

REVIEW
of a dissertation
for obtaining a scientific and educational degree "Doctor"
in the professional field 3.3 Political Science (Public Administration)

Author of the dissertation: Vesela Stefanova Politova, PhD student (part-time form of study) at the Department of Public Administration, Sofia University "St. Kliment Ohridski". Cl. Ohridski";

Dissertation title: "Quality of Regulations and the Importance of Impact Assessment in the in the field of education";

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1. General presentation of the doctoral dissertation.

Vesela Politova's dissertation meets the formal requirements for the development of this type of work. It consists of an Introduction, four chapters, and a Conclusion.

The first chapter clarifies the basic concepts that the author uses in the process of proving her doctoral thesis. The concepts of "regulation", "good regulation", "smart regulation" are introduced. The difference between these concepts is explained against the background of the actual transition in public administration practices – from state control to rules for the activities of independent individuals. Karl Polanyi, an author who has been essential for the understanding and development of modern capitalism, has been used correctly, although its importance and its presence in science in recent decades has been greatly underestimated. In general terms, the concepts of "public policies" and "public governance" are also clarified – these concepts are used to explain the nature of regulations as an instrument of public governance, and regulation making as a process of public policies. Chapter One also raises the question of the main organizations – authors of the ideas of good and smart regulation, which actively disseminate them among their members and partners. However, they are considered as authors rather than main stakeholders in this process. Accordingly, the ideas they stand behind are used to clarify the content of regulation, rather than the process related to the practices for its implementation.

The second chapter raises the issue of regulation and regulatory policy in Bulgaria. The issue of the introduction of the concept in the Bulgarian legislation and the outlining of the practices for its use in the Bulgarian context is presented in a relatively complete way. The emphasis is on the process of drafting regulations, as well as on impact assessment as a necessary tool for ensuring the quality of regulations.

Chapters three and four present the results of the empirical research conducted by Vesela Politova in the process of proving her doctoral thesis. Chapter Three presents the methodology, data and conclusions from a study of 26 normative acts according to pre-developed criteria. The aim is to establish the quality of the normative documents. The study is focused on the field of education, respectively, the main normative acts in force in this area are subjected to research. The fourth chapter presents the results of the case studies related to the process of changing regulations in the field of education in emergency situations. Cases related to the Covid-19 pandemic and the war in Ukraine have been examined. The aim of the study is to trace the process of changing normative acts in the context of crisis emergence of new problems.

The introduction defines the goals, tasks and methods of the research work. The object and subject of the research are clearly formulated. There is a complete correspondence between the formulated goals, tasks and methods, on the one hand, and the content of the dissertation, on the other. The limitations of the study are introduced and explained. The arguments for the choice of the field (education) to which the empirical research refers are formulated. The working hypothesis of the doctoral student research is explicitly formulated, according to which "the process of drafting normative acts in the field of preschool and school education is essential for the quality of the normative acts themselves, and the performance of an impact assessment as an element of the process is one of the key factors for the development and adoption of better normative acts... The impact assessment (in Bulgarian practices – my note) is not always applied or is applied formally, which is why it does not have a positive impact on improving the quality of the regulatory framework in the field" (p. 9). In the **Conclusion**, where the main lessons of the study are formulated, the working hypothesis is confirmed. Specific recommendations are made to improve the application of impact assessment in order to improve the quality of regulation in Bulgaria.

The dissertation is developed on the basis of **representative literature** – a sufficient number of bibliographic sources in Bulgarian and English, as well as numerous electronic sources, are used. The main normative documents that are used in the doctoral research both as a source and as an object of research are indicated.

2. **Research approach**

In terms of content, the dissertation follows the scientific logic of transition from general-theoretical to concrete-practical knowledge: from the study of the ideas of good regulation to the study of their practical application in the educational policy of Bulgaria. The link used between the scientific categories is: good regulation – the process of drafting regulations – impact assessment as an element of the regulatory process. Ultimately, the study focuses on impact assessment as a prerequisite for the quality of regulations and their compliance with the notion of good regulation.

The dissertation conclusions are related to the improvement of impact assessment in the direction of creating specific structures and capacities.

In research terms, the dissertation has several strengths:

1. The ideas of good regulation are systematized;
2. The importance of impact assessment for the quality of regulations is justified.
3. An in-depth study of the regulation process in Bulgaria has been conducted on the basis of a study of regulation in one policy area – school and pre-school education.

In general, in terms of content, the dissertation is useful mostly with the empirical material created in the process of proving the doctoral thesis.

3. Relevance:

The developed issues are extremely relevant from at least several points of view:

1. The question of regulating the behavior and activities of individuals (regardless of individuals or organizations) is a major problem facing the science of public administration. Its solution depends both on the values of the one who develops it and on the material and cultural context in which these practices are applied. In this sense, the question of regulation always remains open.
2. In the practices of public administration over the past 3-4 decades, the issue of regulation has become extremely important mainly because of the influence of neoliberal ideas, as well as because of the emergence of influential stakeholders in the face of global financial organizations, the EU and the OECD.
3. There is the following paradox in Bulgarian public governance – despite the undoubted success in the regulatory reform, the quality of regulations continues to be low – objectively, because they are subject to frequent changes, and subjectively from the point of view of the assessment of stakeholders. Making sense of this paradox is an essential task for social science and the science of public administration.
4. Additionally, the relevance of the topic of the dissertation is enhanced by the focus through which the topic of regulation is addressed – school and preschool education, which is an essential part of the public and political debate.

4. Knowledge of the problem and the literary material.

Vesela Politova is very familiar with the research on the regulatory process and in particular on the application of impact assessment in it. In her work, she demonstrated a good knowledge and a good ability to use the categories of science for public governance.

The facts on which the contributions are based have been gathered by appropriate methods and have not been manipulated in any way. In addition, they are presented comprehensively in accordance with the theoretical logic adopted by the author.

5. Scientific and scientific-applied contributions.

In her abstract, Vesela Politova has identified 5 contributions to her dissertation. Of these, I can definitely accept the second, third and fourth. Among them, the third is particularly important – the development and application of an author's methodology for the evaluation of normative acts in the field of education and in particular of Bulgarian education, as well as the fourth – the creation of evidences for the quality of normative acts, which have been changed relatively little since their adoption.

The first contribution formulated in the self-assessment of contributions already exists in science, incl. in Bulgarian-language science.

The fifth contribution is related to the formulated recommendations, for which, however, there is insufficient evidence that they would improve the quality of regulations.

The greatest contribution of the dissertation, which has not found a place in the self-assessment, is the creation of significant empirical material in the field of regulation in Bulgarian school and preschool education. In this sense, I would summarize the contributions of the dissertation in the following way: creating new evidence for existing theses in science.

I consider the contributions of the dissertation research to be significant and take them as the main proof of Vesela Politova's research skills.

6. The personal contribution

The dissertation and the conclusions in it are a personal contribution of Vesela Politova. I am not aware of such a study that has been published. I am not aware of any such empirical study.

7. Publications on the topic of the dissertation.

The PhD student has presented 4 scientific publications. They have been published in proceedings of international conferences (2), in a collection of doctoral works of the Faculty of Philosophy of Sofia University and in a peer-reviewed scientific journal. All four publications are directly related to the doctoral research, are written in good scientific language and correspond to of contemporary science.

8. Personal impressions of the PhD student.

During her doctoral studies, Vesela Politova was an active member of the Department of Public Administration. She participates in all scientific events, as well as in departmental and faculty projects,

where her contribution was significant. She is conscientious and at the same time has the ability to generate new ideas, which makes her a desirable member of any scientific community.

9. Recommendations and questions:

The topic of the dissertation is actually quite complex. Although it is ultimately the impact assessment, which can and is often interpreted simply as a technique in the management process, its content, as well as its implementation, is relevant to the objectives of the policies and the way in which they are formulated. Due to the complexity of the research problem, a series of questions related to the topic of the dissertation have remained out of sight of the PhD student.

Particularly important in this regard is the issue of the discrepancy between the assessment of the regulatory reform (according to the data given in the dissertation – very high) and the quality of regulations, which are extremely unsustainable over time. Vesela Politova (and not only her) tries to explain this paradox through the quality of the obligatory element in the process of drafting regulations – impact assessment and accordingly seeks improvements there. This approach is logically sound, but by no means sufficient. Many factors affect the quality of regulations and a well-run process of their development is nothing more than a necessary, but not a sufficient condition. In this sense, in view of the further development of the PhD student's research, I have the following questions for her:

1. What factors hinder "smart regulation" in Bulgaria?
2. What are the minimum characteristics that a regulation must have in order to define it as qualitative.

Conclusion.

Considering the strengths of the dissertation research and the significance of the contributions, I recommend the members of the Scientific Jury to award Vesela Politova the scientific and educational degree "Doctor" in the professional field 3.3 Political Science (Public Administration).

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Prof. DSc Tatiana Tomova