

National Evaluation and Accreditation Agency

Self-Assessment Report of National Evaluation
and Accreditation Agency (NEAA) for External Review
by the European Association of Quality Assurance
of Higher Education (ENQA)

Sofia, **2017**





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TABLE OF CONTENTS

Executive summary / 5

- 1. Introduction / 8**
- 2. Development of the self-assessment report / 8**
- 3. Higher education and QA of higher education in the context of the agency / 11**
- 4. History, profile and activities of the agency / 15**
- 5. Higher education quality assurance activities of the agency / 19**
- 6. Processes and their methodologies / 22**
- 7. Agency's internal quality assurance / 24**
- 8. Agency's international activities / 25**
- 9. Compliance with European Standards and Guidelines (Part 3) / 26**
 - 9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance / 26
 - 9.2 ESG Standard 3.2 Official status / 29
 - 9.3 ESG Standard 3.3 Independence / 30
 - 9.4 ESG Standard 3.4 Thematic analysis / 31
 - 9.5 ESG Standard 3.5 Resources / 32
 - 9.6 ESG Standard 3.6 Internal quality assurance and professional conduct / 35
 - 9.7 ESG Standard 3.7 Cyclical external review of agencies / 37
- 10. Compliance with European Standards and Guidelines (Part 2) / 38**
 - 10.1 ESG Standard 2.1 Consideration of internal quality assurance / 38
 - 10.2 ESG Standard 2.2 Designing methodologies fit for purpose / 45
 - 10.3 ESG Standard 2.3 Implementing processes / 47
 - 10.4 ESG Standard 2.4 Peer-review experts / 50
 - 10.5 ESG Standard 2.5 Criteria for outcomes / 53
 - 10.6 ESG Standard 2.6 Reporting / 55
 - 10.7 ESG Standard 2.7 7 Complaints and appeals / 57
- 11. Information and opinions of stakeholders / 58**
- 12. Recommendations and main findings from previous review and agency's resulting follow-up / 59**
- 13. SWOT analysis / 61**
- 14. Current challenges and areas for future development / 63**

LIST OF ABBREVIATIONS

AC	Accreditation Council
AC	Accreditation council
AA	Agricultural Academy
BAS	Bulgarian academy of sciences
HE	Higher education
HS	Higher school (incl. plural)
EG	Expert group (incl. plural)
EQAR	European quality-assurance register for higher education
ENQA	European association of quality assurance of higher education
ESG	European standards and guidelines
SC	Standing committee (incl. plural)
SO	Science organization (incl. plural)
CQ	Committee on quality assurance of NEAA's activity
HEA	Higher education act
HEI	Higher education institution
LDASRB	Law on development of academic staff of Republic of Bulgaria
MES	Ministry of education and science
NEAA	National evaluation and accreditation agency
PAMC	Post-accreditation monitoring and control
SNEAA	Statutes of NEAA
SCAHE (also SC)	Standing committee on area of higher education
SCPAMC	Standing committee on PAMC
PAMC	Post-accreditation monitoring and control

EXECUTIVE SUMMARY

This self-assessment report (SAR) aims to present the agency's activities on the implementation of ESG 2015 as a prerequisite for external review by ENQA and registering on EQAR. The self-assessment process reported is an important step that will play a defining role in the organization and future of NEAA.

The report contains the following elements (including addressing each ESG individually): 1. Introduction, 2. Development of the self-assessment report, 3. Higher education and QA of higher education in the context of the agency, 4. History, profile and activities of the agency, 5. Higher education quality assurance activities of the agency, 6. Processes and their methodologies, 7. Agency's internal quality assurance, 8. Agency's international activities, 9. Compliance with European Standards and Guidelines (Part 3), 10. Compliance with European Standards and Guidelines (Part 2), 11. Information and opinions of stakeholders, 12. Recommendations and main findings from previous review and agency's resulting follow-up, 13. SWOT analysis, and 14. Current challenges and areas for future development.

The form and contents of this SAR follow *Guidelines for ENQA Agency Reviews* (2016); the report examines each type of NEAA's activity related to the standards in the ESG Parts 3 and 2 individually. For each standard, the report explains how the agency interprets it and complies with it, including the necessary and sufficient evidence and analysis on the effectiveness and efficiency of the agency's approach.

ESG Part 3

Standard 3.1 Activities, policy and processes for quality assurance

NEAA follows and realizes policies and activities of external quality assurance for ef-

fective flow of procedures related to evaluation, accreditation and post-accreditation monitoring. They all have a stimulating role for uninterrupted development of the internal quality assurance systems of education and teaching staff of higher schools. These activities of the agency create conditions for comparability and acquiring good practices of educational institutions from EU member states.

Standard 3.2 Official status

The brief retrospection of NEAA's creation shows that it was legally established and is an officially recognized institution by the competent state organs whose activities and decisions are in compliance with standards and guidelines for quality assurance (ESG Parts 1, 2, and 3). Education institutions undergoing evaluation and accreditation recognize NEAA's decisions and are assured that the outcomes of this process are valid in the framework of the system of higher education, are recognized by the state, by the stakeholders and the whole society.

Standard 3.3 Independence

In this way, integrity and objectivity become fundamental principles in the work of EG, in writing their reports. Analyses, findings and recommendations made by members of EG and members of SC do not suffer from subjectivism and irregular influence of stakeholders. AC and SC decisions are legal, taken under clear rules and published documentation. Activities executed by NEAA in compliance with ESG are the prerequisite for guaranteeing its independent responsibility.

Standard 3.4 Thematic analysis

NEAA guarantees comparativeness of outcomes of individual accreditation procedures and publishes them regularly on its website as part of the weekly updating of the database. NEAA publishes reports with comparative analyses of the compar-

ibility of its activity for increasing the quality of higher education in the country.

Standard 3.5 Resources

Described state of resources available to NEAA must be evaluated as adequate and possible in the context of the general financing of the education system. In the interest of future development of higher education as a factor of economic growth, it should be necessitated that even higher financing of the agency's activities for external evaluation of quality should be attained.

Standard 3.6 Internal quality assurance and professional conduct

NEAA's policy of internal quality assurance is public and published on the website of the agency. This policy is official and legitimate, expressed through concrete decisions and actions of AC, specialized commissions created as consulting organs of the agency. Finding and applying of professional solutions are guarantees that all subjects work for enhancing public authority of NEAA as a specialized state organ for evaluation and accreditation of education at higher schools consciously, responsibly. Competently, ethically, with adequate communication.

Standard 3.7 Cyclical external review of agencies

For NEAA, the experience of external audits is dictated by its mission to be authoritative and reliable partner complying with ESG and participating actively in the maintenance of the common trans-border understanding of ensuring quality culture in education. Self-regulation and cyclical external reviewing stimulate the agency to get trust in its accreditation activity in the country and abroad.

ESG Part 2

Standard 2.1 Consideration of internal quality assurance.

For NEAA, the bringing of the system of criteria for evaluation and accreditation in line with ESG Part 1 is of crucial importance for the assurance of quality of higher education. Application of the new Criterial System substantiates the connection between internal and external quality assurance, stimulates the higher schools in the realization of their policy of preparing highly qualified experts, and heightens academic culture of rigor, goodwill, benevolent concern of undergraduates and doctoral students, and of dialogic relation to employers.

Standard 2.2 Designing methodologies fit for purpose

Creation of methodologies defining the reference framework and principles of performing external quality assurance is a prerequisite for realization of its aims and tasks. Laying emphasis on the need for applying ESG Standard 2.2 includes the agency's balanced work on bringing in higher schools, students, and employers to acknowledge the importance and stimulating role of the accreditation process for enhancing quality of education. Analysis of NEAA's activity shows that it uses fit for purpose mechanisms for objective evaluation of higher schools' capabilities to increase trust of society in them as education institutions.

Standard 2.3 Implementing processes

Description of the above documents aims to make known that NEAA uses them to create conditions for preparing objective reports by all participants in internal and external quality assurance activities. We have emphasized that structure of reports of EG, SC and the decisions of committees is adopted by AC and reflects estimations

about fulfilling of criteria in line with ESG. Publication of reports complemented by summaries in Bulgarian and English allows NEAA to make its procedures reliable and useful not only for higher schools but also for all stakeholders.

Standard 2.4 Peer-review experts

Valuing the role of experts for objective evaluation of quality in line with ESG, NEAA performs planned work for enhancing skills and competences of its employees. Undoubtedly, their training is influenced positively not only by discussions of different methodological documents but also by direct contacts with chairpersons of SC and the leadership of the agency.

Standard 2.5 Criteria for outcomes

NEAA regards its decisions on internal quality assurance on the basis the implementation of its Criterial System in line with ESG Part 1. Construing of this implementation is not administrative evaluation but a profound and objective review in the framework of accreditation procedures published in advance.

Standard 2.6 Reporting

NEAA's efforts to ensure objective and correct reporting of accreditation outcomes in fulfillment of criteria in line with ESG part 1 are useful in quality assurance of education and the achievement of publicity, accountability, support and trust in the higher education system in our country.

Standard 2.7 Complaints and appeals

Compliance with this standard is consistent with the correct and timely activity in line with the necessary legal base. Compliance is accomplished by the Appeals Committee handling students' complaints and contestation of accreditation procedures whose competent members perform professionally and correctly. In so far as this responsible and at the same time delicate activity is at an early stage, it is still difficult to delineate tendencies in the undergoing processes. For NEAA, it is important that the necessary attention is paid to the committee; it has directed its efforts to proclaiming its objective necessity for the enhancing of external quality assurance.

1. INTRODUCTION

The present report aims to present the activity of National Evaluation and Accreditation Agency (NEAA) on implementation of European Standards and Guidelines for quality assurance in European Area of Higher Education (ESG) of May 2015 as a prerequisite of external review of European Association of Quality Assurance of Higher Education (ENQA) and inclusion on the European Quality Assurance Register for Higher Education (EQAR). For NEAA, membership in ENQA and registration on EQAR are recognized responsibility for active participation in the continuing process of enhancing quality in EHEA. Guided by the requirements and following the structure suggested by ENQA, NEAA has prepared this self-assessment report. In its self-assessment the agency offers an analysis of its activities in compliance with ESG Part 2 and Part 3.

The present report is a challenge for all participants in the self-assessment period, in the creation and implementation of the new Criterial System as a measure of implementation of the abovementioned standards by all subjects of the Bulgarian system of higher education.

With the adoption by the Accreditation Council (AC) of NEAA of Program and Action Plan for implementation of ESG in October 2015

https://www.neaa.government.bg/images/files/SUKO/Programa_za_deistvie_NAOA-ESG_EN.pdf

https://www.neaa.government.bg/images/files/SUKO/Plan_za_deistvie_ESG_2015-2017-EN.pdf

and their execution, the agency has contributed competently and voluntarily to the enhancing of quality of Bulgarian higher education.

As an institution with its own history, NEAA is supported in its efforts in implementing ESG by Council of Rectors, National Representation of Students' Councils, National Branch Syndicate "Higher Education and Science" and employers from business circles. On the basis of dialogue and objectiveness, NEAA completes its mission on raising public role of higher education in this country and its integration in the European education area.

NEAA states its confidence that its public responsibility for implementation ESG will earn the objective evaluation of ENQA.

2. DEVELOPMENT OF THE SELF-ASSESSMENT REPORT (SAR)

The process of self-assessment began with an in-depth analysis of the activities of NEAA by the Standing Committees (SC) and the Expert Groups (EG) after the completion of the external review and the reception of ENQA's recommendations. The development of NEAA's SAR was caused by the requirements that the agency's activities should comply with ESG 2015. For that purpose, right after the adoption of the document ESG 2015, it was translated in Bulgarian and published on the agency's website; also, it was sent to the rectors of higher schools and the chair-persons of research organizations.

The methodology of the self-assessment process is determined by the inseparable unity of the 3 parts of ESG and reflects the interconnection between NEAA's activities. NEAA and more concretely the Committee on Quality Assurance (CQ) of the agency produced a methodology for the process of self-assessment according to which three stages of preparation and produc-

tion of the report were worked out:

The first stage shows the organization of the creation of a new Criterial System in line with ESG which should be the basic measure of the respective higher school's capability to apply the standards in its educational activity;

The second stage called "self-evaluation stage" contains the following tasks: collection of information from all departments of the agency on the activities related to ESG Part 2 and Part 3; evaluation of the compliance with standards; definition of strengths and areas for improvement of the agency; producing the first draft of the SAR;

The third stage of the development of SAR is related to the collection of information from stakeholders.

The attention of the Committee on Quality Assurance of the agency's activities in the first stage was directed to formulating the measures for the smooth transition from the standards from Bergen to the ones of 2015. For that purpose, CQ considered all suggestions made by relevant subjects and units, and experts involved in the agency's work. What followed was development of a design of Program and Action Plan for implementation of ESG 2015. In October 2015, the AC adopted these basic documents and started executing them with upgrading of periods and tasks.

Of special importance in the first stage was the moment when the new Criterial System in line with ESG 2015 Part 1 was developed. Based on a decision of AC, two work teams composed of members of the agency were formed; they had the liberty to use the professional experience of stakeholders and employers. The adoption by AC of the new Criterial System (20.10.2016); Procedures for accreditation, evaluation of projects and post-accreditation monitoring and control] Methodology for evaluation of the Criterial System of NESS are published in a Collection in Bulgarian and English

https://www.neaa.government.bg/images/Reports/sbornici/NEAA_sbornik_eng.pdf

rules for voting of procedures for accreditation and evaluation of projects

<https://www.neaa.government.bg/en/evaluation-and-accreditation/voting-rules>

new structure of report of EG and of decision/report of SC,

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

new forms for evaluation in procedures on types of accreditation and evaluation of projects and other documents with operative character; these all are the meaningful steps which the agency has made along the road of preparing the documents for implementing ESG.

The road was successful because it was the result of the agency's cooperation with the Council of Rectors, researchers from scientific organizations, undergraduates and doctoral students, employers from different sectors of business. Relation with the Council of Rectors was especially productive. Its opinions about the approaches and contents of the criteria were the object of a survey carried out by NEAA which was processed and published at the agency website. NEAA paid special attention to the study of students' vision of the application of the accreditation criteria. With its special organ, CQ, the agency worked with the National representation of students' councils. Contacts with Bulgarian Academy of Sciences and Agrarian Academy were beneficial in the production of criteria for program accreditation of doctoral programs. The agency has longstanding and fruitful contacts with National Branch Syndicate "Higher Education and Science" whose experts took part in the creation of the criteria from the very

beginning to the moment of adoption. The same professional attitude was demonstrated by the Chamber of Construction, Chamber of Architects, Chamber of Chemical Industry, and Association of Producers of Vine Planting Material and Dessert Grapes, Association of Industrial Pig Raising, Bulgarian Economic Chamber, Chamber of Engineers in Investment Projects. Their opinions and recommendations are published on the agency's website as evidence of the agency's intensive cooperation with them.

https://www.neaa.government.bg/images/files/SUKO/National_Branch_Trade_Union.pdf

https://www.neaa.government.bg/images/files/SUKO/Bulgarian_Industrial_AssociationTo.pdf

https://www.neaa.government.bg/images/files/SUKO/BULGARIAN_CONSTRUCTION_CHAMBER.pdf

https://www.neaa.government.bg/images/files/SUKO/Chamber_of_architects_in_Bulgaria.pdf

https://www.neaa.government.bg/images/files/SUKO/Bulgarian_chamber_of_chemical_industry.pdf

https://www.neaa.government.bg/images/files/SUKO/CHAMBER_OF_ENGINEERS_IN_THE_INVESTMENT_DESIGN.pdf

https://www.neaa.government.bg/images/files/SUKO/ASSOCIATION_OF_PRODUCERS_OF_GRAFTED_GRAPE_VINE_NURSERY_AND_TABLE_GRAPES.pdf

https://www.neaa.government.bg/images/files/SUKO/ASSOCIATION_OF_PIG_INDUSTRY_IN_BULGARIA.pdf

The description of the production of the new Criterial System shows the agency's understanding of self-assessment as a process which on the one hand needs internal quality assurance evaluation to be measured with objective criteria and on the other hand necessitates the awareness of the external quality assurance of NEAA – ESG 2015 Parts 2 and 3. This approach has provided opportunities in the second stage to consider opinions and evaluations of SC and EG on contents and execution of activities related to ESG, to estimate the agency's strengths and weaknesses against them. The information collected was used as the basis for the first draft of the SAR.

In connection with the completing of the third stage of the progression of SAR, we should note the importance of the information collected from stakeholders. It was considered through the prism of strategic aims and policies of implementing ESG by NEAA. The agency and concretely the CQ organized teams, thematic meetings with higher schools, representatives of students' councils and employers from different sectors of business. At the meetings, ideas for editing the project of SAR were put forward including extending scope with the types of accreditation procedures; that proves the implementation of the new Criterial System in line with ESG 2015 Part 1, the quality of teaching staff, the connection between education and research and innovations, the opinions of students about higher schools' policies of enhancing quality of education process.

Accomplishment of the self-evaluation process permitted objective identification and upgrading of the agency's strengths and areas for development.

We should emphasize the fact that the finalization of the clean copy of the SAR was done by a working group, approved by AC, appointed with an order of the President of NEAA. The AC's

adoption of the SAR and its appendices as illustrations and evidence of described activities is a concluding moment in the process of self-assessment.

ENQA's recommendations aiming to make the development of SAR clearer were seriously studied by the working group. Its detailed response was approved by the AC. The present report includes the additional information suggested constructively by ENQA. Behind the preparation and completion of the SAR, there is responsible work of members of the agency and different stakeholders united by the common purpose of enhancing quality of Bulgarian higher education.

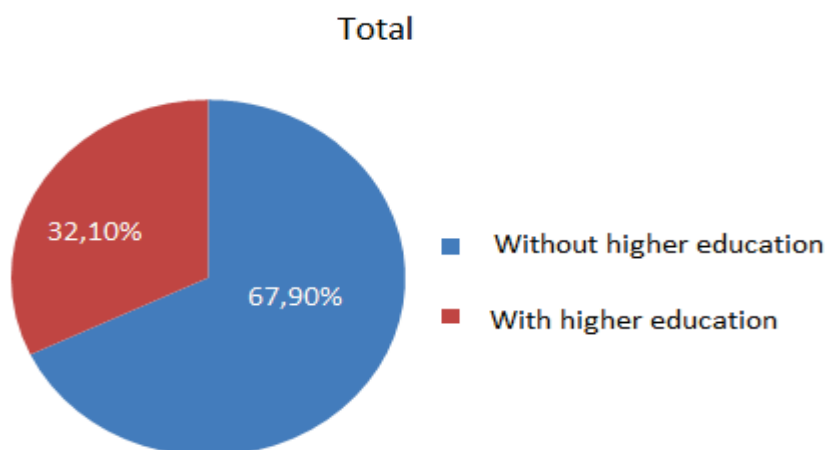
3. HIGHER EDUCATION AND QA OF HIGHER EDUCATION IN THE CONTEXT OF THE AGENCY

In the past decades with the development of science, technology and ICT, the demand for trained workers has increased in European countries including Bulgaria. Therefore, European policy of mass higher education and increase of the number of students started and gradually progressed. This process granted broad access to higher education but also brought about a range of challenges of the need for quality assurance of education and preparing experts in the different sectors of social life.

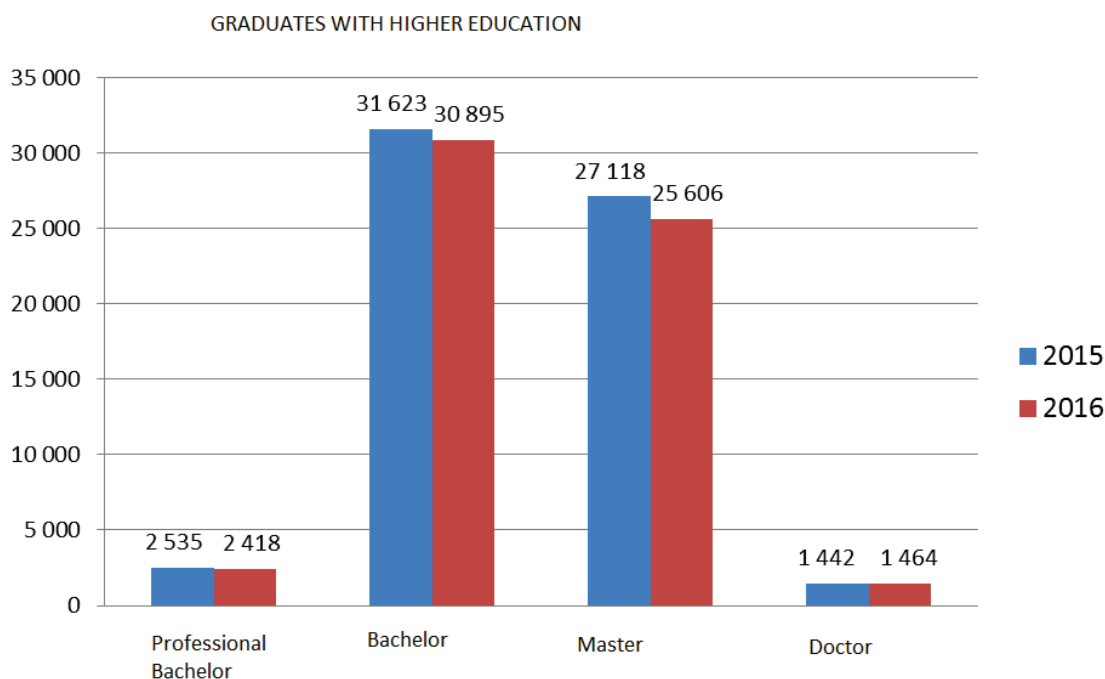
The system of higher education in Bulgaria includes 51 higher schools of which 37 state and 14 private including 30 universities teaching a wide range of specialisms in professional directions (humanitarian, natural, social and technological), and 18 specialized higher schools and 3 independent colleges.

In almost all regional cities of the 6 regions of the country, higher schools have been established; 11 of them have branches in other towns. The National Statistics Institute provides data that the size of graduates with higher education (aged from 30 to 34) reached 32.1% in 2015; that means Bulgaria is on the way to accomplish its national aim with regard to the strategy of 36% set in "Europe 2020".

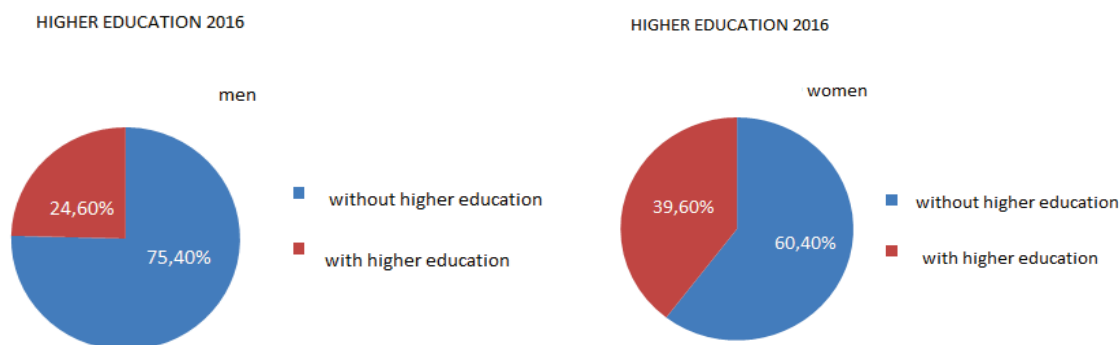
HIGHER EDUCATION 2016



The total number of graduates with higher education in 2015 and 2016 is given below.

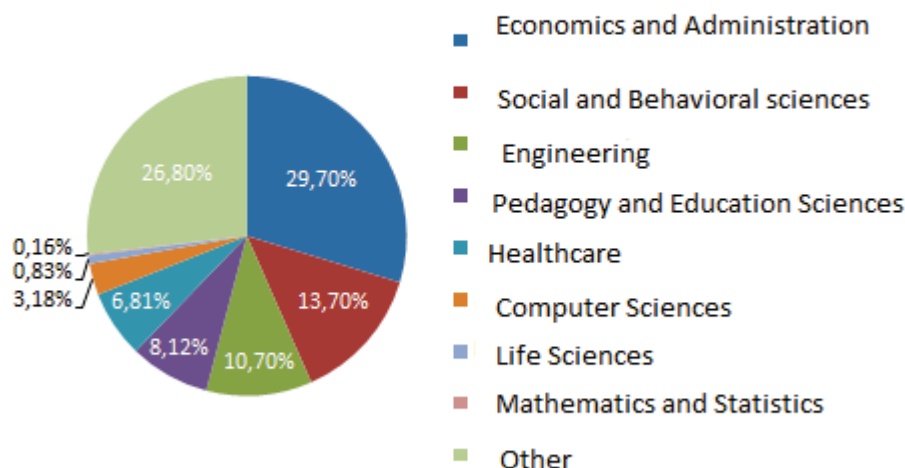


There is significant difference in educational level between genders: percentage of female graduates with higher education is about 15 percent points higher than that of male graduates.



In 2015, the greatest section of graduates with higher education had studied economics and administration – 29.7% followed by social and behavioral sciences (13.7%), engineering and engineering professions (10.7%), pedagogy and education sciences (8.12%) and healthcare (6.81%). Lowest numbers of graduates were attested in computer sciences (3.18%), life sciences (0.83%) and mathematics and statistics (0.16%) (Source: National Statistics Institute, 2016).

HIGHER EDUCATION IN STUDY FIELDS, 2016



The size of cohort of graduates with higher education in social sciences, economics and law is one of the highest in EC with a tendency of decreasing; the segment of graduates with higher education in the area of natural sciences, mathematics and informatics and also healthcare and wellbeing is one of the lowest in EC but is increasing. These data refer to all education and qualification degrees including professional bachelor, bachelor, master and the education and scientific degree of doctor (cf. National Statistics Institute, 2016).

It is important to note that percentage of recent graduates' employment has risen significantly: it was 87.1% in 2015 and presently exceeds average EC level of 81.9%. To a great extent, that is attributed to improving the perspectives of labour market.

According to Bulgarian Constitution and the normative documents, the state should provide opportunities of access to higher education and for its free development by: guaranteeing academic autonomy and self-regulation of higher schools, finances education at state education institutions and supports the system of grants for paying of fees; provides facilities to state higher schools; gives tax and other reductions for all higher schools at completion of activities; defines conditions of state recognition of certificates of higher schools at home and abroad.

Our state introduced a range of positive changes in the system of higher education by, in the first place, creating its own legislation. At the end of 1995, the Higher Education Act (HEA) was passed; with it Bulgaria was one of the first countries in Europe to introduce the 3-tier system of higher education – Bachelor, Master and Doctor. Teaching for earning each degree is in line with the new Classificatory of areas of higher education and professional directions, the newly implemented European system of ECTS. HEA contains provisions related to external and internal system of quality assurance of higher schools, system of credits and European diploma supplement. The regime of accepting undergraduates and doctoral students and specializing students in European Union was harmonized with that of Bulgarian citizens; branches of foreign higher schools for educational franchise, etc., were opened in Bulgaria. Both in HEA and in a special law passed later, Law of recognizing professional qualifications (2008) define the conditions of recognition of right to practice certain regulated professions on the basis of professional qualification earned in countries of the EU. In 2010, a system of giving grants to students with state guarantees after the Law of crediting undergraduates and doctoral stu-

dents. With the latest amendments of the HEA, the process of stimulating development of strategically important for the state professional directions and programs and specialisms which should be protected because they are not attractive but are needed has begun.

Despite some difficulties in implementing the Law on Developing Academic Staff in Republic of Bulgaria (2010), higher schools have unfolded settings and have overcome barriers hindering career development of university teachers.

In keeping with the European Qualifications Framework as an instrument of recognizing qualifications of students and employees, a National Qualifications Framework of Republic of Bulgaria was adopted in 2012. It stipulates 9 qualifications levels; the degrees of higher education are situated in the last 3 levels of the framework.

Bulgarian legal framework is in unison with good practice in Europe. It allowed higher schools on the basis of autonomy and academic self-regulation to create in their structure units of continuing and post-graduate education and also centers of career development. Thus, connections between higher schools and business for joint design of curricula and syllabi aiming at increasing employability have been fostered. In many HEIs together with international universities, there are study programs finishing with issuing joint degrees and certificates.

Important role in the policy of the state is played by the Strategy for development of higher education in the period 2014-2020 adopted by the National Assembly (26.02.2015). In it, priority areas of higher education in its 2 dimensions – as social and individual good, preparing students for their professional realization and their social role and as an engine of economy and society based on knowledge and advance of technologies – are highlighted. As the Strategy points out, in the period 2012-2014, a centralized system of assuring practical training of university students was established; in the course of one year, it provided 60 000 positions for practical training with over 14 000 Bulgarian employers. A web platform was created which includes all regular students and teachers from the register of academic staff; higher schools possess over 800 trained experts participating in the work on the project.

Prospects of continuous enhancement of quality of higher education is directly related to the activity of NEAA created with HEA. Its statute, mission and functions as a specialized state body for evaluation and accreditation and monitoring of quality in the system of higher education are of definite importance for the integration of higher schools in European area.

NEAA is the organ which has implemented both the European Standards from Bergen (ESG 2005) and ESG 2015. NEAA is a full member of ENQA and is recorded on EQAR (up to 2013).

A Ranking System of higher schools in Republic of Bulgaria is established. It started in 2010 as a project financed by Operative Program "Human Resources Development" of the European Social Fund. The system compares higher schools on the basis of accreditation grade and indicators related to graduates' employability, etc.

The higher education system is characterized by transparency and publicity. NEAA's website includes all data on its activity on external and internal quality assurance; the Ministry of Education and Science also keeps a specialized information system containing: Register of higher schools, Register of academic staff of higher schools, Register of current and returning undergraduates and doctoral students, Register of banks giving grants on the basis of Law of crediting undergraduates and doctoral students.

On the whole, the system of higher education and science functions with ambition of satisfying the needs of society for quality education going with European education as part of European

education area. Bulgaria is a country in which there is a stable interest in higher education at all education and qualification levels and forms of study. In this context, in line with the Strategy, Bulgaria has introduced a model of financing higher schools based on learning outcomes. In 2014, 14.6% of state financing of state higher schools was distributed on the basis of criteria based on evaluation of quality and the applicability of education at the labor market. This percentage will rise to 30% in the academic 2016-2017 year; after that it will rise by 10% every year until it reaches 60% in 2019-2020. State financing will not be based predominantly on the number of students registered in a given degree program. It will be estimated according to certain criteria for quality of education and correspondence to needs of labor market such as accreditation evaluation and research work and data on employability of graduates with higher education and also with regard to the country's social-economic priorities.

In this sense, 32 specialisms have already been singled out as "priority areas" and another 12 areas are defined as "protected" (i.e. important but unattractive for students). The list of priority areas includes mathematics, engineering sciences, biotechnologies, chemistry, and energetics, technology of foodstuffs, informatics, computer science and technologies. The protected specialisms are predominantly in areas of philology (e.g. Korean studies, Greek philology and Japanese studies).

The creation of an effective and developing system of higher education guaranteeing quality, accessibility and market orientation of education requires joint efforts of state and all education institutions, NEAA and other stakeholders; they should direct their efforts to fulfilling the aims set in the Strategy: improving of access of increasing the sector of graduates with higher education (reaching 36% graduates at the age of 30-34 years in 2020); enhancement of quality of higher education and its compatibility with European systems of higher education, obtaining a decent place in EHEA; setting up a stable and effective connection between higher schools and the labor market and achieving dynamic match between demand and supply of experts with higher education; increasing finances of higher education and science; expansion and strengthening of the network for lifelong study; broad implementation of all electronic forms of distance learning; improving access and increasing the size of cohort of graduates with higher education (reaching the level of 36% of graduates with higher education from 30 to 34 years of age).

The state and prospects of enhancing quality of education and development of the higher education system in Bulgaria determine the need for higher schools and NEAA to apply in their work the principles of accountability, monitoring and transparency consistent with European standards on quality assurance in EHEA.

Compliance with ESG 2015 of Bulgarian HEIs and its objective evaluation by NEAA is one of the important prerequisites for increasing trust of society and setting them up as reliable partners in European education area.

4. HISTORY, PROFILE AND ACTIVITIES OF THE AGENCY

NEAA was created on the basis of Art. 11, Par. 1 of the Higher Education Act (HEA) passed by the National Assembly on 27 December 1995. With Ordinance of Council of Ministers No 189 of 1 August 1996, Statutes of NEAA and the staff of the agency were adopted.

In 1996, the Accreditation Council (AC) of NEAA, having been assigned with the task of structuring and organizing the agency, adopted the basic approach of studying existing good

practice at international level and considering the traditions of Bulgarian higher education. For the development of the necessary methodology and documentation, NEAA's participation in the project PHARE-BG 95.06-05.01.001 was of major importance. The first phase of the project "Preliminary study of accreditation of higher schools in Bulgaria" was done with the consulting support of Quality Support Centre, Open University-London-QSC; the second phase "National Agency for Evaluation and Accreditation" was completed in one year by a team of the British Council. In this way, the opportunity of bringing evaluation and accreditation in compliance with European developments in this period was provided.

According to changes in HEA of 2004, NEAA was charged with the functions of a specialized state organ for evaluation, accreditation and post-accreditation monitoring of quality of education at higher schools in Republic of Bulgaria. NEAA's mission is related to national goals for raising the role and enhancing quality of higher education as a factor of social progress. Results of accreditation procedures are taken into account in forming the state's education policy in the area of higher education. Obligations and rights of NEAA are regulated also by the Law on development of academic staff in Republic of Bulgaria. Unified state requirements for experts of regulated profession and other legal documents.

NEAA stands up for the principles of independence, publicity and transparency in performing accreditation activities for assuring the high competence of participating in the procedures Bulgarian and international experts and equality in evaluation and accreditation of state and private higher schools. Functions and structure of NEAA are defined in HEA (art. 86 and art. 87). Its executive organs are AC and its President. AC is composed of President and 10 members – habilitated persons in fields of higher education one of whom is the Vice-President for post-accreditation monitoring; they are appointed after the requirements of HEA. Membership includes 6 representatives of higher schools, one representative of Bulgarian Academy of Sciences, one representative of Agricultural Academy, 2 representatives of Ministry of Education and Culture. Nomination of members of AC is organized by the Ministry and Rectors' Conference in a way guaranteeing maximum representation of all basic academic structures and areas of higher education. NEAA's President represents the agency and leads its work. The Prime Minister of Republic of Bulgaria appoints on the basis of labour relations the President, Vice-President and members of AC on a proposal of the Minister of Education and Science.

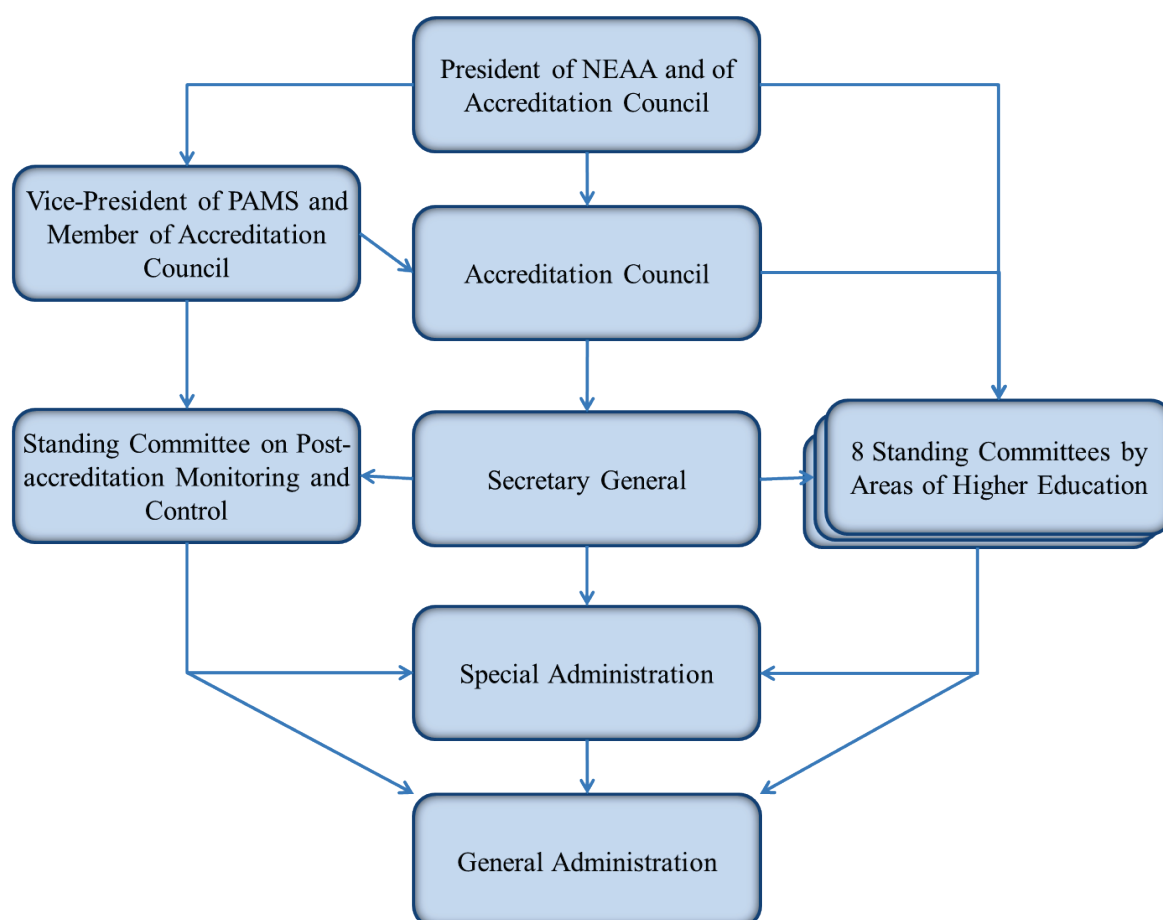
AC creates Standing Committees (SC) on areas of higher education and post-accreditation monitoring. It elects their members on the basis of presented documents. SC consists of 7 members one of whom is chairperson of the committee. In the membership and in the work of SC there is a student representative as a full member. Members of committees are appointed with a mandate of 3 years by the President of AC. Presently, NEAA has 9 SC: SC on pedagogic sciences and social affairs; SC on humanities and arts; SC on social and legal sciences, security and defense; SC on economic sciences and management; SC on natural sciences, mathematics and informatics; SC on technical sciences; SC on agrarian sciences and veterinary medicine; SC on healthcare and sport; SC on post-accreditation monitoring and control.

SCs on areas of higher education take decision on procedures for program accreditation of professional directions; program accreditation of doctoral programs outside regulated professions; evaluation of projects for opening of professional directions. Committees propose nominations for election by AC of members and tasks of expert groups (EG) which carry out procedures for institutional and program accreditation and monitor their work. International experts participate in EG and also representatives of trade and branch unions, employers' societies, etc.

SC on post-accreditation monitoring and control (SCPAMC) carries out post-accreditation monitoring on: the institution's incl. its branches' capability of quality assurance of educational and research activities by means of an internal quality assurance system; the fulfilling of recommendations given in the accreditation procedure; the fulfilling of teaching capacity of the higher school, the capacity of the professional directions and specialisms from regulated professions. Amendments of HEA of 2011 and 2016, have stipulated that in case of unfulfilled in time recommendations found by PAMC (formulated in AC's accreditation decision or that of the respective SC) and also in case of unfulfilled criteria for applying internal quality assurance system NEAA, on a proposal of SCPAMC, should apply sanctions: lowering the accreditation grade, decreasing educational capacity; declining accreditation. Control is performed by SCPAMC whose statute and functions are defined by HEA. The commission carries out its activities on accepted timetables for the calendar year for respective procedures, methodological directions and criteria for use of internal quality assurance system in line with ESG 2015 Part 1. The legal basis of SCPAMC is adopted by AC and published at the website of the agency.

Activity of SCPAMC has been identified as good practice in a report of international working group on development of Bologna Process and modernization of higher education.

The graph presented below shows the structure and the interconnections of the units of NEAA.



Administrative services at NEAA are executed by general and specialized administration. In order to improve operative and informative base of carrying out of accreditation procedures, NEAA is building an information system monitoring all stages of accreditation; a website with current information is supported.

In carrying out policies of the agency for partnership with HEIs, the President of NEAA represents the agency at home and abroad and coordinates the connections with external partners.

With the purpose of developing and maintaining long-lasting and constructive cooperation, NEAA is in dialogue with higher schools, Ministry of Education and Science, other institutions and organs related to higher education in the country. NEAA works successfully with Bulgarian Academy of Sciences and other scientific organizations, National representation of students' councils, National branch syndicate "Higher education and science". NEAA organizes and participates in joint work-groups, consultative councils, international conferences and seminars on the problems of enhancing quality of higher education. Especially important is the understanding of cooperation with employers and higher schools. For that reason, the agency keeps direct contacts with all stakeholders in the education system. In NEAA's work, there are representatives of non-academic circles, e.g. public organizations.

HEA stipulates that AC of NEAA creates criteria for evaluation and accreditation of concrete procedures and related documentation. As of January 2017, NEAA uses a new Criterial System for evaluation and accreditation of higher schools in line with ESG 2015, adopted by AC. The agency's Criterial system is based, according to HEA, on an assessment scale from one to ten which allows higher concreteness of grades in fully detailed and measurable elements. Compliance with HEA and verbal grades of NEAA has been achieved. For the correct execution of the existing 11 types of procedures of accreditation and evaluation of projects, Methodological Guidelines and rules have been produced and adopted; they are applied on an equal basis to higher schools and research organizations. NEAA supports enhancement of quality of higher education by periodic institutional and program evaluation accreditation of higher schools in Bulgaria, professional directions, specialisms from regulated professions, doctoral programs; by means of evaluation of projects for opening new professional directions and by post-accreditation monitoring. As a result of institutional and program accreditations, summaries and analyses are produced related to organization and outcomes of the work of SC and SC of NEAA. Provision of access and publishing of outcomes of procedures of institutional and program accreditation and evaluation of projects, NEAA assures comparability between accredited higher schools, accredited professional directions; supports candidate-students in their choice of program; provides opportunities for society and employers to learn about quality of education at concrete higher schools.

For NEAA, European cooperation and membership in ENQA and EQAR is of great importance. The agency has gone a long road of development together with partner agencies members of ENQA. Recommendations of the first external review in 2008 were accepted with attention and with the help of ENQA were used to introduce the suggested improvements. In February 2014, NEAA was reviewed for the second time by a review panel of ENQA. The Board of ENQA decided on 24.04.2014 to confirm NEAA's full membership in the association. The decisions of ENQA are published at the association's website www.enqa.eu. Thus, NEAA was included in work to fulfill the aims of Bologna Process for implementation of the 3-tier system of education with its education and qualification degrees in line with the needs of students and employers from different sectors of social life.

Today NEAA carries out its obligations as stipulated by the Erevan communique of ministers of education of May 2015 for observing ESG and Bulgarian legal framework. Implementation of ESG 2015 is a conscious responsibility in the process of trans-border understanding of quality culture in higher education. That allows higher schools to stand equal in EHEA. NEAA's permanent dialogism, openness and transparency in executing its mission enrich its public image and increase trust in its work.

5. HIGHER EDUCATION QUALITY ASSURANCE ACTIVITIES OF THE AGENCY

The state creates conditions for free development of higher education and access to it and organizes NEAA's activities. In this way, the agency's results are some of the determining factors in the network of higher education in our country.

Accreditation is the recognition by NEAA of the right of a higher school to give higher education in education-qualification degreed in definite areas, professional directions and specialisms of regulated professions by evaluating the quality of their activities. According to HEA, evaluation of higher schools and professional directions can be done by international agencies which are members of ENQA and/or are included on EQAR at the invitation of the respective institution. In 2016, NEAA adopted a supplement to the procedure for accreditation related to recognition of international evaluation. Up to one year after its evaluation by an international agency, a higher school can apply to NEAA for institutional/program accreditation and evaluation of projects.

External quality assurance of higher education and development of the system of Bulgaria higher education is supported by the work of the agency related to different types of accreditation stipulated by HEA.

In the period 2015-2017, Standing Committees and AC have completed in total as follows (cf. Table below):

N	Procedures completed by	2015	2016	to June 2017	Total
1.	Institutional accreditation of higher schools	4	5	4	13
2.	Program accreditations:				
	- professional directions	56	54	18	128
	- specialisms from regulated professions	28	14	7	49
3.	Program accreditations of doctoral programs	312	414	104	830
4.	Evaluation of projects for opening and reforming a higher school	2	2	2	6
5.	Evaluation of projects for reforming basic units of higher schools	4	4	1	9
6.	Evaluation of projects for opening:				
	- Professional directions	16	8	4	28
	- specialisms from regulated professions	5	1	2	8
7.	PAMC of fulfillment of given recommendations:				
	- Institutional accreditation	6	18	8	32
	- Specialisms from regulated professions	7	6	9	22
	- Program accreditation of professional directions	14	25	36	75
	Control of adhering to capacity of a higher school	1	1	1	3
8.	Changing capacity of specialisms from regulated professions and capacity of professional directions	18	14	10	42
9.	Evaluation of environment of and distance form of learning	3	11	2	16
Total number of procedures		476	577	208	1261

The types of procedures shown in the table above will be described briefly.

According to HEA, institutional accreditation is based on evaluation of the way a higher school realizes its mission; it is the result of evaluation of the effectiveness with which an education institution controls, assures and enhances quality of education. Evaluation in the case of institutional accreditation is directed to checking the implementation of criteria adopted by AC in line with ESG Part 1 and in connection to art. 77, par. 2 of the abovementioned law. On the basis of this legal regulation, NEAA carries out institutional accreditation by generally stressing on evaluation of: published policy for quality assurance of education in the interest of social needs; effectiveness of internal quality assurance system; the execution of procedures of approval, monitoring and renewal of curricula and syllabi; scientific research and artistic activity of the reviewed higher school; management of the system of accumulation and transfer of credits; maintenance and development of material facilities of the higher school.

Program accreditation is based on evaluation of quality of education in a certain professional direction, specialism from regulated professions or doctoral programs in education-qualification degrees Bachelor, Master or Doctor. Within a given professional direction, evaluation is oriented to checking the execution of criteria adopted by AC in line with ESG Part 1 and in connection with art. 77, par. 2 of HEA; in general, the objects of evaluation are: policy and management of the higher school for assurance of quality of education in the respective professional direction; structure, organization and contents of curricula and syllabi, methods of teaching and assessment of students' achievements; profile and qualification of teaching staff and the interconnection between scientific research and the respective professional direction and also the participation of undergraduate and doctoral students in it; material and technical base of education.

Projects for opening, reforming higher schools, opening, reforming faculties, branches and colleges within higher schools, opening of professional directions and specialisms from regulated professions in which education will be carried out are realized after positive evaluation by NEAA. Evaluation of projects is done on the basis of established criteria adopted by AC in line with ESG Part 1 and in connection with art. 81, par. 6 of HEA. Without highlighting details in the application of criteria for the types of procedures concerning projects described, we shall underline the fact that requirements for evaluation are consistent with those for institutional and program accreditation.

Procedures for PAMC on implementation of recommendations after decision of AC are applied depending on given assessment in institutional, program accreditation of professional directions/specialisms from regulated professions of a higher school. Evaluation of internal quality assurance system of education and academic staff is applied depending on given assessment in institutional accreditation on the basis of criteria for PAMC in line with ESG Part 1.

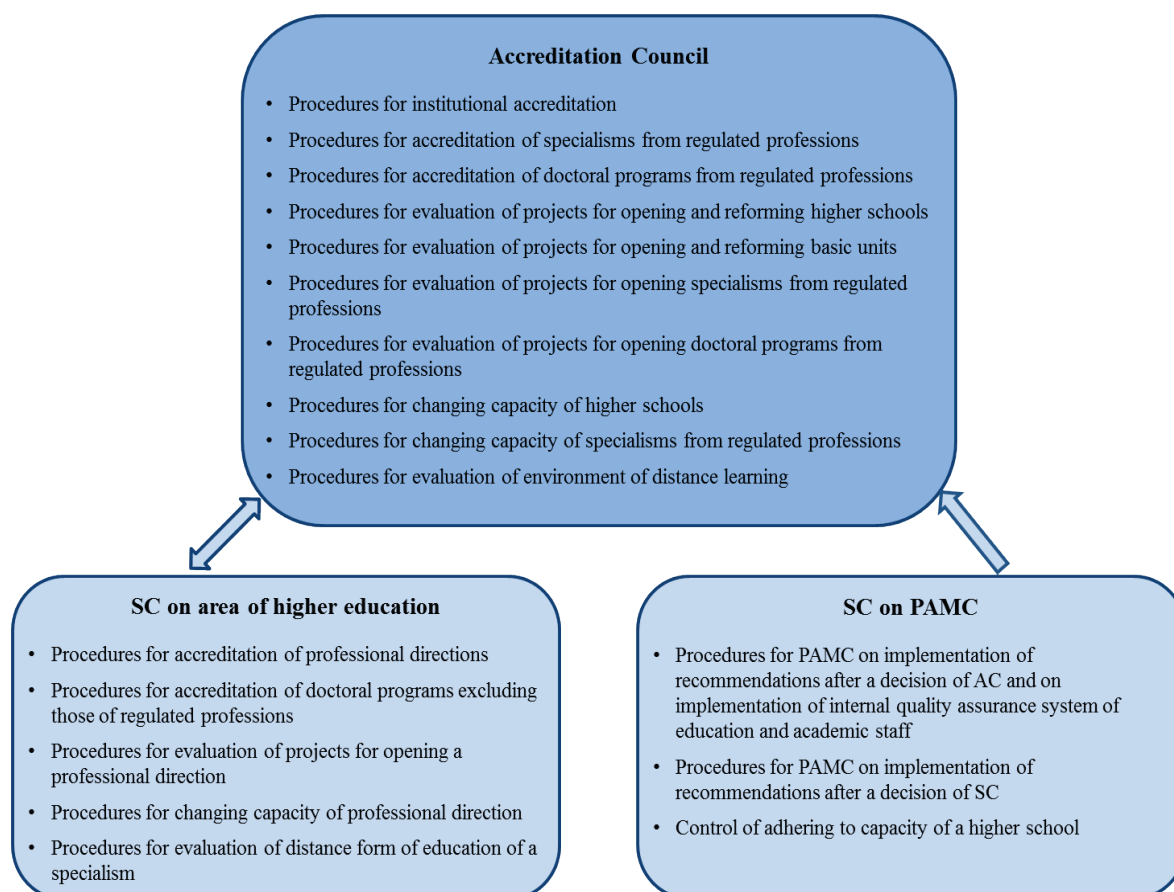
SCPAMC is obliged by law to control the execution by the particular higher school of the institutional capacity as defined by AC. The report of the commission on the results is accepted by AC and informs the minister of MES. Under the framework of the process of implementation of recommendations on the respective professional direction and specialisms from regulated professions, the fulfillment of the defined capacity is accounted for.

Procedure for changing capacity of specialisms from regulated professions and capacity of professional directions is carried out after a report of SC on the basis of published requirements for the higher school. The report of respective SC is discussed and adopted/rejected by AC at special sessions. NEAA carries out a procedure for evaluation of distance learning environment and distance form of learning on the basis of Instruction and Criteria adopted by AC,

<https://www.neaa.government.bg/en/evaluation-and-accreditation/distance-learning>.

By law, NEAA is responsible for giving the minister of education and science information on the results of completed procedures.

According to HEA, subjects which execute and adopt decisions on procedures as described are: AC, SC and SCPAMC.



HEA regulates the right of AC and SC to take legitimate decisions on completing the procedure with an evaluation, capacity for educating a certain number of students and recommendations on future development of the evaluated institution. SC informs AC on the completion of its procedures.

Realization of recommendations as follow-up activities of the respective higher school is evaluated by SCPAMC which is obliged by law to present to AC a project for a concrete decision on their implementation. AC takes the final decision.

Technology of carrying out accreditation procedures shows the sharing of responsibilities between decision-making bodies (Standing Committees and Accreditation Council).

Results of accreditation procedures and reports of higher schools on implementation of recommendations help the uninterrupted development of internal quality assurance systems of education and academic staff. Opportunities are provided for comparing and use of good practices by higher schools of countries who are members of EU, quality and means of education and research of undergraduate and doctoral students is improved at higher schools and scientific organizations.

Energy of NEAA is bound for establishing the agency as a factor of quality assurance of education and of further protection of the agency's autonomy and independence.

6. PROCESSES AND THEIR METHODOLOGIES

In order to carry out its tasks, AC of NEAA has adopted the following documents and procedures regulating processes and methodology of accreditation activity:

- Methodological guidelines for preparing SAR; methodological guidelines for EG; rules for work of undergraduates and doctoral students, members of EG; rules for international experts; program for briefing members of EG; methodological guidelines for estimating/ changing capacity of higher schools in institutional and program accreditation; methodological guidelines for drafting a report on a higher school's implementation of recommendations in institutional and program accreditation and the application of IQA system of higher education and academic staff.
- Procedure for institutional accreditation; procedure for program accreditation of professional direction excluding regulated professions; procedure for program accreditation of specialisms/doctoral programs from regulated professions; procedure for evaluation of projects; supplement to procedures for institutional/program accreditation and evaluation of projects in connection with art. 88 par. 3 of HEA; procedure for post-accreditation monitoring and control; procedure for PAMC on implementation of recommendations after decisions of AC with grade in institutional accreditation of 4.00-4.99, 5.00-6.99, 7.00-8.99, 9.00-10.00; procedure for PAMC after decision of AC with rejection of institutional accreditation of the higher school; procedure for PAMC on observing capacity of the higher school, capacity of professional directions and specialisms from regulated professions; procedures for PAMC on a proposal of the minister of MES, procedure for implementation of internal quality assurance system of education and academic staff.

In Section 5, we describe the different types of procedures for accreditation as concrete activities of NEAA. Here, we shall explain the stages which the agency and its units execute in realizing the procedures. Thus the focus is on explaining the statute, role and activities of EG. NEAA keeps a register of all experts who have the necessary experience, qualification and will to participate in procedures of evaluation and accreditation. The database is available at

<http://www.neaa.government.bg/>.

The list of experts is published annually on the website of the agency.

Of special importance is the methodology of work with EG which is valid for all its members. The concrete elements show functions, rights and obligations of members of EG, mechanism of carrying out of their work – from the site-visit at the applying institution to the production of the report on the review in the respective procedure.

On the suggestion of SC, AC approves the tasks and composition of EG based on the respective procedures for evaluation and accreditation. Members of EG are experts of the professional directions matching the procedure. In addition, EG includes undergraduate and postgraduate students, international experts and employers who have equal rights as the other members. One member of SC on area of higher education is appointed as observer of the work of EG on the respective procedure.

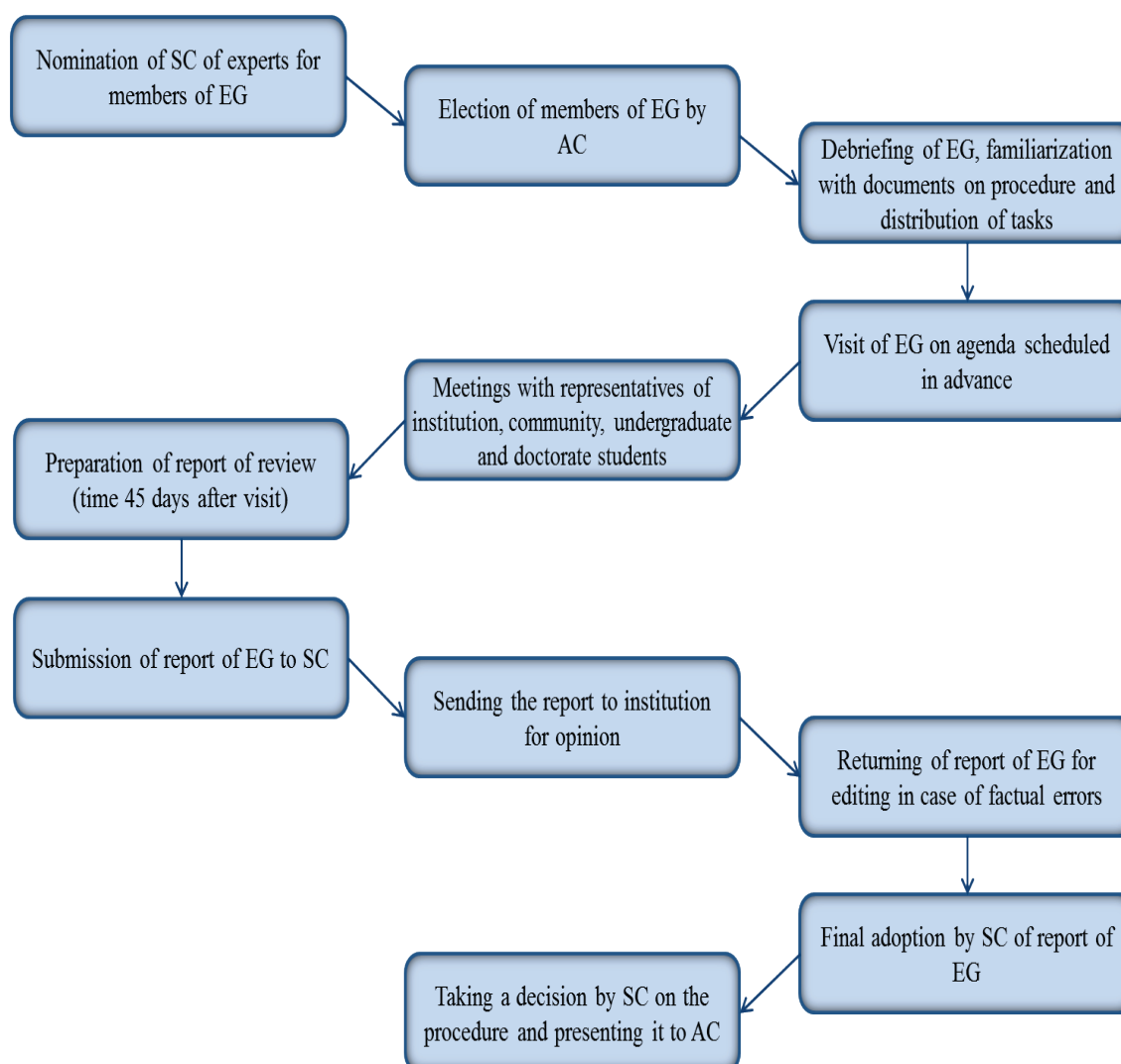
External evaluation is a stage which follows the institution's self-assessment, application for opening the respective procedure and election of EG. The basic task of EG in its site-visit is to examine and analyze (on the basis of the self-assessment report, the evidence provided, undergraduate and postgraduate students' opinions) the quality of education provided. Analysis aims to establish the strong and weak points in the activity of the institution and also the requi-

sites of guiding principles of improving its work. It is necessary for the experts to know their rights and obligations, policy of NEAA, corresponding legal documents, Code of Ethics of NEAA, criteria and procedures applied in external evaluation. They should keep the principles of confidentiality and avoidance of conflict of interests in direct and indirect line.

NEAA trains its experts in instructing sessions, seminars and separate consultative meetings. The agency encourages them to observe the principles of independence, following the adopted procedures, knowledge of methodology of execution and high expert competence.

In site-visits, questions asked by experts at the time of meetings should be sensible, reasonable and clearly formulated. At the time of site-visit, members of EG hold meetings at which they discuss impressions, coordinate their actions and the raised questions regarding the general review. EG compares and expands information in order to draw conclusions which should be based on found evidence and should support the truthfulness of statements in the self-assessment report. EG is familiar with general information on students' opinions. After EG familiarizes with particular information from different sources, it formulates in the report the results of the examination of implementation of criteria, strengths and weaknesses, direction of improvements of work of reviewed institution.

Despite the type of accreditation, AC has adopted a route on the basis of Methodological Guidelines of each EG's course of procedure which is to be followed in terms of designated steps.



With the final adoption of the report of EG by SC, the work on the respective procedure of EG is completed; however the role of its activity as the fundament of decision/report of SC is paramount. This shows the character of the methodology in terms of nature and contents; it provides opportunities for the most important subjects in the accreditation process – EG and SC – to interact copiously.

SC is the subject which on the basis of the report of EG prepares its decisions/reports depending on the type of procedure. We have explained above which reports are adopted by AC for the final accreditation evaluation.

7. AGENCY'S INTERNAL QUALITY ASSURANCE

For guaranteeing maintenance, monitoring and improvement of quality of the agency's work, AC assisted by its consultative, operative organ – Committee on quality of the activities of NEAA (CQ) with functions following the adopted "Rules". The membership in CQ includes 3 members of AC one of whom is Chairperson of the committee, 3 representatives of higher schools, 1 representative of BAS, 1 representative of Agricultural Academy, 3 representatives of undergraduates and doctoral students, 3 representatives of employers of graduates with higher education, 1 representative of MES.

In line with recommendations of the Board of ENQA and the "Program for Implementation of ESG", in December 2015, AC adopted updated "Rules" for work of CQ

<https://www.neaa.government.bg/images/files/SUKO/PravilaZaDeinosttaNaKomissiaVOK-EN.pdf>.

CQ holds planned meetings at which members discuss directions possibilities of improving the agency's activity. Documents related to updating the rules, procedures and criteria are reviewed. Representatives of higher schools, members of CQ, have marked the necessity of optimizing some of the procedures and decreasing the administrative load on higher schools. Positive opinions for expanded participation of students and employers which were included in expert groups for accreditation were put forward by undergraduates and doctoral students. The concrete aspects of this activity are as follows.

In 2015, the updated text of "System of quality assurance of NEAA" was adopted. Three types of procedures of maintenance of the system were debated and approved – "Coordinating and preventive activities", "Internal audits" and "Surveys". The procedure of surveys was adopted by AC together with survey forms necessary for keeping feedback; the report "Comparative analysis of the results of institutional procedures for accreditation of higher schools 2012-2015" was discussed; recommendations for optimizing the accreditation process were formulated. On the proposal of CQ, AC adopted a decision of introducing a session on changing capacity of higher schools, professional directions and specialisms from regulated professions and carrying out procedures on the basis of documents in the case of grades from 7.00 to 10.00. Principled questions on the prospects of decreasing documentation of institutional and program accreditations including accreditation of doctoral programs were debated.

CQ works in direct relationship with the Group for Internal Audit established by AC. According to the decision of AC, it conducts examinations of documentation and normative timelines of accreditation procedures of SC. The reviews have finished with protocols of findings adopted by AC and with recommendations on enhancing SCs' work.

Bearing in mind the need for implementation of ESG related to NEAA's independence and autonomous execution of its responsibility for enhancing quality of education, for integrity of its activities and the outcomes, CQ continues to cooperate with the Ethics Committee. The latter has updated its rules as they are included in the Code of Ethics of NEAA. CQ cooperates with the new Committee on Appeals of students and pleading accreditation procedures which works with its own statutes,

https://www.neaa.government.bg/images/files/SUKO/rules_of_procedure.pdf.

The basis of this interaction is the fact that the two committees are consultative bodies of AC of NEAA and assist its work preventively.

AC is responsible and alert in its support of the work of CQ. Meetings of CQ and AC are held periodically together with chairpersons of SC related to organization of work, interaction of SC with SCPAMC, sharing good practices and difficulties in carrying out of accreditation procedures.

Comprehension and implementation of ESG Part 1 is facilitated by the agency's work in international R&D projects, e.g. EIQAS, www.eiqas.com. In 2016, it sent to trainings five students to Ljubljana, Slovenia, and five experts to Lisbon, Portugal under the framework of the project.

The abovementioned activities of IQA correspond to ESG and are in conformity with the mission of NEAA,

<https://www.neaa.government.bg/en/about-us-3/mission-and-strategy>,

and the Strategy of Development of the agency,

https://www.neaa.government.bg/images/files/SUKO/Strategija_2014-2017_extended_ver_EN.pdf.

8. AGENCY'S INTERNATIONALIZATION

Internationalization is a major characteristic of the activities of NEAA; it guarantees achievement of goals of the agency as an element of the national system of higher education. The agency considers its integration in the international community of quality assurance agencies to be its most valuable asset. Internationalization includes in the first place membership in ENQA and registration on EQAR, cooperation with individual agencies of the European association, membership in other international organizations, e.g. CEENQA, work in international R&D projects, etc. In 2016, a positive assessment carried out by ENQA resulted in renewal of the agency's full membership. Estimated full and substantial compliance of activities of the agency with ESG 2015 reinforces authority of the agency at international and national level; it is a guarantee for its usefulness in the national system of higher education.

NEAA participates regularly in the General Assembly and the Members' Forum of ENQA. Arrangements were concluded for joint work with partners in the existing frameworks of international agreements of cooperation, e.g. with the Polish agency PKA and the agency of Slovenia SQAA; new cooperation agreements were signed, e.g. the latest one with Bosnia and Herzegovina is planned to be signed in 2017.

NEAA is a partner in the consortium of 10 institutions (agencies, universities and rectors' councils) of 4 countries (in alphabetic order: Bulgaria, Poland, Portugal and Slovenia) of the ERASMUS+ research and development project, *Enhancing Internal Quality Assurance Systems*

(EIQAS, www.eiqas.com) (25) which aims to enhance the internal quality assurance systems of higher education in Europe. NEAA's concrete work package is to survey higher schools' readiness to harmonize their quality assurance systems and their work with the new ESG 2015. The sample includes 25% of Bulgarian higher schools selected randomly in order to find examples of good practices in the area of the 10 standards of ESG Part 1. The national report is published at the website of the project. One of the project's products is "Guide to ESG" which was discussed and approved at a working meeting of the partners in Lisbon, December 2016. EIQAS finished at the end of January 2017. Another international project, *Quality Assurance and Accessibility in European Open Education*, (QAA in EOE) has been prepared in cooperation with NAKVIS (Slovenian QA Agency for Higher Education) as Coordinator General and other partners and submitted in March 2017 ERASMUS+, KA2. The QAA in EOE project represents an incentive for national quality assurance agencies via field-test case studies in massive open learning environments and OER that renders effective quality assurance mechanisms and processes for IQA and EQA systems. The project offers real-life results in terms of transforming traditional courses to open courses and provides innovative approaches in quality assurance standards and guidelines by creating and adopting the educational resources for blind and visually impaired.

In line with ESG, international experts are invited to be members of EG; they are representatives of foreign agencies members of ENQA or registered on EQAR. They participate as EG members in accreditation procedures. The international experts contribute with their experience to the successful use of good practices of accreditation.

NEAA coordinates and executes its activity in partnership with a wide circle of national and international institutions, organizations and organs with activities in the area of higher education.

In executing NEAA's policies of partnering with institutions of higher education, the President of NEAA represents the agency at national and international level and coordinates the connections and relations with international partners.

9. COMPLIANCE WITH EUROPEAN STANDARDS AND GUIDELINES (PART 3)

9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

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

3.1.1 NEAA performs activities of external quality assurance which have clear, precise goals and objectives which are part of the publicly announced mission statement. The whole organisation of NEAA's activity for executing accreditation procedures and post-accreditation monitoring and control related to institutional and programme evaluation of higher schools and doctoral programmes of science organisations in Bulgaria contributes for the accomplishing of its mission. NEAA's mission defined by HEA is directly related to national goals which render into account the role of higher education as a factor of socioeconomic development of the country. According to this law, external evaluation and accreditation aim to stimulate higher schools to develop their potential and to enhance quality of offered education. The Cri-

terial System of NEAA adopted by AC in line with ESG and also the Procedures for accreditation and evaluation of projects, Methodological documents and Rules for voting published at the website of the agency in Bulgarian and English are being applied equally to all higher schools and science organisations. This means that the same principles and approaches are used; they are defined by objective flow of different accreditation procedures and the achievement of their reliability and consecutiveness.

The agency carries out activities for guaranteeing quality of education process, of education environment and research activities at higher schools before all by means of the new Criterial System; the latter evaluates the fulfilment of European standards. NEAA observes the legal framework by sending reports of EG and respectfully of SC to higher school in order to overcome factual inaccuracy in the accreditation procedure. They finish with decision of AC/SC whose content is regulated by HEA. NEAA's decisions are individual administrative acts and as such they can be appealed on the order of the Administrative-Processual Code.

3.1.2 In external quality assurance, the agency is led by the principles of objectiveness, transparency and accountability of its own activity and its outcomes which are defined in NEAA's Strategy for development in the period 2014-2017. Some of the fundamental priorities in this document are connected to the work for achieving progress in enhancing quality of higher education capable of producing experts who are competitively qualified for the labour market. NEAA aims to guarantee objective assessment of higher schools and to orient them in their advancement by professionally organised and completed accreditation procedures and post-accreditation control. For NEAA, it is especially important to raise public trust and its main task is to create a diversified system of public information on the activity of the agency's decision-making bodies – AC and SC. Outcomes of accreditation procedures, reports of EG related to programme accreditation of professional directions, reports and decisions of SC, decisions of AC and their summaries are made public constantly and regularly on the website of the agency in Bulgarian and English languages according to the decision of AC,

https://www.neaa.government.bg/en/accredited-higher-education-institutions/higher-institutions_

https://www.neaa.government.bg/en/accredited-higher-education-institutions/scientific-organizations_

On its Internet site, NEAA publishes statutes and methodological documents on its activities; books with the system of criteria and procedures for different accreditations; tasks that the agency adopts which are applied in the schedules of the SC. The following documents have been made public: results of surveys for feedback information from involved institutions aiming to ascertain omissions and weaknesses in the performance of accreditation and undertaking appropriate preventive and corrective measures: "Analysis of state and observable trends in the development of higher education in our country" (it is made on the basis of 31 summary reports of completed procedures for programme accreditation of professional directions at higher schools for the period 2013-2015. Until 2017, a total of 42 summary reports on professional directions has been published, https://www.neaa.government.bg/en/publications/summarizing-reports_. Public is informed on the outcomes of accreditation procedures by the website of the agency where EG and SC reports are published with summaries in Bulgarian and English. On the site, there is a form for feedback which provides contact with the administration and leadership of NEAA and for getting additional information on the accreditation process. NEAA performs activities according to the Law for access to public information, in case of private persons or from institutions.

With its planned and continuous actions, NEAA demonstrates openness of its goals, principles and methods of work; thus it reinforces its authority and importance for the enhancement of quality of higher education. Sharing of facts related to ongoing activities in accreditation and support of internal quality assurance system shows that people participating in NEAA's activities are competent and act professionally and ethically. NEAA's team strives to perfect its information and consulting communication with stakeholders and citizens and contributes for the construction of a positive public opinion and institutional trust.

3.1.3 Reinforcement of quality culture in the system of Bulgarian higher education is directly connected to the application in accreditation procedures of the Criterial System of NEAA created in compliance with ESG and in line with the national legislation. In the Criterial System, the basic principle of European standards is amalgamated – higher schools should be responsible for quality assurance of education. The agency is led by the understanding that the three parts of ESG are interrelated. It continues the practice and effective interaction with higher schools which are knowledgeable of the Criterial System adopted on 20.10.2016. Executing the decision of AC of 3.11.2016 for new applications for procedures, applicants (higher schools) should produce SAR according to the requirements of the Criterial System and after 01.01.2017 they should submit the respective documents.

For assuring quality and enhancing NEAA's work, the leadership of the agency and members of AC carry out actively consultations and insist on communicating with stakeholders on questions regarding criteria, assessment procedures, accreditation procedures, determining capacity and post-accreditation and control.

All documents of NEAA on quality assurance and carrying out of institutional and programme accreditations are accessible, printed in book form and published on the site of the agency.

3.1.4 NEAA accords, coordinates and executes its activity in partnership with a wide circle of national and international institutions, organisations and organs with activities in the area of higher education.

In section 8 of this SAR, we outline international activities of NEAA. That is why here, we shall highlight NEAA's membership in ENQA, the agency's cooperation with agencies of the European association, membership in other international organisations, participation in international R&D projects. Agreements with PKA of Poland, the accreditation agency of Bosnia and Herzegovina, participation in the consortium of 10 institutions of the EIQA Project,

<https://www.neaa.government.bg/en/home-en/120-english/news/660-european-project-for-the-development-of-internal-quality-systems-eiqas>

all aim to increase quality of higher education and development of IQA systems of higher schools in Europe.

Of special importance is the understanding of cooperation with employers and higher schools at national level. Therefore, the agency maintains close relationships with all stakeholders in the education system and Bulgarian society.

In conclusion, NEAA follows and realises policies and activities of external quality assurance for effective flow of procedures related to evaluation, accreditation and post-accreditation monitoring and control. They all have a stimulating role for uninterrupted development of the internal quality assurance systems of education and teaching staff of higher schools. These activities of the agency create conditions for comparability and acquiring good practices of educational institutions from EU member states.

9.2 ESG Standard 3.2 Official status

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

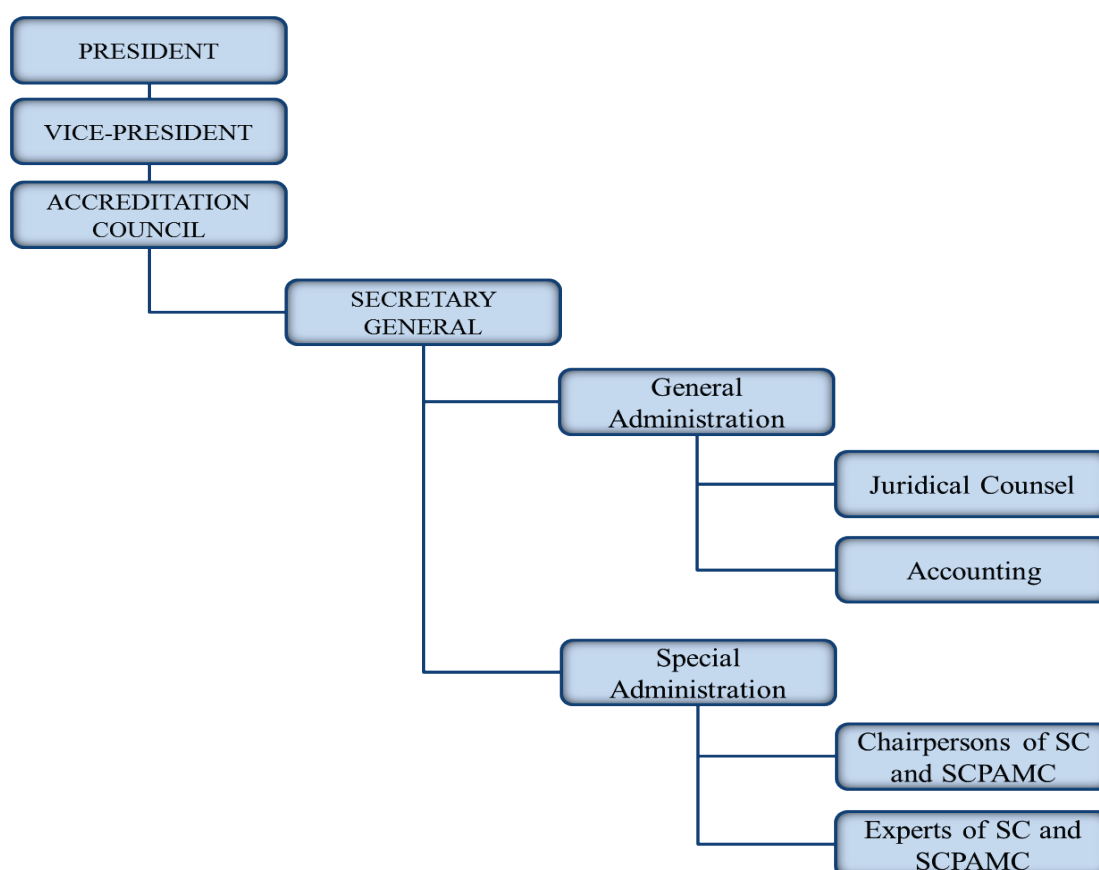
3.2.1 In explaining history, profile and activities of NEAA in section 4, it was made clear that NEAA at the Council of Ministers is established on the basis of HEA as an independent specialised state organ for evaluation, accreditation and control of quality of activities of higher schools. With the changes in HEA of 2004, NEAA was assigned to perform functions of post-accreditation monitoring and quality control of Bulgarian higher education.

The agency does its activities in compliance with the Statutes of NEAA adopted by the Council of Ministers. NEAA's work is in conformity with other legislative acts such as Law for recognition of professional qualifications, Law for access to public information, Code of Labour, Law for administration, Law for the civil service and other legal acts.

As has been explained (Section 4) with a decision of AC and order of the President of NEAA, eight SC and one SCPAC work at the agency, ПИКАНН

<https://www.neaa.government.bg/en/about-us-3/structure>.

NEAA has 30 full-time employees according to PMS No 11 of 03.02.2010 for adopting a statutory regulation of the MES and instituting first-level and second-level distributors of budget credits at MES.



In conclusion, the brief retrospection of NEAA's creation shows that it was legally established and is an officially recognised institution by the competent state organs whose activities and decisions are in compliance with standards and guidelines for quality assurance (ESG Parts

1, 2, and 3). Education institutions undergoing evaluation, accreditation and control of ENQA recognise NEAA's decisions and are assured that the outcomes of this process are valid in the framework of the system of higher education, are recognised by the state, by the stakeholders and the whole society.

9.3 ESG Standard 3.3 Independence

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

3.3.1 NEAA is an independent institution. Its functional independence is legally guaranteed in a separate section of HEA which stipulates the way of structuring and functioning of the agency. NEAA gets a state subsidy from the republican budget which makes it financially independent of stakeholders. Organisational and functional autonomy spring from the way they are defined and internal documents of the agency regulating its structure are used including the system of criteria for evaluation higher schools, professional directions and programmes.

On this basis, NEAA strengthens its authority and responds to the need of Bulgarian higher institutions to develop their self-government by interacting with a reliable, independent and trustworthy partner.

3.3.2 The agency is operationally independent in all activities. Official information published on the agency's website ascertains its readiness to evaluate independently higher schools' capabilities to prepare competitive experts.

With a self-regulating decision of AC, the composition of EG is elected and appointed, as was explained in Section 6 of SAR.

According to its strategy and mission, AC decides on auxiliary units with consultative character, their members and their Rules of Activity. For instance, Committee on Quality, Committee on Ethics, Committee on Appeals of students and petition of accreditation procedures.

In carrying out its concrete policy, AC realises its autonomous right to create working groups with concrete tasks and timelines of completion. In the period 2015-2017, working groups were created with the purpose of: updating Methodological Guidelines and Procedures; two groups on the new Criterial System in line with ESG 2015; Methodology of Evaluation; creation of Guidelines for Distance Learning; preparation of self-assessment reports for external reviews of ENQA.

The output of each working group is accepted by AC after which the group is dissolved; that is evident in the Action Plan,

https://www.neaa.government.bg/images/files/SUKO/Plan_za_deistvie_ESG_2015-2017-EN.pdf.

In conclusion, in this way integrity and objectivity become fundamental principles in the work of NEAA. Analyses, findings and recommendations made by AC and by members of SC do not suffer from subjectivism and irregular influence of stakeholders. AC and SC decisions are legal, taken under clear rules and published documentation. Activities executed by NEAA in compliance with ESG are the prerequisite for guaranteeing its independent responsibility.

9.4 ESG Standard 3.4 Thematic analysis

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

3.4.1 NEAA has introduced a practice of preparing, discussing, adoption and publishing summary reports on the outcomes of accreditation procedures which describe and analyse the basic findings of the activities of programme accreditation. Summary reports are in nature and character comparative sector analyses. In them, empirical studies of accreditation of a certain professional direction for respective higher schools, good practices and areas for improvement are presented. In addition to summary analysis of the state of education in the respective professional direction, summary reports formulate visions for the future development of the area. Findings and conclusions made in these reports, provide: categorisation of quality of education in the particular professional direction for education-qualification degrees; description of specific aspects; account on degree of inclusion in the regional public and economic life; comparisons with analogous programs of foreign higher schools; proofs for satisfaction/dissatisfaction of employers and the whole society with educational and scientific outputs related to the professional direction.

To March 2017, AC has adopted 42 Summary Reports. They are published on the agency's website with annotations in English. In addition to the narrow circle of experts, MES and direct stakeholders, data of these analyses orient candidate-students in their selection of study place or raising of qualification, business representatives in their search for employees, and media in their description of the level of teaching and the opportunities for employment of graduates.

On the basis of data of Summary Reports, sector analysis is made; it reviews the state and tendencies in the development of the system of higher education in this country, https://www.neaa.government.bg/images/Publications-en/summerizing_reports/NAOA_annn_summ_reports.pdf.

It shows that organization and management of the teaching process at higher schools is at a good level. Education is carried out in line with educational mission, aims and tasks of the higher schools; internal normative documents have been created for the contents of study documentation and the obligatory procedures for its approval, monitoring and updating. A system of control and management of quality has been created. Study documentation is periodically updated in line with new educational practices, changing conditions, development of the respective scientific area, requirements of the labor market. It has been found that higher schools apply an approach to teaching and learning centered on students and their needs. Opinions of students and employers on the education system are studies, analyses and taken into account in the revision of study documentation.

The extension of Summary Reports as sector analyses of particular professional directions and the development of reports related to tendencies in the development of the system of Bulgarian higher education are proofs for finding the right approach in assuring transparency and provision of information relevant to society. They are a good objective basis for future state policy on the basis of full and systematic information on the whole system of higher education in the country. They mark the implementation of innovative practices in teaching, use of modern technical aids and online resources. Summary Reports provide opportunities for tracing the development of particular professional directions and facilitate students and stakeholder institutions to be informed on current achievements in the respective area.

3.4.2 At special seminars, review reports on the results of accreditations are discussed. Information obtained in the course of these reviews are published on the website of NEAA. It is the fundament for comparability of the work of higher schools in the country. Reports contain data on research, publications in reviewed and indexed periodicals, and the presence of Bulgarian science in the information environment of modern academic exchange and also of international research projects. In the reports, international mobility of students and teachers is conveyed. NEAA's policy of transparency is also proved by publication of reports of EG, decisions of AC and SC, annotations on accreditation procedures of institutions and professional directions and information letters to institutions,

<https://www.neaa.government.bg/en/accredited-higher-education-institutions/higher-institutions> .

In conclusion, NEAA guarantees comparativeness of outcomes of individual accreditation procedures and publishes them regularly on its website as part of the weekly updating of the database. NEAA publishes reports with comparative analyses of the compatibility of its activity for increasing the quality of higher education in the country.

9.5 ESG Standard 3.5 Resources

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

3.5.1 NEAA is financed by the state budget and fees for accreditation. According to HEA, NEAA is a juridical person with budget support with a seat in Sofia; the costs of accreditation and evaluation procedures and for evaluation of projects and changes in determined capacity are paid by the applicant at rates normatively adopted by the minister of finances. Financing of the agency is defined in the Statutes of NEAA as follows: "The agency is a second level user of budget credits at the Ministry of Education and Science. Support of its activity is ensured by a subsidy from the state budget and own income. The agency is administrator of its own income from procedures of evaluation of projects, procedures of accreditation ad control, publishing activity, national and international projects and programmes, other sources related to its activity".

NEAA's financial policy is regulated by System of Financial Management and Control which stipulates transparency and fitness for purpose of all financial operations. The system is founded on a set of audit tracks and internal rules which determine processes, communications and responsibilities of individual organisation units of NEAA in the realisation of financial activity. The President of NEAA orders the agency's finances (art. 10, par. 2, and point 12 of Statutes of NEAA) and submits for adoption by AC the budget project of the agency and for updating of the budget (art. 10, par. 2, and point 13 of Statutes of NEAA).

Real expenditure of financial means for the past 4 years are presented in Table 2.

Table 2: Real expenditure of finances in the period 2013-2016

Real expenditure of finances in the period 2013-2016	
Financial year	Real expenditure in BGN
2013	1 333 686
2014	1 235 021
2015	1 182 986
2016	1 253 884
Total for the period 2013-2016	5 005 577

Audit Office of Republic of Bulgaria carries out periodical independent audit of the activity of NEAA with which it guarantees the results of the activity of NEAA. The Ministry of Education and Science in its competence of first level user of budget credits of the republican budget reviews regularly NEAA's financial activity.

3.5.2 NEAA's human resources and material resources make possible the organisation and carrying out of activities of external quality assurance.

NEAA's work is executed by the following groups of human resources:

- Accreditation Council (President and 10 members)
- Chairpersons of Standing Committees (8 chairpersons of SC and 1 chairperson of SCPAMC)
- Members of SC (52 in total)
- Expert Groups and external experts
- Experts of Special Administration
- Administrative staff of General Administration

The President, Vice-President, members of AC, and the chairpersons of SC are habilitated persons with doctoral degrees in their education and science area. They are full-time employees of NEAA. The agency's activity is facilitated by experts appointed with civil contracts (part-time employees) at SC and administration.

Age structure of full-time employees of NEAA

Structural Unit	To age 50	Age 50-60	Above age 60
Accreditation Council		3	8
Chairpersons of Standing Committees		2	7
General and Special Administration	2	1	5
Total	2	6	20

Age structure of part-time employees of NEAA

Structural Unit	To age 40	Age 40-60	Above age 60
Members of Standing Committees	9	18	26
Part-time employees of General and Special Administration	4	3	5
Total	13	21	31

At present, relation between men and women of members of AC, SC and members of administration is as follows:

- Accreditation Council: 8 male and 3 female members
- Chairpersons of SC: 6 men and 3 women
- Members of SC (civil contracts): 32 men and 21 women
- General and Special Administration: 4 men and 16 women

NEAA takes care annually of qualification and career development of experts of Special Administration following a plan for training, participation in seminars and forums related to quality of higher education at national and international level.

NEAA's activities in executing accreditation procedures at higher education institutions is facilitated by EG. For guaranteeing objectivity and professionalism, AC of NEAA has appointed the following EG:

Expert Groups	2015	2016	Up to June 2017
Total number of EG	250	246	134

AC has approved undergraduate and doctoral students and international experts as members of EG as follows:

Expert Groups	2015	2016	Up to June 2017
Undergraduate students in EG	49	97	61
Doctoral students in EG	137	136	73
International experts in EG	4	13	7

3.5.3 NEAA has created an information system of managing the administrative processes related to evaluation and accreditation procedures. It provides electronic processing of part of current documentation. The system is in its initial stage of completing data; it is expected to facilitate operative execution of NEAA's activity and to optimize it significantly. At the following stage, it will be connected to other state institutions of central administration working in the sphere of higher education – MES, Council of Ministers, Fond "Scientific Research".

NEAA's website and the websites of HEIs provides electronical data on accreditation – decisions, reports, terms of accreditation and evaluation, samples of correspondence and other operative documents.

In conclusion, the state of NEAA's resources, as described, is possible in the framework of the total financing of the system of higher education in the country. These resources are used effectively by AC for executing the agency's activities.

9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

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

3.6.1 Internal quality assurance, as a realised necessity and fundamental task of the agency, is achieved by actualising its independence in harmony with autonomous, honest and professional execution of its responsibilities for an objective, transparent and publically announced accreditation process. NEAA attempts to carry out permanent monitoring of its multifaceted activity with which it guarantees competent achievement of its mission and functions as defined by HEA. The fulfilment of the contents of Standard 3.6 shows how subjects officially created by AC as its supporting organs accomplish the necessary organisation, suitable methods and aids of stimulating uninterrupted improvement of the system of internal quality assurance.

The major subject which guarantees the quality of different procedures in the policy of NEAA in that respect is the Commission on Quality Assurance (CQ) adopted by AC

<https://www.neaa.government.bg/images/files/SUKO/PravilaZaDeinosttaNaKomissiaVOK-EN.pdf>

CQ has amassed experience in applying the system "Corrector-NEAA" as an important element of quality assurance of the agency's activity,

<https://www.neaa.government.bg/images/files/CORRECTOR - NEAA.pdf>

In fulfilling the "Corrector-NEAA" system, CQ analyses the results of accreditation procedures, observations and findings of stakeholders. CQ formulates recommendations for changes in the normative documents of NEAA. It also suggests upgrades of procedures of changing capacity, distance form of learning in specialisms of accredited professional directions, doctoral programs which have been discussed at special meetings of the AC and appropriate decisions have been taken. CQ holds periodically meetings at which it marks adequate measures for intensification of the organisational environment in which NEAA is expected to enhance its internal quality assurance and its professional conduct. In some of the meetings of CQ, ad hoc participants coming from higher schools, science organisations, and sector syndicates take part; in the course of discussions, they formulate recommendations for action directed at NEAA's work. CQ keeps contacts with representatives of the quality committees of higher schools providing consultations on documents, procedures and activities.

At the initiative and with the active participation of the Commission on Quality and in cooperation with SC, the agency held seminars at which a wide range of experts engaged directly with the complex accreditation activity discussed topics devoted to "Enhancing quality of the activity of NEAA. Practical application of the updated methodological guidelines and procedures for evaluation and accreditation. International activity – participation in projects and trainings" (10.03.2016); "Current state, problems and prospects for development and affirmation of pedagogical fields of study by means of the focus of accreditation procedures" (21-22.03.2016); "Analysis of outcomes of the review made by the Group on Internal Audit for quality assurance of the activity of NEAA in accreditation procedures in the period 01.06.2015-31.01.2016 and follow-up activities" (20.04.2016); "Standards and guidelines for quality assurance in EHEA (ESG). Implementation of the Criterial System for evaluation and accreditation of NEAA in line with ESG Part 1" (24.11.2016).

<https://www.neaa.government.bg/en/about-us-3/quality-assurance-in-the-activities-of-the-neaa>

https://www.neaa.government.bg/images/files/SUKO/Statements_NAOA-Komisiq%D0%9Aa4estvoto_EN.pdf

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

https://www.neaa.government.bg/images/files/SUKO/Statement_zlZdravkova.pdf

Together with SCPAMC, CQ took part in a seminar organised by the National Sector Syndicate "Higher Education and Science" where problems of post-accreditation criteria were discussed in keeping with ESG on the application of the internal quality assurance system of education and academic staff of higher schools

https://www.neaa.government.bg/images/files/SUKO/doklad_vatr_sistema_SANK_EN.pdf

In 2007, in connection with the implementation of the Criterial System, CQ held a meeting with Students' Unions and participated in the General Assembly of students' unions at higher schools (10-11.06.2017). Representatives of CQ and SCPAMC held meetings with representatives of teachers, students and employers of BSU (21-22.06.2017) and UASG (27.06.2017).

https://www.neaa.government.bg/images/files/SUKO/info_sreshti_KK_NAOA-2017_en.pdf

3.6.2 In Section 7 of the SAR, we made a retrospection of the joint work of CQ with the Group on Internal Audit and the Committee on Ethics.

Positive influence of the committee on quality is manifested in the enriched dialogue of the agency with higher schools and science organisations, the Rectors' Council with regard to the implementation of the new Criterial System, the keeping of the timetables of accreditation procedures, the finding and utilizing those honest activities which guarantee internal quality assurance of the agency.

As has been stated, an important subject in the system of internal quality assurance of the agency is the Committee on Appeals of students and contesting accreditation procedures created by AC. As a consulting organ in NEAA, the committee reviews appeals, documents on contesting accreditation procedures and states opinion on them without infringing the decisions of SC and respectively AC.

Positive respectful importance for improving internal quality assurance at NEAA have played the audits of the Audit Office, Inspectorate of Council of Ministers and the Ministry of Education and Science and also the financial audits.

In conclusion, NEAA's policy of internal quality assurance is public and published at the website of the agency. This policy is official and legitimate, expressed through concrete decisions and actions of AC, specialised commissions created as consulting organs of the agency. Finding and applying of professional solutions are guarantees that all subjects work for enhancing public authority of NEAA as a specialised state organ for evaluation and accreditation of education at higher schools consciously, responsibly. Competently, ethically, with adequate communication

9.7 ESG Standard 3.7 Cyclical external review of agencies

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

3.7.1 NEAA has been a full member of ENQA since 2008. With this decision, Republic of Bulgaria as represented by NEAA became the 21st member from Europe and the first member from Southeast Europe of ENQA among the 28 states of EU and the 47 states in the Bologna Process. Two external reviews from ENQA have been realised; for the purpose, two SARs were prepared with appendices in Bulgarian and English languages. The SARs reflect the current state of the agency's work and serve as basis for decision-making of ENQA on the statute of NEAA as a full member of ENQA. External reviews carried out by ENQA show that NEAA executes its activities in compliance with ESG minding the national and historical traditions and also the specificity of higher education in Bulgaria. As an ENQA member, NEAA makes every effort to contribute to improving and maintaining high quality of higher education at Bulgarian higher schools, for sharing good practices and supporting cooperation of education institutions with leading European universities.

NEAA is included in the system of external audits executed by ENQA. According to decision of the Board of ENQA, NEAA's full membership is renewed,

https://www.neaa.government.bg/images/novini/ENQA_Letters/Letter_ENQA_to_NEAA_05.2015.pdf

From 07.09.2009 to 31.07.2013, NEAA was registered in EQAR (35). NEAA's registration was done after a review and analysis was made resulting in a decision under which Bulgaria became the sixth European country recorded on it after Germany, Spain, Netherlands, Belgium and Poland,

[https://www.eqar.eu/register/map.html?tx_pxdeqar_pi2\[cid\]=9#container_agencies_by_country_9](https://www.eqar.eu/register/map.html?tx_pxdeqar_pi2[cid]=9#container_agencies_by_country_9) and

http://www.eqar.eu/fileadmin/documents/eqar/information/eqar_annualreport09.pdf.

In its activity, NEAA is led by the conviction that quality assurance as the main instrument of the Bologna Process provides opportunities for developing higher schools in the common European qualifications framework observing the goals and principles of ESG 2015. An important result of the agency's work is the support to higher schools in creating and academic quality culture and in providing opportunities for adaptation in the changing environment of the EHEA. NEAA's endeavour is higher education and higher schools in Bulgaria to be distinguishable in European countries and the mutual agreements for mobility of students and teachers, joint educational and scientific research projects with foreign higher schools to tend to be permanently binding.

NEAA undertakes the present external review of implementation of ESG 2015 in order to have its membership in ENQA renewed and on the basis of that to be included on the EQAR.

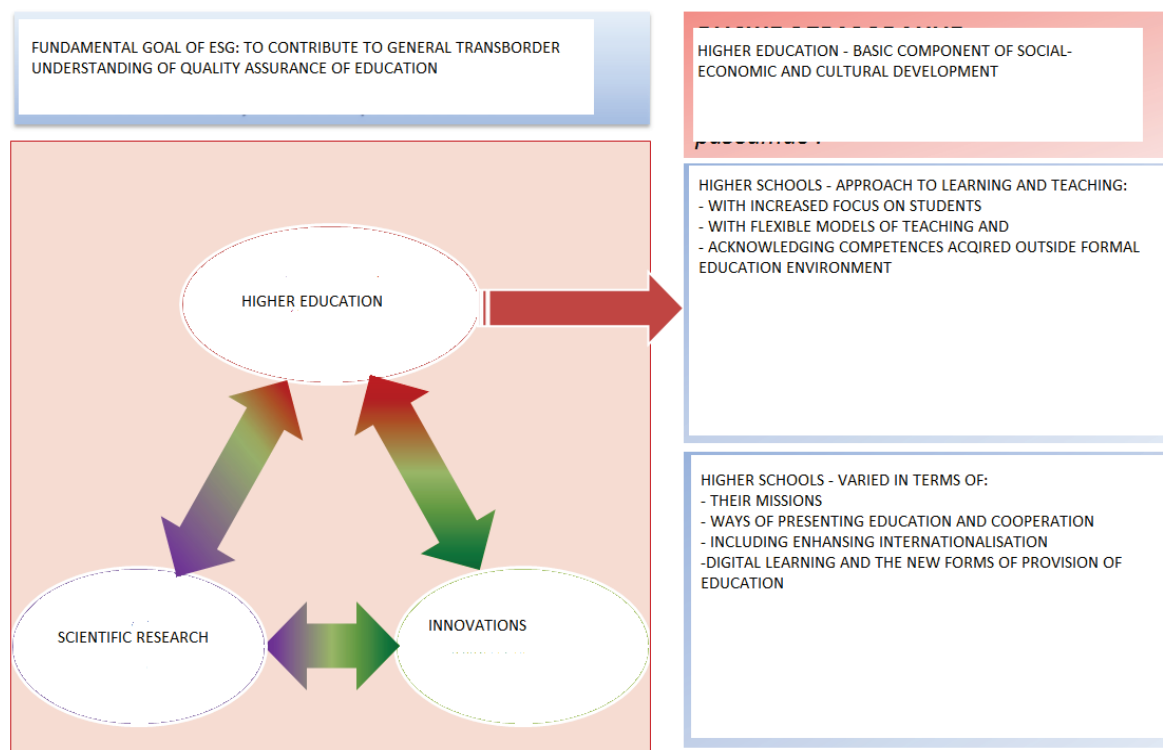
In conclusion, for NEAA, the experience of external audits is dictated by its mission to be authoritative and reliable partner complying with ESG and participating actively in the maintenance of the common trans-border understanding of ensuring quality culture in education. Self-regulation and cyclical external reviewing stimulate the agency to get trust in its accreditation activity in the country and abroad.

10. COMPLIANCE WITH EUROPEAN STANDARDS AND GUIDELINES (PART 2)

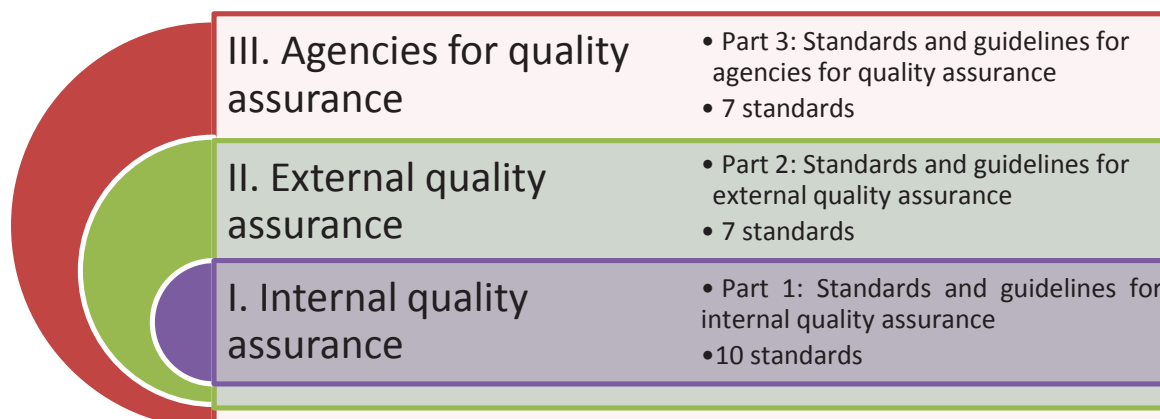
10.1 ESG Standard 2.1 Consideration of internal quality assurance

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

2.1.1 Explaining external quality assurance by means of the effectiveness of procedures of internal quality surety is to be done by stating that NEAA follows the goals and structure of ESG.

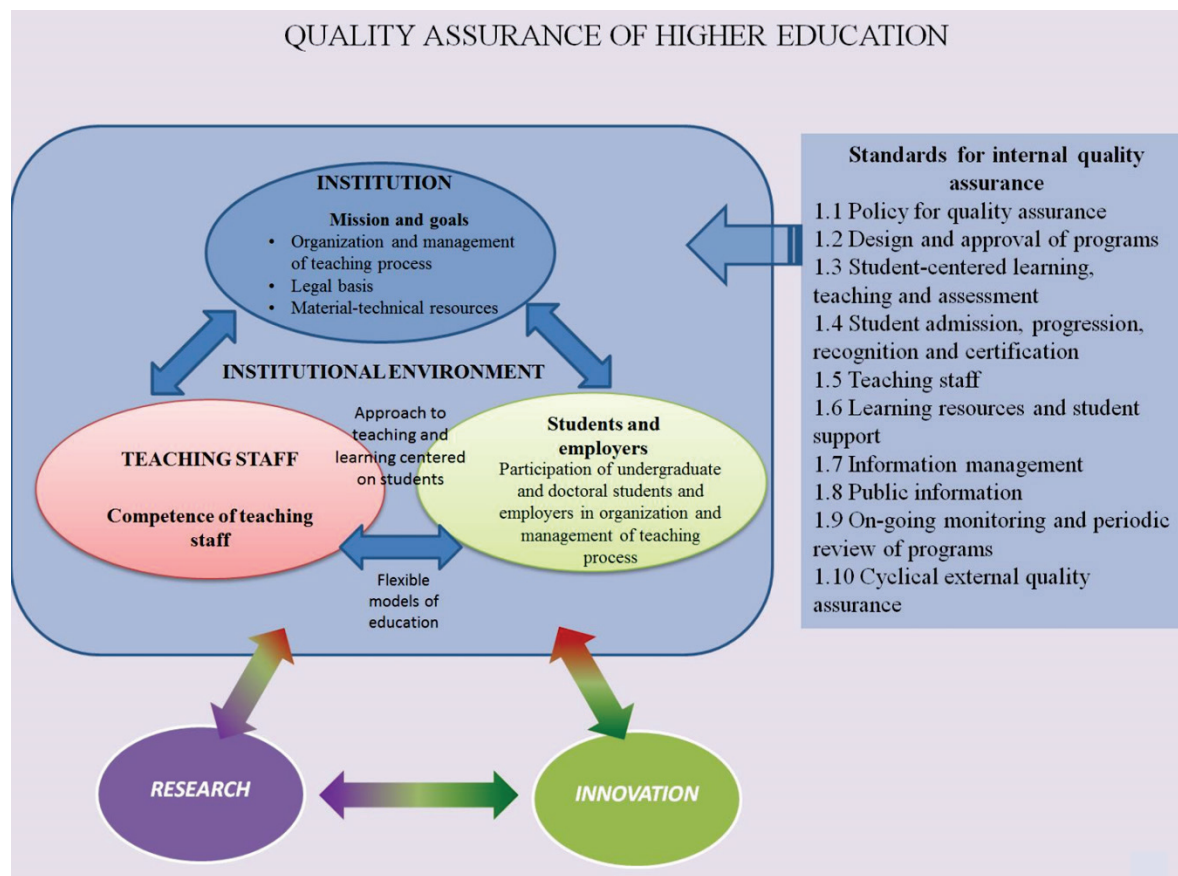


The structure of ESG standards, which are logically divided in three parts, is in fact indivisibly interconnected. They all form the basis of the European framework of quality assurance. This ascertains internal quality assurance in direct relation to external quality assurance and compatibility with the respective agencies for quality assurance.



STRUCTURE OF EUROPEAN STANDARDS (ESG)

The indivisible fitting together of the three parts of ESG permits to analyze, recognize and support institutional responsibility and the degree of higher education institutions' capability to implement the standards in Part 1 of ESG.



HOW HIGHER SCHOOLS IMPLEMENT ESG PART 1

In different accreditation procedures defined by HEA, NEAA uses a Criterial System created by it for internal quality assurance in line with ESG Part 1.

The aim of internal quality assurance carried out by the agency is by means of the abovementioned criteria to evaluate the degree in which higher schools fulfill their mission and responsibility for implementing ESG Part 1.

NEAA observes the compatibility between all standards in ESG Part 1 and its own criteria used in respective types of accreditation. Despite the fact that they are tuned to the specificity of each type of accreditation procedure, criteria follow the logic of the ten standards for internal quality assurance and have a general characteristic as the basic measure of the higher education institution capability to apply European Standards and Guidelines for enhancing quality of higher education.

Criteria of NEAA for types of accreditation procedures in line with ESG Part 1 are available at:

https://www.neaa.government.bg/images/Criteria_EN/Kriterii_IA_EN.pdf

https://www.neaa.government.bg/images/Criteria_EN/Kriterii_PN_SRP_EN.pdf

https://www.neaa.government.bg/images/Criteria_EN/Kriterii_ONS_EN.pdf

https://www.neaa.government.bg/images/Criteria_EN/Kriterii_Proekt_PN_SRP_EN.pdf

https://www.neaa.government.bg/images/Criteria_EN/Kriterii_proekt_Ozvena_EN.pdf

https://www.neaa.government.bg/images/Criteria_EN/Kriterii_proekt_otkrivane_VU_EN.pdf

ESG Part 1	Criteria of NEAA					
Standards	Institutional accreditation in compliance with ESG Part 1 (1-10) and art. 77, par. 2 of HEA	Program accreditation of professional direction/specialism of regulated professions in compliance with ESG Part 1 (1-10) and art. 78, par. 3 of HEA	Program accreditation of doctoral programs in compliance with ESG Part 1 (1-10) and art. 78, par. 3 of HEA	Projects for opening a professional direction/specialism of regulated professions in compliance with ESG Part 1 (1-10) and art. 81, par. 6 of HEA	Projects for opening and reforming a basic unit or branch of a higher school in compliance with ESG Part 1 (1-10) and art. 81, par. 6 of HEA	Projects for opening and reforming a higher school in compliance with ESG Part 1 (1-10) and art. 81, par. 6 of HEA

ESG 1.1 Policy for quality assurance

Content of this standard calls for definition of the institution's declare and Carry out a policy of guaranteeing quality designed and applied in direct cooperation with employers, sector organizations and other external stakeholders. On the basis of a self-assessment report of higher schools and the reports of EG/decisions and reports of SC of NEAA on executed procedures, one can find the fulfillment of this standard in the case of institutional/program accreditation and evaluation of projects.

In the analysis of implementation of this standard, it is proved how a higher school and its basic units bear responsibility for developing quality culture; how internal structures for design and application of a policy of quality assurance including students and stakeholders are built and function; the professional level of education and research of the institution, interrelationship between scientific research, education and needs of labor market; the capability of the higher school to set up conditions for achieving academic freedoms and intolerance to cheating and discrimination. In EG reports and SC reports, it is explained how this activity is conjoined with the internal quality assurance system of education and academic staff of a given higher school.

EG of NEAA aim to establish by means of the abovementioned criteria the higher school's capability, depending on its mission, to organize education in a professional direction/specialism from regulated professions in an education-qualification degree and forms of teaching. This standard is evaluated also from the perspective of to what degree the whole activity of the professional direction/specialism from regulated professions is subject to the institution's quality assurance system; internal audits for evaluation of quality and functioning of respective teaching programs; policy of the higher school to establish connections between scientific research and teaching; application of academic freedoms and intolerance of forms of discrimination, prevention and sanctioning of exam cheating and plagiarism. Experts are required to

pay special attention whether the policy of applying this standard is published, is enacted fully in practice with the active participation of students and employers.

Implementation of ESG Standard 1.1 is evaluated by means of the realization by higher education institutions' of criteria for published with official statute and accountability policy of assuring quality of teaching in doctoral programs. Here too, attention of EG of NEAA is focused on the capability of the higher school/scientific organization to carry out education in the respective doctoral program in unison with its mission, with the aims and the functioning of the institutional quality assurance system; with the policy of interconnectedness between scientific research and education in doctoral programs; with the observation of rules of the code of ethics for ascertaining academic unity and academic freedoms.

Projects for opening a higher school, of basic units or branches, or professional directions/specialisms from regulated professions are evaluated by NEAA in line with the implementation of this standard. In practice, this obliges EG to establish whether internal structures can develop the policy of assuring quality in which external stakeholders are included. The expected way of management of keeping academic self-government is analysed; its capabilities of guaranteeing academic freedoms; the planned internal quality assurance system of education and academic staff; the way of surveying students' opinions and publishing the results; the internal audit procedures which are in place. Education is evaluated in the respective professional direction/specialism from regulated professions at education-qualification degrees depending on the needs at national and regional level; how the basic unit expects to assure the achievement of planned specific aims of the professional direction/specialism from regulated professions; the interconnection between scientific research and education in the professional direction; declared keeping of the rules of the code of ethics of the higher school.

ESG 1.2 Design and approval of programs

Implementation of criteria corresponding to this standard ascertains, in different accreditation and evaluation projects, how the higher school builds and applies its procedures for design, approval, monitoring and renewal of study documentation in professional directions and specialisms, i.e. to what degree the higher school is equipped with policies, ways and means of creating and updating qualification characteristics, curricula and syllabi. In these procedures, students should participate as well as other stakeholders. Despite the fact that it is the case of institutional or program accreditation or evaluation of projects, NEAA's experts obtain information on the higher school's capability to design programs in conformity with its strategy.

Self-assessment report is accompanied with different documents which are defined and evaluated by NEAA such as: set of documents for each study program which should contain the program, description of obtained qualification at separate education-qualification degrees, professional competences, curriculum of specialisms, teaching methods, assessment methods, opportunities for practice internships, studies of students' interest in the respective education program harmonized at European level; information on the dynamics of interest of employers in competences acquired in the study programs; bilateral contracts for cooperation with employers' organizations for staging internships and other documents evidencing the degree of preparedness and adaptation of all components of the so-called study documentation.

Especially important accent in implementing this standard is the higher education's capability, by means of concrete study programs, to give students qualifications at the level announced in advance in the national qualifications framework and the qualifications framework of the European Higher Education Area.

ESG 1.3 Student-centered learning, teaching and assessment

Implementation of this standard is substantiated by fulfilling certain criteria for the particular type of procedure. Here, it is important to note that it is established if the higher school has got methodological standards for designing curricula and syllabi, their changing aiming to stimulate motivation and engagement of students in the teaching and learning process which are officially adopted. Observation of this standard necessitates the higher schools to provide data and facts: how students' opinions are found out in the modernization of the education process; how students' needs of achieving high quality of education in profiling disciplines are established and fulfilled; existence of flexible models of teaching and of varied academic paths for mobility of students; if published official system of examination procedures is reliable for giving objective assessment of mastered knowledge and skills of students; if published procedure of handling students' appeals is transparent. It is important that this standard is applied under the circumstances of generalized and published outcomes related to teaching methods and achievements of students, encouragement of mutual respect in relations between students and teachers.

In this case, a special role is played by post-accreditation monitoring and control of the application of the internal quality assurance system of education and academic staff and ascertaining students' opinions. Without going into detail of realization of the contents of the criteria related to this standard, we shall point out that the necessary evidence in concrete procedures give clarity as to management and organization of the higher education institution of education, teaching, assessment which should be focuses on students.

ESG 1.4 Student admission, progression, recognition and certification

Application of criteria related to this standard is connected with the activity of structures of a concrete higher school responsible for design and publishing of relevant internal normative documents about the functioning of the whole education process from student admission to graduation. Published regulations, rules for recognition of periods of study at other higher education institutions by transfer of credits (ECTS), contracts for cooperation with other higher schools which provide opportunities for study of undergraduate and doctoral students, contracts for awarding joint and double certificates with foreign education institutions evidence the capability of the higher school to respond consistently and timely to students' needs, to encompass with adequate forms of interaction with stakeholders the whole life cycle of students.

An important moment in the realization of this standard is to explore the organization of attracting, supporting and adapting Bulgarian and foreign undergraduate and doctoral students, of students with special educational needs in the education process. In the course of different procedures, institutional practices are screened – to what degree they are in compliance with the principles of the Lisbon Convention for recognizing qualification in higher education in the European region. Effectiveness of administrative system of registration of graduates at undergraduate and doctoral level is examined..

ESG 1.5 Teaching staff

Observation of this standard is a fundamental condition of quality education. Criteria in line with its essence and contents provide opportunities for studying the dynamics of fitness-for-purpose of the higher school's policy for attracting and development of quality academic staff.

In the course of respective procedures, special attention is paid to the profile and qualification of teachers; whether they meet the requirements for quality education in the respective professional direction.

It is examined whether procedures of hiring and the conditions of career development of teachers are adequate; for stimulating their research; for strengthening the relation between education and scientific research; for introducing innovations in education. In management of the higher school and in the functioning of the internal quality assurance system, it is essential to evaluate the system in place of teacher appraisal with regard to their capabilities of innovative teaching and research; for academic dialogue between students and teachers, for mechanism of support and stimulation of students during the period of their education. The outcomes of the system introduced of stimuli of academic and administrative staff depending on the degree of quality assurance and the feedback with graduates is accounted for.

ESG 1.6 Learning resources and student support

The implementation of this standard is carried out by means of criteria which evaluate the state and policy of the higher school for enriching the material-technical equipment and information base necessary for improving quality of education and scientific research of teachers, undergraduate and doctoral students. In each accreditation procedure, different evidences, facts and circumstances are analyzed; they reveal presence or absence of planning of development of teaching resources, rules of teaching students with special educational needs, working students and foreign students.

A special accent is put on the analysis on the part of EG of NEAA of financial provision of teachers in executing quality education and also in facilitating students in using affordable resources helping their activities. Environment and study documentation of the higher school is evaluated in the area of distance learning, resources for teaching senior students and of working students. Investing in modern infrastructure of the higher school, specialized support of teachers as scientific supervisors, councilors and other experts is an important condition for the development of students, for their growth and acquiring the necessary competences for their future employment at the labor market.

ESG 1.7 Information management

Implementation of this standard is directly related to the higher school's capability, depending on its policy, to collect and analyze information necessary for improving and updating curricula, forms and methods of teaching in response to students' and stakeholders' interests and employers' interests. In the course of concrete accreditation procedure, NEAA's experts get familiar with the activities of the reviewed institution, with its methods of collecting information necessary for analyzing curricula, for effective functioning of internal quality assurance system of education and academic staff, for taking concrete managerial decisions.

Management of information includes evaluators' holistic knowledge of students' population, development and academic success, students' difficulties of objective and subjective nature in the teaching process. The higher school should consider opinions and conclusions of the internal audit teams, of students, syndicates and consumer organizations. The higher school should not only gather information but also analyze it in order to carry out adequately its mission and policy; to support students' development including financial aspects; for effective functioning of internal quality assurance system; for renewal of the policy of modernizing the education

process with current study documentation and curricula; for undertaking measures for improving mobility, practical training and successful employment of students.

ESG 1.8 Public information

Implementation of this standard requires analysis and generalization by NEAA of the degree to which institutions articulate their activities, publish information on their strategic goals, policy and ways of achievement. In different procedures, EG learn practically published information on different professional directions and specialisms in the respective education-qualification degrees and forms of study; for current curricula and syllabi, qualification characteristics; forms of assessment; results of audits, decisions of academic councils; for participation of students in different university forums and other events related to the life of the higher school; data on students' achievement and on employability of graduates.

For the prestige of the higher school and the raising of trust of society, it is important how much information is given on priorities and aims of research of academic staff, on undergraduate and doctoral students' success in the research of the higher school. The higher school should provide information on its connections with business, the culture sector of the country, its international activities, and its cooperation with international universities, opportunities for exchange of undergraduate and doctoral students with them. Experts' attention is focused not only on the scope and volume of information but also on its validity and usefulness for students, employers, society at large.

ESG 1.9 On-going monitoring and periodic review of programs

Regular monitoring and periodical upgrading of study programs, in line with the evolution of scientific knowledge and technologies, is the generalizing criterion providing opportunities for finding the degree to which this standard is implemented. Criteria seek correspondence of study programs with the social-economic needs of social development.

On the basis of the self-assessment report of the higher school, of supplementary evidence required by EG in the process of post-accreditation monitoring, it is possible to conclude whether monitoring is fit-for-purpose and timely in order to guarantee the creation of qualified and competitive experts ready for the labor market. In other words, it clarifies whether monitoring of programs facilitates gathering of information necessary for changes and improvements of quality. Teachers', students' and employers' engagement in the review and improvement of study programs is analyzed. Thus, the purposefulness and effectiveness of monitoring is substantiated. Updated programs are published in order to secure publicity of education and increase trust of society in the higher education system.

ESG 1.10 Cyclical external quality assurance

Implementation of this standard provides favorable circumstances to examine the higher education's potential to assure quality of education and academic staff by carrying out planned activities for self-assessment and external evaluation of all study programs. Thus, by means of external evaluation of quality, effectiveness of internal quality assurance is achieved. Accreditation procedures show if the higher education institution carries out planned activities for self-assessment and external evaluation of study programs and of the education process as a whole.

Statute of SCPAMC, its functions of control of realization of the internal quality assurance system and the implementation of recommendations made by AC and SC in institutional and

program accreditation stimulates advance achieved after the previous external evaluation and is a factor of further development of the higher education institution's policy and for guaranteeing quality assurance in the future.

* * *

2.1.2 The review of internal quality assurance and the effectiveness of procedures of internal quality assurance require NEAA to have periodic information on the way higher schools accept the accreditation process. The study conducted by the Committee on Quality shows a general positive opinion of rectors with regard to dialogue and interaction between them and NEAA; the usefulness of accreditation procedures and their good organization and objective evaluation is conveyed. About 80% of respondents (1079 persons from 51 higher schools) state that the accreditation process is dynamic and has an open character and propose to streamline the accreditation model, in other words, to integrate institutional and program accreditation in one procedure. This conclusion is important in the case of the forthcoming changes of HEA. A new survey carried out in 2017 is devoted to the Criterial System in line with ESG; it provides feedback from institutions applying for accreditation procedures. Its results are published in a report adopted by AC of NEAA and published at the agency's website.

In conclusion, for NEAA the setting up of its Criterial System of accreditation in line with ESG Part 1 has decisive importance for quality assurance of education at higher schools. The implementation of the Criterial System provides the necessary connection between internal and external quality assurance, stimulates higher schools in the execution of their policies of preparing highly qualified experts, makes certain academic culture and strictness, attitudes of good-will to needs of undergraduate and doctoral students, dialogic communication with employers.

10.2 ESG Standard 2.2 Designing methodologies fit for purpose

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

2.2.1 In the context of the policy of publicity, accountability, support and trust, NEAA has defined the activities with which it realizes compliance with ESG Part 2 Standard 2.2.

Immediately after the adoption of ESG 2015 in Erevan, AC of NEAA outlined the tasks related to the scope, approach and manner of developing respective methodologies which in their entirety should guarantee the appropriateness of external evaluation of quality to its meaning and contents. For that purpose, leadership of NEAA and Committee on Quality using the competencies of members of SCAHE and EG, Councils of Rectors and representatives of employers concentrated on developing a project of Program and Action Plan which should take account of the fundamental goals and concrete actions of the agency for implementing ESG. The two documents were adopted by AC in October 2015 and they show the policy of the agency for assuring the process of implementation of ESG 2015. The Program and Action Plan have an open nature and are updated with the dynamics of responsibilities of NEAA.

We should note that NEAA has joined forces with eminent scholars, leaders in the area of higher education, representatives of students' councils, chambers of employers and branch organizations in order to develop a new Criterial System in line with ESG Part 1. It is the basis of objective evaluation of internal quality assurance and allows to raise trust in Bulgarian educa-

tion system. The Criterial System was adopted by AC; it is described in Sections 2 and 4 of the SAR. It shapes up the special design of methodological documents/guidelines and procedures and also the updating of the existing ones. As described in Sections 2 and 6 of the report, they are the result of considered policy of NEAA and its leadership with regard to the mission of assuring quality of higher education. These methodologies give life to the Criterial System in order to respond to the needs for external assurance of quality to be reliable, useful and stimulating for higher schools to implement European standards. The aims of external evaluation of quality are approved by stakeholders. This facilitates the preparation of documentation in terms of including not only SC and SCPAMC but also rectors, syndicates, students' councils, branch organizations. Their active attitude in producing the Criterial System has contributed for their motivation in creating methodological documents. All participants in this creative process have considered all recommendations from discussions of different kinds with stakeholders. Thus the authors of the methodologies were convinced that the implementation will bring new meaning to accreditation, will increase objectivity and publicity of evaluation of quality of higher schools.

Developed methodologies are neither casual nor speculative exercise of NEAA. In the years of its activity, it has demonstrated deep and responsible approach to introducing changes in its operation. Respecting good practices in Bulgarian higher education system and with responsibility to new tendencies in European higher education area and successes of the Bologna Process, in 2011, NEAA adopted a system of criteria for evaluation and accreditation in line with European standards from Bergen, 2005. Even then, the agency took up the practice of initiating changes in a mode of dialogue with stakeholders, especially with leaderships of higher education institutions, and of expanding the scope of involved experts and employers known for their competence and capabilities for consulting. This practice has become standard and in the recent years NEAA has applied it confidently to achieve the desired results. NEAA uses concrete working groups presided usually by chairpersons of SC of NEAA. A cursory look at the Action Plan reveals NEAA's approach in developing its methodologies.

Methodological documents no matter if they are guidelines or procedures for the respective type of accreditation are mutually preconditioned. Their common and complex character determines both their applicability to all types of accreditation despite specifics and their equal standing with regard to all evaluated institutions. NEAA's aim is for methodologies to create conditions for achieving publicity, accountability, support of institutions in their quality assurance activity, for gathering truthful information on the results of evaluation, for stimulating institutions to continue their policy of quality assurance. The sustaining of academic dialogue between partners is a prerequisite for carrying out a rhythmical and transparent accreditation process with stages observed by all those involved. Costs paid by institutions are normatively set by the Ministry of Finance depending on the degree of complexity of the particular accreditation procedure.

2.2.2 An important condition for the effectiveness of methodologies for guaranteeing effectiveness of external evaluation of quality is not only their observing but also to expand fruitful cooperation between NEAA and stakeholders, to have an established stable policy of publicity of information on the evaluation. In this respect, the agency has set up the practice of publishing at its website the EG reports, SC and AC reports/decisions.

In conclusion, the creation of methodologies defining the reference framework and principles of performing external quality assurance is a prerequisite for realization of its aims and tasks. Laying emphasis on the need for applying ESG Standard 2.2 includes the agency's balanced

work on bringing in higher schools, students, and employers to acknowledge the importance and stimulating role of the accreditation process for enhancing quality of education. Analysis of NEAA's activity shows that it uses fit for purpose mechanisms for objective evaluation of higher schools' capabilities to increase trust of society in them as education institutions.

10.3 ESG Standard 2.3 Implementing processes

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include • a self-assessment or equivalent; • an external assessment normally including a site visit; • a report resulting from the external assessment; • a consistent follow-up.

2.3.1 Taking into account mutual conditionality of Part 2 and Part 3 of ESG and their necessitating that procedures of external quality assurance should be outlined in advance, sequentially realized and made public, AC has adopted the methodologies listed in Section 6 of this SAR whose application has to influence positively reliability and effectiveness of education process. They were presented in the previous section in the context of Standard 2.2, so, in line with their role and importance, we can conditionally divide them in two groups:

(A) Methodological documents/guidelines adopted by AC and published; they are described in Section 6 of the SAR. We should emphasize that they are published on the website of the agency and also in the cited collection book in Bulgarian and English.

These documents are markedly concrete and pragmatic including full descriptions of all activities which participants in accreditation must do during the stages of each procedure.

(B) Procedures for accreditation and evaluation of projects adopted by AC and published; their contents are also described in Section 6. We must note that strict design of all procedures with the respective stages, actions of the accreditation applicant (the higher school and the minister of MES) and of the evaluator (NEAA), required documentation are the necessary base for good organization and correct execution of the accreditation process.

The abovementioned methodologies and heir following in the accreditation process is a condition not only for outlining its chronological consecutiveness but also for determining the contents and usefulness of the main stages/steps of the respective procedure.

The first stage for the beginning of a procedure for accreditation is the submission of a self-assessment report by the higher school. This requirement comes from HEA which regulates the submission of the report to NEAA. The agency recommends the use of the published Methodological Guidelines by the higher school in the preparation of the self-assessment report. In general, the aim of the report is for it to allow to evaluate: policy which the institution realizes for managing quality of education; professional level of teaching staff and its abilities for scientific research and project work; functioning of structures of the higher school and maintain the internal quality assurance system.

The report's structure and contents should be developed according to the requirements of the Criterial System of NEAA for the respective procedure. The higher education institution self-assesses its activities on implementation of the Criterial System for: publication of its policy for quality assurance of teaching; design of study programs with the participation of students, employers, stakeholders; using the internal quality assurance system; competence of teaching staff and support of its research; resources and student support; information management and

its publication in society.

The following documents should be enclosed in the self-assessment report: information on the implementation of recommendations of NEAA of previous accreditation; copy of Protocol of Academic Council evidencing the adoption of the self-assessment report; organizational structure of the applying institution; copy of Statutes of the applying institution. Each higher education institution can supplement the report with evidences. It is important that information in the report be full and truthful.

The second stage of the accreditation procedure is related to the producing of an external evaluation by NEAA which includes a site-visit of EG, appointed by AC, at the evaluated higher school. The activities of EG, its tasks are described in Section 6 of the SAR. Here, we shall point out that the meetings and discussions of EG on topics planned in the agenda of the visit with representatives of the institution, with students, with employers are quite important. The closing meeting of EG with leadership of the institution allows the chairperson of the EG to present the general conclusions made on the basis of the examination of the self-assessment report and the impressions from the site-visit.

After these moments of the review of the EG, it is time for preparation of the objective report. It should prove the degree to which the higher school follows ESG and also whether education matches the announced aims and needs of students and society. The report is a common effort of all members of EG, undergraduate and doctoral students and international experts.

The report of EG is discussed at a meeting of SC and when it is adopted it is sent to the evaluated institution for finding factual inconsistencies. After a statement of the higher school has been received in a 14-day period, the report is adopted finally by SC. We must note that after the adoption of the new Criterial System, NEAA adopted a structure of reports of EG and SC,

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

The third stage of the accreditation procedure includes the production of a report/decision of SC. Following HEA, SC produces a report on the result of the external evaluation in institutional accreditation, project for opening and reforming a higher school; basic units and branches; specialisms and doctoral programs from regulated professions. This report based on conclusions and facts in the report of EG is discussed and the conclusion of the accreditation process is executed by AC. It is the organ which, following the adopted methodology of evaluation, takes the final decision of the accreditation and gives recommendations for follow-up activities on the part of the evaluated institution. The rest of the procedures mentioned in Section 4 of the SAR, namely program accreditation of professional directions or projects for opening; program accreditation of doctoral programs outside the area of regulated professions are completed with decisions and evaluations made by the respective SC. Following HEA, it has the right on the basis of the report of EG to make the decision as defined in the law and to put its evaluation.

It is important that every calendar year AC adopts a schedule for the respective types of accreditation; that is a condition for avoiding bias and randomness in the carrying out of external evaluation.

2.3.2 For the effectiveness of the procedures on external quality assurance, it is important that PAMC is in place. Design of external evaluation of quality and the need for follow-up activities for its further development highlights the stimulating role of PAMC. In Section 4 of the SAR, PAMC is described, we shall point out that in line with Statutes of NEAA control of SCPAMC on the use of the internal quality assurance system at the higher school is related to

the procedures on implementation of recommendations of the institutional accreditation and with the extension of the scope and perfection of the Criterial System in line with ESG Part 1.

Post-accreditation monitoring and control of application of the internal quality assurance system for education and teaching staff of higher schools,

https://www.neaa.government.bg/images/SANK/Kriterii_za_SANK_EN_2016.pdf.

Without neglecting any of the PAMC criteria on internal quality assurance system adopted by AC, evaluators pay special attention to the ones related to the life-cycle of the students, way of studying students' opinions, financial resources of education, internal and external audits on quality of education.

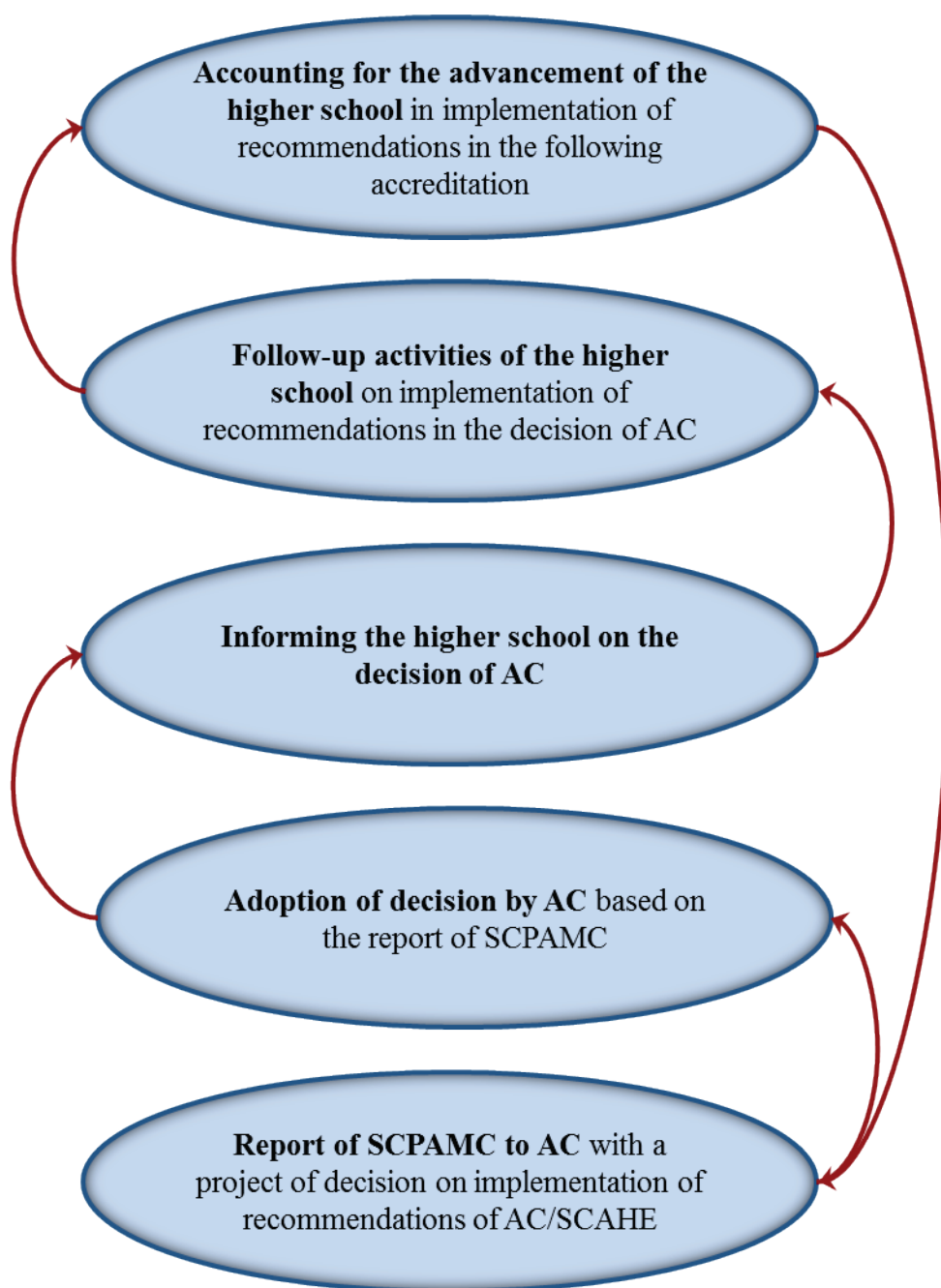
The review of PAMC report adopted by AC on the implementation of the internal quality assurance systems of education and academic staff at higher schools deserves attention,

https://www.neaa.government.bg/images/files/SUKO/NAOA-dokladESG_en.compressed.pdf

It outlines both strengths and weaknesses of the functioning of the internal systems. All higher schools have internal systems in place; they are functioning together with their well-kept study documentation which is updated and published for the benefit of all students; students' opinions are studied; teachers are appraised; contact with employers is well-kept. In this context, NEAA analyses the problems of Bulgarian higher education such as use of stimuli related to the contribution of teachers for quality assurance, financing of modernisation of equipment of higher schools, insufficient activeness of businesses in support of students' learning.

On the basis of reports of SCPAMC on implementation by the higher school of the recommendations (of institutional accreditation; program accreditation and internal quality assurance system), AC is the organ which requires that evaluated institutions should overcome omissions and should implement the recommendations given as follow-up activities providing opportunities for future development, for following evaluations showing the progress of the institution.

In conclusion, description of the above documents aims to make known that NEAA uses them to create conditions for preparing objective reports by all participants in internal and external quality assurance activities. We have emphasized that structure of reports of EG, SC and the decisions of committees is adopted by AC and reflects estimations about fulfilling of criteria in line with ESG. Publication of reports complemented by summaries in Bulgarian and English allows NEAA to make its procedures reliable and useful not only for higher schools but also for all stakeholders.



10.4 ESG Standard 2.4 Peer-review experts

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

2.4.1 External quality assurance is guaranteed by competent action of experts who are involved in the accreditation process following a decision of AC.

As has been explained in Sections 4 and 6 and in Section 3.3.2 and in connection with ESG Part 3 Standard 3.3, the agency has adopted the document "Procedure for election of experts" which is applied at the stage of appointing experts,

https://www.neaa.government.bg/images/files/SUKO/Procedure_for_selection_of_experts.pdf

In line with it, NEAA asks higher school, BAS, Union of Scholars, AA, National Representation of Students' Councils, National branch Syndicate "Higher Education and Science", employers' organizations, Bulgarian Chamber of Economics, etc. to nominate experts willing to participate in accreditation procedures. On the basis of proposals, AC forms a bank of experts by means of election based on documents and periodically elects nominated candidates. Eligible candidates are:

- Experts from Republic of Bulgaria including representatives of undergraduate and doctoral students,
- International experts,

The general framework of the profile of experts selected for a particular EG is such that all experts are elected on the basis of equal requirements as follows:

- They should be habilitated experts, to have professional experience in education, research or artistic work and in supervising doctoral students,
- They should have scientific and teaching authority in the academic sphere, in design and management of quality management systems, participation in scientific councils and structures,
- They should know normative base of higher education and the accreditation practice of NEAA,
- They should know tendencies in development of education, scientific research and systems of management predominantly of countries in EU,
- They should have declared their consent to participate in accreditation procedures.

We must note that AC of NEAA selects students for experts who are nominated by NRSU and by the leadership of higher schools. They should:

- Have very good academic assessment to the moment or to have succeeded in executing their individual plan as doctoral students,
- Be familiar with the normative base of higher education in Bulgaria and in particular of NEAA,
- Follow tendencies in development of education predominantly in countries in EU.

This equality in application of requirements to candidates for experts determines their profile as people with professional competences and skills, with leadership culture for the respective accreditation, mode of behaviour in order to fulfil tasks strictly. The majority of experts are habilitated university teachers. The register of experts is updated periodically so that representatives from different spheres with leadership experience. As is stipulated in Procedure of selection of experts in particular accreditations, experts can be also employers, leading managers in respective professional directions and national companies, leaders of human resources units, representatives of branch chambers, etc. Participation of international experts is expanded especially in the case of institutional accreditations. The abovementioned Procedure specifies a requirement for attracting international experts to participate in accreditation procedures; it should come about at the invitation of AC of NEAA. Invitations should be addressed to foreign accreditation agencies and organisations equivalent to NEAA, academic leadership of leading foreign universities, leaders of international organisations and unions in which Republic

of Bulgaria is a member or participates as partner. For NEAA, interaction with international experts is of particular importance for exchange of good practices between evaluators and for synchronizing approaches in realization of accreditation procedures, for augmenting information on experiences of higher schools of countries-members of European Union.

The database of external experts nominated by AC of NEAA is available to SC; the latter selects candidates depending on the type of accreditation procedure. The fund of experts of SC is re-examined periodically and is updated.

The document "Procedure of selection of experts" fixes the basic rules for forming EG; that shows their temporary character. SC makes a proposal for membership of EG for each accreditation procedure to AC of NEAA including information card with data on experts. The composition of EG is approved by AC of NEAA numbering from 3 to 7 people depending on complexity of procedure. In selection of international experts for each procedure, AC applied the principle of equal standing of experts from different higher education institutions. Chairperson and members of EG sign contracts with the President of NEAA following the Law of Obligations and Contracts.

The description of the procedure for selection of experts should highlight the fact that for NEAA independence of experts is guaranteed by the rules of incorporation, appointment and functioning stipulated in HEA and Statutes of NEAA.

2.4.2 Inclusion of undergraduates and doctoral students in each EG has become a consciously proven policy which has been applied also in the formation of SC. Having been elected according to a decision of AC of July 2015, their membership includes students as full members participating in evaluation, accreditation and quality control of the activity of the educational institution. A positive fact is the election of representatives of sector organizations, syndicates and student unions according to the Programme and Action Plan for implementation of ESG. They work pro bono and have a advisory vote at meetings of SC and SCPAMC. The list of these peers is published at the website of the agency

https://www.neaa.government.bg/images/files/Spisak_potrebiteli_kadri_2015.pdf.

Experience of SC in this respect is modest and the agency's efforts are directed to expand this good practice in line with publicity and openness of agency's work.

The agency guarantees independence of experts by applying the mechanism of preventing conflict of interest. This mechanism is applied as early as the formation of EG keeping the requirement that it should not include members from the same higher school and also no one should be working at the accredited institution.

2.4.3 An important facet in NEAA's work is permanent training of experts. In 2016, it organized seminars devoted to problems of enhancing quality of agency activities on implementation of the new Criterial System in line with ESG. Training of experts as a basic task of NEAA is done also by means of periodical meetings of experts and members of AS, chair persons of SC, members of Quality Committee of the agency. At the meetings participants discuss concrete materials, documents of the legal base of the agency, samples of reports and methods of their creation, methodological guidelines. Thus, good practices are shared and uniformity of approaches to application of evaluation criteria is achieved, and also specific cases are resolved.

In experts' training, as has been noted in this report, special attention is paid to organization of their briefing before the site visit to the higher school. For that purpose, the Program for briefing EG members on evaluation and accreditation procedures adopted by AC is used. Briefing

is done by the chairperson of SC together with the observer of the respective procedure who is a full member of SC and an expert from the special administration of the agency. Without going into details of the way briefing is carried out, we shall state that it is, substantially, a kind of seminar in which experts come to know and understand their rights, obligations and ways of cooperating with the leadership and representatives of the applying institution at every stage of the procedure. Respectful attitude of experts to representatives of higher school at the time of the site visit, dialogic nature and academic tone of strictness in examining acts and circumstances presented in this SAR are basic to the realization of Standard 2.4 of ESG Peer-review experts. Obliging themselves to observe the principles of confidentiality and absence of conflict of interests, participating experts in EG produce jointly on equal standing the report and submit it for approval by the SC.

In conclusion, valuing the role of experts for objective evaluation of quality in line with ESG, NEAA performs planned work for enhancing skills and competences of its employees. Undoubtedly, their training is influenced positively not only by discussions of different methodological documents but also by direct contacts with chairpersons of SC and the leadership of the agency.

10.5 ESG Standard 2.5 Criteria for outcomes

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

2.5.1 In conformity with its nature, goals and principles, external quality assurance defines higher schools' capability to realize accordingly their publicized mission and policy for executing competitive education. As a specialized state organ for evaluation, accreditation and control of quality of enacted education, NEAA follows the legally established 7 types of accreditation procedures valid for all 51 higher schools in Republic of Bulgaria established by an act of the National Assembly. The agency's efforts are directed to creating conditions for external evaluation to be objective, reliable, useful and fair from the point of view of HEA and ESG. Its outcomes can only play a stimulating role for the future development of the education institution when they reflect correctly the actual state of undergoing processes.

Trust in NEAA and its external quality assurance activity is founded on the way it carries out its accreditations applying systematically the criteria which have been designed and publicized in advance in compliance with ESG Part 1. In the presentation of the agency's activity related to Standard 2.1 Consideration of internal quality assurance, we reviewed in tables the new Criterial System including the criteria for PAMC of evaluating internal quality assurance system of the particular higher school. Here again, we shall underline that design of criteria was a difficult creative effort because we had to find the correspondence between ESG Part 1 and NEAA's criteria for every type of accreditation. At the same time, the pursued correspondence had to be accommodated with the norms of Bulgarian legislation, especially with HEA, LDASRB, Unified state requirements for specialisms of the regulated professions and other legal documents.

NEAA's approach and principles in implementing the Criterial System are the same for all higher schools. In order for experts to understand correctly and to apply in the same way criteria, the agency described in detail their contents together with evidences which higher schools should submit,

https://www.neaa.government.bg/images/Reports/sbornici/NEAA_sbornik_eng.pdf.

Thus, the presentation of criteria with immanent characteristics and essential evidence is the result of the effort of working groups which together with representatives of stakeholders developed the project of the Criterial System for 7 types of accreditation. Without underestimating professional competence of EG and SC, the agency developed conditions for criteria to be understood and interpreted correctly and to be applied consecutively in the same way in each accreditation. According to HEA and Methodology of Evaluation adopted by AC, this extended characteristic of criteria is in fact the set of elements evaluated in line with art. 79, par. 2 of HEA. Detailed description of the evaluation allorhythmia is described in the Methodology and published at:

https://www.neaa.government.bg/images/Reports/sbornici/NEAA_sbornik_eng.pdf (p. 137).

Therefore both experts who apply and evaluate fulfilment of criteria and higher schools and society have the opportunity to get acquainted with the actions of EG, SC and AC. Their reports are based on their objective estimate of the extended meaning of criteria an evidence presented by the particular higher school. Preserving and increasing the role of experts' conclusions and findings in the accreditation process, NEAA decreases substantially the subjective element of the post-accreditation process using the new criteria.

Each report at the respective level is important for the evaluation at the higher level. Therefore not only the EG report but also that of SC should be developed according to the Criterial System depending on the type of accreditation; it should be structured so that it should show the implementation of each criterion in line with the respective ESG standard; it should contain not only a description of the activities which are object of examination and evaluation but also an analysis of achievements and evidences for that.

NEAA relates external quality assurance, as a just and reliable process, to the execution of criteria defined and published in advance. Implementation of the criteria in line with ESG Part 1 show results of accreditation such as: evaluated institution's way of fulfilling its policy for quality assurance; realisation of obligations and responsibilities of the higher school in control and developing of teaching in the respective professional directions/specialisms from regulated professions at different education-qualification degrees and the education-scientific degree of Doctor; functioning of basic units of the higher school and of the internal quality assurance system of education and academic staff.

Abovementioned results are grouped in general but they include the work of the education institution on implementation of each criterion in each standard for the particular accreditation procedure. At the same time, they prove that fact that NEAA is ambitious and strives to carry out external evaluation of quality which is not only reliable and consistently applied but also is trustworthy and is supported by the evaluated higher school and by society.

2.5.2 One must note the importance for the internal quality assurance systems in line with ESG of the criteria for PAMC designed, adopted and published. We mentioned the role and importance of PAMC, as a follow-up procedure which audits and monitors substantially the fulfilling of the criteria, in section 2.3.2 of this report. Now we shall state that goals, principles and contents of ESG Part 1 presuppose follow-up criteria whose scope, meaning and realization stimulate post-accreditation monitoring and control as interaction and dialogue between NEAA and higher schools. Measurability of application of each standard with regard to using the respective criterion, achieved by means of PAMC, is the factor which stimulates quality of education enhancement. Internal system as a unique synthesis of evaluation, main-

taining quality of teaching and development of teaching staff conditions the need for applying a uniform procedure in which simultaneous evaluation and fulfillment of its effectiveness and recommendations of the decision of AC are executed depending on the received assessment grade in the institutional accreditation.

2.5.3 When we explain the use of criteria in different types of accreditation, a short comment on the hierarchy of decision-making bodies in evaluation of higher education institutions based on ESG Part 1 is due. Despite the fact that this issue is discussed in Section 4, Section 5 and also in Section 2.3.1 when we review subordination in developing and adopting reports and taking decisions on evaluation, recommendations and capacity by SC and AC, the essential issue is that HEA stipulates the described protocols. As has been pointed out, different procedures according to HEA are carried out by AC and by SC. So we shall underline the following: according to the law the accreditation procedure finishes with a motivated decision of AC in which an evaluation is given together with an accreditation term and capacity, recommendations and term of their implementation or with a motivated decision of the respective SC.

In conclusion, NEAA regards its decisions on internal quality assurance on the basis the implementation of its Criterial System in line with ESG Part 1. Construing of this implementation is not administrative evaluation but a profound and objective review in the framework of accreditation procedures published in advance.

10.6 Standard 2.6 Reporting

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

2.6.1 NEAA's activity in external quality assurance at a respective stage of the accreditation procedure is focused on the preparation, adoption and publishing of the reports of EG, the decisions and reports of the SC and the SCPAMC. For NEAA the structure and contents of the reports are of special importance because on their basis evaluation of the fulfillment of criteria in line with ESG Part 1 is carried out. As has been pointed out in the analysis of 2.3.1, after the adoption of the new Criterial System, AC took on new models of structure of reports/decisions for different types of accreditation and evaluation of projects. In this case we must indicate that the so-called "decisions" are an official document of SC which is prepared in conformity with HEA and Statutes of NEAA and reflects the course of the procedure, outcomes and assessment grades of fulfillment of criteria for program accreditation of professional directions and doctoral program outside those of the regulated professions and also for procedures for evaluation of projects without opening new specialisms of the regulated professions.

Bearing in mind what has been said so far, we shall repeat that there is no accreditation procedure whose report/decision is not sent to the accredited institution for approval and elicitation of factual discrepancies made before it is submitted for review to AC. Actually, as has been said, NEAA provides the opportunity to estimate the report's factual truthfulness and its improvement if the institution will call attention to any factual mistakes. One should note that each report is published at the website of the agency with a summary in Bulgarian and English. This openness and availability for the academic community, external partners and other stakeholders is at the basis of the heightening of trust between NEAA and higher schools and also of society in Bulgarian higher education system.

2.6.2 For the agency, reporting as a standard of external quality assurance is a defining condition of objective evaluation of fulfillment of criteria in line with ESG Part 1. This requirement is not arbitrary, nor is it an attempt to hamper any evaluators. Here, it is a question of impartial and reasoned reporting of not compromising the accreditation process, not permitting subjectivism and bias in marking the outcomes of the review.

We should not underestimate the importance of training seminars and briefings of all EG before site-visits at a particular higher education institution. Full-scale and competent participation of each expert in writing the report is governed by some circumstances, as follows:

- Individual familiarization with the self-assessment report and examination of compliance of the higher school's activity with ESG Part 1; with the policy of the higher school on publicity of information, accountability, student support; establishing missing documents as evidence supporting conclusions in the self-assessment report; contradictions in the report of the evaluated institution which should be dissipated during the site-visit of EG; information given by the higher school in order to orient each expert on questions which are to be discussed at the time of the site-visit;
- Participation in all meetings with representatives of the respective institution and the community observing correctness, academic respect and dialogism;
- Participation in meetings of EG and stating personal opinions, analyses of evidence and information, formulation of outputs of the review;
- Participation in the concluding meeting with the institution at which the chairperson of EG presents conclusions made by its members.

In writing the report the principles of correctness of participation and confidentiality, objectivity and following the report structure adopted by AC are observed. After the presentation of the individual report which can reflect only one section of the general report according the tasks set, each expert gets familiar with the whole project-report written by the chairperson of the EG; the expert participates at a special meeting held in order to review the whole report. When the report is completed, it is sent by the chairperson of EG to the respective SC. It analyses the report and in the case of agreement it schedules a joint meeting with EG at which the report is discussed. Then the project-report is sent to the evaluated institution for a statement with regard to factual inconsistencies; after the institution makes a statement and in case of lack of inconsistencies the report was adopted finally by the SC.

According to the new structure and contents of different types of reports, the respective higher school should be described in them with its concrete profile; its content analysis should reveal the fulfillment of criteria based on concrete evidence. An important element of the exposition of the reports is constituted by the findings which should be correct so that they be used in making recommendations for consequent activities on the part of the higher school.

2.6.3 Essential role for enhancing quality of reporting is the activity of the Internal Audit Committee which every 6 months with a timetable and program adopted by AC performs control of the organization and execution of accreditation procedures. Audits end with a final report which contains recommendations for improving the work of the agency; the latter are assigned to SC. At the initiative of the Internal Audit Committee, meetings are held with members of committees and with experts participating in evaluation. At them participants discuss outcomes of reviews and delineate measures for enhancing quality of accreditation procedures.

In conclusion, NEAA's efforts to ensure objective and correct reporting of accreditation outcomes in fulfillment of criteria in line with ESG part 1 are useful in quality assurance of education and the achievement of publicity, accountability, support and trust in the higher education system in our country.

10.7 ESG Standard 2.7 Complaints and appeals

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

2.7.1 External quality assurance requires objective and fair evaluation in each accreditation procedure. In order to guarantee open, responsible and fair decision making and to protect rights of students and of applying institutions, NEAA has provided opportunity to evaluated institutions to appeal of infringements done in the course of the accreditation process. For that purpose, AC has announced publically the setting up of an Appeals Committee handling students' complaints and contestation of accreditation procedures (03.12.2015); its statutes and its composition was adopted by AC. This decision of AC is in keeping with point 5 of the Action Plan of the agency and in connection with point 5 of the Action Plan for implementation of ESG.

Statutes of NEAA regulate the rulings, structure, functions and organization of work, powers and responsibilities of the members of the Appeals Committee. In its work, the committee follows HEA, LDASRB, the Law on Preventing and Ascertaining of Conflict of Interests, Code of Ethics of Civil Servants in State Administration, Statutes of NEAA, procedures and schedules of different types of accreditations, and the Code of Ethics of NEAA.

The Appeals Committee handling students' complaints and contestation of accreditation procedures is a consulting organ of the AC. It adopts statements of opinion which do not bear upon the decisions of AC, respectively SC, i.e. its decisions have recommendatory character and are not obligatory. The committee's membership is of three members: two teachers nominated by the National Sector Syndicate "Higher Education and Science" and one student representative of the National Students' Representation. The chairperson is a habilitated teacher of law. The committee's mandate is three years.

The committee's statutes as a consultative organ of AC envision the following functions:

- Review of appeals contesting accreditation procedures and stating opinions on them;
- Review of appeals of students from the respective higher school in case of discrepancy between publicly announced policy of higher school for quality assurance of higher education and the actual education process; the way in which curriculums and assessment of knowledge stimulate students in mastering new knowledge;
- Disregarding/ignoring students' opinion in connection with the organization and functioning of quality assurance of education and academic staff. In case of this kind of appealing, the committee states an opinion.

Organization of work of the committee is regulated by the statutes and the internal rules. The chairperson organizes work and calls meetings. Appeals submitted to the committee are reviewed in the order of their chronicling. Anonymous appeals and documents are not reviewed. All statements, complaints, applications etc. submitted at NEAA are distributed by the agency's President to the respective units in charge. Documentation on submitted appeals of

students and documents contesting accreditation procedures are recorded in a register by the committee; that register is a component of the general register of NEAA.

Selection of appeals according to their character is a very important principle which observes the object of work of the committee so it cannot extend the scope of its activity. This means that the committee according to its functions reviews only the complaints related to the HEA which regulates NEAA's activity. With its work the committee can have a say in appeasing and reaching an agreement between the institution and the respective SC of ENQA where the applicant has submitted documents on infringements of the accreditation process.

The Appeals Committee handling students' complaints and contestation of accreditation procedures presents its statements of opinion and reports its work to AC. We must state that the committee's work does not limit the right of the education institution to contest decisions of AC according to the legal Administrative and Process Code.

NEAA complies with ESG Standard 2.7 in having publicly announced the establishment of the committee which is amassing experience and strives to prove itself as a reliable partner of higher schools and students in their policy of enhancing education quality.

In the period 2016 – July 2017, the Commission has held 8 regular meetings. 14 appeals, documents and signals have been reviewed in the order of their submission. The Committee has found that the submitted queries do not concern its scope regulated by art. 12 of Rules for Activity of Commission on Appeals of students and contesting accreditation procedures. On all complaints, actions have been taken, determined by the competences of the Commission, which pronounces a statement on a case by case basis. The Commission presents adopted statements and gives an account periodically on its work to AC. Information letters in written form on the Committee's statements are sent to the individuals who have submitted the particular signals in the legal period of time.

In conclusion, compliance with Standard 2.7 is consistent with the correct and timely activity in line with the necessary legal base. Compliance is accomplished by the Appeals Committee handling students' complaints and contestation of accreditation procedures whose competent members perform professionally and correctly. In so far as this responsible and at the same time delicate activity is at an early stage, it is still difficult to delineate tendencies in the undergoing processes. For NEAA, it is important that the necessary attention is paid to the committee; it has directed its efforts to proclaiming its objective necessity for the enhancing of external quality assurance.

11. INFORMATION AND OPINIONS OF STAKEHOLDERS

In executing the three stages of the self-assessment process, conditions for effective interaction between NEAA and all subjects which are directly and indirectly involved in the management of the education and research process and in the assurance of its quality and in the employment of graduates were created. In general, those are the stakeholders whose attitude to NEAA's readiness to assure quality internally is directly related to external quality assurance (as reviewed in Section 2 of the SAR). We should highlight the constructive role of the Rectors' Conference whose members reacted opportunely to accreditation procedures based on the new Criterial System in line with ESG 2015. Their support and responsibility were surveyed by means of two studies whose summarized results are published at the website of the agency.

Students' usefulness is demonstrated by their participation in the life of NEAA as experts in

EG and full members of SC and also in the expression of opinions with regard to internal quality assurance system of higher schools. In this respect, 2 meetings were important; at the Committee for Quality's meetings with the National representation of students' councils, participants discussed the meaning of the new criteria for evaluation and the policy of higher schools for increasing education quality and also the difficulties in implementing ESG 2015. These meetings are described at the agency's website.

NEAA interacts with the National Branch Syndicate "Higher Education and Science" as has been mentioned in section 2 of the report. The syndicate has representatives as external experts in SC (this is evident from the minutes of meetings of SC). We shall reiterate that in execution of the Program for implementation of ESG, in the SAR, Section 2, we have described NEAA's approach of working with representatives of different areas of economy (selection and appointment is approved by AC).

In this SAR, special attention is paid to positive cooperation between NEAA and employers including those approved by AC for participation in the work of SC,

https://www.neaa.government.bg/images/files/Spisak_potrebiteli_kadri_2015.pdf.

Employers' concrete positive attitude in the drafting of the Criterial System was described in detail in Section. 2. At the agency's website, employers' statements are published.

Seminars and meetings with representatives of higher schools, students' councils and employers are described at the website of the agency; that shows NEAA's consecutive policy and regular work in this respect. All the meetings have planned agendas which are kept as evidence.

12. RECOMMENDATIONS AND MAIN FINDINGS FROM PREVIOUS REVIEW AND AGENCY'S RESULTING FOLLOW-UP

When we analyze the implementation of recommendations from previous reviews, we should stress on the ones made by the ENQA Board in the decision of 24 April 2014. These recommendations are consistent with ESG before their updating in 2015. They are related to the following standards:

- Reporting (ESG 2.5),
- System-wide analyses (ESG 2.8),
- External quality assurance criteria and processes used by the agencies (ESG 3.7),
- Accountability procedures (ESG 3.8).

These recommendations were the object of implementation by NEAA. The agency directed its efforts and started publishing reports of different types of accreditation procedures on a regular basis and achieved openness and publicity. The recommendation that NEAA produce system-wide analyses of higher education was realized through the prism of its accreditations. The policy and efforts of the agency to involve stakeholders was implemented by increasing the participation of students, international experts and representatives from branch and employers' organizations in the work of EG and the activities of SC. A mechanism of feedback in NEAA's activities was established including dialogue, meetings and other effective methods of intensification of the system Corrector – NEAA with surveys and analyses. Opinions and recommendations for improving the work of NEAA of rectors, students, administrative officers, employers of graduates with higher education were used as the basis of its policy for enhancing

effectiveness of its accreditation operation as stipulated by HEA.

The recommendations of the ENQA Board of 24 April 2014 played a stimulating role for the taking in of NEAA's strategy and practice. Their implementation shows the will of the agency to raise quality culture as a process which is also directly related to requisites of Bulgarian legal framework.

With a letter of 16 March 2014, the Group for partial review acknowledged that NEAA had carried out fast and decisive actions in order to fulfil the recommendations of the ENQA Board. Evolution of NEAA on the road of applying ESG shows that, in the period from April 2015 to April 2016, the agency fulfilled the said recommendations related to the agency's full membership in the association. The "areas for improvement" as they have been called by the ENQA Board necessitated NEAA's responsible reaction and the agency executed its determined effort which was reflected in the report, which followed, on the implementation of the five recommendations of ENQA as follows:

First recommendation: "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 judgments, 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."

In response to the first recommendation, the content and organization of the structure of reports of EG and SC has been improved in a way showing chronology of procedure, motivation of decisions and respective recommendations. Reports are dully published at the website of the agency with an annotation in English. This approach has achieved as well the necessary degree of transparency and publicity at accreditation procedures.

Second 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."

In the implementation of the second recommendation, NEAA has extended the scope of system-wide analyses by producing summary reports which are capable of providing more information on tendencies in the development of the professional directions in relevant higher schools. On the basis of the summary reports, the agency made a special analysis of the development of the system of Bulgarian higher education system, its strengths and its difficulties and published it in the interest of all stakeholders,

https://www.neaa.government.bg/images/Publications-en/summerizing_reports/NAOA_annn_summ_reports.pdf.

continued to further undertake activities related to the implementation of the content of area for development 2. The scope of system-wide analyses and reports has been increased so as to supply more information on tendencies of development of Bulgarian higher education system; they are publicly accessible and are regularly published at the website of the agency for the benefit of all stakeholders.

Third recommendation: "NEAA should ensure that when the reconstruction of its Standing Committees takes place, student representatives are made full members of all those committees, on a constant basis."

Regarding the third recommendation, NEAA has designed a procedure of nominating experts

and has approved the practice of including students' representatives as full members in Standing Committees.

Fourth recommendation: "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."

With the aim to maintain outcomes and to increase the effectiveness of its activities, NEAA publishes on its website statements about procedures. Publicity is guaranteed including public access to information and participation in processes of internal quality assurance of NEAA.

Fifth recommendation: "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."

As regards the fifth recommendation, AC has supported all planned activities and audits of the Committee on Quality of NEAA. CQ makes public regularly its activities organized with different groups of stakeholders by publishing its statements (as has been described in this SAR).

In conclusion, NEAA has implemented the areas for development (recommendations), specified by ENQA, as a requisite of the creation of a quality culture across the Bulgarian higher education sector. Committed to the objectiveness of the recommendations and their importance as areas for development, NEAA has fulfilled them fully in terms of purpose and contents in the expected period of time (April 2015 – April 2016). For the Agency, this is a good example of positive impact of ENQA on its concrete activities of implementing ESG in coordination with national legislation. Implementation of recommendations from previous external review and also future recommendations for development is a fruitful challenge opening new opportunities for development of the agency. That plays a part in the growth of trust in NEAA and enhances its public image.

13. SWOT ANALYSIS

SWOT analysis is a popular tool for auditing NEAA and its environment (the acronym stands for *strengths, weaknesses, opportunities, and threats*). Strengths and weaknesses are considered internal factors and opportunities and threats are deemed external factors of the agency. The analysis is undertaken with the aim of matching the positive features of internal strengths with external opportunities of the agency and achieving added value in quality assurance. In the process of self-assessment of NEAA, the necessary survey was carried out with members of SC, AC and the specialized administration of the agency. In the structured survey with open questions, respondents pointed out opinions on strengths and weaknesses of NEAA and on opportunities and threats as external factors of the environment. After processing the information collected (statistical and logical analysis of frequency of use of certain notions, phrases and linguistic rules), some propositions were identified (cf. Table below).

Strengths of NEAA	Weaknesses of NEAA
<ul style="list-style-type: none"> • Clear internal legal framework and a new Criterial System in line with ESG • Smooth and strictly followed system of organization and management of procedures based on the principles of objectivity and transparency • Built consulting units supporting the work of AC • Well-prepared and experienced expert potential expanded with international experts in the recent years • Undergraduate and doctoral students are equal full members of SC • In accreditation procedures, each EG has undergraduate and doctoral students in its composition • Rich experience amassed in carrying out of procedures of evaluation and accreditation • No conflict of interests is observed in carrying out of procedures • NEAA has positive authority and public trust in the system of higher education in Republic of Bulgaria; timely publication of normative documents backing up the agency's activities and results of accreditation procedures • NEAA cooperates with ENQA and other structures in EHEA 	<ul style="list-style-type: none"> • NEAA has no legislative initiative for changing external normative organization • Lack of legal mechanisms of sanctioning in case of untimely applying for accreditation of higher education institutions • Delay of some procedures caused by uneven piling up of cases program accreditation of professional directions and doctoral programs • Absence of legal instruments for influencing financing of HEIs as a result of evaluations by NEAA • Employers do not participate actively in meetings of SC of NEAA
Opportunities of NEAA	Threats of NEAA
<ul style="list-style-type: none"> • Attracting external expert potential and expanding opportunities for international activity • Wider popularization of results of NEAA's work and their importance • Accreditation evaluations of the agency should be the basic indicator in establishing state policy for higher schools • Participation of representatives of NEAA in preparing legislative acts including optimization of accreditation procedures • More frequent seeking the opinion of esteemed professionals from higher schools o the work of NEAA • Active participation of NEAA in the structures of EHEA • Holding seminars and training of officers of the agency and external experts and exchange of good practices • Introducing of a new information system for management of accreditation processes • Financing the agency as a first-level operator of budget means • Organizing regional meetings, discussions, seminars on problems of quality of higher education with NEAA, higher schools and stakeholders 	<ul style="list-style-type: none"> • Possibility of withdrawal of erudite trained experts and scholars because of insufficient financing of their expert work in accreditation procedures • Insufficient interest of representatives of business circles and employers in the work of NEAA • Unsubstantiated claims of demands for correction of accreditation evaluation • Turnover of staff in appointing undergraduate and doctoral students as members of EG • Habilitated staff is getting old • Slowing down of change in legal framework of accreditation procedures

14. CURRENT CHALLENGES AND AREAS FOR FUTURE DEVELOPMENT

On the basis of SAR and the SWOT analysis in it, we can delineate the current challenges and areas for future development which NEAA and its partners face. The deep meaning and inseparable connection of the three parts of ESG 2015 define NEAA's capability to determine, organize and complete responsibly the activities with which according to its statute it can meet the basic permanent challenge – enhancing quality of Bulgarian higher education. It should be noted that the facts and circumstances mentioned below can be in harmony at one moment but at another they can reveal themselves as a dynamic and often controversial process with possible subjectivism and dogmatism, for schematics and chaos which undermine constructive nature of accreditation process. NEAA's understanding of this situation is one of the most important prerequisites for finding the right approaches for future development of the agency.

Procedures executed since 01.01.2017 on the basis of the new Criterial System delineate the tendency of higher schools observing the basic principle of quality in NEAA, namely to implement ESG Part 1,

https://www.neaa.government.bg/images/files/SUKO/Kratko_predstaviane_kriterii-2015_EN.pdf.

They have a publicly announced policy of quality assurance as part of strategic management of the education institution in the interest of social needs. The main challenge in this case is the policy of higher schools to become stable practice, to be executed regularly at the higher school. In contrast, there may be negative phenomena getting in the way of the public contract between higher school and students.

NEAA views effectiveness of procedures of internal quality assurance both through the prism of the degree of application of the new Criterial System by higher schools and in the perspective of their capability to perform and maintain self-control at all management levels and basic structural education units. The indicator of this effectiveness is the internal quality assurance system of the higher school which includes surveying of students' opinion. Systematic and precise monitoring of the system of evaluation and maintenance of quality is executed by NEAA's post-accreditation monitoring and control. It shows results of functioning of the system, defines the degree of fulfillment of standards and establishes digressions from them. In this respect, issues such as the problem of objective accounting for the students' opinion (important for academic leadership) being interfered with by the administrative pressure and infringement of objectiveness of estimate of students' intolerance of the way the education process is executed come to the fore. Here, lack of legal regulation for effective control and sanctioning of ineffective management and illegal activity of higher schools need consideration.

NEAA's activities in line with ESG stimulate the execution of an important principle of quality assurance by HEIs - to render into account the needs and expectations of students, stakeholders and the society directed to achieving competitive education. For the agency, education policy of higher schools is still in debt to interests of students and their opportunity of timely professional employment. Education in skills and adaptiveness to requirements of the market, of quickly changing social practice are among the basic challenges. By its accreditation procedures and the new methodology of evaluation, NEAA guides higher schools to make effort for encompassing all stages of the life cycle of students including the setting up of systems for registering employment of graduates.

Review of execution of activities in compliance with ESG shows that students participate more

categorically at all levels at which educational programs and study curricula are discussed at concrete higher schools; this, students' involvement in the education process is increased.

The implementation of European standards by NEAA outlines the need for wider inclusion of undergraduate and doctoral students in research work. The problem of students' and teachers' mobility is standing due to financial reasons, language skills, formal use of the systems of ECTS, outdated legal basis.

Insufficient interrelatedness of the agency's financing and evaluation activities and the Ranking System and the lack of stimuli for increasing quality are directly related to the need for developing the respective bylaws; the latter is in the power of executive authorities.

Effectiveness of accreditation process is related to the creation of a modern legal framework; NEAA has shown its readiness to support such developments. ESG 2015 and the Criterial System are the basis on which relevant legal changes can update the accreditation process.

For NEAA public responsibility of supporting the process of increasing quality of higher education, protecting students and teachers in executing their right to academic freedom as full partners in management of autonomous education institutions is a fundamental social obligation. Its execution defines the future development of the agency.

At the same time, we should bear in mind the fact that delineating the current challenges should not strain long-term crises in social life which influence prospects of higher education and science. The Strategy for development of higher education points out essential risks: demographic crisis with high rates of increase of elderly population and low levels of birthrate; decrease of numbers of candidate-students; disproportions at the labor market including devaluation of labor; unemployment especially of young people as cyclic and stable structural phenomenon. Under these circumstances, the role and importance of NEAA is rising; the agency upholds ESG 2015, permanently sustains its mission of raising social role of higher education in our country, for its authoritative integration in the European education area.

Potential energy contained in ESG 2015 stimulates NEAA to be partial to the strategic aims of "European Union 2020" and "Europe 2020" by means of consistent implementation of the standards of quality assurance in higher education.

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