that representatives of employers are included in EGs and foreign experts are included in institutional accreditation (see ESG 2.4.).

During the interviews with the stakeholders, especially HEIs, they expressed satisfaction with the level of their involvement in the development of EQA methodologies and procedures.

## **Analysis**

Based on the evidence provided, the review panel confirms that NEAA has the publicly available mission statement and clear and explicit goals which are part of the Development Strategy. There is also publicly available Action Plan for the implementation of NEAA's Strategy which enables the operationalization of the strategic goals.

The mission statement refers to NEAA's active role in improving the quality of Bulgarian HE system and it is achieved through the implementation of various EQA processes which NEAA conducts on the regular basis. The data presented in the SAR show that NEAA regularly carries out an extremely large number of EQA procedures, over 400 procedures annually. Most of them refer to the programme accreditations, namely accreditation of doctoral study programmes and accreditation of professional fields.

Following the recommendation of the 2017 ENQA review that the revised strategic plan should allow streamlining of operations and resources in an effective and efficient way, from its reading and discussions, the panel can confirm that this recommendation is reflected in the current Strategy and its goals<sup>1</sup>. However, having in mind the information about the limited human resources (see ESG 3.5.) as well as the information from the SAR about the delay of EQA procedures, the question of better planning of all activities, their rationalisation and streamlining of procedures and resources still remains open. This raises the question of the sustainability of the processes, and the recommendation from the previous ENQA review process remains relevant. This is further accentuated by the fact that the recent amendments in the HEA have enabled NEAA to conduct accreditations abroad which can put additional pressure on the already overloaded human resources.

Following the recommendation of the 2017 ENQA review to ensure wider stakeholders' involvement in NEAA's government, the review panel can confirm that effective action regarding the involvement of stakeholders in the bodies and processes of NEAA has been taken but there are still room for improvement. During the site visit, the stakeholders emphasised that their involvement has been increased, especially in the EGs, the SCs, the newly established Advisory Council. Involvement of the broad range of the different stakeholders' representatives in NEAA's advisory and auxiliary bodies as well their involvement in the development of methodologies and procedures, is a positive signal. However, the AC is still composed only of representatives of the academic community, without neither students' nor employers' representatives. The lack of students' representatives in the AC was mentioned during the interview with students as a weakness. Also, students are not represented in the Ethics Committee. Therefore, the previous ENQA review recommendation to ensure wider stakeholders' involvement in the NEAA's governance still has not been addressed to the fullest extent.

The lack of the wider range of stakeholders in the AC is somewhat diminished by the fact that the stakeholders' representatives are included in the composition of the SCs, which are also part of the governing structure. The composition of the SCs (there are 9 SCs specialised for 9 scientific fields) enables better understanding of specificities of certain professional fields. However, accreditation of interdisciplinary programmes/fields demands for more flexible organisation and open discussion among the SCs. Also, with respect to the SCs, communication between students' representatives in the different bodies occurs in a non-organised way, providing no practical ways to coordinate efforts and visions.

The review panel noticed some space for the improvement in relation to EQA of cross-border HE studies programme offer. In this regard, the review panel encourages NEAA to start with the implementation of the European Approach for the Quality Assurance of Joint Programmes because it can make the implementation of EQA processes easier. The panel also encourages NEAA to include Bulgarian study programmes offered abroad in the EQA scheme as well.

In conclusion, the 2017 ENQA review recommendation that NEAA should strive for formalised procedures regarding ad-hoc consultations of stakeholders, has been implemented to some extent, especially in relation to the composition and work of NEAA's auxiliary and advisory bodies. However, the panel is concerned that the different groups of stakeholders have not been adequately included in the AC, the main governing body. Although the current legislative framework does not enable such representation, it is important that NEAA puts additional efforts into exploring opportunities to implement those recommendations from the previous review process that are still relevant.

## **Panel commendations**

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<sup>1</sup> see "Objective 5. Building an information-analytical capacity for competent interaction with the bodies of the legislative, executive power and stakeholders, supporting the amendment and improvement of the regulatory framework in the field of evaluation and accreditation" in [https://www.neaa.government.bg/images/files/NEAA\\_Development\\_Strategy\\_2018.pdf](https://www.neaa.government.bg/images/files/NEAA_Development_Strategy_2018.pdf)

- (1) Initiative to establish the Advisory Council with the representatives of the various employers' organisations which enables better communication, cooperation and interaction with professional and branch organisations.

#### **Panel recommendations**

- (1) Include a representative of students and a representative of employers/industry in the AC;
- (2) Include a representative of students (preferably with a legal background) in the Ethics Committee.

#### **Panel suggestions for further improvement**

- (1) Initiate discussions and explore possibilities for the involvement of Bulgarian study programmes offered abroad in the NEAA's EQA scheme and for the implementation of the European Approach for Quality Assurance of Joint programmes in a case of study programmes jointly offered by Bulgarian and foreign HEI;
- (2) Establish a student body by which students can communicate suggestions to NEAA and also communicate with each other.

#### **Panel conclusion: partially compliant**

### ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

#### **2017 review recommendation**

No recommendation.

#### **Evidence**

Pursuant to the HEA and the SNEAA, NEAA is "specialised governmental body to the Council of Ministers for evaluation, accreditation and quality control of the activities of the higher education institutions (HEIs)...".

The HEA and the SNEAA also define that NEAA shall carry out activities for evaluation of projects, for opening and transformation of HEIs, primary units, branches, units of HEIs territorially located elsewhere in the country and abroad, professional fields and majors from the regulated professions, and shall perform institutional and programme accreditation as well as post-accreditation monitoring and control.

The HEA and the SNEAA additionally define that the aim of NEAA's activities is to stimulate and control HEIs, to ensure and upgrade the quality of the education they offer, as well as to conduct it in accordance with the standards and guidelines for quality assurance in the European Higher Education Area.

NEAA has participated and continues to participate in various working groups (for development of the Strategy for HE 2021-2030, for amendment of the HEA, for development of the normative framework of the Unified state requirements on the specialties from regulated procedures etc.). Panel's interviews, particularly with representatives from the MES, clearly demonstrated that NEAA is perceived by the national authorities and HEIs as an important body which encourages the development of the quality of higher education system in Bulgaria.

### **Analysis**

NEAA has an established legal basis and it is the only officially recognised EQA agency operating in Bulgaria. NEAA was established pursuant to the HEA adopted by the National Assembly in 1995 as an independent state body specialised for EQA activities of Bulgarian public and private HEIs. With enforcement of the amendments to the HEA in 2004, NEAA has become an independent, specialised state body for evaluations, accreditations and post-accreditation monitoring and quality control of Bulgarian private and public HEIs. The latest amendments of the HEA adopted in 2020 also relate to NEAA's work and its activities.

The SNEAA is the legal basis for performance of NEAA's identified activities. SNEAA also stipulates, among others, the model of governance and NEAA's structure, work organisation and number of employees. The SNEAA was adopted by the Council of Ministers under Decree firstly in 1996. The latest amendments date from 2021.

NEAA's accreditation decisions are formally recognised by the national authorities and in accordance with the HEA, the accreditation results shall be considered when formulating the state policy regarding the HEIs. Pursuant to the HEA, NEAA's accreditation is defined as recognition by the NEAA of the right of HEIs to provide higher education qualification degrees in certain areas, professional fields and the majors from the regulated professions. NEAA also has a regulatory function as it carries out reviews for altering the capacity of HEIs.

NEAA is considered as a major participant in the Bulgarian educational policy. NEAA participated and participates in many working groups which were/are established with the goal to encourage the development of higher education in Bulgaria.

**Panel conclusion: compliant**

### ESG 3.3 INDEPENDENCE

Standard:

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

### **2017 review recommendation:**

No recommendation.

### **Evidence**

### *Organisational independence*

According to the SAR, organisational independence is guaranteed by the following regulations: the HEA and subsequently the SNEAA. NEAA is the only national institution responsible for conducting EQA activities. NEAA was established following adoption of HEA by the National Assembly in December 1995. The SNEAA was thereafter approved by Decree of the Council of Ministers in 1996. Following this period there were several amendments in NEAA's legal framework. The latest amendments to the HEA were adopted in 2020 and new SNEAA was adopted with the Decree of the Council of Ministers in 2021.

The SAR states that the fact that the work of NEAA is attached to the Council of Ministers makes it independent from the MES. Additionally, the SAR expresses the opinion that independent governance is ensured by the independent election procedure of the members of AC, the main governing body, where the Bulgarian academic community has strong representation (see ESG 3.1.).

The nomination procedure and the composition of the AC is defined by the HEA. The number of the nominated candidates must be two times bigger than the number of representatives. The Council of Ministers appoints the members of the AC on the basis of nominations. The Prime Minister appoints the Chairperson of the AC (President of NEAA) and Deputy Chairperson of the AC (Vice-President of NEAA). The Chairperson, the Deputy Chairperson and the members of the AC are appointed for the period of 6 years and may not be appointed for more than one term of office. Half of the members of the AC, except the Chairperson, are renewed every three years.

The mandate of the Chairperson, Deputy Chairperson and the members of AC, according to the HEA, may be terminated before the expiration of their term in the following cases: if he/she requests so in writing, if he/she systematically fails to perform his/her duties, in case of factual impossibility to fulfil the position for more than 6 months, in the case when the conflict of interest has been found, in the case incompatibility with the position occurs (he/she becomes rector, deputy rector, dean, director of the branch in HEI and chairman, deputy chairman and director of institute of the BAS and the AA) and in the case of the death of the person.

The HEA and the SNEAA also regulate the process of nomination and appointment of the members of SCs. According to the SAR the AC appoints the members of SCs whereas the selection of candidates is based on the nominations from the HEIs, NRSC and employers' organisations. The members of SCs are appointed by the Chairperson of AC for the period of three years.

In addition to the aforementioned governing bodies, support for the management process is also provided by other advisory and auxiliary bodies such as the Committee for Quality Assurance, the Ethics Committee, the Complaints Committee and the recently established Advisory Council.

During the interviews the review panel heard from NEAA's management and its stakeholders that there is a public call for nomination of stakeholder's representatives in NEAA's bodies and any organisation may apply including any individually interested person. However, the chances for appointment of such a person are low.

### *Operational independence*

According to the SAR operational independence is guaranteed by the methodological frameworks, rules and regulations which are set up by NEAA and published on its website. The review panel verified NEAA's website and noticed a number of very detailed methodologies and procedures relevant for

each of the EQA procedures. These methodologies, rules and regulations guarantee that NEAA conducts procedures independently from the third parties.

The SAR also includes the information that the EGs are composed of the representatives of stakeholders and various institutions and bodies can nominate experts for EQA procedures (see ESG 2.4.). SCs propose EG members (panel) to the AC for the appointment. In accordance with the SNEAA, members of EGs, like members of the AC and SCs, cannot be persons with the position of rector, deputy rector, dean, director of branch at HEI or chairman, deputy chairman and director of institute of the BAS and the AA.

Additionally, the SAR states that NEAA's Code of Ethics guarantees that procedures are conducted on the basis of the values such as legality, impartiality and good faith, independence, objectivity and honesty, competence, transparency, responsibility, confidentiality and dialogue. NEAA has also established the Ethics Committee in this regard.

In terms of managing its financial resources, SAR explains that NEAA is financed from the state budget and from the fees from performing accreditation activities. However, during the interviews, it was explained to the review panel that there is a need to enable NEAA to manage its own revenues in order to financially stimulate external experts because the expert fees are currently non-competitive (see also 3.5.).

The SAR also explains that NEAA has 30 full-time positions approved. However, the review panel heard during the interviews that there are still 9 vacant positions. That is, to some extent, caused by the fact that the salaries of the staff are low and are defined on the national level. Also, during the discussions, it was confirmed to the review panel that NEAA is allowed to select and recruit its own staff. Although NEAA's staff are civil servants and there are some rules for the selection of civil servants defined at the national level, during the selection process for NEAA staff, a selection committee is formed and defines selection criteria which following both the specific NEAA requirements and those of the legislation.

### *Independence of outcomes*

The review panel learned from the SAR that the multi-level decision-making process create prerequisites for the exclusion of external influences and guarantee the independence of decisions. Upon the completion of the EG's report, it is submitted to the relevant SC for the review and discussion. The SC then prepares its report with the proposal of the outcome which is referred to the AC. The AC makes the final decision. During the panel's interviews with the stakeholders, they expressed their satisfaction with this three-level process (EG-SC-AC) which, they said, encourages objectivity and independence of the decision-making process (see also ESG 2.5).

### **Analysis**

Based on the presented evidence, the review panel recognizes the efforts made by NEAA in ensuring organisational and operational independence as well as independence of the formal outcomes of its EQA procedures. The legal status of NEAA, along with the procedures for election of governing bodies, the procedures and rules which enable the independent implementation of procedures and decision-making process, including the outcomes and resource management are primarily based on the legislative framework (i.e. namely the HEA and subsequently the SNEAA).

**Organisational independence** is achieved through the procedure of nomination and appointment of governing bodies (AC and also SCs), since members are nominated by stakeholders' representatives and their organisations. When selecting members, one of the criteria to be considered is that such



a person does not perform management functions at their own institutions. Also, there are clearly prescribed rules for dismissal of members of these bodies in cases such as possible conflict of interest, etc. However, the fact that AC, the main governing body, still includes only representatives of academic community without representatives of other stakeholders' groups (see ESG 3.1.), may create a certain risk of the predominantly academic driven view of QA processes. The same issue was observed in the past 2017 ENQA review process.

This risk is to some extent reduced by the fact that, in addition to the AC, NEAA's governance also includes the SCs, whose composition has undergone certain changes since the last ENQA review, and which are composed of representatives of such stakeholders, including students and employers. In the view of the panel, the large number of advisory and auxiliary bodies and the representation of different groups of stakeholders in them, as described in the evidence section, have a positive impact on the independence of NEAA's work and the implementation of its EQA procedures. It should also be emphasised that various internal documents such as the Code of Ethics support independence, integrity, objectivity and trust.

**Operational independence** is achieved through the implementation of EQA procedures that are pre-defined, strongly formalised and controlled in order to protect them against impartiality and third-party influence. NEAA adopted and published on its website all methodologies and procedures for each of the external evaluation processes in addition to overall internal rules and regulations. These mechanisms enable NEAA to control and monitor all procedural steps.

The independent selection and appointment of the EGs is particularly important and it is achieved in such a way that enables representatives of various stakeholders and their organisations to nominate the members of EGs. There is also the possibility for an individually interested person to apply through the open call. At the same time, it is important to emphasise that the involvement of stakeholders' representatives, especially appointment of students and employers but also foreign experts as members of the EGs has increased since the last ENQA review in 2017.

NEAA's operational independence is achieved through the independent management of its own human resources to the great extent. However, there are some challenges in relation to the independent managing agency's own revenues for the purpose of increasing experts' fees (see ESG 3.5.).

**Independence for the outcomes of procedures**, which is especially important, is achieved through a multi-level decision-making process. At the first level, the EG, which is independently appointed and composed of stakeholder representatives, prepares a report which forms the basis for decision-making. At the next level, the SC, which is also composed of stakeholder representatives, prepares its report and proposes the outcome of the procedure based on the EG report, and finally the AC decides on the final outcome of the procedure.

In conclusion, NEAA has developed significant mechanisms that are manifested through the adopted documents, rules, regulations, but also through the way of conducting its process and monitoring each of its phases. All this contributes to the independence of the implementation of procedures, integrity, objectivity and trust, which was confirmed by all stakeholders during the interviews with the review panel. However, the review panel noticed some areas which can be reconsidered in order to additionally strengthen organisational and operational independence: first, regarding the composition of the AC comprising mostly academics, and second, the impossibility to manage its own revenues

collected from accreditation fees for the purpose of increasing the expert fees. The panel strongly encourages NEAA to initiate some further steps in order to solve these challenges.

### **Panel recommendations**

- (3) Reconsider possible risks for NEAA's independence that could eventually arise from the predominantly academic representation in its governing body (i.e. the AC).
- (4) Explore possibilities and actively propose measures to strengthen its financial independence, especially with regard to the possibility of deciding on the amount of the experts' fees.

### **Panel conclusion: compliant**

## ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

### **2017 review recommendation**

No recommendation.

### **Evidence**

The SAR states that NEAA has introduced the practice of preparing summary reports on the results of the programme accreditation. These summary reports are prepared by SCs and presented to the AC. The AC adopted 23 summary reports in the period 2018-2021. Summary reports present a comprehensive comparative analysis of a particular scientific field or professional field based on the findings from accreditation procedures. They assess the quality of education within the field, identify strengths and weaknesses of the various HEIs providing training in such field, represent satisfaction of employers and society with the educational and scientific results, involvement of HEIs in regional and economic life, including trends in the development of HEIs and compare programmes within certain field with similar programmes of foreign HEIs.

The panel found the table with published summary reports on the results of the completed programme accreditations of professional fields in HEIs on NEAA's website. The summary reports are available in Bulgarian and NEAA is currently working on preparation of the English version of summary reports. The English version of NEAA's website contains 19 summary reports for 19 professional fields so far. The panel verified the summary reports available in English language and noted that they include the following data: the list of accredited institutions within the professional field, the validity of the accreditation, the grades, the main strengths and weaknesses noticed in the field as well as recommendations for improvement. Some of the summary reports available in the English language are quite short. The Bulgarian version of the website contains 45 summary reports divided within 9 scientific fields. The panel learned from the SAR that the distribution of summary reports does not go beyond NEAA's webpage.

According to the SAR, the summary reports are prepared with the aim not only to serve as an analytical tool for the relevant decision-making process but also to inform the public about the quality of HE in Bulgaria, especially students when choosing the programme and employers when employing potential employees as they can easily find the information about the quality of programme of such graduates.

The Senior Management emphasised during the interviews that the main benefits of such reports is that they summarise actions that should be taken within the field in order to improve the quality of the field but also that they present comparative analysis of all HEIs that provide education within the field. At the meeting with the representatives of the AC the panel heard that summary reports are presented to the HEIs and to the Ministry. Therefore, the Ministry can use them to develop certain policies in the professional field, HEIs can use them to learn about the practice at other HEIs and students can use them in the application process. The representatives of HEIs confirmed during their meeting with the panel that these thematic analyses were presented to them, that they were discussed at the HEI's Councils and have been considered in the managing of the institution.

In addition to the already mentioned summary reports, NEAA is aware of the increased interest in and necessity to provide information on various topics which could be further explored and analysed systematically. NEAA is striving to adequately respond to such needs and has therefore initiated activities which will broaden the scope of its work and which go beyond the current agency definition of thematic analysis. One example is the analysis of the problems and prospects of pedagogical education which was presented at the National Conference "Perspectives and Challenges for Pedagogical Education in the XXI century", organised by NEAA in 2019. The main goal of this conference was to initiate discussion on the quality of training of pedagogical specialists in HE in Bulgaria through the prism of requirements of the ESG underlying the accreditation procedure. As a result of this conference, specific proposals were made to the MES related to the state requirements for acquiring the professional qualification "teacher" and state standards for the training of teachers and other pedagogical specialists. NEAA plans to continue with such activities and to organise similar conferences in other various fields.

According to the SAR, NEAA publishes annual reports on its activities each year and holds special seminars to discuss results of EQA procedures with relevant stakeholders.

## **Analysis**

Following 2017 ENQA review suggestion, NEAA included in its strategic plan the task to continue with preparation of regular summary reports. On the basis of the presented evidence, the review panel can confirm that NEAA has been implementing this task successfully. The summary reports are based on findings of all programme accreditations conducted within a certain field what is understandable since the programme accreditation of professional fields is one of the most significant of NEAA's activities. The panel confirms that the summary reports are regularly published at the NEAA's website.

All stakeholders highlighted that they are familiar with summary reports; they know that they are available and they consider them useful. They are aware that their main goal is to improve the quality of the professional field. NEAA certainly plans to continue with the preparation of such summary reports in the future as this has been defined as one of its strategic goals.

However, the panel noticed that NEAA has not yet started to follow the additional suggestion from 2017 ENQA review to thematically analyse the new criteria system in place as well as good practice and challenges in relation to EQA activities. In general, thematic analyses have not been used so far in

a way that identifies the strengths and weaknesses of the QA system for the purposes of improving EQA procedures.

Also, the panel noticed that, currently, there are no thematic analyses/summary reports that would refer to other EQA procedures, such as institutional accreditation, accreditation of doctoral programmes, etc.

Summary reports are prepared by SCs, but during the meeting with NEAA's staff, it was emphasised that they are also involved in preparation of thematic analyses to some extent. Since NEAA's employees are already quite burdened with implementation of numerous accreditation procedures, the review panel recognizes a certain risk regarding the necessary capacities of NEAA employees for the implementation of these activities in future. Therefore, the review panel encourages the NEAA to take that into account when planning its own resources (see ESG 3.5.).

### **Panel suggestions for further improvement**

- (3) Initiate certain thematic analysis focused on EQA processes so that they can identify strengths and weaknesses and therefore be used for necessary improvements.

### **Panel conclusion: compliant**

## ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

### **2017 review recommendation**

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

### **Evidence**

#### *Financial resources*

According to the SAR, NEAA is financed from the state budget (approved by the Council of Ministers of the Republic of Bulgaria after proposal and negotiations with MES through the Budget Act) as well as from its own revenues - fees from accreditation procedures, revenues from national/international projects and other sources related to NEAA's activities. In the period 2018-2021, revenues from HEIs amounted to 60-70% of total revenues of NEAA. In 2021 total share of revenues was 65% from HEIs and 35% from state subsidies. The largest share was accumulated from programme accreditations, especially doctoral programme accreditations. In 2021 there were no revenues accumulated from national/international projects or other sources related to NEAA's activities. NEAA manages its revenues from accreditation, evaluation and PAMC procedures and from other activities specified above. The AC approves the budget. NEAA's financial policy is regulated by the national Financial

Management and Control System which provides transparency and suitability of all financial transactions. Independent financial audits are periodically performed by MES and the Bulgarian National Audit Office.

The SAR also states that, in regard to the expenditure, NEAA spends funds on remuneration and social security (for employees) and on expenses for running its activities. The actual yearly expenditure was quite stable for the period 2018-2021 and it ranges from 1 285 394 BGN yearly to 1 481 520 BGN yearly for the period from 2018-2021. NEAA's revenues/expenditures for the year 2021 were 661 733 euro for the revenues and 661 733 euro for the expenditures.

During the site visit it was explained to the review panel that NEAA's revenues have enabled NEAA to regularly conduct EQA activities so far (more than 400 procedures annually) but there is a need to enable NEAA to manage its own revenues in order to financially stimulate external experts and employees because the expert fees and staff salaries are currently non-competitive. Additionally, there is a need to stimulate internal innovation (for example, by promoting staff active involvement in redesign of methods and procedures for IQA). Without some changes in this regard, the engagement of quality experts and staff could be potentially at risk in the future and this might have a negative impact on the quality of provided activities. It is particularly important to ensure adequate remuneration for external experts in order to attract international experts. It was also explained that the problem could be solved if NEAA is allowed to use its own finances from the accreditation fees in order to increase the amount of expert fees. Currently this is not the case because NEAA's budget is set within the budget lines (which include, not only finances from the state budget, but from NEAA's own revenues - mostly fees from accreditation procedures) and the finances from the budget lines can be spent in line with the strict rules defined at the national level. Therefore, NEAA cannot increase the expert fees which are currently non-feasible because national rules and regulations of the Ministry of finances do not allow NEAA to do so. This creates a situation in which the finances collected from the accreditation fees cannot be used to increase the expert fees so they remain unspent and are therefore returned back to the state budget at the end of the fiscal year. NEAA's management explained that they have been very active in warning the authorities about the problem of non-feasible expert fees but also about non-competitive staff salaries but did not succeed in solving the problem. In the discussion with the MES representatives, it was confirmed that they are aware of the problem which is the result of some strict regulations on the national level and one possibility to solve the problem could be to rethink the reallocation of the budget.

#### *Human resources*

According to the SAR, NEAA has 30 full-time positions approved. However, in accordance with the data provided in the SAR there were 22 full-time employees and 26 part-time employees in 2021. The difference between full-time and part-time employees is in the type of contract they hold with NEAA. Full-time employees are considered those with the approved positions (civil servants or appointed following the roles of the AC, SCs etc.) while the part-time employees are those with civil contracts.

SAR states that the distribution of 22 full-time employees is as follows:

- Accreditation Council – 2
- Secretary General - 1
- General and Specialized Administration – 19

SAR also states that distribution of 26 part-time employees is as follows:

- Accreditation Council – 9
- Chairpersons of Standing Committees – 9
- General and specialised administration – 8

Following the previous ENQA review recommendation to put in place processes aiming to develop staff competences further, regarding the needs for being QA professionals, NEAA has undergone significant changes in relation to its own staff. The members of the AC and Chairpersons of the SCs which had been full-time employees became the part-time employees (with civil contracts) while NEAA's own staff which had been part-time employees became fully employed. This was decided in order to strengthen NEAA's staff on full-time positions and better plan their growth. Following these changes, the number of full-time employees in general and specialised administration which was 8 in the period before 2021 became 19 in 2021. During the site visit the panel heard that there are still 9 full-time vacant positions. SAR identifies as one of NEAA's strengths "expansion of staff potential" but at the same time it also states the following "as can be seen from the number of procedures, they require maximum mobilisation of not very large staff of NEAA" and "as the workload is high, procedures are sometimes delayed".

During the interviews with the stakeholders, the panel heard that NEAA's key staff are knowledgeable and have considerable expertise in the EQA processes with which they work. The representatives of the AC emphasised that they are very dependent on the key staff; otherwise it will not be possible to ensure the quality of the processes. The Management pointed out that the salaries of the key staff are not competitive and this creates a barrier for attracting more highly skilled expert staff. The key staff mentioned that they would like to be more involved in the processes at a higher level (for example they do not participate at the site visit together with the EG because one SC's member joins them, they do not train the experts, they are not allowed to give comments on the EG report, only to make some technical remarks and warn about irregularities, etc.). Most of the responsibility lies on the SC's members who actively participate in the process.

In relation to the gender structure, the previous ENQA review noticed the fact that females were in the majority on the lower levels of hierarchies (general and specialised administration). This situation has evolved since 2017 report to a slightly more balanced structure of decision-making bodies: thus, there are now 5 women in the AC and 7 among the Chairpersons of SC. Also, the Secretary General is now a woman.

In relation to the age structure, the previous ENQA review noticed that the majority of employees were over 60. In order to rejuvenate and strengthen NEAA's staff, in 2021 two competitions for senior and junior experts were announced and eight employees were appointed in NEAA.

The SAR states that annual activities for career development of "expert staff" are carried out. According to the provided data, 13 staff in 2018, 13 staff in 2019, 2 staff in 2020 and 4 staff in 2021 participated in various kinds of staff development events. The key staff expressed their opinion that they see some improvements in regard to their opportunities to participate in some training but they still need much more training in order to strengthen their competences as is it is expected from QA professionals, especially training organised at the international level.

#### *IT resources*

In the previous 2017 ENQA review, the expert panel commended NEAA's efforts made in development of the information system, aiming to support accreditation processes in an efficient,

transparent way. The 2022 SAR states that NEAA has started the development of an electronic platform for managing the administrative processes related to external QA activities, including PAMC. It is envisaged that at the later stage there will be connections with other state institutions of the central administration working in the higher education system – MES, the Council of Ministers, NACID, the Bulgarian National Science Fund, and others. The representatives of HEIs expressed their positive opinion about the importance of the development of such electronic platform during their meeting with the panel.

## **Analysis**

NEAA is financed from the state budget (35%) and from the revenues from its activities, mostly accreditation fees (65%). The data provided for the several previous years confirm that these revenues have been sufficient to cover staff cost (their salaries and social security) and for running a huge number of external quality assurance procedures (over 400 procedures yearly).

However, the main challenge remains the fact that NEAA cannot manage its own finances in a way which will enable NEAA to ensure the best quality of its activities. Due to some very strict regulations and rules defined on the national level in relation to the so-called budget lines and how they may be spent, NEAA cannot use the revenues from the accreditation fees as it would like to. This obstacle especially refers to the amount of the expert fees which is quite low and makes the possibility of engaging the high-quality experts, especially international experts, quite difficult. Also, the salaries of NEAA's key staff, which are defined on the national level, are non-competitive and make the employment opportunities for highly qualified staff very challenging. All this creates the situation in which NEAA cannot use its own finances to improve the quality of its own activities and to ensure their sustainability as, at the same time, a certain amount of its finances (accreditation fees) every year remains unused and are removed back to the state budget. The Management staff confirmed that this situation caused them difficulties in their work, especially in relation to the very low expert fees. This was also confirmed by the stakeholders who also considered expert fees as insufficient. In the future these difficulties might be even more emphasised having in mind the inflation we are currently facing.

In relation to the human resources some changes and improvements following 2017 ENQA review recommendation have been made. Firstly, the number of fully employed staff in the General and Specialized Administration has been increased from 8 to 19 employees. Also, the type of contracts has been changed in a way that NEAA's key staff which had been part-time employees became fully employed and the members of the AC and Chairperson of the SCs which had been fully employed became the part-time employees. The only fully employed staff, in addition to NEAA's key staff, is the Chairperson and Vice-Chairperson of the AC and the Secretary General.

The above-mentioned changes were implemented with the aim of ensuring an adequate number of NEAA's key staff with relevant expertise and knowledge to deal with the QA procedures. During the interviews with the stakeholders it was confirmed to the panel that NEAA's staff is highly respected by the AC and HEIs and their representatives emphasised the importance and the quality of the support the key staff provides to them. However, it is still the case that 9 positions are vacant and the main obstacle to the employment of the high-quality staff are non-competitive salaries. At the same time the workload of the staff is very high and it causes a delay in conducting large number of EQA procedures. Despite the fact that the staff has become specialised in QA matters, they also expressed that they would like to get more opportunities to participate at the various training and to be involved in the procedures at a higher level. The review panel agrees on the opinion expressed during the

interviews that the model of operating should be reconsidered because the members of SCs do the most of the work in the accreditation and the role of NEAA's own resources should be strengthened.

In the light of its findings, the review panel can confirm that some improvements have been made in relation to the previous 2017 ENQA review recommendations, especially with respect to ensuring an increase in NEAA's fully employed staff. However, some challenges still remain, mainly that NEAA cannot manage its own finances to the full extent and use them to increase the expert-fees and therefore improve the quality of its activities. This could have a negative impact on the sustainability and the quality of the processes. At the same time, in the panel's view, NEAA has insufficiently used the opportunity to secure additional funds from other sources like international projects or activities conducted abroad. In addition, there are still 9 full-time vacant positions and it might be difficult to employ the new high-quality key staff due to the fact that the salaries are low and therefore non-competitive. At the same time, the workload of the employed key staff is very high and this causes the delay in conducting EQA procedures. The role of NEAA's key staff should be further strengthened and put on a higher level which will then allow them to have more responsibilities in conducting procedures. This will require more systematic and strategic planning and training of staff members, taking into account the career development of NEAA's staff.

#### **Panel recommendations**

- (5) NEAA should pursue with the MES changes in the financial management legal framework to ensure fair and structured remuneration of the work of both staff and EG members;
- (6) Continue with recruitment of new staff to ensure optimal workload and implementation of EQA processes on time;
- (7) Staff members, in particular chief experts, should be more involved in the EQA procedures with more responsibilities at the higher level;
- (8) Encourage further professional development of the key staff and their participation in seminars, conferences and international activities.

#### **Panel suggestion**

- (4) Use the opportunities to increase the budget from other sources of income, especially from the EU funds, international activities etc.

#### **Panel conclusion: partially compliant**

### ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.



## 2017 review recommendation

No recommendation.

### Evidence

The review panel learned that the basic documents for the development of the NEAA's IQA framework are the Strategy for development of NEAA 2018-2023 and the Action plan for the implementation of the Strategy. The review panel checked these documents and noted that the Strategy defines 6 objectives including specific tasks, many of which are related to the enhancement of the EQA model, criteria, procedures etc. The Action plan for the 5-year period defines 32 activities which are not directly linked to the strategic objectives but cover their main direction. The Action plan defines responsible persons and the deadlines for the implementation of these activities. These documents, however, do not include monitoring mechanisms such as indicators/key performance indicators (KPIs). The review panel was not provided with one document and/or information which proves that NEAA included its stakeholders in the strategic planning nor which proves in any similar form that NEAA regularly monitors the realisation of its activities and the accomplishment of its strategic objectives. Also, the review panel was not provided with one document which regulates NEAA's IQA framework such as a quality policy, quality manual or similar.

In accordance with the SAR, NEAA's IQA framework relays on activities which are conducted in three directions:

- through NEAA's bodies such as Committee on Quality Assurance (CQA), Ethics Committee, Complaint Committee and Advisory Council;
- by conducting internal quality audits;
- by considering stakeholders' feedback.

In relation to the IQA activities which are realised through the work of NEAA's bodies, the SAR explains that the main body for conducting such activities is the CQA which is an auxiliary body to the AC for monitoring, maintaining and improving the quality of NEAA's activities in accordance with the ESG. CQA's establishment and activities are prescribed by the SNEAA and the *Rules for the activity of NEAA's CQA*. The CQA consists of 19 members who are the representatives of various stakeholders including students, employees, MES, syndicate etc. The CQA analyses the collected internal and external recommendations for improving the quality of NEAA's activities through the mechanisms and procedures for collecting feedback. The CQA aims to periodically analyse the need for updating NEAA's regulatory framework in line with the ESG. It also monitors the mechanisms for ensuring independence, publicity, transparency and accountability of NEAA's EQA procedures; for taking into account the students' opinion on the quality of education and for avoiding the conflict of interest. The CQA prepares reports to the AC on its analysis and findings.

The review panel checked the *Rules for the activity of NEAA's CQA* which are available on the website and learned that CQA's function includes both: feedback from stakeholders on EQA procedures and also from students on the quality of education. However, the results of CQA work are only used internally and are not widely shared, so the review panel did not have the opportunity to learn more of such recommendations and improvements.

The SAR additionally states that the CQA cooperates with the Internal Audit Group (IAG), the Ethics Committee, the Complaint Committee and the Advisory body whose tasks are also related to IQA. The IAG is constituted by the AC and it inspects documentation and verifies deadlines for EQA procedures of SCs. Its findings and recommendations for the improvement of SC's work are adopted by the AC. The Complaints Committee is an advisory body which deals with the complaints related

to EQA procedures (see ESG 2.7.). The Ethics Committee is established based on the Code of Ethics. It monitors compliance with the Code of Ethics by performing inspections and taking decisions in case of warning issues. It also assists the President of NEAA in implementing the Counter-Corruption and Unlawfully Acquired Assets Forfeiture Act. The Ethics Committee also prepares reports on the ethical behaviour and culture of NEAA's employees and makes recommendations for their improvements. The Advisory Council aims to discuss the key issues related to better communication, cooperation and interaction with professionals and branch organisations and addresses issues which could improve EQA procedures.

In relation to the NEAA's IQA activities that are realised by conducting internal quality audits, the review panel learned that only one internal audit has been conducted to date, in 2019 and it included the following topics: compliance with normative deadlines, measures and actions of SCs; application of the Criteria system in accordance with the ESG in external quality assurance procedures, including PAMC and the analysis of the SCs' methodology for evaluation. However, the review panel could not find the results of this internal audit published at NEAA's website. The interviewed participants responded that this is probably because NEAA's website has been updated.

In relation to the IQA activities which are realised through consideration of stakeholders' feedback, the review panel learned from the SAR that NEAA set up procedures for collecting stakeholders' feedback information. The SAR also mentions that NEAA participated in the ENQA project "Effective Involvement of Stakeholders in External Quality Assurance Activities". This project resulted in the analysis and recommendations for the improvement of NEAA's activities, especially in relation to optimising the interaction with stakeholders. Following these recommendations, the CQA developed an Annual Plan for 2022 and, as part of that Plan, the survey with stakeholders has already been conducted. The aim of this survey was to examine the level of satisfaction of HEI's and employers' representatives with NEAA's work. The review panel checked the NEAA's website and noticed only one published summary of survey results of the opinion of stakeholders about the EQA procedures dated from 2016.

During discussions with stakeholders, the review panel heard from HEIs' representatives that NEAA is very clear and regular in its communication with them, especially when some EQA documents and criteria have been amended. However, the student representatives who participated in the EQA processes responded that they have not been asked to give their feedback in the formal way but, upon the completion of the process, they had informal discussion. Also, the review panel asked NEAA's key staff about their involvement in IQA procedures and they responded that there were some CQA recommendations presented to the AC but they are not sure about these recommendations because they were not involved in these procedures.

During the interviews the review panel was told that the main mechanism for preventing unethical cases and ensuring professional conduct is the Code of Ethics and its rules, which includes launching methods in a case when non-ethical behaviour has been noticed. The review panel checked the Code of Ethics which is available on NEAA's website and noticed that this document defines principles, values and rules of conducting EQA activities and thus contributing to build confidence in such activities and their results. The Code of Ethics covers various groups of stakeholders and includes general principles, professional behaviour including rules for avoiding conflict of interest, personal behaviour, measures which have to be taken by the Ethics Committee etc. During the site visit it was confirmed to the review panel that NEAA has clear rules for preventing conflict of interest and ensuring the confidentiality; the EG members sign a declaration of non-conflict of interest and confidentiality which, among others, means that members cannot have any relationship with HEI in question which also includes their relatives and many persons were excluded following these rules. During the meeting with the Ethics Committee members, it was explained that the focus is on preventing unethical behaviour including the conflict of interest.

## Analysis

Based on the presented evidence the panel believes that NEAA has started to develop its IQA system. Within NEAA's IQA framework, some mechanisms and procedural steps have been developed. However, the elements of such procedures are fragmented and not fully structured, integrated and connected in a systematic way. Also, there is a lack of transparency of such mechanisms and their results. This can be seen from the fact that there are elements of the PDCA cycle in place but some crucial parts are missing and the review panel cannot confirm that the quality loop has been closed.

In relation to the planning phase, the review panel can confirm that NEAA has developed core documents like mission statement, the Strategy and associated Action Plan. The Action Plan includes activities and deadlines for finalisation of these activities. However, there are no monitoring mechanisms or activities for monitoring the realisation of the Action Plan and achievement of NEAA's strategic goals. The other two documents which are relevant for the NEAA's IQA are the Rules for the activity of NEAA's CQA and the Code of Ethics. The review panel was not provided with any other documents like the quality policy, the quality manual or similar.

Following the planning phase, NEAA conducts a significant number of activities in line with its mission and strategic goals and monitors these activities in different ways. The most important part of monitoring includes NEAA's auxiliary and advisory bodies, especially the CQA. Although the CQA deals with feedback on EQA procedures and also with direct students' feedback on the quality of education, the review panel was not presented with any concrete recommendations made by the CQA.

In relation to the collection of stakeholder feedback, NEAA has begun to act in this regard. The review panel understood that NEAA's participation in ENQA's project focused on stakeholders' involvement has shown that this aspect should be strengthened and as a result, NEAA organised a stakeholder's feedback survey in 2022. This stakeholder's feedback was oriented towards HEI's representatives and employers. Some of the results are presented in the SAR but not widely spread. However, during the interviews, the review panel found out that the core stakeholders such as students and NEAA's staff are not included in the IQA activities. The students had the opportunity to give their feedback upon the completion of the procedure only informally and the key NEAA's staff were not included in giving their feedback. Communication about recommendations for improvements is mainly discussed between the CQA and the AC. However, HEI representatives told the panel that they were satisfied with their involvement and possibility to give their feedback to NEAA.

In addition to the stakeholder's feedback, another tool used for the IQA is internal quality audit. Pursuant to information provided NEAA has conducted one internal audit in 2019, but the review panel was unable to access information about its results as these are not published. The review panel was unable to ascertain whether further such audits have been conducted.

On the basis of the analysis done, the panel confirms that NEAA has been working on improvements in relation to the results of internal and external QA activities. However, there are still some areas for improvements which have not been tackled yet. For instance, some of 2017 ENQA review recommendations in this regard are still relevant today which demonstrates that the quality loop has not yet been closed. The main question which still remains open is connected with the huge number of EQA procedures, their streamlining and optimization; revision of criteria and indicators; stronger involvement of different stakeholders in NEAA's governance; strengthening NEAA's staff, their professional development and workload etc. All these areas were already emphasised in the 2017 ENQA review but have not yet received an adequate response.

Finally, although the panel recognizes the efforts of NEAA in developing its IQA system which will encourage enhancement of its overall work and activities, the review panel is of the opinion that such a system is still in the developmental phase. All the elements of such system (which have already been set up), need to be better connected, regularly implemented with the involvement of all internal and external stakeholders and their implementation and the achievement of the results need to be better monitored and widely communicated. NEAA may benefit from some thematic analysis focussed on IQA.

### **Panel recommendations**

- (9) Reconsider the current IQA framework, starting from the adoption of fundamental documents which regulate this area following the necessary improvements in NEAA's strategic planning and monitoring of the results achieved. NEAA should involve its internal and external stakeholders in NEAA's IQA activities, regularly implement such activities and communicate better to a wider audience the results of such activities and improvements made.

### **Panel suggestions for further improvement**

- (5) Think about implementing some thematic analysis in relation to IQA procedures and use them to strengthen NEAA's IQA framework.

### **Panel conclusion: partially compliant**

## ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

### **2017 review recommendation**

No recommendation.

### **Evidence**

NEAA has been a member of ENQA since 2008 with a short intermission. It undergoes the present external review as part of its renewal of ENQA membership and re-registration in EQAR. The present review is the fourth external review (third coordinated by ENQA) of NEAA. NEAA has already been reviewed against ESG in 2008, 2014, 2015 (partial review) and 2017.

### **Analysis**

During interviews with the stakeholders the panel learned that the compliance with ESG is perceived as very important. This is also emphasised in several places in the HEA and the SNEAA. NEAA and its external stakeholders, especially the Ministry are clearly very committed to the compliance of NEAA's work and activities with the ESG and perceive NEAA's membership in ENQA and registration in EQAR as crucial for the enhancement of the quality of HE in Bulgaria.

**Panel conclusion: compliant**

## **ESG PART 2: EXTERNAL QUALITY ASSURANCE**

### ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

#### **2017 review recommendation**

No recommendation.

#### **Evidence**

The SAR states that NEAA criteria are clearly mapped to the ESG part one and that they follow the logic of those 10 ESG standards, regardless of the EQA process in question. The table below shows the mapping of NEAA's criteria for each EQA procedure within the scope of this review against the ESG part one. This mapping is set out in NEAA's *Criteria for Assessment and Accreditation in Accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area* and is also available via links on NEAA's website.

*Table 6. Mapping of agency's criteria with ESG part I*

ESG Pt. I	Instit. accred.	Programme accred. of professional fields, majors from regulated professions & intro of new study programmes	Programme accred. of doctoral programmes	Projects for opening or transform. of HEIs	Projects for opening or transform. of primary units or branches of HEIs	Projects for opening a new professional field or major from regulated profession	Reviews for altering the capacity of an HEI	*Distance learning offers	PAMC
1.1	1.1-1.2	1.1-1.2	1.1	1.1	1.1	1.1	x	1.1-1.2	1.1
1.2	2.1	2.1	2.1	2.1	2.1	2.1	x	2.1	2.1
1.3	3.1	3.1	3.1	3.1	3.1	3.1	x	3.1	3.1
1.4	4.1	4.1	4.1	4.1	4.1	4.1	x	4.1	4.1
1.5	5.1-5.2	5.1-5.2	5.1	5.1	5.1	5.1	1.1-1.2	5.1	5.1
1.6	6.1	6.1	6.1	6.1	6.1	6.1	2.1,2.2,3.1	6.1	6.1
1.7	7.1	7.1	7.1	7.1	7.1	7.1	x	x	7.1
1.8	8.1	8.1	8.1	8.1	8.1	8.1	x	x	8.1
1.9	9.1	9.1	9.1	9.1	9.1	9.1	x	x	9.1
1.10	10.1	10.1	10.1	10.1	10.1	10.1	x	x	10.1

Each of NEAA's criteria are sub-divided into a number of sub-criteria that specify the content of each individual criterion and it was clear to the review panel that, although the framework provided by the ESG part one is strictly adhered to, the individual criteria will vary according to the focus of the process. For example, the criteria for institutional accreditation differ in focus from those for opening or transforming an HEI. Further examples can be found in the summary paragraphs below on each standard:

### 1.1 Policy for quality assurance

The focus on this standard will vary according to the procedure being undertaken: processes at institutional level focus on how the institution as a whole is developing a quality culture and if/how internal structures for the development of a quality policy are in place, with the involvement of students and other stakeholders. At the level of the study programme, the focus is on how far the institution's processes are understood and respected at ground level.

### 1.2 Design and approval of programmes

At institutional level EG will focus on if/how an HEI has developed appropriate processes for developing, implementing and monitoring of its programmes whilst, for programme level procedures, the focus is on how these processes are used, together with the input of stakeholders, to ensure that

the programmes, including those at doctoral level, are appropriate and located appropriately on the Bulgarian qualifications framework.

### 1.3 Student-centred learning, teaching and assessment

This standard is mainly assessed according to the criteria set for each procedure; however, at institutional level, the extent to which the HEI has adopted methodological standards for the development and revision of curricula and the stimulation through this of student learning is also assessed in order to provide evidence of the institution's own internal processes for assuring its quality and of the extent of student-centred learning, teaching and assessment.

### 1.4 Student admission, progression, recognition and certification

NEAA's criteria for the assessment of this standard are in line with ESG 1.4. However, of particular importance is the fact that the NEAA criteria, in addition to assessing the general processes for attracting and supporting students through to completion, also require an assessment of how effective such processes are for the admission, progression, recognition and certification of different categories of students; i.e. Bulgarian, international, doctoral, those with special needs etc. This is evidenced in the *NEAA Criteria for Assessment and Accreditation in Accordance with the ESG* by the differentiation in NEAA standard 4.1 for each method. For example, for doctoral programmes, it is specified that, "...opportunities have been provided for participation of doctoral students in research systems."

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*\*Criteria for distance learning offers are currently mainly incorporated within the criteria for the accreditation of professional fields – at the site visit, the review panel was informed that, following the pandemic, further work on developing specific criteria in this area is continuing and NEAA hopes to complete this work by the end of the calendar year.*

### 1.5 Teaching staff

The SAR describes compliance with this standard as fundamental. An example of how the criteria differ in focus across the procedures can be seen in the emphasis placed on the accreditation process for doctoral programmes on the suitability and experience of the academic staff in supporting and training doctoral students.

### 1.6 Learning resources and student support

At institutional level, NEAA criteria in this regard scrutinise the institution's policies for ensuring that resources and support continue to be appropriate; at programme level, the impact of these policies is examined with specific focus on the programme (discipline, level or mode) under accreditation.

### 1.7 Information management

The institutional accreditation procedure focuses on the HEI's policy and process for collecting, analysing and acting on various sources of data. Criteria for other procedures such as evaluation of doctoral programmes or the opening of a new professional field specifically relate to how data is collected, managed and analysed within that field, in line with the institutional policy.

## 1.8 Public information

Criteria in this field require evaluation of the type and extent of public information provided by the HEI including its offering, the results and qualifications awarded and data on student employment. Of particular importance for the prestige of the HEI (and an example of how the criteria are focused in this regard) is information about the success of academic staff in their fields of research and also in relation to doctoral students, the training they receive, results of quality audits in relation to doctoral programmes and university events in which doctoral students participate.

## 1.9 Ongoing monitoring and periodic review of programmes

A focus on the importance of regular monitoring, review and updating of programmes is apparent in the criteria across all procedures, along with the engagement of teachers, students and employers in such reviews and the publication of updated programmes in order to ensure reliable information about the institutions' offers and contribute to the goal of improving public trust in the HE sector.

## 1.10 Cyclical external quality assurance

All procedures clearly set out criteria that require regular accreditation and follow-up through the post-accreditation monitoring and control process (PAMC).

### **Analysis**

The review panel asked various stakeholder groups, particularly HEI representatives, how far they felt that their own IQA processes were of importance during the various accreditation procedures. Based on their replies, it was clear that HEIs are very aware of the work that NEAA has done to integrate part one of the ESG into its work and there was strong opinion that the impact of this on HEI's own internal processes is positive. NEAA is believed to be positive and cooperative in its approach to helping HEIs develop their own processes through the EQA processes. In fact, the review panel was informed that, in learning to develop their own internal QA criteria and processes, HEIs had set up an intra-institutional group through which they develop and evaluate their own work on IQA; this in turn has stimulated an exchange of views and practice between HEIs. In addition, HEIs believe that the focus on IQA through the mapping of the criteria to the ESG part one has led to an increased focus on students through the introduction of student surveys. Those who spoke to the review panel described the results of these surveys as "invaluable."

In conclusion, in line with the SAR which stated that the interconnection between the ESG part one, the mapped criteria and the indicators used by NEAA in its accreditation processes provides stimulation for the HEIs in relation to their own IQA, the review panel was able to verify a strong link between the approach to accreditation taken by NEAA and the framework provided by the ESG part one. The panel also noted that the template for the EG reports is also mapped to the ESG part one, thus ensuring coverage of all part one standards during the accreditation procedures. This focus on stimulation was reinforced by NEAA during the site visit and was recognised and appreciated by HEIs.

### **Panel commendations**

- (2) The support and cooperation provided by NEAA in assisting HEIs to develop their own IQA criteria and processes.

### **Panel suggestions for further improvement**

- (6) That NEAA continues to support the embedding of IQA by promoting the frameworks provided by the ESG part one and its own criteria and processes to



ensure that they are seen as a holistic overview of the student lifecycle at an HEI and as a means of developing an overarching IQA policy and system, as well as a series of standards against which recommendations are made.

**Panel conclusion: compliant.**

## ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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

### 2017 review recommendation

No recommendation.

### Evidence

The SAR states that the aim of NEAA is that the methodologies create conditions for publicity, accountability, support of institutions in their activities to improve quality and to obtain reliable information about the results of the evaluation, and for encouraging institutions to continue the policy of quality improvement.

NEAA is striving to achieve that aim by conducting various EQA activities in accordance with the HEA and the SNEAA (see ESG 3.1). All methodological and procedural documents that cover all EQA activities are pre-defined and published on NEAA's website. The review panel checked NEAA's website and found the following documents:

1) Methodological documents (guidelines) for EQA activities adopted by the AC and published:

- *Methodological guidelines for drafting a self-evaluation report for accreditation;*
- *Methodological guidelines for the activities of the EG on accreditation procedures of NEAA;*
- *Work rules for students and doctoral students, members of the EGs for evaluation and accreditation procedures;*
- *Rules for the participation of foreign experts, members of EGs for evaluation and accreditation procedures;*
- *Programme for briefing the members of EGs in relation to evaluation and accreditation procedures;*
- *Methodological guidelines for determining/changing the capacity of higher education institution or a professional field/major from regulated profession list for institutional and programme accreditation.*
- *Methodological guidelines for preparation of a report by HEIs on the implementation of the recommendations of institutional/programme accreditation and the implementation of its internal system for assessment and maintenance of the quality of education and the academic staff.*

2) Procedures for EQA activities adopted by the AC and published:

- *Procedures for institutional accreditation;*

- *Procedures for programme accreditation of majors and doctoral programme of the regulated professions;*
- *Procedures for programme accreditation of majors and doctoral programme other than those of the regulated professions;*
- *Procedures for project evaluation;*
- *Procedure for changing the capacity of higher education institutions;*
- *Supplement to the procedures for institutional/programme accreditation and evaluation of projects.*

In addition to these methodological and procedural documents, the SAR states that the main methodological tool for assessing the quality of education in HEIs according to the ESG part I is the manual *Criteria for assessment and accreditation in accordance with the ESG*. The manual was adopted in 2016 and has been implemented since 2017. This detailed manual was provided to the review panel in hard copy with links also available on NEAA's website.

Following amendments of the HEA in 2020, the AC is developing a supplement to the Criteria System: indicators for institutional accreditation have been reduced, and, with regard to programme accreditation, the revisions aim to improve the objectivity of the evaluation by introducing standardised quantitative indicators for assessing the achievements of HE in each specific professional field and each major from regulated professions. The intention is that all programme offered in the same professional fields and/or majors from regulated professions will be reviewed at the same time in order to allow the real comparison of strengths and weaknesses as well as contribute to their ranking. There are also intentions to simplify new subsequent institutional accreditation and to better bind the accreditation of doctoral programmes with the accreditation of professional fields.

In addition, NEAA is developing the electronic information platform through which data related to these indicators, as well as all other indicators for EQA assurance procedures, will be unified and collected once or twice a year with a view to making it easier when writing the self-assessment report, because it will be based on objective, publicly available information, which has been built up over a period of time rather than provided ad hoc, and which will be visible and verifiable.

The SAR also states that the methodologies and criteria are aligned with the HEA. Stakeholders have also been involved in giving the feedback during their development. Already mentioned is the example of the development of indicators for EQA activities which were developed by working groups comprised of professionals and specialists competent and experienced in the area of quality assurance in HE. During the site visit the review panel heard from representatives of stakeholders that they were asked to give their feedback in the process of development of methodologies and that they provided NEAA with their concrete proposals for the improvement of methodologies.

HEIs representatives also told the review panel that they believe that perhaps the current suite of procedures and processes could be streamlined in order to decrease their burden, but they were also strongly of the view that NEAA was working within the legal context in this regard and that the methodologies that are applied are fit for purpose. The representatives also provided examples of how the various procedures encourage improvement in their institutions and programme. They were very supportive of the initiatives that NEAA is taking, such as the development of the electronic information platform, which they believe will reduce their burden and also suggested that, after the first round of simultaneous accreditation of the professional fields, it may be possible to streamline this process further.

## Analysis

The review panel discussed the development and implementation of NEAA's EQA methodologies with various groups of stakeholders. The review panel heard about the involvement of different stakeholders in the development of the new criteria and processes, particularly those in HEIs but also employers and EGs' members. All these stakeholders mentioned a continuous and regular consultation process through which NEAA invites them to provide their opinions on changes and further development to NEAA's methodologies.

The review panel was able to confirm that the additional objectives for NEAA's EQA methodologies such as publicity of information from the evaluations were also met, for example through the publication of EG's reports and the decisions and reports of the SCs and the AC in relation to each procedure.

In conclusion, the review panel obtained evidence of continuous development and improvement of NEAA's methodologies for EQA activities. Stakeholders were also involved in this process by giving their opinion and input. These processes have clear goals and objectives that are fit for purpose in the Bulgarian context. NEAA seeks to increase the level of objective evaluation of HEIs with the outcome of increasing public trust in their role as educational institutions.

### Panel suggestions for further improvement:

- (7) Continue to seek ways of streamlining its current procedures and processes (see standard 2.6 for an example).

### Panel conclusion: compliant.

## ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

### 2017 review recommendation

No recommendation.

### Evidence

In accordance with the information provided in the SAR, all EQA processes are implemented following the methodologies which have not been changed since the previous 2017 ENQA review. All methodologies and procedures for EQA activities are predefined and available online (see ESG 2.2.). The review panel checked the NEAA's website and can confirm that the procedure for each of the NEAA's EQA activities is published on NEAA's website under a specific section which is related to

each of the EQA activities. As it has already been explained in the review report before, NEAA is currently making an additional effort to further develop its procedures and make them more efficient.

The SAR explains that NEAA's EQA procedures include 4 steps: self-assessment, external assessment including site visit, report written by a group of experts and the follow-up. The review panel verified this through the discussion conducted with the stakeholders, checked adopted procedures available online and also reviewed the additional table that NEAA provided upon the request from the review panel which elaborated these 4 procedural steps for all EQA procedures.

- The first step in any of EQA procedures is drafting a self-assessment report by the HEI referring to the *Methodological guidelines for drafting a self-evaluation report*. The structure and the content of the self-assessment report should be elaborated in accordance with the requirement of NEAA's criteria system for the respective procedure. Some additional documents need to be mandatory attached to the self-assessment report. With the new methodology, quantitative data will be presented in a common IT system/digital platform.
- The following procedural step is the appointment of the EG. The AC appoints members of the EG based on the proposal of the SC. The EGs consist of 3 to 7 members, depending on the degree of complexity of the procedure. Methodologies for working with EGs are valid for all members. Members of EGs are trained/briefed prior to the site visit to the HEI. EGs are briefed according to a programme adopted by the AC. Briefing is given by the supervising member of SC. EGs are always composed of experienced and new members (self-training process). All EQA procedures include site visit. The duration of the site visit to the HEI depends on the number of professional fields at HEI. Usually it lasts 3 days but may last 5 days in case of HEI's branches. The site visit is included in all procedures (including distance programme offers) but in the case of PAMC and the reviews for altering the capacity of HEI it is not mandatory.
- In the next procedural phase, the external review report is prepared by the EG and based on the EG report, the SC prepares its report (see ESG 2.6.). The structure of SC's report differs depending on the procedure. Before submitting the SC report to the AC, the report is sent back to the HEI for the factual check. The SC's report is the basis for the AC's final decision. The external review report is drafted in all EQA procedures with the exception of the evaluation of projects for opening of new study programmes.
- The final procedural step is post-accreditation monitoring and control (PAMC). This is a follow-up phase with a purpose to encourage HEI to improve its quality based on the recommendations provided. The PAMC is not included in the case of programme accreditation of doctoral programmes, reviews for altering the capacity and the assessment of distance learning offers.

The above mentioned, 4 procedural steps, are not included in the case of the evaluation of projects for opening of new study programme because, as it was already explained, this evaluation initially requires only notification letter and they are evaluated later on, during the programme accreditation of the relevant professional field.

## **Analysis**

NEAA has made a lot of effort to develop a wide range of EQA methodologies and procedures. The methodologies and procedures have been developed with the involvement of stakeholders, they are predefined and published at the NEAA's website and applied consistently.

As stated above in the evidence section and in line with the SAR, information provided at the NEAA's website and from the discussions during the site visit, the review panel can confirm that NEAA's EQA activities follow four procedural steps which include the following: the preparation of the self-assessment report, the site visit to the HEI, drafting of the report and adoption of the final decision after which begins the follow-up procedure called post-accreditation monitoring and control (PAMC).

The only exceptions are PAMC and the reviews for altering the capacity of HEIs because in these cases there is not always a site visit. During the interviews it was explained that in the case of PAMC, it depends on the evaluation grade and in the case of reviews for altering the capacity of HEIs, it is at the discretion of the SC, depending on the specifics of individual cases.

Additionally, in the accreditation of doctoral programmes and the reviews for altering the capacity, the follow up phase (PAMC) is not included. During the interviews it was explained that in these cases the follow up is done later within the programme accreditation of professional fields. Assessment of distance learning offers is a new procedure. This is going to be amended by the end of 2022 and the follow up in this case will be included in this process.

To conclude, NEAA conducts EQA activities based on methodologies and procedures which are pre-defined, clear, consistently applied and well known to HEIs. All 4 procedural steps as prescribed by ESG are implemented consistently. Although the follow up is not included in the case of the accreditation of doctoral programmes and altering the capacities of HEIs, these activities are linked with the programme accreditation of professional fields and follow-up is a mandatory part of such accreditation procedures. Also, there are some plans to include in the future accreditation of doctoral programmes in the programme accreditation of professional fields. Additionally, follow up to the accreditation of distance learning offers, which is a new procedure still in the developmental phase, is planned in line with other procedures.

### **Panel recommendations**

- (10) During the planned revision of the methodologies and procedures, ensure that the consistent follow up is included in all EQA procedures.

### **Panel conclusion: compliant**

## **ESG 2.4 PEER-REVIEW EXPERTS**

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

### **2017 review recommendation**

The review panel recommends accelerating the development of strategies for the involvement of foreign experts and other constituencies (e.g. business, professional bodies and employers) in its procedures. This task, of course, requires efforts of all stakeholders involved (MES, HEI).

## Evidence

According to the SAR the selection of review experts is organized on the basis of the document *Procedure for selection of experts* adopted by NEAA. The document is published on NEAA's website. In accordance with this document the various institutions and bodies can nominate experts for EQA procedures: HEIs, the Bulgarian Academy of Science, the Union of Scientists, the National Representation of Students Councils, the National Branch Syndicate "Higher Education and Science", employers' organizations, the Bulgarian Industrial Association etc. Upon submission of proposals, the AC selects the experts from the candidates and creates a pool of experts. The database of external experts nominated by the AC is at the disposal of the SCs. SCs select appropriate candidates according to the type of accreditation. The SC proposes the EG members (panel) to the AC attaching the Information Card with the experts' data and EG members are then accepted by the AC. It was confirmed during meetings with the panel that the SC proposes the experts and AC appoints the experts and decides on the chair. The pool of experts is regularly revised and updated. The list of experts is published at NEAA's website.

During the discussion with the stakeholders, the panel heard that the EG members can be nominated by their organisations (such as HEIs, RC, students' and employers' organisation) or by themselves following the public call which is published twice a year. When NRSC or HEIs nominate the students, they take into account the selection criteria, including the criterion related to very good grades. A very good grade is considered as 5.00 or more out of 6-point grading scale. The students who spoke to the panel did not find that criterion difficult.

The SAR also states that each EG consists of 3-7 experts, depending on the complexity of procedure. Each EG includes a mix of experienced and the new members. The experts are selected for the EG according to certain requirements uniformly applied for each category of candidates: academic staff, students, employers, foreign experts. For example, the academic staff must be specialists with academic expertise in the discipline, they should have management and quality management experience and be familiar with higher education legislation and accreditation practices and respected in the academic community etc. The student member, for example, must have very good overall grades, be familiar with the higher education legislation and should follow the trends in development of education etc. The employer member, for instance, must be leading manager in the respective professional field, nominated by the respected branch chamber and should have adequate knowledge about the education and HE system including the work of NEAA, etc.

According to the table provided in the SAR the overall number of students included in the EQA activities for the period from 2018-2021 was 885 and the number of foreign experts was 41 (foreign experts are included only in institutional accreditation).

During the interview sessions, it was confirmed to the panel that the student and employer members are mandatory in each EG. The overall opinion of the stakeholders was that NEAA has increased the involvement of stakeholders, especially students and employers in the work of EG's. The students who have already participated in the process confirmed that they have the same rights and obligations as the other panel members and are considered as the equal members. It was explained during interviews that the main obstacle for greater involvement of foreign experts are very low expert fees. During COVID-19 pandemic the procedures were carried out online which facilitated the involvement of foreign experts. Students and other EG members emphasized their excellent impressions and satisfaction with the process, they see them as efficient and effective with the possibility for constructive dialogue.

The members of EG need to follow the principles, values and rules of conduct defined in the Code of Ethics. The document defines the cases of the conflict of interest and how to avoid them. In line with

this document, EG members sign declaration of non-conflict of interest and confidentiality which, among others, means that members cannot have relations with HEI in question.

The SAR explains that the experts are trained during each stage of the implementation of the EQA procedure. The training is carried out through the regular meetings with the AC members, SC chairpersons and CQA. The review panel was also informed about the *Methodological Guidelines for the activities of the EG on accreditation procedures of NEAA*. It was prepared to assist the EG members while implementing procedures.

The stakeholders, during the meetings, pointed out that trainings for experts before the COVID-19 pandemic were very well organised. The last such training was organised four years ago. The panel also heard that the training is not obligatory but each EQA procedure includes instructions. The member of the SC who is responsible for the monitoring of the EG and who joins the EG during the site visit, is also responsible for conducting a preparation of the EG prior the site visit. Briefings of experts prior the site visit are mandatory element of every quality assurance procedure. NEAA's key staff confirmed, during the discussion with the panel, that the SC's member is responsible for the briefing of experts prior the site visit and not NEAA's key staff.

## **Analysis**

Based on the evidence presented, the panel can confirm that, following the previous recommendation to involve more different stakeholders in the work of the EGs, NEAA has improved this area of its work. The data on the number of various stakeholders involved in the EGs in the period between 2018-2021 provided in the SAR and the stakeholder's information provided during the interviews, confirmed that the EGs are composed of different stakeholders' representatives. Although the students' and employers' representatives are mandatory members of each EG, there are still some challenges in the greater involvement of foreign experts.

The process of nominating experts is carried out following a public call that is published twice a year. Candidates can be nominated by their organizations but there is also possibility for an individual person to apply. However, there is a little probability that an individual person will be appointed because most of the appointed candidates are respected and prominent persons nominated by their own organisations.

The selection process is carried out in accordance with the pre-agreed and published criteria. The main document that defines selection process and criteria is *Procedure for selection of experts*. The document is available via NEAA's website and it defines selection criteria for different groups of stakeholders including academic staff, students and employers. The document defines, among others, that students who participate in the EQA procedures must have very good grades. Although the students did not find this selection criterion as an obstacle to become the member of the EG, it is a fact that such criterion might reduce the possibility of a wider involvement of students who could certainly contribute to the process. EG members are appointed by the AC on the proposal of the SC. They have to follow rules defined in the Code of Ethics and all EG members signs a non-conflict of interest and confidentiality declaration. The list of experts is available via NEAA's website.

In the view of the panel, the training of experts, especially since the time of COVID-19 pandemic, is insufficient and is mostly reduced to a briefing before the site visit. Briefings prior to the site visit are not enough to ensure adequate competences for EG members in the area of QA because all relevant topics (understanding of procedures and criteria, ensuring consistency, procedure of drafting report, etc.) cannot be adequately covered in a such short period. In overcoming that challenge, the panel would especially like to encourage NEAA to use the benefits of online training of experts. The briefing of experts is carried out by one member of the SC who also monitors the work of the EG and joins

the EG during the site visit. In the event that a member of the SC is not available to conduct training for EG's members, NEAA's key personnel may replace the member of the SC and conduct some instructions for the experts.

### **Panel recommendations**

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

### **Panel suggestions for further improvement**

- (8) Include NEAA's key staff in conducting the training of experts;
- (9) Encourage the involvement of foreign experts in the EQA procedures;
- (10) Reconsider the criterion according to which the student experts have to have very good grades.

### **Panel conclusion: compliant**

## ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

### **2017 review recommendation**

No recommendation.

### **Evidence**

The SAR stated the agency's belief that trust and confidence in the outcomes of its procedures and in its decision-making are predicated on the interconnectedness of cooperation between and control by the relevant NEAA bodies, particularly the SCs and AC. The system of indicators that underpins the Criteria System has been revised recently with a view to ironing out some of the problems in consistency of outcomes in previous methods.

The SAR acknowledged that problems had been created by the use of a common EQA methodology for different types and levels of accreditation; by the subjective element that is necessarily part of any review process where human input is central, and also by a lack of resource for automation (i.e. the lack of national database for information). To mitigate against these problems, new qualitative and quantitative indicators have been developed along with coherent and consistent models for collection and presentation of evidence. This information will, in future, be processed digitally by a specialised unit in NEAA. The combination of the collection of data from the indicators alongside the role of the experts in agreeing findings and coming to conclusions provides the agency with confidence that the



element of subjectivity will be reduced whilst maintaining peer evaluation at the core of the EQA procedures. Quantitative data will be made available by the National Centre for Information.

The agency has also ensured that the new indicators and collection of evidence impact on the structure of the reports written by the expert groups which demands that evaluation against each criterion is demonstrated and analysed (see also ESG 2.6).

In addition, the SAR states that NEAA uses a number of monitoring mechanisms which contribute to the consistent implementation of procedures and their results. One of them is that a SC's member monitors the work of the EG during the site visit, and the other is that a member of AC participates as observer at the meeting of SC's session where the actual evaluation is discussed.

NEAA stressed the importance of PAMC in maintaining consistency in the application of the criteria and indicators as its subsequent control processes ensure that a dialogue with the programme and/or institution is maintained, with clear tracking of each recommendation and the fulfilment of each criterion and indicator.

In relation to the process for decision-making, three levels of scrutiny are in place to aid consistency: a report on each accreditation process is drafted by the EG. This report is scrutinised and summarised by the relevant SC with both reports going forward to AC. In addition, NEAA uses numerical grading system in decision-making process which is based on the coefficients of relative weights of all criteria. There are clear rules proscribed by law how the grades impact the results of the accreditations.

With the amendments in the newly adopted SNEAA (effective from the beginning of 2021), the responsibility for making final decisions for all EQA procedures lies with the AC. The agency also believes that the newly introduced system for simultaneously evaluating all programmes in a professional field will further assist in increasing consistency across the field.

In addition, what has been explained above, the data provided upon the request of review panel, show that the number of refusals as a result of various EQA procedures in the period 2018-2021 was as follows:

- programme accreditation of doctoral programmes - 6
- evaluation of a projects for opening a professional field – 1
- evaluation of a projects for opening a main unit – 1
- evaluation of distance learning offer - 1
- programme accreditation of altering the capacity - 2

In the same time period, the number of revoked accreditations after PAMC procedure was as follows:

- institutional accreditation – 3
- programme accreditation of a professional field – 2
- programme accreditation of the majors from regulated professions - 1

## **Analysis**

The expert panel was able to confirm that the indicators and the criteria system, as well as rules for grading and decision-making system, for all EQA procedures are published in the *NEAA Criteria for Assessment and Accreditation in Accordance with the Standards and Guidelines for Quality Assurance in the EHEA* and are also available through the links on the agency's website. Institutional representatives and other stakeholders who spoke to the panel were clear about the Criteria System and where to find information and details.

The expert panel discussed the reasons for the revised set of qualitative and quantitative indicators with the senior management of the agency and also with members of staff responsible for the operation of the various EQA procedures. It was explained that a more detailed framework of criteria will provide support to members of the expert groups who must now use that framework to form and test their arguments. Work on the indicators is begun as a desk-based study by EG members and followed up through the evaluative site visit. Members of staff confirmed that the new indicators should lead to increased objectivity on the part of the experts and that they are currently being tested within the framework of the Criteria System.

Institutional representatives who spoke to the panel were clear that they understood the reasons behind the development of the indicators and many of the representatives had been involved in this development and in commenting on and testing the new indicators. Representatives of the National Centre for Distance Learning have also been involved along with other external stakeholders with specific expertise in certain areas. There was agreement that the criteria provide useful standards against which HEIs can measure themselves, although the view was also expressed that the criteria are, in fact, more burdensome for institutions than the accreditation processes and that, in the future, some work might be done to differentiate the criteria for HEIs of different sizes.

The panel discussed the three-stage process for decision-making with various groups at the site visit, including the senior management, members of AC and representatives of the SCs. In addition to the three-stage process, the following mechanisms were cited as the most important in relation to ensuring consistency of decision-making:

- Top-down responsibility by AC, with each member of AC being responsible for the work of one SC and for reporting on that work to AC;
- One member of the relevant SC is appointed as a moderator and observer on each EG; this person audits the ESG report before it goes to the SC;
- The experts are trained and instructed as a group;
- There is a published template for the structure and content of the EG report.

Representatives from AC told the expert panel that the new three-stage process allowed for the correction of errors and also placed responsibility for decisions squarely with the AC. The panel was interested to learn what would happen if there was a difference in opinion between AC's views and those of the relevant SC. It was explained that AC has the right to return the SC report to that body if it finds that there is insufficient evidence/information on which to base a decision, together with instructions as to what areas need further clarification. If the SC maintains its position, the panel was told that the AC has the right to gather the necessary evidence and to render its decision, which could be different from the proposed one by the SC. It was clear to the panel that such an incidence has not occurred. The AC also clarified that, although the new process of simultaneous accreditation across professional fields is important, decisions are made on the basis of meeting the criteria and not on any process of comparison.

It was further explained by representatives of the SCs that the initial analysis and recommendations are made by the EG and that these must be based on evidence and on the analysis made by that group. In the view of the SCs, currently EG members learn 'on the job' and gain experience over time. SCs do sometimes return reports to the EG but this is a learning experience. Representatives of the SCs believe that the conditions of engagement of EG members needs to be improved and that they should be offered training in the accreditation procedures as well as instruction before each individual accreditation visit (see also standard 2.4).

The panel sought clarification on two further matters: it was interested to know if the qualitative indicators cover teaching and learning and was informed that this was the case but that the aim was

to produce a set of indicators that could be universally applied across all methods which means that any category of indicators are more generic than specific. The panel was also informed that, in the case of institutional accreditation, the EG report goes to the SC with the closest fit to the mission and profile of the institution.

### **Panel suggestion**

- (11) In order to ensure objectivity and consistency of the EQA processes, the agency should secure the support to the EGs, mainly during the site visits, from the staff of the agency, not the members of SCs.

### **Panel conclusion: compliant**

## ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

### **2017 review recommendation:**

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

### **Evidence**

In accordance with the SAR, NEAA has put a lot of effort into producing good quality reports with relevant elaborations and to publish them on NEAA's website. In order to provide clear and consistent reports, NEAA uses several tools. NEAA has developed templates for the reports which follow the same structure and content and which provide the basis for the assessment of NEAA's criteria in compliance with the ESG part I. NEAA has also been updating the system of indicators and made clear differentiation between qualitative and quantitative indicators which will facilitate and standardise the work of HEIs in preparing self-assessment report but also the work of EGs in preparing the EG's report. Additionally, NEAA ensures the quality of the reports by training/briefings of EG's members prior to the site visit.

Additionally, the SAR states that the EG's report is a joint effort of all members and the finalised report is sent to the SC's chairperson. The EG's chairperson participates in the meeting of the SC, presents the report and takes part in the discussion. If the SC requires clarification, the report is sent back to the EG. The draft report of the EG is then sent to the HEI for the factual check. In the event that some discrepancies have been identified, they are corrected and the SC produces its final report. The SC's report is prepared based on the EG's report. The SC prepares the decision which includes the accreditation grade and the capacity. The SC's report is then sent to the AC and the chairperson of the SC participates in the discussion at the AC's session. Finally, the AC adopts the final decision based on the EG's report and SC's report or returns it to the SC together with instructions needed for further clarification.

The panel was able to find reports for the list of all 52 Bulgarian HEIs on NEAA's website. The results of various EQA processes are published for each HEI from the list separately. When the HEI from the list is selected, the results of all EQA processes for that HEI are available. The Bulgarian version of the website contains the full text of the EG's report and SC's report, the decision of the AC and the decision of the SCPAMC, the validity of accreditation, the grade and the institutional capacity. The English version of the website contains the summary report of the SC, the summary of the decision of the AC and the summary of the decision of the SCPAMC.

The panel looked at the sample of the reports in Bulgarian and 2 reports in English (one from institutional and one from the programme accreditation). The SC's report in institutional accreditation procedure contains the following parts: chronology of the procedure, implementation of the recommendations from the previous cycle, analysis of the compliance with the ESG, conclusion and recommendations. The SC's report in programme accreditation procedure contains the following parts: chronology of the procedure, implementation of recommendations from the previous cycle, analysis of the compliance with the ESG, strengths and weaknesses and conclusion. The panel confirms that reports contain analyses which follow NEAA's criteria.

During interviews with the stakeholders, it was confirmed that the report is prepared by the EG and based on it the SC's report is prepared. It was explained to the panel that the EG's report reflects the main findings while the SC's report analyses and summarises findings from the EG's report, compares all collected data and proposes to the AC the outcome of the process. The SC's report is presented at the AC's session. If the AC finds some weaknesses in the report, then the report may be sent back to the SC. The representatives of stakeholders confirmed to the panel that they receive both the EG's report and SC's report and they see the reports as useful and understandable. They also use them in their work.

A crucial role in enhancing the quality of reporting has the activity of Internal Audit Group which assesses the quality of final reports and organises the meeting with the SC and EG's members to discuss possible improvements.

## **Analysis**

Following the panel recommendation from the 2017 ENQA review to reconsider NEAA's practice in which the EG's report is reflected in the SC's report, NEAA made significant improvements. Although there are still 2 (types of) reports, the panel can confirm that EG's reports are published in full on the NEAA's website. The full EG's reports are published in Bulgarian together with the full SC's report, AC's decision and SCPAMC's decision (except in the case of doctoral programmes which are not included in PAMC), and the English page on NEAA's website contains a summary of the SC's report, AC's decision and SCPAMC's decision. The reports are easily available on NEAA's website in a special menu that can be searched by HEIs, and for each HEI, reports and decisions are published for various EQA procedures in which that HEI participated.

Since the last ENQA review, NEAA has also been working on improving the quality of reports, by using the following tools: a structured template has been developed in accordance to which reports are compiled and indicators that help in the preparation of reports are being developed. NEAA continues to work on their improvement and the quality of reports is in focus during the panel's briefing prior to the site visit. The quality and consistency of the report is also ensured by some procedural steps that include the preparation of 2 (types of) reports (EG's report and SC's report). Also, a member of the SC monitors the work of the EG, and a representative of the EG presents the report to the SC. Based on the EG's report, the SC prepares a SC's report that is provided to the AC. The SC's representative presents the report at the AC session. AC can ask for revisions, if it deems it necessary.

Following the suggestion from 2017 ENQA review, the structure of the EG's report currently includes the names of the EG's members in the introductory part.

Stakeholders confirmed that both reports are easily accessible, useful, practical, clear and serve as a good basis for improvements. Also, stakeholders consider the existence of two (types of) reports useful as they see it as a tool for ensuring the quality and the consistency of reports.

### **Panel suggestions for further improvement**

- (12) Continue to keep under consideration the practice of preparing two reports (EG's report and SC's report), with a view to further streamlining processes.

### **Panel conclusion: compliant**

## ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

### **2017 review recommendation**

NEAA is recommended to reconsider and clarify the role of its Appeals Committee as a Complaints Committee, especially as students complaints are involved, and to communicate in a transparent way to third parties the complaints and appeals procedures that are available, notably on its website.

### **EQAR decision letter 2018 (partially compliant)**

The Register Committee...concluded that it was not sufficiently clear whether the existing possibility of appeal was effective and clearly communicated to institutions.

### **Evidence**

In its SAR, NEAA stated that various auxiliary and advisory bodies to the AC had been set up, including a Complaints Committee. Following the recommendation in previous ENQA review and comments by EQAR, NEAA carried out an in-depth analysis of Bulgarian legislation in the field of education, following which NEAA concluded that it was not possible to grant the Complaints Committee the functions of an arbitration body as this, according to the information provided in SAR, contradicts national legislation on the evaluation and accreditation of HE, which provides only judicial procedures for appealing accreditation decisions made by NEAA. Also, as a response to the 2017 review recommendation, and on the basis of Article 12 of the SNEAA, NEAA has established a separate standing Complaints Committee as advisory body to the AC (instead of the previous Appeals Committee).

The established Complaints Committee functions in accordance with the SNEAA and the *Rules of Procedure of the Complaints and Alerts Commission of the NEAA* (adopted by the AC on December 19, 2019) which determine the status, structure, functions and work organisation as well as the authority

and responsibilities of its members. In 2019 – 2020, NEAA’s Complaints Committee and its functions are published on NEAA’s website.

The Complaints Committee is an advisory body to the AC. It is composed of five members appointed by the AC: three lecturers nominated by the National Branch Syndicate “Higher Education and Science”, one student and one representative of NEAA. The Chair is a recognised law professor. The Complaints Committee members may serve for a term of three years with the possibility of an extension of one further term (maximum of two terms). The Committee’s functions include:

- To review complaints and notifications of violations that occur during NEAA’s external quality assurance procedures and to provide advice to the AC;
- To review complaints by members of the academic staff, students and doctoral students in HEIs and SOs and formulate opinions and recommendations in case of:
  - discrepancies between the HEI’s publicly declared policies for assurance of education quality and the actual educational process;
  - disrespect for student opinions concerning the organisation and operation of the internal system for assessing and maintaining quality of education.

Consideration of the recommendations made in relation to complaints is reviewed within NEAA’s follow-up procedure (PAMC) which presents the recommendations to the AC, and regularly or upon request reports on its activity to the AC.

During the period under review, the Complaints Committee has reviewed a total of 30 complaints, and it has provided opinions on all complaints and notifications. The complaints related to various topics, including matters which were referred to the relevant SC or SCPAMC and matters which related to academic ethics and plagiarism. The SAR stated that there have been no challenges to accreditation procedures, but during the interviews the review panel learned that 2 complaints were related to the accreditation procedures.

NEAA believes that the Complaints Committee strives to provide comprehensive opinions within the limits of its competence in order to fulfil its role of an advisory body to NEAA and the AC.

## **Analysis**

The review panel clarified during the site visit that the situation in relation to the possibilities for making a complaint or for appealing an accreditation decision had not changed since the last ENQA review in 2017; that is, the process for complaints is internal to NEAA (in line with legal requirements) but, in line with Bulgarian legislation, the process for appealing a decision must be followed through the Bulgarian courts and is, therefore, external to NEAA, although the panel did hear of instances where such matters were resolved informally and internally thus alleviating the need for HEI to go to court. Despite the statement in the SAR that there were no appeals during the review period, the panel was informed by one HEI that it had made an appeal through the regional court and that this process was not difficult.

The review panel met with the Chair of the Complaints Committee who confirmed the Complaint committee’s role as an advisory and intermediary one that provides advice and information to both the complainant and the AC within the limits of its competences. It has no legal competence and the Complaint Committee is governed by its own internal regulations as to the extent of its competences on which it can express an opinion or provide advice.

Based on the evidence presented, the review panel confirms that the processes for making a complaint and for appealing a decision are clearly defined. This was confirmed by stakeholders with whom the review panel spoke, in particular representatives of HEIs, who knew where to find the process for complaints and who told the review panel that each accreditation report contains a paragraph at the end explaining the steps and deadlines for making an appeal through the Bulgarian legal system. The review panel was able to view the details of the complaints process on NEAA website, although it would suggest that this is currently rather 'buried' in the section on legislation and would suggest that it might be moved to ensure that it can be more easily accessed. The review panel was also provided with a sample of accreditation reports which confirmed the explanatory paragraph relating to the appeals process.

In conclusion, the review panel can confirm that NEAA has a functioning complaints committee, the role and remit of which is published on its website. The complaints procedure addresses only complaints in connection to the procedural grounds (complaints as described in the guidelines) and it does not allow HEIs to challenge outcomes of external QA activities (appeals as described in the guidelines). HEIs can appeal in the ordinary legal way by filing a lawsuit against the administrative decision in these cases. The appeals process, although external to NEAA, is clearly understood by the relevant stakeholders.

**Panel recommendation:**

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

**Panel suggestion for further improvement**

- (13) That NEAA considers moving the information about the Complaints Committee to a clearer location on its website and publish the composition of the Complaint Committee and its opinions in this section.

**Panel conclusion: compliant**

# CONCLUSION

## SUMMARY OF COMMENDATIONS

The panel agreed on the following commendations:

- (1) Initiative to establish the Advisory Council with the representatives of the various employers' organisations which enables better communication, cooperation and interaction with professional and branch organisations.
- (2) The support and cooperation provided by NEAA in assisting HEIs to develop their own IQA criteria and processes.

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, **NEAA is in compliance with the ESG.**

The panel concluded that NEAA complies with ESG as follows:

- compliance is achieved in ESG 2.1., 2.2., 2.3., 2.4., 2.5., 2.6., 2.7., 3.2., 3.3., 3.4. and 3.7.
- partial compliance is achieved in ESG 3.1, 3.5. and 3.6.

The panel agreed on the following recommendations:

- (1) Include a representative of students and a representative of employers/industry in the AC;
- (2) Include a representative of students (preferably with the legal background) in the Ethics Committee.
- (3) Reconsider possible risks for NEAA's independence that could eventually arise from the predominantly academic representation in its governing body (i.e. the AC).
- (4) Explore possibilities and actively propose measures to strengthen its financial independence, especially with regard to the possibility of deciding on the amount of the experts' fees.
- (5) NEAA should pursue with the MES changes in the financial management legal framework to ensure fair and structured remuneration of the work of both staff and EG members;
- (6) Continue with recruitment of new staff to ensure optimal workload and implementation of EQA processes on time;
- (7) Staff members, in particular chief experts, should be more involved in the EQA procedures with more responsibilities at the higher level;
- (8) Encourage further professional development of the key staff and their participation in seminars, conferences and international activities.
- (9) Reconsider the current IQA framework, starting from the adoption of fundamental documents which regulate this area following the necessary improvements in NEAA's strategic planning and monitoring of the results achieved. NEAA should involve its internal and external stakeholders in NEAA's IQA activities, regularly implement such activities and communicate better to wider audience results of such activities and improvements made.
- (10) During the planned revision of the methodologies and procedures, ensure that the consistent follow up is included in all EQA procedures.



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

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

## **SUGGESTIONS FOR FURTHER IMPROVEMENT**

The panel agreed on the following suggestions:

(1) Initiate discussions and explore possibilities for the involvement of Bulgarian study programmes offered abroad in the NEAA's EQA scheme and for the implementation of the European Approach for Quality Assurance of Joint programmes in a case of study programmes jointly offered by Bulgarian and foreign HEI;

(2) Establish a student body by which students can communicate suggestions to NEAA and also communicate with each other.

(3) Initiate certain thematic analysis focused on EQA processes so that they can identify strengths and weaknesses and therefore be used for necessary improvements.

(4) Use the opportunities to increase the budget from other sources of income, especially from the EU funds, international activities etc.

(5) Think about implementing some thematic analysis in relation to IQA procedures and use them to strengthen NEAA's IQA framework.

(6) That NEAA continues to support the embedding of IQA by promoting the frameworks provided by the ESG part one and its own criteria and processes to ensure that they are seen as a holistic overview of the student lifecycle at an HEI and as a means of developing an overarching IQA policy and system, as well as a series of standards against which recommendations are made.

(7) Continue to seek ways of streamlining its current procedures and processes (see standard 2.6 for an example).

(8) Include NEAA's key staff in conducting the training of experts;

(9) Encourage the involvement of foreign experts in the EQA procedures;

(10) Reconsider the criterion according to which the student experts have to have very good grades.

(11) In order to ensure objectivity and consistency of the EQA processes, the agency should secure the support to the EGs, mainly during the site visits, from the staff of the agency, not the member of SCs.

(12) Continue to keep under consideration the practice of preparing two reports (EG's report and SC's report), with a view to further streamlining processes.

(13) That NEAA considers moving the information about the Complaints Committee to a clearer location on its website and publish the composition of the Complaint Committee and its opinions in this section.

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

### Schedule for site visit to National Evaluation and Accreditation Agency (NEAA)

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
<b>19 September 2022</b>				
	09:30-11:00	Review panel's kick-off meeting and preparations for day I (online)		
	11:00-12:30	A pre-visit meeting with the agency's resource person to clarify any remaining question after the online clarification meeting (online)	<ol style="list-style-type: none"> <li>1. Secretary general of the agency;</li> <li>2. Head of Directorate of Spec. Admin.</li> <li>3. Financial director;</li> <li>4. Lawyer of the agency.</li> </ol>	
<b>27 September 2022</b>				
	09:00-09:30	Review panel's private meeting		
1	09:30-10:30	Meeting with the CEO	1. President of NEAA	
	10:30-10:45	Review panel's private discussion		
2	10:45-11:15	Meeting with the team responsible for preparation of the self-assessment report	<ol style="list-style-type: none"> <li>1. Chief expert at NEAA, Standing Committee on Educational Sciences and Social Activities;</li> <li>2. Chief expert at NEAA, Standing Committee on Natural Sciences, Mathematics and Informatics;</li> </ol>	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			<ul style="list-style-type: none"> <li>3. Chief expert at NEAA, Standing Committee on Social and Legal Sciences, Security and Defence;</li> <li>4. Chief Expert at NEAA, Standing Committee on Humanities and Arts;</li> <li>5. Junior expert at NEAA;</li> <li>6. Lawyer at NEAA.</li> </ul>	
	11:15-11:30	Review panel's private discussion		
3	11:30-12:30	Meeting with representatives from the Chief Management Team	<ul style="list-style-type: none"> <li>1. Secretary general of NEAA;</li> <li>2. Head of Directorate of Specialized Administration.</li> </ul>	
	12:30-13:30	Lunch (panel only)		
4	13:30-14:15	Meeting with key staff of the agency/staff in charge of external QA activities	<ul style="list-style-type: none"> <li>1. Chief expert at NEAA, Standing Committee on Educational Sciences and Social Activities;</li> <li>2. Chief expert at NEAA, Standing Committee on Agrarian Sciences and Veterinary Medicine;</li> <li>3. Chief expert at NEAA, Standing Committee on Social and Legal Sciences, Security and Defence;</li> <li>4. Chief expert at NEAA, Standing Committee on Technical Sciences;</li> <li>5. Chief expert at NEAA, Standing Committee on Healthcare and Sports;</li> <li>6. Chief expert at NEAA, Standing Committee on Humanities and Arts.</li> </ul>	
	14:15-14:30	Review panel's private discussion		
5	14:30-15:15	Meeting with representatives of Accreditation Council		

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			<ol style="list-style-type: none"> <li>1. Vice-president of NEAA;</li> <li>2. Representative of the Agricultural Academy quota;</li> <li>3. Council of Rectors quota;</li> <li>4. Ministry of Science and Education quota;</li> <li>5. Bulgarian Academy of Sciences quota;</li> <li>6. Council of Rectors quota.</li> </ol>	
	15:15-15:30	Review panel's private discussion		
6	15:30-16:15	Meeting with representatives of Standing Committees including Standing Committee for Post-Accreditation Monitoring and Control	<ol style="list-style-type: none"> <li>1. Chairperson of SCPAMC; Assoc. Prof. at University of National and World Economy, jurist;</li> <li>2. Chairperson of Standing Committee on Humanities and Arts; Sofia University "St. Kl. Ohridski", Faculty of Slavic Philology;</li> <li>3. Chairperson of Standing Committee on Educational Sciences and Social Activities, Sofia University, Faculty of Pedagogy;</li> <li>4. Chairperson of Standing Committee on Healthcare and Sports, Medical University, Sofia;</li> <li>5. Standing Committee on Natural Sciences, Mathematics and Computing, University of Mining and Geology;</li> <li>6. Standing Committee on Technical Sciences, Technical University, Sofia;</li> <li>7. Standing Committee on Agrarian Sciences and Veterinary Medicine; Technical University, Varna, Department of Crop Production;</li> </ol>	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			<ul style="list-style-type: none"> <li>8. Standing Committee on Agrarian Sciences and Veterinary Medicine; PhD at University of Food Technology.</li> <li>9. Standing Committee on Economic Sciences and Management, University of National and World Economy.</li> </ul>	
	16:15-16:30	Review panel's private discussion		
7	16:30-17:15	Meeting with representatives of Complaints Committee and other auxiliary bodies of the Agency	<ul style="list-style-type: none"> <li>1. Chairperson of Complaints Committee;</li> <li>2. QA Committee; Associate professor, University of National and World Economy, Sofia;</li> <li>3. QA Committee; professor at Agricultural University Plovdiv;</li> <li>4. Lawyer of NEAA, Ethics Committee;</li> <li>5. Chairperson of Advisory Council of NEAA; retired;</li> <li>6. Advisory Council; National Grain Producer Association;</li> <li>7. Chairperson of Union of Teachers, Advisory Council of NEAA.</li> </ul>	
	17:15-18:15	Wrap-up meeting among panel members and preparations for day II		
<b>28 September 2022</b>				
	09:00-10:00	Review panel's private meeting		

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
8	10:00-10:45	Meeting with ministry representatives	<ol style="list-style-type: none"> <li>1. Vice-Minister of Education;</li> <li>2. Director of Higher Education Directorate, Ministry of Education;</li> <li>3. State expert, Higher Education Directorate, Ministry of Education</li> </ol>	
	10:45-11:00	Review panel's private discussion		
9	11:00-11:45	Meeting with heads of some reviewed HEIs/ HEI representatives (all persons are rectors of the indicated HEIs)	<ol style="list-style-type: none"> <li>1. Vice-president, Council of Rectors, Ruse University;</li> <li>2. Sofia University "St. Kl. Ohridski" representative;</li> <li>3. VUZF University (private university) representative;</li> <li>4. Higher School of Security and Economics (private university) representative;</li> <li>5. University of Forestry representative;</li> <li>6. Sofia University of Mining and Geology representative;</li> <li>7. University of Library Studies and Information Technologies representative;</li> <li>8. Academy of Economics "Dimitar Tsenov" representative.</li> </ol>	
	11:45-12:00	Review panel's private discussion		
10	12:00-12:45	Meeting with quality assurance officers of HEIs	<ol style="list-style-type: none"> <li>1. Plovdiv University representative;</li> <li>2. Burgas Free University representative;</li> <li>3. Military Academy representative;</li> <li>4. Sofia University representative;</li> <li>5. University of Economics, Varna representative;</li> <li>6. State Music Academy representative;</li> </ol>	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			7. Medical University – Sofia representative.	
	12:45-13:45	Lunch (panel only)		
	13:45-14:15	Review panel's private discussion		
11	14:15-15:00	Meeting with representatives from the reviewers' pool	<ol style="list-style-type: none"> <li>1. Medical University Sofia;</li> <li>2. New Bulgarian University (music);</li> <li>3. Plovdiv University (psychology);</li> <li>4. Sofia University, (pedagogy);</li> <li>5. Robotics Institute, Bulgarian Academy of Sciences;</li> <li>6. Plovdiv University (biochemistry and microbiology);</li> </ol>	
	15:00-15:15	Review panel's private discussion		
12	15:15-16:00	Meeting with representatives of students	<ol style="list-style-type: none"> <li>1. Student from Plovdiv University of Agriculture, expert in SCASVM</li> <li>2. Student from Bulgarian Academy of Sciences, member of SCNSMC;</li> <li>3. Student from South-West University, expert in SCESSA;</li> <li>4. Student from High College of Telecommunications and Posts, expert in SCTS;</li> <li>5. Student from University of Forestry, expert in SCESM;</li> <li>6. Student from Medical University – Sofia, expert in SCHS;</li> <li>7. Student from Veliko Tarnovo University, member in SCSLSSD;</li> </ol>	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			8. Student from Technical University Sofia, expert in SCTS.	
	16:00-16:15	Review panel's private discussion		
13	16:15-17:00	Meeting with other stakeholders, such as employers, local community	<ol style="list-style-type: none"> <li>1. Counsellor of the chairperson of BIA-UBB, member of Advisory Council of NEAA;</li> <li>2. Vice-president, Scientific and technical Union on Transport;</li> <li>3. Director of Rights of the Child Directorate, office of the Ombudsman of Republic of Bulgaria;</li> <li>4. Director of Regional Directorate of Education, Sofia;</li> <li>5. Regional Museum – Sofia;</li> <li>6. TechnoLogica.</li> </ol>	
	17:00-18:00	Wrap-up meeting among panel members: preparation for day III and provisional conclusions		
<b>29 September 2022</b>				
	09:00-10:00	Meeting among panel members to agree on final issues to clarify		



SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
14	10:00-11:00	Meeting with CEO to clarify any pending issues	1. President of NEAA	
	11:00-12:30	Private meeting between panel members to agree on the main findings		
	12:30-13:30	Lunch (panel only)		
15	13:30-14:00	Final de-briefing meeting with staff and Council members of the agency to inform about preliminary findings	<ol style="list-style-type: none"> <li>1. President of NEAA;</li> <li>2. Vice-president of NEAA;</li> <li>3. Secretary General of NEAA;</li> <li>4. Head of Directorate of Specialized Administration;</li> <li>5. Financial director;</li> <li>6. Lawyer of NEAA</li> </ol>	

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

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

Annex I:

### TRIPARTITE TERMS OF REFERENCE BETWEEN NEAA, ENQA AND EQAR

February 2022

#### I. Background and context

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

The National Evaluation and Accreditation Agency (NEAA) has been established under Article 11, sub. article 1 of the Higher Education Act, implemented by the National Assembly of the Republic of Bulgaria on the 27th of December 1995.

The regulations governing the newly created agency were established by Ministerial Decree No. 189 from the 1st of August 1996 for the approval of the Statute of the NEAA and the capacity of its staff.

In accordance with its mission and goals the NEAA aims to contribute greatly to the improvement and retention of the high level of quality of higher education in Bulgarian higher education institutions. The NEAA strives to be an institution that enables the active development of skills and capabilities of students, which improve their preparation for being highly trained specialists and the furthering of their employment potential.

The following is a detailed description of the external quality assurance activities of the NEAA:

In accordance with the laws and regulations, the NEAA ensures regular institutional and program accreditation of higher education institutions, professional fields, EQDs from the regulated fields, the right of institutions to provide training for doctoral degrees; evaluation of projects for creation of new higher education institutions and primary units; post-accreditation monitoring; assessment of distance learning in a professional field.

Institutional and program accreditation procedures, which inform the public of the areas and professional fields of higher education. Moreover, they ensure the public of the effectiveness with which higher education institutions monitor, maintain and improve the quality of the training they provide. All the procedures inform the public of the effectiveness with which higher education institutions monitor, maintain and improve the quality of the training they provide

- The institutional accreditation procedures conducted by the NEAA evaluate the conditions provided by the institutions to the students, as well as the fulfilment of the institutions' missions and goals.
- During the procedures for program accreditation of professional fields, EQDs from the regulated professions and/or doctoral programs, the NEAA evaluates the quality of the provided education at the higher education institution by monitoring the implementation of the relevant accreditation criteria for:

- Program accreditation of professional fields;
- Program accreditation of EQDs from the regulated professions;
- Program accreditation of doctoral programs;
- Amendment of an institution's and/or professional field's student capacity;
- Evaluation of projects for: establishment of new higher education institutions; transformation of higher education institutions; transformation of institutions' primary units; opening of new EQDs from the regulated professions; opening of new professional fields; introduction of new study programs.
- Procedures of post-accreditation monitoring, which aim to oversee the compliance with the recommendations of the Accreditation Council or the Standing Comities in fields of higher education.
- Assessment of distance learning in a professional field, aimed at evaluating and improving the capabilities of higher education institutions for providing education via the methods of distance learning.

NEAA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2008 and is applying for ENQA renewal of membership.

NEAA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2018 and is applying for the renewal of EQAR registration.

## **2. Purpose and scope of the review**

This review will evaluate the extent to which NEAA (the agency) complies with each of the standards of Parts 2 and 3 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for ENQA membership and/or for EQAR registration.

### **2.1 Activities of the agency within the scope of the ESG**

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature. The following activities of the agency must be addressed in the external review:

- Institutional accreditation
- Programme accreditation, including accreditation of professional fields, majors from the regulated professions and doctoral programmes
- Post-Accreditation Monitoring and Control (PAMC) procedures
- Assessment of distance learning offers
- Evaluation of projects for:
  - opening or transformation of higher education institutions
  - opening or transformation of primary units and/or branches of a higher education institution
  - opening a professional field or a major from the regulated professions list
  - introduction of new study programmes
- Reviews for altering the capacity of a higher education institution

Considering the renewal of NEAA's application to EQAR, the self-evaluation report and the external review report is expected to give specific attention to the issues where the Register Committee

concluded in its last decision that the agency complied only partially with the ESG, namely ESG 2.6, ESG 2.7 and ESG 3.1.

Should anything change between now and the review, including introduction or change of the activities within and outside of the scope of the ESG, the agency should inform EQAR at the earliest convenience.

### **3. The review process**

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the Guidelines for ENQA Agency Reviews and the requirements of the EQAR Procedures for Applications.

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between NEAA, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

#### **3.1 Nomination and appointment of the review panel**

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

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide the agency with the proposed panel composition and the curricula vitae of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

### **3.2 Self-assessment by the agency, including the preparation of a self-assessment report**

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is expected to contain:
  - a brief description of the HE and QA system;
  - the history, profile, and activities of the agency;
  - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
  - opinions of stakeholders;
  - the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);
  - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
  - a SWOT analysis;
  - reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the Guidelines for ENQA Agency Reviews, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

### **3.3 A site visit by the review panel**

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review

process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed membership with ENQA or registration on EQAR.

### **3.4 Preparation and completion of the final review report**

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind EQAR's Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies<sup>2</sup> to ensure that the report contains sufficient information for the

Register Committee to consider the agency's application for registration on EQAR. A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA. The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

### **3.5. Publication of the report and a follow-up process**

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

## **4. Use of the report**

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

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration or ENQA membership.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email before the expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

### ANNEX 3: GLOSSARY

AC	Accreditation Council
BAS	Bulgarian Academy of Science
CQA	Committee on Quality Assurance of NEAA's activity
EG	Expert Group
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
EQD	Educational Qualification Degree
EDS	Educational and Scientific Degree
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	Higher Education
HEI	Higher Education Institution
MES	Ministry of Education and Science
NACID	National Centre for Information and Documentation
NEAA	National Evaluation and Accreditation Agency
NRSC	National Representation of Student Councils
PAMC	Post-Accreditation Monitoring and Control
QA	Quality Assurance
PF	Professional Field
SAR	Self-assessment report
SC	Standing Committee
SCHEA	Standing Committee on Higher Education
SCAMP	Standing Committee on Post-Accreditation Monitoring and Control
SG	State Gazette
SNEAA	Statute of NEAA
SRP	Specilaty of Regulated Profession
SO	Scientific organization



## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY NEAA

NEAA Development Strategy for the 2018-2023 period

[https://www.neaa.government.bg/images/files/NEAA\\_Development\\_Strategy\\_2018.pdf](https://www.neaa.government.bg/images/files/NEAA_Development_Strategy_2018.pdf)

Action Plan of NEAA for the implementation of NEAA's Development Strategy for the 2018-2023 period

<https://www.neaa.government.bg/images/files/Actionplan0906Eng.pdf>

Higher Education Act

[https://www.neaa.government.bg/images/Legislation/Law/HIGHER\\_EDUCATION\\_ACT.pdf](https://www.neaa.government.bg/images/Legislation/Law/HIGHER_EDUCATION_ACT.pdf)

Act to Amend and Supplement the Higher Education Act

<https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=146064>

Act on Development of the Academic Staff in the Republic of Bulgaria

[https://www.mon.bg/upload/21464/act\\_on\\_development\\_acadStaff\\_022019.pdf](https://www.mon.bg/upload/21464/act_on_development_acadStaff_022019.pdf)

Regulations on the state requirements for acquiring higher education in specialties from the regulated professions

<https://www.mon.bg/bg/59>

DECREE No. 125 on the Council of Ministers for approval of a Classifier of higher education areas and professional fields

[https://www.neaa.government.bg/images/Legislation/Decrees/DECREE-No\\_125-of-the-Council-of-ministers-of-24-June-2002.pdf](https://www.neaa.government.bg/images/Legislation/Decrees/DECREE-No_125-of-the-Council-of-ministers-of-24-June-2002.pdf)

Rules of procedures on the Committee on Students' Complaints and Challenges to Accreditation procedures

[https://www.neaa.government.bg/images/files/SUKO/rules\\_of\\_procedure.pdf](https://www.neaa.government.bg/images/files/SUKO/rules_of_procedure.pdf)

System of quality assurance in the activities of the National evaluation and accreditation agency

[https://www.neaa.government.bg/images/files/Sistema\\_za\\_osigurjavane\\_na\\_kachestvo\\_NEAA\\_EN\\_short.pdf](https://www.neaa.government.bg/images/files/Sistema_za_osigurjavane_na_kachestvo_NEAA_EN_short.pdf)

Criteria for institutional accreditation in accordance with ESG part I and pursuant to Art. 77, para. 2 of the HEA

[https://www.neaa.government.bg/images/Criteria\\_EN/Kriterii\\_IA\\_EN.pdf](https://www.neaa.government.bg/images/Criteria_EN/Kriterii_IA_EN.pdf)

Criteria for programme accreditation of a professional field/major of the regulated professions in accordance with ESG part I and pursuant to Art. 78, para. 3 of the HEA

[https://www.neaa.government.bg/images/Criteria\\_EN/Kriterii\\_PN\\_SRP\\_EN.pdf](https://www.neaa.government.bg/images/Criteria_EN/Kriterii_PN_SRP_EN.pdf)

Criteria for programme accreditation of doctoral programmes in accordance with ESG part I and pursuant to Art. 78, para 3 of the HEA

<https://www.neaa.government.bg/en/evaluation-and-accreditation/programmeme-accreditation/doctoral-programme>

Criteria for evaluation of projects for opening and transformation of HEI in accordance with ESG part I and pursuant to Art. 81, para. 6 of the HEA

<https://www.neaa.government.bg/en/evaluation-and-accreditation/evaluation-of-projects>

Criteria for evaluation of projects for opening and transformation of primary units and/or branches of a HEI in accordance with ESG part I and pursuant to Art. 81, para. 6 of the HEA

<https://www.neaa.government.bg/en/evaluation-and-accreditation/evaluation-of-projects>

Criteria for evaluation of projects for opening a professional field or a major from regulated profession in accordance with ESG part I and pursuant to Art. 81, para. 6 of the HEA

<https://www.neaa.government.bg/en/evaluation-and-accreditation/evaluation-of-projects>

Criteria for determining and altering of the capacity of HEI

<https://www.neaa.government.bg/en/evaluation-and-accreditation/altering-capacity>

Criteria and procedures for Post-Accreditation Monitoring and Control (PAMC)

<https://www.neaa.government.bg/en/pamc/criteria-and-procedures>

Report model of Expert Panel on the Completed Review of the Institutional Accreditation Procedure of HEI and Report model of Standing Committee on the Completed Review of the Institutional Accreditation Procedure of HEI

<https://www.neaa.government.bg/en/evaluation-and-accreditation/structure-of-reports>

The database of experts

<https://www.neaa.government.bg/99-balgarski/about-us/osigurjavane-na-kachestvoto/225-procedura-za-podbor-na-eksperti>

Procedure for selection of experts

<https://www.neaa.government.bg/99-balgarski/about-us/osigurjavane-na-kachestvoto/225-procedura-za-podbor-na-eksperti>

[https://www.neaa.government.bg/images/files/SUKO/Selection\\_procedure\\_for\\_experts.pdf](https://www.neaa.government.bg/images/files/SUKO/Selection_procedure_for_experts.pdf)

Criteria for PAMC on implementation of the internal system of evaluation and support of higher education and academic staff quality

[https://www.neaa.government.bg/images/SANK/Kriterii\\_SANK\\_vutreshna\\_sistema\\_20.10.2016.pdf](https://www.neaa.government.bg/images/SANK/Kriterii_SANK_vutreshna_sistema_20.10.2016.pdf)

NEAA criteria for assessment and accreditation in accordance with the ESG

[https://www.neaa.government.bg/images/Reports/sbornici/NEAA\\_sbornik\\_eng.pdf](https://www.neaa.government.bg/images/Reports/sbornici/NEAA_sbornik_eng.pdf)

Rules of procedures on the activities of the Complaint Committee at NEAA

[https://www.neaa.government.bg/images/Legislation/Rules/Pravilnik\\_na\\_KJS.pdf](https://www.neaa.government.bg/images/Legislation/Rules/Pravilnik_na_KJS.pdf)

Standing Committees by Areas of HE

<https://www.neaa.government.bg/en/home-en/115-english/about-us/structure/284-standing-committees-by-areas-of-higher-education>

Rules of the organisation and procedure of the Advisory Board of NEAA

[https://www.neaa.government.bg/images/Legislation/Rules/Pravilnik\\_na\\_KS.pdf](https://www.neaa.government.bg/images/Legislation/Rules/Pravilnik_na_KS.pdf)

## ENQA AGENCY **REVIEW 2023**

THIS REPORT presents findings of the ENQA Agency Review of the National Evaluation and Accreditation Agency (NEAA), undertaken in 2022.

**enqa.**

European Association for  
Quality Assurance in Higher Education