

OPINION

for dissertation to obtain an educational and scientific degree "Doctor" in the scientific area 3.3. "Political Science (Public Administration)"

Reviewer: Assoc. Prof. Simeon Atanasov Petrov, PhD

Department of Public Administration, Sofia University "St. Kliment Ohridski"

Author of the Dissertation: Vesela Stefanova Politova, part-time PhD student in Department of Public Administration, Sofia University "St. Kliment Ohridski"

Dissertation topic: „Quality of regulations and the importance of impact assessment in the field of education”

Research supervisor: Assoc. Prof. Elena Kalfova, PhD

The review is submitted on the basis of an Order № ПД 38-179/16.04.2024 of the Rector of Sofia University "St. Kliment Ohridski" and (2) Decision of the Scientific Jury dated 17.04.2024 to appoint reviewers.

1. Qualification, training, and professional experience of the PhD student

Vesela Stefanova Politova was awarded the right of Dissertation defense as a part-time PhD student in the Public Administration Department of Sofia University "St. Kliment Ohridski". She graduated with distinction from the Bachelor's program "Public Administration" (in the period 2007-2011) and the Master's program "Policy evaluation and impact assessment" (2019-2020). It is impressive that during this period Vesela Politova received a Bachelor's and Master's degree in Pedagogy, again at Sofia University. Important to the success of Vesela Politova's Dissertation research is her professional experience. For more than 10 years, she has been involved in management in the education sector, holding expert, control, and management positions in the National Inspectorate of Education and the Metropolitan Municipality - Izgrev district, participating in several projects.

2. General characteristics of the Dissertation

2.1. Formal Dissertation Parameters

The Dissertation on the topic "Quality of regulations and the importance of impact assessment in the field of education" was discussed and directed to defense by the Public Administration

Department, Faculty of Philosophy of Sofia University "St. Kliment Ohridski". It is important to note that Vesela Politova made significant changes taking into account the questions and recommendations presented during the internal discussion, which I believe have visibly increased the quality of the research and the recommendations derived from it. The presented Dissertation has a total volume of 223 pages (189 pages of actual text, structured in an Introduction, three Chapters, and a Conclusion; a bibliographic list; and 2 Annexes - A Scorecard assessing the quality of normative acts in the field of preschool and school education; and Data for held public consultations on announced projects of normative acts and their amendments). The text contains 24 figures and 3 tables. The bibliography includes a total of 202 sources, of which 93 are scientific publications, about a third of which are in English. Just over 40% of cited scientific publications are from the last 10 years.

2.2. Justification and relevance of the topic

The topic of the influence of the process of drafting the various normative acts and the formal procedures for impact assessment is relevant both on a theoretical and a practical level. In the Bulgarian governance literature, there are relatively few studies of the application of impact assessment in different sectors, especially in education. The presented Dissertation is valuable in this sense due to the application of the methodology adapted by the author for criteria and indicators evaluating the quality of the process of drafting regulatory acts. The findings are of immediate importance for impact assessment practices in Bulgaria.

2.3 Design of the research (object, subject, goals, limitations, methods)

The methodological design proposed by Vesela Politova in the Introduction of the Dissertation is clear and logical. The subject of the study is the application of impact assessment as one of the formal tools for the adoption of better normative acts in the field of preschool and school education. The main objective of the paper is: "to find out how the rule-making process is carried out and the performance of the impact assessment influence the quality of the normative acts in the field of preschool and school education". Following it, 10 specific tasks for the research have been formulated, which I consider to be fulfilled to a large extent. Perhaps a missing component is the derivation of specific recommendations to improve the procedures themselves for pre- and ex-post impact assessment, insofar as the conclusion in the text prevails that the procedures are not followed or are neglected, without explicitly pointing out the shortcomings in the regulations for drafting impact assessment.

The thesis defended in the Dissertation is that "the process of drafting the normative acts in the field of preschool and school education is essential for their quality, and carrying out an impact assessment as an element of the process is one of the key factors for drafting and adoption of better regulations". The formulated thesis points to the improvement of specific practices and does not imply substantial theoretical claims. In the Introduction of the Dissertation, the limitations of the research are indicated, the biggest of which is rather hinted at - the chosen topic - compliance with the statutory requirements for drafting the normative acts itself has an impact on their quality, but it is far from being the only condition, or even more, a guarantee for it.

Vesela Politova applies successfully several desk research methods - analysis of acts, a study of two specific cases, and last but not least - adaptation and application of a methodology of criteria and indicators for evaluating the quality of the process of drafting regulatory acts. Their results are presented clearly and concisely, mostly through quantitative data. In my opinion, the research would have benefited if these results had been supplemented by the conduct of interviews (or expert cards) that would have given breadth to the findings, especially regarding barriers to implementation and informal procedures. Vesela Politova herself aptly advocates both approaches in another study of hers - "Application of impact assessment in the field of education at the local level". The benefits of including representatives of the responsible institutions, for example in the Ministry of Education and Culture, could have been wider. I will allow myself an example - such a contact would make available to the dissertation author the information that in 2023 a process of preparing a follow-up assessment of the Pre-school and School Education Act is underway (it was officially published on the website of the Ministry of Education and Culture on 26.01.2024). It would also provide possible access to some of the research (including representative) that accompanies the preparation of the evaluation report. Of course, the last note does not replace the serious research work for the Dissertation.

3. Assessment of the structure and content of the Dissertation

In the dissertation work, the predominant structure approach is adopted - three separate chapters, the first of which contains the theoretical basis of the study. Chapter One "Evolution of Regulation in Public Administration: The Path from Regulation to Better Regulation in Public Policy Implementation" is an academically sound synthesis of the key definitions and concepts related to the dissertation topic. The impact assessment is positioned against the broader management categories of governance, public policies, and the regulatory role of the

state. Some elements such as regulations as a mandatory policy tool or regulation as one of the functions of governance (p.25) are not quite tied to the focus of the study. At the same time, two theoretical lines could be further developed at a theoretical level – evidence-based policies (now highlighted on p. 44) and theories of proceduralism – the understanding of legitimacy and compliance with the 'rules of the game' as a leading component of effectiveness. Beyond these reflections, clarifying regulatory quality and impact assessment theory are essential contributions of the Dissertation.

Chapter Two "Regulatory Policy and Impact Assessment in Bulgaria" contains a useful, comprehensive analysis of the regulatory framework and practices in our country. Vesela Politova categorically demonstrates that she knows the leading studies in the Bulgarian scientific literature and the logic and improvement of the impact assessment rules in Bulgaria. At the end of the chapter, she makes a smooth transition to education policy.

Chapter Three "The process of drafting normative acts in the field of preschool and school education and the importance of impact assessment for their quality" contains the results of empirical research. The main pillar here is the Scorecard for assessing the quality of normative acts in the field of preschool and school education, containing 23 indicators divided into 3 criteria. Quantitatively systematically presented data help the reader to recognize clear deficits in the process of preliminary evaluation of the result, even at the level of compliance with formal procedures. They are cleverly complemented by a qualitative analysis of the nature of the changes. In the form of case studies, two crisis situations are examined - the impact of the Covid-19 pandemic and the war in Ukraine on the preschool and school education system and the regulatory changes undertaken. The choice of these two "force majeure" cases for the specific dissertation study is controversial for me, but the analysis is detailed and meaningful. The clear conclusions and summaries at the end of this chapter are commendable.

4. Assessment of the Abstract, identification, and evaluation of scientific and scientific-applied contributions

The abstract covers the academic standards and creates an idea of the structure and methodology, the thesis, and the way to prove it. I believe that Vesela Politova has made the necessary efforts to accept without significant remarks the five contributions mentioned by her. Of particular importance are the theoretical overview, the analysis of formal practices, and the application of a methodology for the preliminary assessment of the impact

5. Publications and participation in scientific forums

During her PhD studies, Vesela Politova authored three scientific articles and participated in several scientific forums and PhD seminars. This meets the mandatory minimum requirements. One article was published in a non-refereed peer-reviewed journal, and two in edited collective volumes in Bulgarian:

1. Politova, V. (2021) Application of impact assessment in the field of education at the local level. In: Yearbook of Sofia University "St. Kliment Ohridski", Faculty of Philosophy, Book PhD Students 2020, Volume 5, pp. 337 – 358, SU "St. Kliment Ohridski", Sofia, 2021, ISSN 2534-935X.

2. Politova, V. (2022) Regulatory reform in the field of education – challenges to public governance before and during COVID-19. In: Proceedings of the Fifth International Conference on Public Administration "Public Administration after 2020: What do we know when we know nothing?", Sofia, 2021, pp. 227 – 243, SU "St. Kliment Ohridski", Sofia, 2022, ISBN 978-954-07-5484-0.

3. Politova, V. (2023) Public governance in the field of preschool and school education in Bulgaria in the conditions of a global crisis. In: "Public Policies.bg", Volume 14/ Number 1/ April 2023, 60-71, ISSN 1314-2313.

Two of the articles are largely integrated into the Dissertation work itself and represent a preliminary verification of the two case studies examined in Chapter Three, which is why it is not justified to present them in detail in this review. The article of independent interest is „Application of Impact Assessment in the Field of Education at the local level“.

Vesela Politova examines the implementation of impact assessment in the five largest municipalities and tests the quantitative indicators of the quality of impact assessments. As a result, she identified significant gaps related to the availability and quality of municipal assessments. A particular added value in the article is the complementation of quantitative data with qualitative research (interviews) - an approach that, if applied to the dissertation research, would improve its scope and the practical applicability of the conclusions.

6. Critical remarks and questions

The Dissertation, like any serious research, contains some ambiguities, most of which I noted in the course of this review. The most important of them can be summarized as follows:

- It is likely that the quality of the process of creating the normative regulations depends not only on compliance with the procedures but also on the quality of the procedures themselves in the Bulgarian context
- In the future, Vesela Politova could pay more attention to other factors influencing the quality of regulations outside of the formal procedure of preliminary impact assessment and the emphasis on the number and frequency of changes in normative acts;
- Supplementing the current data with information from qualitative research among key actors would enhance and extend the findings.

In this regard, I would like to ask the author the following questions:

1. How do you assess the ex-post impact assessment of the Pre-school and School Education Act published in early 2024? Does it confirm the conclusions drawn in the Dissertation?
2. How impact assessment should 'test' compliance with strategic objectives in the education sector?
3. And finally, I would like to ask for a synthesized answer in a few sentences to one of the two research questions posed at the beginning of the Dissertation: In what way does the implementation of the process of drafting the normative acts in the field of preschool and school education affect their quality?

7. Conclusion

The proposed Dissertation "Quality of regulations and the importance of impact assessment in the field of education" fully covers the formal regulatory requirements. This gives me the reason to give my positive opinion of the dissertation work and to recommend to members of the scientific jury to support a decision FOR awarding the Educational and Science Degree "Doctor" in Professional direction 3.3 Political Science (Public Administration) to Vesela Stefanova Politova.

Sofia,

07.06.2024

Member of the Scientific Jury:

Assoc. Prof. Simeon Atanasov Petrov, PhD

