

## Approval of the Application by National Evaluation and Accreditation Agency (NEAA) for Renewal of Inclusion on the Register

**Register Committee**  
12-13 October 2023

**Ref.** RC40/A126  
**Ver.** 1.0  
**Date** 2023-10-19  
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<b>Application of:</b>	2022-02-25		
<b>Agency registered since:</b>	2018-02-01		
<b>Type of review:</b>	Full	<b>Site visit:</b>	2022-09-20
<b>External review report of:</b>	2023-02-17	<b>Submitted:</b>	2023-02-28
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)		
<b>Review panel members:</b>	Damir Solak, Fiona Crozier, Jordi Villà i Freixa, Sandra Bezjak		
<b>Decision of:</b>	2023-10-13		
<b>Registration until:</b>	2028-02-29		
<b>Absented themselves from decision-making:</b>	Sandra Bezjak		
<b>Attachments:</b>	1. <a href="#">External Review Report, 2023-02-17</a> 2. <a href="#">NEAA Additional Representation, 2023-09-14</a>		

1. The application of 2022-02-25 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2022-03-15.
3. The Register Committee considered the external review report of 2023-02-17 on the compliance of NEAA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee invited NEAA to make additional representation on the grounds of possible rejection on 2023-06-30. The Register Committee considered NEAA's additional representation on 2023-10-13.

### Analysis:

5. In considering NEAA's compliance with the ESG, the Register Committee took into account:

- *Institutional accreditation*
- *Programme accreditation including*
  - *accreditation of professional fields*

- *majors from the regulated professions*
- *doctoral programmes*
- *Post-Accreditation Monitoring and Control*
- *Evaluation of projects for:*
  - *the establishment of new higher education institutions*
  - *transformation of higher education institutions*
  - *transformation of institutions' primary units*
  - *opening of new EQAD from the regulated professions*
  - *opening of new professional fields*
  - *opening of new study programmes*
- Reviews for altering the capacity of a higher education institution
- Assessment of distance learning offers

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6. The Register Committee found that the report provides sufficient evidence and analysis on NEAA's level of compliance with the ESG.

7. With regard to the specific European Standards, the Register Committee considered the following:

### ESG 2.4 – Peer-review experts

8. The Register Committee noted from the panel's analysis that the trainings of experts have been reduced to only a briefing session taking place before the site visit. The panel's analysis further show that the last training organised by NEAA took place in 2018 (before the Covid-19 pandemic).

9. The Register Committee underlined that the agency is expected to ensure that experts have the appropriate skills and competences to carry out external reviews and that such skills and competences are acquired through regular (periodic) trainings organised by the agency.

10. In its representation, NEAA provided information that it has started intensively working on preparation and implementation of several trainings focused on specific standards and criteria. NEAA also informed that future training sessions will be included in its Action Plan.

11. The Register Committee welcomed the steps taken by NEAA to address the earlier concerns, but noted that the Committee could not verify whether these training activities will ensure that all members of a panel will be systematically trained prior to undertaking an external quality assurance procedure. The Committee noted that these will remain to be determined in NEAA's next external review.

12. The Register Committee therefore remained unable to concur with the panel's conclusion, but considered that NEAA complies only partially with ESG 2.4.

### ESG 2.7 – Complaints and appeals

13. In its initial application for inclusion the Register Committee raised concerns regarding the lack of an internal appeals system within the agency.

14. The Register Committee noted that since the last external review of NEAA, nothing has changed in relation to the possibilities for higher education institutions to make an appeals with the agency.

15. The Register Committee further noted, that NEAA does not have its own appeals process nor a separate body in considering appeals and that the only existing appeals procedures are outside of NEAA's remit, defined by law and under the legal competency of the Bulgarian courts.

16. The Committee considered that external quality assurance processes should always include an internal possibility to appeal within the responsible body that carried out the review itself.

17. In its representation the agency provided full documentation on its new internal provisions for complaints and appeals and for the functioning of its body the Complaints and Appeals Committee. The Committee noted that the new body is a standing committee within the agency, fully operative with permanent members and clear provisions outlined in the Statutes of the Complaints and Appeals Committee.

18. Having been able to verify that the agency provides both internal processes for complaints and appeals, **the Register Committee finds that the initial concerns have been addressed. The Register Committee therefore concluded that NEAA now complies with ESG 2.7.**

### ESG 3.1 – Activities, policy and processes for quality assurance

19. In its last decision, the Register Committee noted that the composition of NEAA's Accreditation Council (AC) is dominated by representatives of the academia and that there is a lack of stakeholder involvement with no student or labour market/employment representatives involved in the work and governance of NEAA.

20. The Register Committee noted that while NEAA expanded the direct participation of stakeholders in its work i.e., including representatives of students and employers in the Expert Groups and the Standing Committees, that the composition of the Accreditation Council (AC) is still limited to only representatives of the academic community.

21. Despite the improvements done by NEAA in the involvement of stakeholders' in some of its processes and bodies, the Register Committee considered the lack of stakeholder involvement (as per the requirement of the standard) in the core governance body of NEAA as of crucial importance.

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22. The Committee further emphasised the recommendation of the panel to ensure the inclusion of a representative of students and employers/industry in the AC, including a representative of students (preferably with a legal background) in NEAA's Ethics Committee.

23. In its representation, the agency provided information on the actions taken toward the government and parliament around the need for legislative changes. The Committee took note and welcomed the positive developments towards the involvement of stakeholders in the Accreditation Council, however at the time of the Register Committee's consideration, no changes have happened, nor a clear timeline for such changes has been provided.

24. The Register Committee acknowledge that although NEAA has taken all possible actions to improve the involvement of stakeholders within relevant normative documents, the fact remains that the level of compliance is negatively impacted by the regulatory framework within which NEAA operates.

**25. The Register Committee therefore concurs with the panel that NEAA complies only partially with ESG 3.1.**

### **ESG 3.5 – Resources**

26. The panel noted that the main challenge for NEAA remains the fact that it cannot manage its own finances in a manner that will enable NEAA to ensure the best quality of its activities. Even if the majority of the funding comes from its external quality assurance activities i.e., mostly accreditation fees, due to the strict regulations and rules defined on national level, NEAA cannot access these revenues. The Committee concurs with the panel that this could have a negative impact on the sustainability and the quality of its processes.

27. The panel underlined that despite the improvements and increase of staff members since its last review, from 8 to 19 staff members, NEAA still had a high number of vacant positions.

28. The Committee emphasised the panel's recommendations on the need for the agency to pursue with the Ministry changes in its financial management and to continue the recruitment of new staff to ensure optimal workload and implementation of external QA processes on time.

29. In its representation, NEAA reported of a further increase in its staff (i.e., from 19 to 23 employees), with recruitment for some of these positions currently underway. The Committee noted that the agency has taken active steps addressing specific proposals to increase pay rates to the Ministry of Education, the Ministry of Finance and the Prime Ministers office. Similar efforts are directed towards the Council of Rectors. Further, the agency stated that there are constant efforts made towards the responsible national authorities with a request to increase the budget of the agency.

30. The Register Committee welcomed the actions taken by NEAA. The Register Committee, however, noted that despite the improvements in NEAA's permanent staff, the agency's financial independence, due to

external factors, remains constrained, and while the limitations in resources may not pose an immediate concern as to the sustainability of the agency, it may negatively impact the scope and quality of the activities undertaken by NEAA.

**31. The Register Committee therefore concurred with the panel's conclusion that NEAA complies only partially with ESG 3.5.**

### **ESG 3.6 – Internal quality assurance and professional conduct**

32. The panel noted that NEAA started developing its internal quality assurance system introducing, some new mechanisms and procedures. However, the panel underlined that the elements of the procedures are fragmented and not fully structured, integrated and connected in a systematic way. The panel also noted the lack of transparency of the mechanisms and their results.

33. Despite NEAA's efforts to develop its own internal quality assurance system, the Register Committee found that the process is still in a developmental phase. The Committee underlines the panel's recommendation that all the elements of the internal QA system needs to be better connected, regularly implemented with the involvement of all internal and external stakeholders.

34. In its representation, NEAA informed that in 2023, the agency undertook an internal audit to identify the weaknesses and bottlenecks in its own internal processes and review procedures. The agency also provided details of the internal audit process and the series of recommendations that were outlined to correct the issues. NEAA further stated that necessary measures are being implemented to improve the functioning of the agency.

35. While the Register Committee welcomed the steps taken by NEAA, the Committee underlined that the issues outlined before remain to be considered and reviewed by an external review panel to determine the improvement in the functioning of NEAA's internal QA system.

**36. The Register Committee therefore concurred with the panel's conclusion that NEAA only partially complies with ESG 3.6.**

37. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

### **Conclusion:**

38. Based on the external review report and the considerations above, the Register Committee concluded that NEAA demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Previous decision (2018-06-13)	Review panel conclusion	Register Committee conclusion
2.1	Compliance	Compliance	Compliance

2.2	Compliance	Compliance	Compliance
2.3	Compliance	Compliance	Compliance
2.4	Compliance	Compliance	Partial Compliance
2.5	Compliance	Compliance	Compliance
2.6	Partial compliance	Compliance	Compliance
2.7	Partial compliance	Compliance	Compliance
3.1	Partial compliance	Partial compliance	Partial Compliance
3.2	Compliance	Compliance	Compliance
3.3	Compliance	Compliance	Compliance
3.4	Compliance	Compliance	Compliance
3.5	Compliance	Partial compliance	Partial Compliance
3.6	Compliance	Partial compliance	Partial Compliance
3.7	<b>Compliance</b>	(not expected)	<b>Compliance</b> (by virtue of applying)

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39. The Register Committee considered that NEAA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that NEAA complies substantially with the ESG as a whole.

40. **The Register Committee therefore approved the application for renewed NEAA's inclusion on the Register. NEAA's inclusion shall be valid until 2028-02-29<sup>1</sup>**

41. The Register Committee further underlined that NEAA is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

<sup>1</sup>Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.



**REPUBLIC OF BULGARIA – COUNCIL OF MINISTERS**  
**NATIONAL EVALUATION AND ACCREDITATION AGENCY**

Registered in the European Quality Assurance Register for Higher Education (EQAR)  
Member of the European Association for Quality Assurance in Higher Education (EQAR)

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**ADDITIONAL REPRESENTATION TO THE NEAA APPLICATION FOR RE-  
REGISTRATION TO EQAR**

We take very seriously the comments and recommendations made by our colleagues at the ENQA and EQAR. Part of the recommendations concerns a change in the legislation and activities of ministries which is a lengthy and difficult process. Nevertheless, this does not stop us from putting forward our demands for legislative and other changes at every level.

Following are the responses to the recommendations made in the letter of 17 July 2023 with regard to the decisions of the Register Committee of 30 June 2023. These responses reflect our actions on the implementation of these recommendations not only in the period following receipt of the Register Committee's decision but also in 2022 and 2023 after completing the self-assessment report. The present report was approved by the Accreditation council on its meeting held on 7 September 2023 (see Annex 5 - excerpt from Protocol No.21 of 7 September 2023).

**ESG 2.4 – Peer-review experts**

7. The Register Committee noted from the panel's analysis that the trainings of experts have been reduced to only a briefing session taking place before the site visit. The panel's analysis further shows that the last training organized by NEAA took place in 2018 (before the Covid-19 pandemic).

8. The Register Committee underlined that the agency is expected to ensure that experts have the appropriate skills and competences to carry out external reviews and that such skills and competences are acquired through regular (periodic) trainings organized by the agency.

9. The Register Committee therefore could not follow the panel's judgment on compliance, but concluded that NEAA complies only partially with ESG 2.4.

**Actions in implementation of the recommendations:**

It should be noted that the Covid-19 pandemic which heavily restricted group gatherings in 2020 and 2021 upset the plans of all national institutions, including NEAA. Notwithstanding the unexpected circumstances, the Agency quickly reorganized its modus operandi and continued its activities. The briefings of the Expert Groups were conducted online according to the attached training instructions (see Annex 1 - Briefing programme for the members of the expert groups on evaluation and accreditation procedures) and were quite detailed. This practice has been maintained until now - before the departure of each EG, this briefing is conducted online by the expert or the chair of the relevant committee which also allows for a better organization of the EG's work and a Q&A about the specific procedure.

In 2022 the NEAA team focused on preparation of the report to ENQA, an internal audit by the Ministry of Education and Science as well as substantial changes to its staff. These circumstances



unfortunately resulted in an inability to resume the in-person trainings of experts. Only one training was held - in October 2022 in Pamporovo for experts from the Paisii Hilendarski University of Plovdiv on “Quality Management System in Higher Education Institutions”. The training was conducted by Assoc. Prof. Silvia Tsvetanska, member of the Accreditation Council (AC) of the NEAA.

In 2023, however, we started intensive work on the preparation and implementation of several trainings focused on the specifics of the 10 ESG and the criteria system for their application, the structuring of the self-assessment report and the EG reports. As the experts are a very large group living and working in HEIs in different cities, we decided to organize the trainings regionally – in one particular city for each region – so that we can cover members of expert groups, heads of teaching units and those responsible for the accreditation procedures at the respective HEIs in a given region.

The first event was in Ruse. The scientific and applied conference on “Digital Transformation of Education - Problems and Solutions, Evaluation and Accreditation” was held on 27-28 April 2023 and organized by the NEAA in cooperation with the “Angel Kanchev” University of Ruse, and included two panels dedicated to the evaluation and accreditation of the digital environment and digital forms of learning by the NEAA. The conference was opened by EU Commissioner Maria Gabriel, currently Vice Prime Minister of Bulgaria, followed by a welcoming address by Prof. Kabakchieva, President of the NEAA, and Acad. Hristo Beloev, Rector of the University of Ruse. It raised considerable interest and achieved great success. The panels concerning accreditation were attended by most members of the NEAA’s AC.

For more details about the conference, see: <https://neaa.government.bg/homepage/106-balgarski/novini/783-nacionalna-nauchnoprakticheska-konferencija-digitalna-transformacija-na-obrazovanieto-problemi-i-reshenija-ocenjavane-i-akreditacija>

Evidence to the conference success is the fact that, due to the high regard by the participants, a second conference like this one will be organized on a similar topic, again by the NEAA and the University of Ruse, in April next year, for which registration is currently open.

See: <https://www.conf-dte.bg/proceeding-papers.html>

The next trainings took place in the second largest city in Bulgaria, Plovdiv, where the second largest university in the country is located, the Paisii Hilendarski University of Plovdiv. These trainings were dedicated to the criteria system and the evaluation procedures. Two training seminars were held at the educational facilities of the University of Plovdiv.

At the first seminar held on 20 June 2023, the indicators for institutional accreditation of higher education institutions and their application in the accreditation procedure were discussed.

The second training was held on 3 July 2023 and was dedicated to the content, interpretation and application of the new criteria for programme accreditation of Professional Fields / Specialties from the Regulated Professions in conformity with art. 78, para. 3 of the HEA. Prof. Maria Schnitter, Deputy President of the NEAA on Post-Accreditation Monitoring and Control, was lecturer at both seminars.

Link to the seminars: <https://www.neaa.government.bg/en/home-en/120-english/news/794-neaa-training-seminars-for-quality-assurance-experts-during-2023>

On 4-5 September 2023 in Burgas, at the Burgas Free University, another training seminar was held on “Specifics of the NEAA’s New Criteria System for Programme Accreditation of Professional Field / Specialty from the Regulated Professions - Intersections and Solutions” which was attended by 70 experts on quality of education from 22 HEIs across the country (see Annex 2 - Programme of



the seminar and List of participants) including rectors, vice rectors, heads of units and experts at the NEAA. The lecturers included Prof. Petya Kabakchieva, President of the NEAA, Prof. Miroslav Dachev, member of the NEAA's AC, Prof. Hristo Georgiev, member of the NEAA's AC, Prof. Siyka Chavdarova, Chairperson of the SC on Educational Sciences and Social Activities at the NEAA, and Ms. Asya Stoyanova, Director of the NEAA's Specialized Administration. Prof. Hristo Georgiev presented, among others, the new functions of the Appeals and Complaints Committee at the NEAA and the options for HEIs to challenge the reports and their possible grades. The seminar raised great interest and a desire to organize such trainings more often.

Link to news and presentations: <https://www.bfu.bg/bg/sabitiya/bsu-e-domakin-na-seminar-na-naoa-za-novata-kriterialna-sistema>

A training for the HEIs in Sofia is also planned to take place before the end of the year. There is a preliminary arrangement with the Rector of the "G. S. Rakovski" National Defence Academy to hold this training seminar in their auditoria. Future training sessions and seminars of experts will be part of the NEAA's new Action Plan for the next three years.

## **ESG 2.7 – Complaints and appeals**

10. In its initial application for inclusion the Register Committee raised concerns regarding the lack of an internal appeals system within the agency.

11. The Register Committee noted that since the last external review of NEAA, nothing has changed in relation to the possibilities for higher education institutions to make an appeal with the agency.

12. The Register Committee further noted, that NEAA does not have its own appeals process nor a separate body in considering appeals and that the only existing appeals procedures are outside of NEAA's remit, defined by law and under the legal competency of the Bulgarian courts.

13. The Committee considered that external quality assurance processes should always include an internal possibility to appeal within the responsible body that carried out the review itself.

14. The Register Committee welcomed that establishment of a Complaints Committee by NEAA and acknowledged the efforts by the agency to provide internal process for complaints, but underlined that the standard also requires that appeals processes are clearly defined as part of the agency's external quality assurance processes and communicated to the institutions.

15. The Register Committee therefore could not follow the panel's conclusion on compliance, but concluded that NEAA complies only partially with ESG 2.7.

### **Actions in implementation of the recommendations:**

Until recently, the NEAA has had a Complaints and Appeals Committee but its functions were not directly related to the external quality assurance procedures of the Agency. Nevertheless, HEI have always had opportunities to defend against potentially improper actions undertaken by NEAA. The first opportunity is the ability to comment on the Agency report before a final decision is given. Secondly, the national legislature provides for appeals of acts of administrative bodies, such as NEAA, before the courts within 14 days of receiving the decision of the administrative body. Granting the Complaints Committee functions of an arbitration body contradicts the national legislation on the evaluation and accreditation of higher education, which provides only for administrative and judicial procedures for appealing the decisions of NEAA.

Nevertheless, to implement the recommendation on ESG 2.7, the AC moved forward with extending the powers of the existing Complaints and Appeals Committee. A new Statute of the

Committee was drafted and accepted, which imparted on it the powers of a conciliatory body during administrative procedures of NEAA (see Annex 21- The Statutes of the Appeals and Complaints Committee). The Committee would be responsible for ruling on appeals and complaints submitted by HEIs and scientific organizations concerning possible disputes during the procedures on the NEAA. A system is implemented in which the applicant will be notified of the decision of the AC on the procedure before its implementation and they will have the opportunity to appeal said act, including the report and the proposed grade before the Appeals and Complaints Committee. The ruling of the Committee will be discussed by the AC and considered before a final decision is implemented.

The new Appeals and Complaints Committee will have the status of a Standing Committee, pay its members and consist of 7 members – 3 of them lawyers, one representative of each of the higher education trade unions and one of the National Assembly of Student Councils. The detailed functions and procedures for complaints and appeals are elaborated in the Statutes of the Appeals and Complaints Committee adopted after a series of discussions and consultations at the AC on 20 July 2023 (see Annex 3 – excerpt from Protocol No.18 of 20 July 2023 regarding the adoption of the Statutes). The Statutes are uploaded on the NEAA's website, and attached as Annex 21:

[https://www.neaa.government.bg/images/Legislation/Rules/ENG-ED\\_rules\\_for\\_appeals- 2.8.23 - 24.08.pdf](https://www.neaa.government.bg/images/Legislation/Rules/ENG-ED_rules_for_appeals-2.8.23-24.08.pdf)

The new functions of the Appeals and Complaints Committee were presented and discussed at the training seminar in Burgas held on 4-5 September 2023. Five members of the Committee have been elected (see Annex 4 and Annex 5 - excerpts from Protocol No.19 and Protocol No.21 on the election of Committee members), and nominations from the HE syndicate and the NASC for the other 2 positions are expected. There is already a decision of the AC to assign to the Appeals and Complaints Committee the review of the Project for opening of PF Pharmacy at the MU Plovdiv and the received appeal from the MU Plovdiv regarding the SC report (see Annex 5).

### **ESG 3.1 – Activities, policy and processes for quality assurance**

16. In its last decision, the Register Committee noted that the composition of NEAA's Accreditation Council (AC) is dominated by representatives of the academia and that there is a lack of stakeholder involvement with no students or labour market/employment representatives involved in the work and governance of NEAA.

17. The Register Committee noted that while NEAA expanded the direct participation of stakeholders in its work i.e., including representatives of students and employers in the Expert Groups and the Standing Committees that the composition of the Accreditation Council (AC) is still limited to only representatives of the academic community.

18. Despite the improvements done by NEAA in the involvement of stakeholders' in some of its processes and bodies, the Register Committee considered the lack of stakeholder involvement (as per the requirement of the standard) in the core governance body of NEAA as of crucial importance.

19. The Committee further emphasized the recommendation of the panel to ensure the inclusion of a representative of students and employers/industry in the AC, including a representative of students (preferably with a legal background) in NEAA's Ethics Committee.

20. The Register Committee therefore concurred with the panel that NEAA only partially complies with ESG 3.1.

### **Actions in implementation of the recommendations:**

The quotas for AC members are regulated by the HEA. The NEAA raised the issue of including representatives of employers' organizations and students in the AC during the previous cycle of amendments to the HEA but due to political and legislative circumstances no change

occurred. For that reason, the NEAA's AC introduced the Advisory Board to the AC as an additional auxiliary body which includes representatives of various employers' groups as well as trade unions and students, and provide valuable suggestions regarding both the criteria system and the preparation of the terms of reference for the public procurement for building an electronic information platform for the implementation of the evaluation and accreditation processes (Annex 6 – Protocols of the meeting of the AB to the NEAA).

Presently, we have prepared and sent to the Minister of Education a proposal for future legislative amendments to the HEA, one of which concerns the increase of the AC staff from 11 to 13 members with the two new members being nominated as follows: one from the employers' organizations represented in the National Council for Tripartite Cooperation, and one from the NASC (see Annex 7 - Letter to the Minister of Education, No. 105). Moreover, we organized a meeting of the Minister of Education and Science and the Deputy Minister responsible for higher education with the NEAA's AC – the meeting took place on 20 July 2023 during the AC session (see Annex 3) where we presented this proposal among others. This proposal was met with approval by the Minister of Education and Science; yet, it was explained to us that the change could not occur quickly but only after a package of amendments to the HEA discussed and proposed by various institutions would be tabled at the National Assembly. A commitment was made to act quickly and, indeed, a working group for drafting amendments to the HEA was formed at the MES. We received an invitation to send a representative of the NEAA in this working group (Annex 8 - Letter from the MES regarding the inclusion of a representative of the NEAA in a working group on amendments to the HEA). We appointed attorney Blidov as our representative in this working group (see Annex 9 - Ordinance No. RD-12-52, Annex 10 - Response from the NEAA to the MES).

We will continue our efforts in this direction and believe that the change will be implemented. It should be emphasized that as a result of the NEAA's efforts, the ten ESGs are now part of the legislative regulations of the HEA of Bulgaria. The NEAA is currently in the process of building an electronic platform that will ensure full transparency of the evaluation and accreditation processes. The terms of reference for the public procurement for building this platform are already prepared.

### **ESG 3.5 – Resources**

21. The panel noted that the main challenge for NEAA remains the fact that it cannot manage its own finances in a manner that will enable NEAA to ensure the best quality of its activities. Even if the majority of the funding comes from its external quality assurance activities i.e., mostly accreditation fees, due to the strict regulations and rules defined on national level, NEAA cannot access these revenues. The Committee concurs with the panel that this could have a negative impact on the sustainability and the quality of the processes.

22. The panel underlined that despite the improvements and increase of staff members since its last review, from 8 to 19 staff members, NEAA is still having 9 vacant positions.

23. The Committee emphasizes the panel's recommendations on the need for the agency to pursue with the Ministry changes in its financial management and to continue the recruitment of new staff to ensure optimal workload and implementation of EQA processes on time.

24. The Register Committee therefore concurred with the panel's conclusion that NEAA complies only partially with ESG 3.5.

### **Actions in implementation of the recommendations:**

#### **Financial resources:**

Every year, the NEAA writes letters asking for an increase of the Agency's budget which covers salaries and capital expenditure (see Annex 11 - letters to the MES). In 2023, the salaries of the Agency's experts were increased by 15% but are still low. We continue our efforts in this direction.

Concerning the fees received from the HEIs for the procedures carried out by the Agency, the NEAA initiated a request for a change in the payrates for the different procedures so that the remuneration of the members of the EGs, SCs and the AC could be increased. The following measures were undertaken: A. A letter with well-grounded new payrates for the procedures was sent to the Prime Minister, the Minister of Finance and the Minister of Education (see Annex 12 - Letter No. 06-1691 and Annex 13 - Reply from the MES, Letter No. 0303-265 from 2 August 2023). Before sending the letter, the rates for changing the fees were presented at a meeting with the Minister and Deputy Minister of Education held on 20 July 2023, and we received approval in principle (see Annex 3). B. We submitted the proposal for an increase in the payrates to the Council of Rectors for opinion (see Annex 12) and it was subsequently shared with all HEIs. We received one response agreeing with the need to increase the fees but making specific suggestions for changes towards reducing some fees. We will review the rates once again in a few days preparing to present a slightly revised proposal to the relevant institutions. If these rates get increased in line with our requests, the financial problem of the NEAA will be solved to some extent.

### **Staff provision and policy**

We believe that the current NEAA team has achieved a lot in this respect. The increase in the Agency's permanent staff from 8 to 23 members has itself been achieved with great efforts and is already a success. The NEAA regularly announces competitions for chief, senior and junior experts to fill the vacant positions but firstly, there is not much interest due to the salaries that are offered and, in secondly – and more importantly – the NEAA wants to recruit qualified and motivated professionals. We believe that we have had quite some success in this respect: in 2023, the following competitions have been launched – a competition for senior experts (see Annex 14 - competition announcement), a competition for chief accountant (Annex 15) and a competition for junior experts (Annex 16 - competition announcement for junior experts). Since 2022, four highly qualified senior experts have been appointed who have worked as such in various units of the MES system, and, as already mentioned, a competition for 3 junior experts is currently underway. It should be noted that the staff situation of the NEAA is dynamic as a rejuvenation of the team and the retirement of older colleagues have begun. As a result of this process, a young new senior accountant has been recruited following a competition along with a new chief accountant, a new head of Human Resources and a new director of Department “Specialized Administration”.

A competition for a lawyer at the NEAA was launched twice but received no applications because of the low salary. Nevertheless, we are working extremely well with two young lawyers on civil contracts and other legal issues. Twice, a competition was launched for the post of secretary general, one time the candidate was rejected for lack of experience in a managerial position, the second time the competition was won by a very well-prepared candidate, but they left by mutual agreement for personal reasons. As the term of office of some of the members of the AC, including the President, is coming to an end during September 2023, it is appropriate that the new President would announce a competition for the position of secretary general. New members of the AC will be appointed shortly.

The current structure of the staff is as follows - see Annex 17 (staff by position). As one can see in the annex, out of the 30-member staff of the NEAA, there are 7 vacant posts. There is

currently a competition for the 3 vacant junior expert positions, and two candidates have thus far submitted applications so we expect the vacant positions to remain 4 or 5.

The training of the Agency's staff is very important and that is why we applied under the BFUG project IMINQA and two of our experts are about to go to Slovenia for training. (See App. 18, application approval by IMINQA).

### **ESG 3.6 – Internal quality assurance and professional conduct**

25. The panel noted that NEAA started developing its internal quality assurance system introducing, some new mechanisms and procedures. However, the panel underlined that the elements of the procedures are fragmented and not fully structured, integrated and connected in a systematic way. The panel also noted the lack of transparency of the mechanisms and their results.

26. Despite NEAA's efforts to develop its own internal quality assurance system the Register Committee found that the process is still in a developmental phase. The Committee underlines the panel's recommendation that all the elements of the internal QA system needs to be better connected, regularly implemented with the involvement of all internal and external stakeholders.

27. The Register Committee further noted that the lack of progress in ESG 2.7 and 3.1 since the last decision is a regression since the last review and thus does not reflect positively on the agency's internal quality assurance arrangement.

28. The Register Committee therefore concurred with the panel's conclusion that NEAA only partially complies with ESG 3.6.

#### **Actions in implementation of the recommendations:**

We cannot fully agree with the conclusion: "The Register Committee further noted that the lack of progress in ESG 2.7 and 3.1 since the last decision is a regression since the last review and thus does not reflect positively on the agency's internal quality assurance arrangement".

Indeed, there has been seldom progress on ESG 2.7 and 3.1 in this respect but this is beyond the NEAA's powers as it depends on legislative amendments which must be the result of public and political consensus. We have and are continuously proposing legislative amendments but the outcome is not up to us but to the National Assembly. Therefore, as noted above, we amended the internal regulations of the Complaints and Appeals Committee, and we believe that it will now better meet the needs of the HEIs. We have re-proposed a change to the structure of the AC; what the outcome will be is not up to us, we will try to push it through.

At the same time, we should stress that with regard to ESG 3.1, as a result of the efforts of the NEAA, the 10 ESGs are an intrinsic part of the legislative regulations of the HEA following the amendments to the HEA, and as such the Bulgarian Higher Education Quality Assurance system is fully integrated with the EHEA. The NEAA has further developed the criteria system towards a more objective evaluation of Professional Fields, something discussed with many stakeholders. The NEAA is currently in the process of building an electronic platform that will ensure full transparency of the evaluation and accreditation processes. The terms of reference for the procurement for building such a platform have been prepared, and so have been the indicators that will be set into it. All NEAA structures except the AC include representatives of employers and students which, practically, is a partial fulfillment of the 2018 recommendations.

We recognize that a more comprehensive and consistent system of internal control and monitoring should have been developed. In 2023, we continued building such a system, and we attach a list of all documents adopted in 2023 and related to the maintenance of such a system (Annex 19 - List of documents adopted to maintain the internal quality control system).

The Quality Control Committee could have been more active but we have made surveys with beneficiaries, and an internal audit of the activities of the NEAA has been carried out and necessary measures are being taken to improve the functioning of the Agency (see Annex 20 - Report of the Internal Audit Committee).

29. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

We believe that our efforts to improve the quality of higher education bound to a strict compliance with the European standards and guidelines will be appreciated. We hope for a positive decision by the Register Committee on our application to EQAR. We are confident that the NEAA's policy of raising the quality of HE will continue and will find even better and innovative solutions.

Prof. Petya Kabakchieva,  
President of the NEAA