

STANDPOINT

on the dissertation thesis for the award of the educational and scientific degree "**Doctor**" to **Vesela Stefanova Politova**, PhD student in the extramural form of study, state order, in the professional field 3.3. Political Science, Doctoral Program Public Administration, with a scientific supervisor **Assoc. Prof. Dr. Elena Kalfova-Voynova**

Topic of the dissertation:

"Quality of Regulations and the Importance of Impact Assessment in Education"

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1. Relevance of the topic and appropriateness of the set goals and objectives

National security, economic growth, healthcare and education are the basis for the stability and prosperity of the modern state. In the intensively developing world of a modern technological society, it is of great importance to prepare thinking and knowledgeable people who, having access to all kinds and volumes of information, are able to convert information into knowledge, and who know how to use it to contribute to the development and progress of their respective field.

In 2015, one of the most far-reaching reforms in the field of education since 1989 began in the country. On 1 August 2016, a completely new Law on Pre-school and School Education came into force, which repealed the Law on National Education that had been in force for 27 years. The Law on Preschool and School Education defines a completely new structure of the education system; introduces a new organization of school education; changes the functions and names of educational institutions, adopts new state educational standards and regulations to correspond to the basic law...

Effective public consultation and, in particular, preliminary impact assessment are key to fully implementing a data and evidence-based approach to the development of management decisions and public policies, respecting the principles of openness, reasonableness and coherence with stakeholders.

In order to function effectively and produce a quality product, the field of education (as well as any other sphere of public life) must be regulated by quality - clear, precise, flexible, applicable and workable, regulations, which justifies the relevance and importance of the topic of the developed dissertation.

2. Characteristics and evaluation of the thesis

The thesis is presented in a volume of 223 pages, composed in an introduction, three chapters, a conclusion, a bibliography and two appendices, and fully meets the requirements for a dissertation for the degree of Doctor of Education and Science. The pages are divided as follows: main text 185 pages, 16 pages of annexes ("Quality assessment map of normative acts in the field of pre-school and school education" and "Data on public consultations on announced draft normative acts and their amendments in the period 01.08.2016 - 31.08.2022") and a bibliography of 202 sources in Bulgarian and English, including 93 scientific sources, 48 official analytical and strategic documents, 48 normative documents and 13 internet sources. The dissertation contains a total of 24 figures and 3 tables. The list of abbreviations used in Bulgarian and English, provided at the beginning of the thesis, makes a good impression.

In the **introduction**, the PhD student convincingly explicates the importance of the developed issues, motivating her choice as an expert in education with many years of experience at both local and national level. Politova points out the great importance of the already statutory obligation to carry out impact assessments when drafting legislation, as well as her observation that this basic function of impact assessment in initiating legislative changes in the sector is underestimated. The focus of the paper is on the process of drafting regulations in the field of pre-school and school education, arguing that compliance with the statutory requirements for their drafting also influences the quality of the regulations themselves.

The doctoral candidate argumentatively identifies the object, the subject, the goal, the tasks, the main research questions, as well as the thesis of her research, the scope of the research and the research methods are indicated. The formulated thesis is acceptable and defensible.

In **Chapter One, "The Evolution of Regulation in Public Governance: the Path from Regulation to Better Regulation in the Implementation of Public Policies,"** presents the evolution of regulation in public governance in historical perspective, drawing parallels between the degree of state intervention in the economy and state regulation in education; regulatory policy; evaluation in public governance; and the role of impact assessment as a tool for improving the quality of regulation.

Attention is given to examining and analysing the concepts of public governance, public policies, regulation and regulatory. Based on official documents, the influence of international

organizations (Organization for Economic Cooperation and Development, European Union, and World Bank) on the development of regulatory policy in supranational and national aspects is presented. In relation to the role of impact assessment as a tool for improving the quality of legislation, different views on the nature of impact assessment are examined and analysed, and a classification of types of impact assessment is presented. The most used impact assessment approaches and the main methods of impact assessment are discussed.

The second chapter "Regulatory Policy and Impact Assessment in Bulgaria" of the dissertation is devoted to regulatory policy and impact assessment in Bulgaria, focusing on the field of education. It examines the actions taken by Bulgarian governments to implement regulatory reform. Due attention is given to better regulation initiatives, an integral part of which is the legal regulation for the application of impact assessment as a mandatory element of the standard-setting process. The stages and steps for the implementation of impact assessment in Bulgaria are presented, as well as the results of scientific research on the application of impact assessment in the first years of its regulation as a mandatory element of the process of adoption and amendment of regulatory acts.

A review and analysis of regulatory policy in the field of education has been carried out and it has been found that the scientific literature on impact assessment lacks publications and studies dealing with impact assessment of educational regulations and its application.

The third chapter of the dissertation "The process of development of normative acts in the sphere of pre-school and school education and the importance of impact assessment for their quality" contains the empirical study of the process of development of normative acts in the sphere of pre-school and school education and the importance of impact assessment for their quality.

The methodology and methods of the empirical study, which consists of two main parts, are presented. In the first part, a methodology is applied by means of a map for the assessment of the quality of normative acts in the field of pre-school and school education, which contains 23 indicators divided into 3 criteria. The development is based on a methodology for assessing the quality of the application of impact assessment, widely applied by a variety of authors in the USA and the EU. Examples of successful application of the questionnaire/scoring card analysis methodology are studies on assessing the quality of impact evaluation implementation by Lee & Kirkpatrick (2006) and by Hahn, Cecot, Renda & Schrefler (2008). The main method applied in the second part of the empirical study is a case study. Two particularly interesting and revealing cases are studied in detail: 1) The impact of the Kovid 19 pandemic on the functioning of the pre-school and school education system and on the normative framework; 2) The impact of the war in Ukraine on the functioning of the pre-school and school education system and on the normative framework. The analyses presented are detailed and of a high level!

Each chapter is followed by a summary, and six lengthy and well-reasoned recommendations are provided after the scholarly and practical Chapter Three.

The conclusion of the dissertation summarizes what has been done in the dissertation and answers the main research questions raised at the beginning of the research, confirming the thesis that the process of drafting regulations in the field of pre-school and school education does not fully follow the statutory rules and procedures and that impact assessment is not always applied or applied formally.

The obtained results, conclusions and recommendations give a different scientific and practical view on the state of the process of normative acts in the field of pre-school and school education. They would be of interest both to experts working in the sector and to representatives of public administration who are responsible for policy decisions in this area.

3. Contributions and Significance of the Development for Science and Practice

Based on the developed dissertation and its results the following contributions of scientific and applied nature are formulated:

1. The transition from regulation to better regulation in the implementation of public policies in the context of public governance is summarized and analyzed and the role of impact assessment as a tool for improving the quality of regulations is outlined.

2. The impact of the process of drafting regulations in the field of pre-school and school education on their quality is studied and the importance of impact assessment as a factor in improving the quality of regulations is established.

3. A new approach to the analysis of the process of drafting regulations and the importance of impact assessment in the field of pre-school and school education is justified and applied. An author's methodology of criteria and indicators is applied, in accordance with the specificity of the field of education and the current Bulgarian legislation.

4. Through case studies, secondary data analysis and content analysis, it has been proven that normative texts that have not been amended and supplemented since their initial adoption are workable over time and applicable even in unforeseen situations, which defines them as high quality.

5. Specific recommendations are formulated to achieve greater efficiency of the normative process and to improve the quality of normative acts in the field of pre-school and school education, which is useful from a practical and applied point of view.

4. Abstracts and publications

Four publications (two of which are identical) have been published in connection with the topic of the dissertation, presented in prestigious scientific publications, such as. Public Policies, as well as in two collections of scientific papers from international conferences. These works testify to the doctoral student's ability to make the results of her research experience available to the scientific community.

The abstract to the dissertation is formatted according to the requirements and reflects in a concise form the aims, objectives, methods used, results, conclusions and generalizations drawn, as well as scientific contributions.

List of publications on the topic of the dissertation:

1. Politova, V. (2021). Application of impact evaluation in the field of education at the local level. In. Kliment Ohridski", Faculty of Philosophy, Book Doctoral Students 2020, Vol. 5, pp. 337 - 358, University of Sofia "St. Kliment Ohridski", Sofia University. Kliment Ohridski", Sofia, 2021, ISSN 2534-935X.
2. Politova, V. (2022). Regulatory reform in education - challenges for public governance before and during Kovid-19. In. 227-222, Sofia, 2022, ISBN 978-95407-5484-0.
3. Politova, V. (2023). Public governance in the sphere of pre-school and school education in Bulgaria in the conditions of global crisis. In. "Public Policy.bg, Volume 14/ Number 1/ April 2023, 60-71, ISSN 1314-2313.
4. Politova, V. (2023). Public governance in the sphere of pre-school and school education in Bulgaria in the conditions of global crisis. In: Proceedings of the Sixth International Conference on Public Administration "Public Administration in a Global Crisis: between Liberalism and Statism", Sofia, 2022, pp. 401 - 412, University of St. Petersburg, Sofia. Sofia, 2023, ISBN 978-954-07-5732-2.

5. Recommendations for future use of the dissertation contributions and results

The PhD thesis represents complete and thorough research, the results of which can be used directly in the practice of the relevant institutions, as well as in the development of applied and research projects of PhD students, students and teachers!

In view of the topicality of the problem and the popularization of the results of the research, it seems to me appropriate to organize a national (or at least SU) conference in relation to the issues under consideration and to present similar data in other areas of state and public administration.

CONCLUSION

The dissertation contains scientific and applied results that represent an original contribution to science and meets all the requirements of the Academic Staff Development Act in the Republic of Bulgaria (ASDA), the Regulations for the Implementation of the ASDA and the relevant Regulations of Sofia University "St. Kliment Ohridski".

The dissertation work shows that the doctoral candidate Vesela Politova possesses in-depth theoretical knowledge and professional skills in the professional field 3.3. Political Science (Public Administration) and demonstrates qualities and skills for independent scientific research.

Considering the distinguished merits of the dissertation, namely the topicality of the topic and its contributory character, I give my positive assessment and recommend the esteemed members of the Scientific Jury to vote positively for the award of the degree of Doctor of Education and Science to Vesela Stefanova Politova in the field of higher education. Social, Economic and Legal Sciences, Professional field 3.3. Political Sciences, Scientific speciality Public Administration.

26 May 2024

Prepared by:

/ Assoc. Prof. Albena Pavlova/