

Report of the Panel appointed to undertake a Partial Review of the National Evaluation and Accreditation Agency (NEAA) of the Republic of Bulgaria.

March 2015

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Executive Summary

This is the report of the partial review of the National Evaluation and Accreditation Agency (NEAA) of the Republic of Bulgaria. The partial review was undertaken in February, 2015, with the purpose of determining whether NEAA meets a number of defined criteria for renewal of full membership of the European Association for Quality Assurance in Higher Education (ENQA).

The report describes:

- the background and context for the partial review
- the Panel's assessment of the level of compliance by the Agency with those specific ESG criteria identified by the ENQA Board for further examination
- the Panel's conclusions

The conclusion of the report is that for the ESG standards and criteria specified by the ENQA Board (see section 2 below) the Panel found that NEAA was fully or sufficiently compliant.

1 Background

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

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

The third part of the ESG covers the approach to be taken to the cyclical external reviews of quality assurance and accreditation agencies. This external partial review of NEAA was conducted in line with the process described in the ESG (third edition) and in the accompanying ENQA Guidelines for external reviews of quality assurance agencies in the European Higher Education Area and in accordance with the defined timeline. As a partial review, it addressed only specific areas of the ESG, as detailed below.

2 The Partial Review

Following a full review of the Bulgarian National Evaluation and Accreditation Agency (NEAA) carried out in February 2014, and the subsequent panel report, the Board of ENQA determined in April 2014 that NEAA be awarded the status "full member under review" for a period of two years.

Regarding the status of "full member under review" the ENQA statutes

state the following:

"A further review will be carried out by the Board, or its nominated reviewers, at the end of the two-year period (or sooner, if the member agency so requests) and shall focus on the deficiencies mentioned in the report of the first review. An agency that, in the opinion of the Board, and following the further review, still does not comply with ENQA's criteria for Full/Associate Membership will, by confirmation of the General Assembly, be debarred from ENQA. A debarred agency will be permitted to reapply for membership after a further period of two years." (ENQA statutes, Article 5)

In communicating its decision to NEAA, the ENQA Board expressed its concerns regarding those elements of the ESG where the agency had demonstrated non-compliance or partial compliance. NEAA was informed of the decision by a letter on 20 May 2014. The Agency was given two years to undergo a new review process, allowing them to opt for a new review at an earlier stage.

In establishing the Partial Review of NEAA, the ENQA Board identified from the 2014 review report a number of specific areas which would be the focus of the review procedure. These were aspects of the Agency's work where the level of the compliance with the ESG criteria had been judged to be weak. The focus of the Partial Review, and of this report, is on the evolving level of compliance with the following ESG Standards:

1. Criterion 1, sub-criterion ESG 2.5 – reporting
2. Criterion 1, sub-criterion ESG 2.8 – system-wide analysis
3. Criterion 3, ESG 3.4 – resources
4. Criterion 6, ESG 3.7 - external quality assurance criteria and processes used by the agencies
5. Criterion 7, ESG 3.8 – accountability procedures.

In December 2014 NEAA submitted to ENQA a Self-Evaluation Report (the SER), giving information on the above five criteria and on other developments in the Agency over the preceding year.

The ENQA Board then appointed a review panel to carry out the Partial Review. In the interest of providing for continuity and sufficient background knowledge of the Agency, the Board decided to appoint three members of the panel that carried out the last full review (in 2014).

The members of the Panel appointed by ENQA were:

Peter Findlay (Chair and Secretary of the Panel) Independent Higher Education Consultant

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

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

3 Approach and Procedure

It should be carefully noted that the Partial Review is a shorter and more focused version of a full ENQA review, and thus considerably more limited in its scope and its aims. Therefore this report does not include the detailed information regarding the national context, the Bulgarian higher education system, NEAA's strategic approach to external quality assurance, and the structures and procedures of the Agency that would all form a part of a full ENQA review report. That information can be found in the preceding 2014 ENQA report on NEAA . This previous report can be found by interested readers on the ENQA website at:

<http://www.enqa.eu/index.php/reviews/review-reports-and-decisions/page/2/>

The present report should be regarded as a follow-up to the 2014 report, aiming to provide additional information on corrective developments undertaken by NEAA in the period 2014-2015. To avoid any possible confusion, wherever necessary the relevant panel and report will be identified by year date.

The partial review was carried out using a process designed and managed by the Panel following established ENQA practice, independently of NEAA. NEAA produced a self-evaluation report and the Panel also sought further supporting documentation following its initial analysis of the self-evaluation. The Panel conducted a site visit to explore further the content of the self-evaluation and to clarify points at issue. Finally, the Partial Review Panel produced the present final report on the basis of the self-evaluation report, the site visit and its findings. As part of the process, the Panel has provided an opportunity for NEAA to comment on the factual accuracy of the draft report.

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

- considered a self-evaluation document prepared by NEAA for the partial review, a range of supporting documents and web-based materials submitted in advance of the site visit (Appendix 2)
- considered additional documentation relevant to the Panel's lines of enquiry during the site visit (Appendix 2)
- conducted a two-day visit to NEAA (9-10 February 2015), at NEAA's headquarters in Sofia, Bulgaria (Appendix 1)
- met with staff of the Agency and academics and students involved in its procedures (Appendix 1), including:
 - The President of the Council, the Vice-President, and the Secretary General
 - Three Chairs of NEAA's Standing Committees
 - The Chair NEAA's Quality Assurance Committee
 - Two student representatives, members of expert panels
 - Members of NEAA's professional administrative staff

4 Self Evaluation Report

The self-evaluation report (SER) submitted by NEAA was a concise but informative statement relating primarily to those ESG criteria identified for attention by ENQA. The SER addressed each of the identified ESG criteria in turn and provided information about the decisions and changes that had been introduced over the last year. The SER also provided information about progress with meeting other recommendations made in the 2014 panel report. The SER gave the clear impression that the Agency was responsive to the concerns and recommendations raised in the 2014 review report and that it had moved urgently and decisively to address these.

The SER included as an Annex a helpful table evaluating the level of compliance with the ESG standards, achieved by the time of its submission from the point of view of NEAA. The SER also contained relevant information about strategic planning and internal reflective activity within the Agency. The Panel were particularly interested that it included an analysis of strengths, weaknesses, opportunities and threats (SWOT) currently affecting the Agency, and in the way in which this analysis had been used in a full consultation across the Agency, designed to support future strategy. The SER concluded with a list of the main developmental priorities for the Agency. The Panel took the view that these various features of the SER showed a welcome indication of the commitment to a more well-developed approach to strategic planning.

5 General developments in NEAA's work 2014-2015

In the course of the review, the Panel noted the following wider developments in NEAA's work over the last year:

- The development and publication of the *Strategy for the development of NEAA in the Period 2014-2017*. This planning document was adopted by the Accreditation Council at its meeting on 30 October 2014. It resulted from a consultation process which covered discussion with Council members, consultation with representatives of the professional subject fields, and refining of the draft text in two meetings of the Council. The Strategy is broadly based on the expectations of national agencies that are framed by the ESG. More specifically it includes the aim of meeting the recommendations of the 2014 ENQA review, which are individually included in the strategic statement. Other important aims outlined there are: to secure a greater level of independence for NEAA; to create a more integrated and simplified methodology for its accreditation work; and to develop and implement technology to support greater efficiency of operation. The concluding section of the SER for this 2015 review, describing the current priorities for NEAA, emphasised these latter developments and also pointed to the greater input of international experts into its work as an

important aim. The Panel would agree with and fully endorse these strategic aims.

- NEAA has carried out a full revision and updating of its agency website, providing a major improvement over the earlier version. The Panel appreciated the efforts made to improve the website and its communication function. There is an English version of the site made available, although not all pages are reproduced there. Reports are published in Bulgarian under institution headings, with a cross-reference link on the English pages. Work is still in progress in fully populating the new website and the Panel strongly encourages NEAA to give continuing attention to its development, with regular updating of information on Agency activities.

6 NEAA compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area: evaluation of the identified criteria for attention in the Partial Review

This section of the report looks in turn at each of the five criteria identified by the ENQA Board for particular attention by the Panel. Under each criterion heading there is given a brief account of the finding made by the original review panel, in the 2014 report. The findings of the Partial Review Panel regarding changes and developments over the last year are then given. Finally a conclusion is reached regarding the newly achieved level of compliance with the Standard or criterion in question.

6.1 ESG 2.5 Publication of reports

The finding of the review panel relating to this Standard in the 2014 report was that NEAA was **not compliant**.

In view of this, the ENQA Board concurred with the recommendation of the 2014 panel that:

"NEAA, institutional representative bodies and the Ministry of Education and Science should review the current policy of not publishing reports in full and as a priority take the necessary measures to resolve this major deviation from the ESG" (2014 Panel's report, p.27).

The 2015 Panel found that NEAA has responded actively and effectively to this recommendation. Previously a major obstacle to publication had been gaining the full agreement of institutions in Bulgaria to report publication. NEAA committed itself to full publication through an internal order of the President. The Agency entered into correspondence with the national Conference of Rectors, and secured its agreement, together with that of other stakeholders, to publish reports in full. A formal decision to publish reports, confirming the President's order, was then taken by the NEAA Accreditation Council in November 2014.

The Panel were able to check the NEAA website and to confirm that accreditation reports had indeed been published there in full. The format of publication is that for each accreditation a formal statement conveying the decision of the NEAA's competent body is followed by a full version of the report on which the decision is based. All current reports are published and the website also contains a substantial number of past reports. Previous reports are being processed for publication in a planned sequence, and NEAA confirmed that its intention was to publish all institutional and programme accreditation reports for the current accreditation cycle (i.e. from 2013 onwards). The Panel heard that it was also planned that the report publication procedures should be enhanced to become more interactive, so that formal comments and enhancement points could be added by the Agency and by institutions.

The Panel were completely satisfied that NEAA had changed its policy and practice with regard to report publication and it found that the Agency is now publishing its reports in a full and informative version. To provide

even more accessible information for stakeholders, it will be helpful in the medium term to consider whether an introductory statement might be included for each report giving an executive summary of the key judgements and evaluative information.

The Panel therefore concluded that with regard to Standard ESG 2.5, NEAA is now **fully compliant**.

Recommendation

So as to provide even more accessible information for stakeholders, it will be helpful in the medium term to consider whether an introductory statement might be included for each report, giving an executive summary of the judgements, recommendations, and the most significant evaluative information.

In the interest of wider communication and transparency, it would be desirable in future, should resources permit, to publish such a summary in English.

6.2 ESG 2.8 System-wide analysis

In its 2014 report, the panel was not able to identify evidence of any significant contribution to system-wide analysis carried out by NEAA, and characterised this aspect of its work as '*markedly underdeveloped*'. The Standard was judged by the 2014 panel as to be only '**partially compliant**'.

In the relevant statement included in its 2015 self-evaluation report, the Agency drew attention to ways in which it had sought to strengthen its existing practice to make its work in system-wide analysis more accessible. The Panel also learned more about the work of the Agency in this important area.

The various contributions of NEAA to system-wide analysis can be summarised as follows:

- The regular publication of overview reports on major subject areas ('professional fields'), drawing together the information gathered from accreditation activity across the sector. For the accreditation cycle carried out between 2006 and 2008 of 47 professional fields in nine areas of higher education, such reports were published on the NEAA website and in a comprehensive overview Bulletin published in 2008. However, on the occasion of the 2014 visit to the Agency, the panel was not presented with evidence of these past activities, which it now learned more about.
- For the current cycle, which commenced in 2013, programme accreditation had thus far been completed for 22 professional fields. In November 2013 the Accreditation Council approved a standard template for the system-wide reports which would give an overview of these field, covering teaching and learning; research; academic management; and the competitiveness of the educational provision

in the field. The subject-based Standing Committees of the Agency were required to complete these overview reports within six months of the completion of the procedures in each subject area. By December 2014 the Accreditation Council had received and confirmed 15 such overview reports. These are now published on the NEAA website and the reports are also drawn together to form a part of the Agency's five-yearly Bulletin (see below).

- Every five years NEAA publishes a Bulletin, which draws together information for the sector deriving from its completed accreditation procedures. The Bulletin lists the completed accreditations and outcome grades, and includes summaries of the professional field overview reports described above.
- The Panel heard during the visit of the contribution of NEAA to a joint research project with the Bulgarian Ministry of Education and also the participation of NEAA in various working groups at national level (with all stakeholders) for the drafting of bills or the amendment of existing pieces of legislation concerning higher education

The Panel read the professional field overview reports published on the NEAA website and was able to confirm that these provided a useful account of higher education provision across the given subject area, including descriptions of new developments, innovation and good practice. The Panel was also able to examine a copy of the 2015 NEAA Bulletin publication, which is published both in hard copy and on the NEAA website, and found that this also contributed to system-wide understanding.

The Panel considered that, taken together, these activities clearly contributed to addressing the expectation of system-wide analysis as outlined in ESG 2.8. It was appreciated by the Panel that NEAA had taken the necessary steps to make the publication of reports more accessible and better understood as a resource, in particular through the redesign of its website.

The Panel noted, however, that currently the analysis being undertaken by the Standing Committees, valuable though this is, remains confined to the level of the individual academic subject areas. The Panel would therefore encourage NEAA to extend the scope of its analysis and reporting so as to provide more information on wider trends and developments in Bulgarian higher education, something which it is well placed to do.

On the basis of the above evidence the Panel was now able to conclude that with regard to ESG Standard 2.8, System-Wide Analysis, NEAA is **substantially compliant**.

Recommendation

NEAA should aim to extend the scope of its system-wide analysis and reporting so as to provide more information on wider trends and developments across the Bulgarian higher education sector.

6.3 ESG 3.4 Resources

In its 2014 report, the panel had judged that NEAA was **partially compliant** concerning the resources available to it to carry out its functions.

At that time the panel took the view that NEAA as an agency was committed to a full and demanding cycle of accreditation at both programme and institutional level which brought with it an extremely heavy workload. The panel judged that NEAA had sufficient resources to support its current operation, but that the pressure on resources severely limited the capacity of NEAA as an agent for change; improved resources, especially in staffing, would allow the Agency to make a significantly greater contribution to quality enhancement. In its 2014 report, the panel therefore recommended that NEAA should continue to seek project funding from external sources in order to undertake developmental and research activity.

In the context of the current (2015) review visit, the Panel therefore held a searching discussion with the senior management of the Agency regarding the adequacy of its funding and resources. The Panel learned that NEAA's core operations in accreditation were safeguarded by the fact that this activity is always fully covered by institutional fees. State funding mainly contributed to the staffing of the Agency, and while there had been staff reductions it had been possible to maintain the service by using staff more flexibly on a part-time basis. NEAA had experienced some difficulty caused by the policy (in line with other state agencies) for its annual budget allocation, which did not permit it to carry forward surpluses. Unfortunately it was also expected that the Government would be cutting state budgets by 10% in the near future. Nevertheless, the situation was not judged to be critical and it was considered that the impact of these measures could be mitigated by careful financial management. The SER expressed optimism that there may be a more favourable outlook for resources in education and science, based on the Bulgarian Government's Operational Programme Science and Education for Smart Growth 2014-2020. While this information presented a mixed picture overall, the Panel was persuaded by the evidence presented that the Agency's activities are adequately financed.

Further, the Panel was pleased to learn that NEAA had taken action to follow the recommendation of the 2014 panel, and had been successful in obtaining funding as part of a new EU research and development project. This project, EIQAS, will be delivered in partnership with the Polish Accreditation Commission. It is focused on achieving efficiency and effectiveness in accreditation procedures and therefore it is well aligned with NEAA's current development strategy, and should in this way serve to produce a resource saving.

The Panel also noted that NEAA could now demonstrate that it was in fact in a position to carry out a certain amount of enhancement activity – as evidenced by its Bulletin and professional field reports. This also

addressed concerns expressed by the 2014 panel report.

The Panel found no evidence during its visit to the Agency and in its discussions with staff and committee members of any serious problems caused by financial pressures. The Panel judged that, while improved budget or further external funding would clearly allow a wider range of activity, the main accreditation business of the NEAA was secure and some wider enhancement activities were also undertaken.

The Panel took into account that its earlier recommendation to obtain external funding had been successfully addressed. It was reassured by the additional information it received regarding the overall pattern of income and budgetary management.

The Panel therefore concluded that, with regard to ESG Standard 3.4: Resources, NEAA could be considered to be **substantially compliant**.

6.4 ESG 3.7 External quality assurance and processes

In its 2014 report, the review panel was able to confirm that NEAA successfully complied with this standard in a number of respects, but it identified some particular weaknesses regarding the consistent participation of students in its processes, and the wider involvement of other stakeholders. Accordingly, NEAA was found to be **substantially compliant**.

The ENQA Board supported the recommendation of the Panel that these two aspects should be strengthened by the Agency and requested that they again be evaluated in the Partial Review.

The Panel found that considerable progress had been made by NEAA in addressing necessary improvements in the identified areas. The following developments were strongly welcomed by the Panel:

- NEAA has taken positive steps to address the involvement of international experts in its accreditation work. Previously, it was considered by the Agency that this was difficult to do, because it was not in a position to cover the fees and travel expenses of international experts participating in panels. The potential obstacle with regard to payment of experts had been resolved by entering into bilateral agreements with other agencies; such agreements had already been concluded with the Polish and Romanian agencies, with an exchange of information regarding suitable panel experts. Further such agreements are in the pipeline. In addition, the Agency has sought nominations from international academics working temporarily in Bulgaria. As a result it had been possible to establish a pool of international experts to work within both programme and institutional accreditation. NEAA's Accreditation Council has thus far formally approved the nomination of a total of 37 international experts to its accreditation expert pool. The relevant papers documenting these decisions were seen by the

Panel. The nominated experts on the NEAA list were currently from Germany, Greece, Poland, Romania, Russia, UK and US.

- In approving nominations to the expert pool, NEAA has now strengthened the appointment of members of the business community (8 nominees) and is also looking to ensure a better gender balance across its expert groups.
- Finally, with regard to greater consistency in student membership, NEAA has responded actively to the recommendation of the original review. The President of the Accreditation Council wrote to all the Standing Committees of the Agency (responsible for the organisation of accreditation reviews), expressly requiring them to follow the relevant Statute so as to ensure the inclusion of student members in all expert panels on an equal basis. He also undertook to review each and every panel constitution to ensure that student membership was included. In addition, student membership has been strengthened in some of the decision-making bodies of the Agency (e.g. the Quality Assurance Committee).

In the discussions held during the review visit, it was confirmed that for the expert groups directly carrying out accreditation procedures, students are full members and are involved in all aspects: briefing, consideration of the institutional or programme self-evaluation; meetings of the group; meetings with institutional representatives (students, staff, employers) and the framing of the accreditation report. Students met by the Panel particularly emphasised the value of having student members of the panel helping to lead the meeting with students in the institution

In examining the level of consistency in the involvement of students, the Panel did however find that, while consistency had been secured with regard to expert panels, relatively less change had occurred in the context of the Agency's Standing Committees. These committees are concerned with accreditation of subject-based fields, and make the final recommendation to the Accreditation Council on the findings of each expert panel. They are therefore a key body in the decision-making process on accreditation. The Panel learned that it remains the case that across the Standing Committees the membership and voting rights of student members is variable. It was explained to the Panel that this situation had come about because the formally approved constitution of the committees provided for a possible choice of membership between business representatives and student representatives, and different committees had taken different decisions. Some of the committees did now have full student members, but not all. The membership of the Standing Committees changed periodically, and the Panel was assured that with the reconstitution of the committees in the first half of September 2015, the new membership for all Standing Committees would include students.

The Panel concluded that NEAA had made considerable further progress in its compliance with this ESG Standard, and it welcomed in particular the greater involvement of international experts. Student representation has

also been strengthened and the Panel was confident that the necessary plans were in place to achieve a full level of consistency in this regard. In the meantime it can be confirmed that for this Standard, NEAA remains **substantially compliant**.

Recommendation: NEAA should ensure that when the reconstitution of its Standing Committees takes place, student representatives are made full members of all of those committees, on a consistent basis.

6.5 ESG 3.8 Feedback mechanism / accountability procedures

In the 2014 report, the panel could not establish that NEAA had in place any comprehensive procedure for reviewing feedback on the Agency's accreditation activities. It commented that *"the panel has been unable to identify evidence of consistent processes and outputs for: feedback from reviewers, officers and HE education providers on the performance of reviewers during the review; internal feedback from officials and reviewers working within the agency; feedback from the institution and other stakeholders"*

In view of these weaknesses, the ENQA Board decided to request the Panel for this Partial Review to examine again those specific aspects of the Standard relating to internal quality assurance and accountability.

The Panel was pleased to find that a number of steps have been taken by NEAA to address the gaps in its internal quality assurance procedures, with the overall result that these had been significantly strengthened. The relevant changes have included the following significant developments:

- NEAA has published a full and comprehensive statement on quality assurance on its updated website
- It has reviewed and revised the 'Corrector' system which is the basis for its internal self-evaluation
- The Agency's internal Quality Assurance Committee has been reconstituted with a new remit. The committee includes in its membership a number of fully external members, and three student members
- The committee has developed a full range of feedback survey questionnaires to support the quality assurance of the work of the Agency. This will complement and add to the existing 'Corrector' system developed by the Agency for monitoring of its procedures. These surveys, which will be regularly conducted, are sought from:
 - academic institutions, on the organisation and management of the accreditation procedures;
 - Rectors and institutional management, for perspectives on the Agency and the conduct of the expert group;
 - panel experts on the experience of the accreditation;
 - members of the Agency's Standing Committees;
 - students participating in the accreditation
 - students in the accredited institutions
 - employers on graduate performances

- Agency officers on the effectiveness of procedures, facilities, communication, suggested improvements
- The Quality Assurance Committee will continue to work with an internal audit procedure. On an annual basis it samples the work of the Standing Committees, receiving three reports from each committee, and in particular checking that conflict of interest considerations are fully observed in the forming of the Agency's expert panels.

The new initiatives of the revised Quality Assurance Committee (QAC) were at an early stage at the time of the Partial Review, as the QAC was reconstituted at the end of September 2014. Nevertheless it was clear to the Panel, both from the documentary evidence and from discussion that there was a greater clarity of objectives, and a determination on the part of the committee to play a significant role in assessing feedback on the Agency's work and in monitoring its procedures. The Chair of QAC is a full member of the NEAA Accreditation Council, and this supports its authority and influence on agency policy-making.

The Panel remarked that the establishment of an agency-focused quality assurance body, systematically reviewing a range of feedback information, could be considered an example of good practice.

On the basis of the evidence seen, the Panel was therefore able to confirm that NEAA had addressed fully the previous recommendation of the 2014 panel report, namely that it *"takes further steps to introduce a comprehensive system for feedback on its own activities"*.

As all other Guidelines under ESG Standard 3.8 had been found to be satisfied fully in the previous review, and remained so, the Panel judged that with the new measures for internal quality assurance in place, NEAA was now **fully compliant**.

Recommendations

- In the interest of accessibility for the general public and its stakeholders, NEAA should consider producing a briefer and more straightforward statement on its internal quality assurance procedures, for publication on its website.
- The Accreditation Council should continue to give its fullest support to the work of the Quality Assurance Committee, as it develops and fully implements its revised procedures for feedback and monitoring.

7 Aspects of Good Practice

The Panel wishes to confirm again those aspects of good practice in the Agency's work that were identified in the report of the 2014 Panel. These remain evident and significant in the work of the Agency:

- NEAA has a strong national profile as the sole organisation responsible for quality assurance in the whole Bulgarian higher

education and research system. It is recognized as a separate, independent and specialized state body, its authority is guaranteed by law and its integrity is widely recognised and respected.

- Criteria and procedures for evaluation and accreditation are well-defined and well-developed
- Follow-up procedures for evaluation and accreditation, monitoring and control activities are particularly well-developed.
- Individual members of the Agency's Council perform a key role in monitoring and developing the work of the Standing Committees and their review groups.
- The work of the Standing Committees is thorough and well-balanced, and perform a key moderating function in regard to their management of the expert panels

In addition, the Panel considers that the following recent developments also constitute good practice:

- The establishment of the Agency's expert reviewer pools for international experts and experts from the business sector
- The establishment and role of the Agency's internal Quality Assurance Committee, together with the development and introduction of a full range of feedback questionnaires to inform its monitoring and audit activity.

8 Summary of Recommendations

Note: These new recommendations are in addition to those already made in the 2014 Report, many of which had already been addressed at the time of this 2015 review:

- So as to provide even more accessible information for stakeholders, it will be helpful in the medium term to consider whether an introductory statement might be included for each report published by the Agency, giving an executive summary of the judgements, recommendations, and the most significant evaluative information. In the interest of wider communication and transparency, it would be desirable in future, should resources permit, to publish such a summary in English.
- NEAA should aim to extend the scope of its system-wide analysis and reporting so as to provide more information on wider trends and developments across the Bulgarian higher education sector
- NEAA should ensure that when the reconstitution of its Standing Committees takes place, student representatives are made full members of all those committees, on a consistent basis.
- In the interest of accessibility for the general public and its stakeholders, NEAA should consider producing a briefer and more straightforward statement on its internal quality assurance

procedures, for publication on its website.

- The Accreditation Council should continue to give its fullest support to the work of the Committee for Quality Assurance, as it develops and implements its revised feedback procedures.

9 Revised overview of NEAA's level of compliance against the ENQA membership criteria

The following list now gives a revised overview of review outcomes relating to the ESG Standards, taking into account both the (unchanged) positive outcomes from the 2014 review and the revised, improved, outcomes from this 2015 Partial Review

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

ENQA criterion 1, sub-criterion (ESG 2.1): Use of internal quality assurance procedures (2014 report)
ENQA criterion 1, sub-criterion (ESG 2.2): Development of external quality assurance processes. (2014 report)
ENQA criterion 1, sub-criterion (ESG 2.3): Criteria for decisions (2014 report)
ENQA criterion 1, sub-criterion (ESG 2.5): Reporting (2015 Partial Review)
ENQA criterion 1, sub-criterion (ESG 2.6): Follow-up procedures (2014 report)
ENQA criterion 1, sub-criterion (ESG 2.7): Periodic reviews (2014 report)
ENQA criterion 2, (ESG 3.2): Official status (2014 report)
ENQA criterion 1, sub-criterion (ESG 3.3): Activities (2014 report)
ENQA criterion 7 (ESG 3.8): Accountability procedures (2015 Partial Review)
ENQA criterion 8 (miscellaneous) (2014 report)

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

ENQA criterion 1, sub-criterion (ESG 2.4): Processes fit for purpose (2014 report)
ENQA Criterion 1, sub-criterion (ESG 2.8): System-wide analyses (2014 and 2015 Partial Review)
ENQA criterion 1 (overall) (ESG 3.1): Use of external quality assurance procedures for higher education (2014 report)
ENQA criterion 3 (ESG 3.4): Resources (2015 Partial Review)
ENQA criterion 4 (ESG 3.5): Mission statement (2014 report)
ENQA criterion 5 (ESG 3.6): Independence (2014 report)
ENQA criterion 6 (ESG 3.7): External quality assurance criteria and processes used by the agencies (2014 report)

The above outcomes are summarized, for convenience, in the table on the following page.

Overview of conclusions (X) resulting from the Full Review (2014) and Partial Review (2015) of NEAA :

	ESG Part 2								ESG Part 3							
	.1	.2	.3	.4	.5	.6	.7	.8	.1	.2	.3	.4	.5	.6	.7	.8
Non compliant																
Partial compliance																
Substantial compliance				X 2014				X 2015	X 2014			X 2015	X 2014	X 2014	X 2014	
Full compliance	X 2014	X 2014	X 2014		X 2015	X 2014	X 2014			X 2014	X 2014					X 2015

10 Overall Conclusion

The Partial Review Panel found that NEAA had taken rapid and decisive action to address the areas of relative weakness identified in the 2014 panel report, and that it had engaged responsively with other recommendations contained in that previous report.

The areas identified for specific attention had all been addressed so as to comply with ESG expectations.

In addition, a number of significant changes have been made, or are well under way, which should markedly improve the operation of the Agency's work. When completed, these developments will also support more strongly its future compliance with the expectations of the ESG, and of ENQA membership.

The Panel therefore recommends to the Board of ENQA that NEAA should have its Full Membership of ENQA confirmed for a period of five years from the date of the completion of the original full review (i.e. from April 2014).

Annex 1

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

Annex I: TERMS OF REFERENCE

December 2014

1. Background and Context

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

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

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

NEAA has been Full member of ENQA since 2008.

Following its last external review, NEAA was awarded the status "full member under review" in April 2014. The ENQA statutes state that an agency "under review" has to undergo a further review which would focus on the deficiencies mentioned in the report of the first review after a period of two years or sooner if the agency requests so.

NEAA has expressed its willingness to undergo the additional partial review before the adoption of the revised ESG in May 2015.

2. Purpose and Scope of the Evaluation

This is a partial review, following the completion of the full review of 2014 that led to the assignment of the agency as "full member under review". The partial review will evaluate the way in which and to what extent NEAA fulfils the criterion 1 (sub-criterion ESG 2.5 – reporting and sub-criterion ESG 2.8 – system-wide analysis), the criterion 3 (ESG 3.4 – resources), the criterion 6 (ESG 3.7 - external quality assurance criteria and processes used by the agencies) and the criterion 7 (ESG 3.8 – accountability procedures) for the ENQA membership. The review will also consider any relevant changes that have taken place since the full review was completed in April 2014. Consequently, the review will also provide information to the ENQA Board to aid its consideration of whether NEAA Full membership should be reconfirmed.

The review panel is not expected, however, to make any judgements as regards granting Full Membership.

Should the partial review be successful, NEAA's membership will expire five years after the completion of the full review, i.e. in April 2019.

3. The Review Process

The process is designed in the light of the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*.

The evaluation procedure consists of the following steps:

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

3.1 Nomination and appointment of the review team members

According to the ENQA rules for partial reviews, the Board may carry out the review itself, or nominate external reviewers to complete the task. The Board proposed to carry out this review by employing three external reviewers. In order to ensure consistency, sufficient background knowledge on the agency, and the external trust in the outcomes the Board has decided to ask three of the five members of the panel of the full review of NEAA in 2014. One of the members will be an EUA nominee and one will be a student.

ENQA will provide NEAA with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the NEAA review.

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

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

- Self-evaluation is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The agency is expected to produce a partial self-evaluation report on the criteria mentioned under article 2 indicating in particular the changes that have taken place since the last full review (in 2014), and addressing specifically to concerns raised in the letter of the ENQA Board of 20th of May 2014. In addition, the agency will indicate any eventual changes and developments beyond those listed under the criteria under scrutiny. Supporting documents and evidence shall be provided to support the analysis in the self-evaluation reports. The self-evaluation report will be provided in English.
- The partial self-evaluation report is broken down by the topics of the evaluation and is expected to contain, among others: a background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis;

- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NEAA fulfils its tasks of external quality assurance and meets the criteria for the ENQA membership and thus the ESG.
- The report is submitted to the review panel at least one month prior to the site visit.

3.3 A Site Visit by the Review Panel

NEAA will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel one month before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 1 day. The approved schedule shall be given to NEAA before the site visit, in order to properly organise the requested interviews.

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

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

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under article 2 and assess how the compliance has evolved since the last full review (in 2014). It will also assess any eventual changes that have been brought to the attention of the panel in the self-evaluation report. A draft will be submitted for comment to NEAA within one month of the site visit for comment on factual accuracy. If NEAA chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within one week after the receipt of the draft report. Thereafter the review panel will take into account the statement by NEAA, finalise the document and submit it to NEAA and ENQA.

The panel will provide an assessment of compliance on the criteria mentioned under article 2 and will also be invited (though not required to) express its overall assessment of compliance of the agency in light of the outcomes of the full review in 2014 combined with the additional partial review.

The report is to be finalised by mid-March 2015.

4. Follow-up Process and Publication of the Report

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

5. Use of the report

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

The review report is to be used by the Board of ENQA for the purpose of reaching a conclusion on whether NEAA has met the membership criteria/ESG.

The review report is to be considered final only after being approved by the ENQA Board. Once submitted to NEAA and ENQA and until the decision by the Board is made, the report may not be used or relied upon by NEAA, the panel and any third party and may not be disclosed without the prior written consent of ENQA. NEAA may use the report at its discretion only after the Board decision has been made.

Should the review report be used for applying to the European Quality Assurance Register for Higher Education (EQAR), the Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

NEAA shall pay the following review related fees:

Fee of the Chair	2,000 EUR
Fee of first panel member	1,500 EUR
Fee of second panel member	1,500 EUR
Administrative overhead for ENQA Secretariat	1,500 EUR
Travel and subsistence expenses (approximate)	2,500 EUR

This gives a total indicative cost of 9,000 EUR for a review team of 3 members. In the case that the allowance for travel and subsistence expenses is exceeded, NEAA will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to NEAA if the travel and subsistence expenses go under budget.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference and protocol for review	December 2014
Appointment of review panel members	December 2014
Self-evaluation completed	19 December 2014
Preparation of site visit schedule and indicative timetable	December 2014
Briefing of review panel members	January 2015
Review panel site visit	Beg February 2015
Draft of evaluation report to NEAA	February 2015
Statement of NEAA to review panel if necessary	March 2015
Submission of final report to ENQA	Mid-March 2015
Consideration of the report by ENQA and response of NEAA	April 2015
Publication of report	April 2015

Annex 2

Site visit to NEAA 9-10 February 2015

Schedule of meetings

Venue: Floor 4, Block 5

125 Tsarigradsko Shose Blvd, Sofia, Bulgaria

Appendix 1: VISIT TO NEAA BY ENQA REVIEW PANEL Sofia, February 9 and 10, 2015

Day 1 Monday 9 February, 2015		Venue: Sofia
Time	Event	Personnel
9.30	Review Panel arrives at NEAA	
9.30 - 12.00	Private meeting of Panel , regarding documentation and evidence	
12.00-	Meeting with review organisers for any follow-up questions	Mila Penelova - Secretary General Todor Shopov - NEAA External affairs free lance expert
	Lunch break	
14.00 - 15.00	Meeting with NEAA senior management and members of Accreditation Committee	Prof. Boyan Bioltchev - President Ass. Prof. Stanka Velichkova – Vice-President Mila Penelova - Secretary General Prof. Ivan Varliakov – Accreditation Committee member
15.00- 15.30	Private meeting of Panel	
15.30- 16.30	Meeting with representative Chairs of Standing Committees and members of the Quality Assurance Committee	Chairs of Standing Commitjtees: Prof. Emilia Vasileva; Prof. Racho Ivanov; Prof. Ilya Giodjenov; Prof. Vera Boneva Chair of Quality Assurance Committee Ass. Prof. Radoslav Kiutchukov expert to the Quality Assurance Committee

		Mr. Antoan Krasimirov Shotarov student at the University of National and World Economy - Sofia; Mr Slavi Georgiev Georgiev – student at the University of Rouse,Angel Kanchev”
16.30-17.30	Private meeting of Panel	
17.30	Team leave	
	Private dinner and panel discussion	

Day 2		Venue:
Tuesday 10 February, 2015		Sofia
Time	Event	Panel meeting with:
9.30	Review Panel arrives at NEAA	
9.30-11.00	Private meeting of Panel	
11.00-12.30	Meeting with NEAA senior management to explore any remaining questions	Prof. Boyan Bioltchev - President of NEAA Mila Penelova - Secretary General Todor Shopov - NEAA External affairs free lance expert
12.30	End of visit. Panel depart	

Annex 3

DOCUMENTARY EVIDENCE seen by the Panel
1. Documents submitted in advance
NEAA Self Evaluation Report (SER) dated 2014
2. Evidence identified in the SER and submitted and examined during the site visit
NEAA Accreditation Council: Orders on the publication of reports; on student participation
Letters to the Council of Rectors, to the National Student Representation
Relevant Minutes of the Accreditation Council
Reports from the Chairs of Standing Committees
Information on the system-wide reports
NEAA Bulletin 2014
Information on nominated foreign experts; list of approved experts
Information on nominated students/doctoral students; list of approved experts
Call for application to QA pool from student bodies
Lists of experts nominated to act as international experts with another Agency
Rules regulating the work of the Quality Assurance Committee of NEAA, including rules on surveys
Examples of survey templates
Memoranda of cooperation with Polish and Romanian Agencies
3. NEAA Website
http://www.neaa.government.bg