

STATEMENT

By: Assoc. Prof. **Alexander Ivanov Valkov**, PhD
University of National and World Economy
Professional field 3.7. Administration and Management

Regarding: Dissertation for the award of PhD degree
Professional field 3.3. Political Sciences

Author of the dissertation: **Vesela Stefanova Politova**

Dissertation thesis: **Quality of regulations and the importance of impact assessment in the field of education**

Grounds for presenting the statement: participation in the scientific jury for the defence of the dissertation according to Order № ПД-38-179/16.04.2024 of the Rector of Sofia University "St. Kliment Ohridski"

Training in the PhD programme and PhD student data

Vesela Stefanova Politova (02/01/1987) has been admitted to a part-time doctoral program in the Department of Public Administration at the Faculty of Philosophy at Sofia University "St. Kliment Ohridski" in 2020 with a 4-year study period from 07/20/2020 to 03/20/2024. Prof. Dr. Elena Kalfova has been appointed as the scientific supervisor of the doctoral student on the topic "*Quality of regulations and the importance of impact assessment in the field of education*".

Vesela Politova received her higher education at Sofia University, from where she graduated with two bachelor's and two master's degrees. The specialties in which she is trained outline two educational lines, which are decisive for the interest of the dissertation student in the subject she is developing in the current doctoral research. The first line of study is in pedagogy. During the period 2005-2009, Vesela Politova studied in a bachelor's program in "Pedagogy" (with a bachelor's degree from 2009), and after studying in a master's program in pedagogy of deviant behavior (2009-2011), she also obtained a master's degree in pedagogy. The second training line is public administration. Initially, she completed the full course of study in the Bachelor of Public Administration program (as a second major), in which she obtained her Bachelor's degree in 2011. Eight years later, after an accumulated teaching experience as a junior teacher of preschool children, and more later, first as a junior expert (2012-2014) and then as a chief expert (2014-2017) in the "Education, Social Activities, Culture and Sports" Department of the Metropolitan Municipality, Izgrev District, she completed a master's program in "Policy Evaluation and Impact Assessment" and, after successfully defending a master's thesis in 2020, acquired a master's degree in "Public Administration" at Sofia University.

The ascending lines of intensive training in pedagogy and public administration find practical realization: for 5 years she was the head of the "Education, social activities, culture and sports" department of the Sofia Municipality, "Izgrev" district (2017-2022), after which she moved to work at the National Institute of Education, as Chief Inspector (2022-2023) and State Inspector (2023-present). Viktoria Politova's work provides an opportunity for an "inside view" of the regulations in the education system and determines her deep professional interest in the subject.

The linguistic competences of the PhD student are important for the doctoral studies and for the research - she is fluent in English and German, has excellent communication, organizational-management, professional and digital skills. Targeted education in the specified fields - pedagogy and public administration, has been supplemented over the years with intensive participation in various forms of additional training: for the period 2012 - 2023, she

has completed a total of 26 trainings in the field of public administration, education management, pedagogical and organizational skills. She was the head of 11 projects implemented in pedagogical structures in the Sofia Municipality - "Izgrev" region, participant and representative of the teams of the National Inspectorate of Education in the international projects GEMINI, STESSIE, PAIDEIA. During the period of the doctoral studies, there were participations in two international scientific conferences organized by the Department of Public Administration (2020, 2022) and a total of 4 publications on the topic of the dissertation.

The mentioned main biographical moments show that doctoral studies are a natural continuation and the pinnacle of systematically developed education. The choice of topic in the field of regulatory impact assessment is motivated by a sustained interest in which trajectories of study and practice intersect. The combination of practical work in expert and management positions in the educational system, specialized education, scientific and academic activities are of great importance for the successful completion of the doctoral studies.

General characteristics of the dissertation

The dissertation is in a volume of 223 pages, of which 189 pages are the main text, structured as follows: introduction, three chapters and conclusion. The main text of the study includes 24 figures and 3 tables, all illustrated in chapter 3 of the dissertation, which present summarized results of the author's empirical research on the topic of the dissertation. For this reason, the author probably (1) did not consider it necessary to cite a source - all figures and tables are the work of the author, and (2) did not, as is customary at the beginning, list the figures and tables in the text. There is a List of used abbreviations in Bulgarian and in English, which helps to read the manuscript.

An important part of the research methodology and understanding the results are the two applications. The first one presents the Map developed by the author for the evaluation of the quality of the normative acts, where you can see the meanings of the indicators evaluated according to the three criteria (as opposed to the short version of the map (shown on p. 101-102). The second appendix is table that presents a summary profile of the draft regulations (new and for amendments) in the period 01/8/16 - 31/8/22, for which a public consultation has been announced. These are 71 draft regulations, for which in the table it illustrates the performance of all indicators (1÷6) according to quality assessment criterion 2. This table is a very good analytical solution, as it allows to make a clear and reasoned assessment (albeit by formal signs) of whether they have been met the requirements of the Law on normative acts in their preparation. The two appendices shown in this way are very important additions to the methodology presented at the beginning of chapter 3, which make the argumentation of the empirical analysis concrete, convincing and in-depth, and the summaries of the results scientifically valid.

Another very important element of the characterization of the dissertation is the bibliographic reference for the literature used. It shows not so much the theoretical as the empirical basis of the study and agrees with the stated and used portfolio of research methods – desk research, secondary data analysis and content analysis. The bibliography includes a total of 202 sources (shown on 18 pages), of which 52 are in English. Very useful from ch.t. of working with them is that the sources are structured in 4 groups: (a) scientific publications (a total of 93 books and articles, of which 31 are in English); (b) official analytical and strategic documents (a total of 48 sources, of which 21 are in English); (c) 13 internet sources and (d) 48 regulatory documents. It can be summarized that a little over ½ of the used literature provides the reliable and verifiable information base for the conducted office analysis and for the achievement of the methodological and scientific-applied goals of the research.

The cited literature fully corresponds to the selected thematic research field. It should be pointed out (this is the case here) that the compilation of a bibliography of sources is also the result of a precisely prepared, considered and conducted research process that proves the skills of the dissertation writer. A bibliography is a scientific product, the result of serious efforts to collect,

familiarize, systematize and summarize scientific literature and information on the subject. Practically all sources are publicly available with correctly indicated authorship or Internet address, a sign of strict adherence to the rules of scientific ethics, which guarantees transparency and traceability of the data and information used, and this, as a result, increases confidence in the presented results and in the dissertation as Explorer. I have no doubts about the correctness of the PhD student in using the sources indicated. The used way of working with the literature should be uniform - in the submitted manuscript it is a "mix" of in-text citation with an in-text index and "underline" reference. The dissertation student has worked correctly with the indicated literature and data. The literature is presented correctly and in a uniform style.

The language is clear, the style understandable and convincing. My acquaintance with the text and the review of the literature give me reason to characterize the dissertation research as a scientific result with methodological and scientific-applied significance.

Relevance and research approach

Nowadays, regulations are everywhere, affecting everyone and everything. The interests are different, but (probably) converge in one thing – the quality of regulations; and its provision (and achievement) depend on the care and responsibility with which their formulation and implementation is approached. For the scientific community of public management, the quality of regulations is a topic and a scientific task of the highest priority in research programs on good governance. For experts and practitioners from public institutions and organizations (not only from the education sector), this is a familiar but "suffering" topic - poorly prepared, frequently and repeatedly changed, inconsistent, unharmonized and ineffective legislation are a central problem for the way public institutions function systems and on the effectiveness of regulatory practice. For managers, better and sustainable regulation and adoption of better quality legislation (regulatory reform) is a key prerequisite and "necessary condition" in the task of achieving public policy objectives. Citizens and businesses, as the 'recipients' of regulation, need a regulatory environment that is consistent, transparent, fair, secure, motivating and works in their interests, which (from their perspective and rightfully so) can be achieved with the wider their inclusion in the process of their creation. It seems that in this field of stakeholders, the topic of quality regulations is unifying. Which, strangely, is at variance with the insufficient research of the scientific community (in our country) on the subject; with the low capacity to prepare reasoned decisions and legal acts based on data and evidence; with the disregard for strict compliance with the procedures required by the legislation and good practices in the adoption and evaluation of normative acts; with the lack of interest of the interested parties in the preparation of normative acts, etc. practices. The dissertation examines these questions in the broad context of the scientific problem of the quality of regulations, looking for an answer in compliance with the legally established procedures for drafting normative acts, i.e. in guaranteeing the quality of the regulations by ensuring the quality of the process of their preparation.

The doctoral student's approach to the topic is specific and it is decisive for the definition of the object, the subject, and the method of research. The choice of the educational system (and in particular preschool and school education) as a subject area of analysis is natural due to the long-standing practice of the doctoral student in expert and managerial positions in it. To this can be added: (1) the fundamental importance (generally speaking) of the education system for people and their communities, (2) the reforms in the field of education that began after 2016 and (3) the fact that in our country the field of education is fully regulated by the state. The author proceeds from the presumption that: (a) state regulation is a basic and irrevocable part, but an independent function, of public administration; (b) for management through rules (of behavior) established by a normative act, the process of their development is critically important; (c) as a feature of good public management, regulatory quality can be definitely improved and achieved by applying the regulatory impact assessment approach and tools. Regardless of the different ways in which impact assessment is perceived and interpreted, the thesis considers it as an approach to ensure management effectiveness. Conducting effective public consultations and, above all, performing

(preliminary) impact assessment are tools that support the development and making of management decisions based on data, analysis and evidence, taking into account all risks and consequences, while respecting the principles of openness, reasonableness, predictability and active participation of stakeholders.

We can summarize that the topic of the dissertation is *original and is a request for the deployment of a research program* on a major scientific-applied task of immediate importance to public administration. Since there are still very few studies devoted to the topic of regulatory quality in our country, it can be argued that the topic fills a "white spot" in this topic, stimulates and directs the regulatory reform in Bulgaria. Such research and in the outlined context is new to our scientific literature, which outlines it as timely and with well-defined practical benefits.

Study design

The introduction presents a synthesis of the author's main ideas on the topic and key elements of the research plan (the methodology of the empirical study is presented in item 1 of the 3-rd chapter). The plan is well thought out, and its correct implementation is essential for the validity of the results obtained. I find that overall the dissertation has succeeded in this task.

- The title of the dissertation presupposes, in a more general plan, the study of a relationship that reflects the *scientific problem*, the subject of the dissertation research – this is the relationship between the quality of regulations and impact assessment. In the logic of the dissertation, impact assessment (of regulations) is a key tool of public administration, the use of which results in the development and adoption of evidence-based government decisions (development and adoption of normative acts). In other words, the research is interested in a question whose answer is defined as the *main goal* of the dissertation: how does impact assessment, as part of the rule-making process, influence (improve) the quality of normative acts? This relationship is studied in the subject area of a specific system, that of preschool and school education, which allows to unambiguously define the object and the subject of the study. Placed in the specific practical environment, the idea of the research is visibly emphasized and more specifically and precisely described (from the title) in the name of the 3rd chapter (*The process of drafting the normative acts in the field of preschool and school education and the importance of impact assessment for their quality*). The object of research is the normative acts at the national level in the indicated sphere, and the subject - the application of the impact assessment as part of the process of creating normative acts for the adoption of better normative acts. The system of preschool and school education is the practical environment, the laboratory in which the research is conducted. Concentrated (understandably) on this particular object, the dissertation does not consider the possibilities for a wider validation of her research. In fact, it could also be a recommendation for job development. The dissertation does not comment on the question of whether this research (elements such as methodology, generalizations, methods of analysis and evaluation) conducted in an educational setting can be extended and confirmed in other areas. This would greatly enhance the validity and value of the study.

- The idea of the dissertation should be realized in a specific plan of work outlined in the *tasks* of the research and the expectation of a final overall result (the thesis of the research). In connection with the achievement of the goal, a list of 10 tasks was made, which are not related to the structure of the dissertation work (it is not considered in the introduction; a brief presentation of the content is made in the abstract). To the extent that the tasks should set a clear logical chain of the research, and each of them should correspond with a clear result, some of them are formulated in general (points 3, 4, etc.), and others repeat the goal (point 8). The thesis, as a summary description of the final scientific result, sets the framework for making sense of the dissertation research and thus it fulfills its role in the work plan. I would recommend clarifying vague expressions ("substantial meaning", "the necessary quality", "would follow"), as well as obvious ones ("the process of developing normative acts ... is essential to the quality of the normative acts themselves", p. 9).

- The place of the *methodology* and the *methods* used in the plan is very brief (they are listed in ch. 3, item 1 and appendix 1). The need for their more detailed discussion here comes from the fact that the argumentation of the methodology used and the choice of specific methods should be related to the purpose of the work and the specific tasks that outline the logic of the study. Given the topic, I find that the author correctly combines desk research, document analysis and content. The development of a map for the assessment of the rule-making process is the right move, as it implies universality of the analysis, comparability of the results within the country, and the possibility of multiplying this analytical tool in other subject areas. The empirical study implies a full-scale study of author-defined indicators of the quality of regulations in preschool and school education after 2016. Behind this is a huge effort, the success of which depends on the expertise of the dissertation. An important point that has been addressed is the outlined limitations, especially regarding the scope of the study.

It is not clear from the text which and what part of the evaluation methodology (the map) is the author's - in the conclusion it is defined as the author's, a new approach different from other authors (p.187), and in its presentation at the beginning of the 3 chapter is defined as "widely applied" and references are made to other authors (p. 100). The cabinet and documentary research seems justified and sufficient under the adopted very narrow understanding of "quality normative acts", those "which are made in compliance with the statutory requirements" (p. 9). This approach needs further argumentation, as it seems narrow, fully formalized (as seen from the indicators studied) and therefore controversial, as it reduces the study to a formal "compliance assessment" (against the statutory requirements). Of course, with a different definition and understanding of regulatory quality, the package of applicable research methods could look different.

Scientific achievements

The dissertation is structured in 3 chapters. The structure is logical and reasonable (with the notes indicated in this review). The *first* chapter has the task of presenting the broad theoretical basis of state regulation as an independent function of public administration. The *second* chapter offers an analytical overview of the national regulatory policy and reforms with a focus on the selected education sector. The *third* chapter presents the results of an empirical study conducted in two directions: (a) the process of developing the normative acts in preschool and school education and (b) an indicator assessment of the quality of the impact assessments conducted in the sector. The main achievements of the dissertation can be briefly summarized as follows:

- **Chapter One** outlines the broad theoretical framework of the study. The following theoretical summaries are relevant for the dissertation research: (1) Regulation is an independent function in the process of public management, aimed at achieving the goals of public policies, by means of rules of conduct established by a normative act; (2) The public significance and diversity of the forms of state regulation grow with the development of modern public administration. Governance of/through policies requires the ongoing commitment of government institutions to 'better regulation'. The quality of regulation is the goal of the regulatory policy of a government that bases its activities on the principles of good governance; (3) Regulatory policy represents a comprehensive and integrative approach of the government to the development, implementation and evaluation of regulations, with a focus on their results; (4) The concept of "Good Regulation" is a modern and internationally recognized approach to managing the quality of regulations, a basis for international and national regulatory reforms that rely on institutions and the introduction of procedures and tools that ensure that regulatory results are effective, inclusive and sustainable. The overarching concept of "Smart Regulation" emphasizes the participation and shared responsibility of all involved in policies; (5) The impact assessment is a critically important part of the law-making process, which argues for the need to change the normative acts, by assessing the administrative burden of the legislation, its effectiveness, efficiency, openness and transparency.

- **The second chapter** performs a connecting task. In it, the dissertation seeks the answers to two questions in a national context, which pave the way to conducting the empirical research, the results of which are shown in the third chapter: (a) What actions of the Bulgarian governments in the course of the regulatory reform (in particular in the field of education) and (b) How the impact assessment is applied when drafting the normative acts in the field of education. On this basis, the following summaries are more important: (1) The institutional framework of the country's regulatory policy is well developed, but its practical implementation faces endemic problems: lack of government strategy in this area; formal implementation of key regulation-making tools; ineffective regulatory oversight and quality control; insufficient administrative capacity; opaque legislation; frequent change of basic laws; (2) The impact assessment is a mandatory element of the legislative process, which within the framework of the "integrated approach" follows specific procedural stages and analytical steps that make it possible to assess the direct and indirect economic, social and environmental impact, in relation to the affected parties, such as basis for drafting regulations and policies. The practice in our country is characterized by non-compliance with the normative requirements for evaluation, formal evaluation, broken dialogue with the interested parties.

- **The third chapter** occupies a central place, since the evidence regarding the thesis, the purpose and the tasks find their empirical confirmation here. The knowledge and in-depth research on the subject of the processes of drafting and changing the normative acts is a reason to define the analysis as practically valuable as a basis for changes in the regulatory policy of the system of preschool and school education. The generalization of the specific results of the analysis go beyond the field of education, and the evaluation methodology can be applied as a methodological solution in other sectors as well. The two parts of the study aim to extract common and complementary characteristics regarding the process of drafting normative acts and improving their quality, and in they complement each other, and the combination of methods is justified and successful. More important generalizations illustrating the results of the analysis are: (1) Frequent change and large-scale changes in legislation (regardless of the reasons that imposed the changes) in a short period of time is among the most important characteristics that have a negative impact on the quality of regulations in the studied area. Turbulent regulatory change has long-term consequences – it not only destabilizes the environment and complicates processes for participants, but also distorts expectations, erodes incentives, and creates a culture of disregard for norms; (2) Obligatory compliance with the statutory requirements in the preparation and publication of the normative acts, carrying out a (preliminary) assessment of the impact of all acts and expanding the active dialogue with the interested parties are the minimum necessary steps to start a sustainable process of improving the quality of the normative acts; (3) Expert conduct of the partial preliminary impact assessments in options that allow a real choice in a wide range (including co-regulations and quasi-regulations), will increase the quality (objectivity) of the regulations; (4) In unforeseen crisis circumstances, the sustainable regulatory framework stimulates the government to seek solutions not in chaotic and large-scale regulatory changes, but in alternative possibilities for regulation and solving extreme public needs. This increases the scope of the government's capabilities and the efficiency of public administration.

Scientific and scientific-applied contributions

The self-assessment of the contributions made in the abstract (p. 27-28) emphasize the predominant methodological and scientific-applied nature of the dissertation research. Contributions must identify a result new to science. From this point of view, I think the contribution described under No. 4 (p. 28) to be poorly formulated and outside the specific focus of the dissertation topic. The more specific formulation of some of the recommendations as scientific and applied contributions is more correct. The reason for the latter is that the recommendations only mark the most general guidelines for change (disputed and unstudied within the framework of the dissertation research is the recommendation for the establishment of

a separate unit in the Ministry of Education and Science, with the purpose of performing impact assessment).

When evaluating the content of the dissertation, specific scientific achievements are marked higher in the review. Another attempt to refine and supplement the contributing moments might look like this:

- ***With a theoretical-methodological character:*** systematization of approaches, concepts, models for regulation in the context of public administration; conceptual interpretation and development of working definitions of the concepts - regulation, regulatory quality, assessment of the impact of regulations; identification and assessment of the applied approaches to "better regulation" and improving the quality of legislation by the leading international organizations in the field of regulatory policy;

- ***In a scientific-applied context:*** on the basis of a study of the process of development of normative acts, the importance of impact assessment for improving their quality has been established; adapted and applied for the field of school and pre-school education, a map for evaluating the current regulatory framework according to criteria and indicators that allow an unambiguous assessment of the quality of the development of normative acts; an assessment was made of the quality of the development of normative acts in school and preschool education at the national level after the beginning of the educational reform in 2016; problems and sustainable practices that reduce the quality of the process of development of normative acts have been identified; guidelines for improving the rule-making process and the quality of the impact assessment are outlined (unification of the procedures for assessing the impact of draft laws for different proponents; improvement of the assessment form; etc.).

The stated results and contributions are the work of the author of the study. There are opportunities to expand and continue scientific research.

Publications

The dissertation is not published as an independent monographic study. In the abstract, as well as in the appendices to the documents List of printed scientific works related to the dissertation work, a total of 4 independent publications on the subject of the dissertation are indicated (p. 28), all in Bulgarian. The publications were made in the period 2021-2023, i.e. during the doctoral studies. In the Reference for compliance with the national minimum requirements for the educational and scientific degree "doctor" there are 3 publications on the subject (the scientific report published in the Proceedings of the Sixth International Scientific Conference on Public Administration was also published as an article in the academic journal Public policy.bg). Three publications (one scientific report and two articles) evaluated in this review are correctly attached to the defense materials. The publications are in authoritative peer-reviewed journals that provide scientific visibility to the research results. The number and structure of publications meet the minimum national requirements for publication credits. The mentioned publications reflect main moments, results and achievements related to individual stages of the doctoral student's research work. She is an active participant with her publications in the department's annual scientific conference (and proceedings).

The article "*Application of impact assessment in the field of education at the local level*" (2021) seeks an answer to the question of the application of the impact assessment of the normative acts at the local level and more specifically in the field of preschool and school education. The article summarizes the theoretical framework of impact assessment as a tool of public administration and its specificity at the level of local government. On this basis, data from an author's survey on the subject of the territory of the municipalities of Stolichna, Plovdiv, Varna, Burgas and Stara Zagora are presented. The results indicate two main problems: (1) not all municipalities subject their adopted normative acts in the educational sphere to a preliminary impact assessment and (2) the impact assessments are not always of the required quality.

The subject of the scientific report "*Regulatory reform in the field of education – challenges to public governance before and during COVID-19*" (2022) is the reforms in the education system in the

context of good public administration. This makes it possible to identify two key immediate challenges to the development of the reform: (1) evaluation of the reform based on clear criteria and indicators of its results, through a qualitative ex-post evaluation of the impact of the Law on Preschool and School Education and (2) evaluation of the impact of the CoVid-19 pandemic on the regulatory framework and more broadly on the management and functioning of the pre-school and school education system.

The latter is also the subject of the third publication - the article "*Public governance in the field of preschool and school education in Bulgaria in the conditions of a global crisis*" (2023). The article expands the global crisis context that "conducts" the actions of governments and motivates (justifies) their intervention in the management of public life, including and the education system. The subject of the article are the measures in the education sector taken by the Bulgarian government in response to the global crisis. A key challenge in such an environment is ensuring stable public governance.

It can be seen from the publications that they are relatively independent developments, which are a specific analytical section of the overall research conducted within the dissertation. The research work and results are presented to the scientific community in reputable publications. There is a synchronicity between research work on the topic and the publication activity carried out. The publications present the doctoral student as an original researcher on a significant and important topic for public administration.

Abstract

The abstract has a total volume of 28 pages. It was developed in Bulgarian and English. It is a self-contained text that can be defined as a summary of the main parts of the dissertation research, which faithfully and accurately reflects all the main points, ideas and results presented in the dissertation research. The author's abstract provides structured information about the relevance and significance of the researched problem, about the dissertation's motivation for developing the research, about the main thesis, goals and tasks of the dissertation, the author's results and solutions are fully and convincingly presented, the basis for the obtained scientific-applied results and novelties. The text is clear, concise, readable and understandable. References are available for scientific novelties/contributions and for publications on the subject of the dissertation work.

Critical notes and recommendations

The dissertation testifies to the high competence of the author on the subject of the research. In the course of his work, the dissertation student demonstrates skills in the analysis of empirical data and in theoretical generalizations. To the notes and comments made above in the review, the following can be added as more important:

- The sought-after leading scientific-applied emphasis of the study is clearly noticeable in the dominance of the third chapter. It, as noted, was designed and implemented as an analytical piece. The presentation of the results of the empirical office study takes ½ of the content of the text, which I define as an imbalance. In an effort to be as persuasive as possible, the dissertation presents the results of the analysis of individual countries of the process of development and adoption of normative acts through a detailed description for each of them (this analytical approach can be defined as "atomized"). This fills the text with a number of details (eg, related to the description of the content of the regulations, etc., p.107-125; 155-169), at the expense of summarizing the manifestation of the analyzed characteristics. The 'atomization' approach affects the quality of the analysis by making it more descriptive than analytical and focused on causes;

- The dissertation student skillfully and correctly introduces limitations in the conduct of the research (they are in relation to the object, time and content). But there is a fundamental question, regarding the presupposition of the impact assessment as a key factor (a necessary condition) for the quality of the rule-making process, and hence for the regulatory quality. The focus of the dissertation is on compliance and quality implementation of the requirements of the

Law on Regulatory Acts. But as the author writes on p. 30, "the quality of regulation encompasses the processes through which regulations are developed, implemented and evaluated". In other words, from a management point of view, which is the position of the author, *the whole process is important*. A speculation here may be in order: perhaps the results are a reason for the persistent avoidance of a follow-up impact assessment of the Preschool and School Education Act (as well as possibly other regulations). It is the right of the doctoral student to bring (evidentially) to the fore a key aspect of the research (as in the case of the preliminary impact assessment), but outside of the implementation and results of the regulation, it is difficult to judge the "importance of the impact assessment" as is the idea according to the thesis topic. In purely technical terms, we can assume that strict compliance with the requirements of the Law on Normative Acts and conducting (rather than avoiding) impact assessment will contribute to the quality of regulations, but it is not only an expert-technical and instrumental matter;

- And finally, as the possibility proposed in the previous comment, there is another line of development of the dissertation research, for which the last 4 pages are dedicated in the third chapter. These are the recommendations for achieving higher efficiency of the rule-making process and quality of the normative acts in the preschool and school education system. I find that here the doctoral student could have developed in much more detail (at least as a separate paragraph), connected and reasoned ideas related to the improvement of various aspects of the rule-making process (and its implementation) - such as administrative capacity, institutional control and responsibility, organizational procedures, etc.

The notes set out here are an attempt at a good-faith conversation with the author (and on which he can take a stand in the defense), part of the discussion on the really important subject of the dissertation. They do not disturb the overall and very positive impression of the presented dissertation and of the convincingly demonstrated qualities of a researcher on the part of the dissertation student.

Questions

a) In the outlined trend towards "better regulation", impact assessment is seen as an "integrated process" (p. 49) and an approach that requires compliance with the principle of "a thorough and balanced assessment of all impacts, allowing the presentation of a comprehensive analysis and the identification of trade-offs where appropriate" (p. 55). How, according to the PhD student, would this approach be implemented, given that relevant but conflicting impacts measured by different instruments fall within the scope of the assessment? Does the type of impacts (direct – indirect; current – long-term) play a role in this assessment? Is its application mandatory and does not the integrative approach unnecessarily widen the scope of the evaluation, which may be at the expense of the quality of the policy?

b) According to the aggregated data in the table of Annex 2, a "peculiarity" is clearly noticeable, which I would define as a "hierarchy of evaluations": only normative acts of the highest order (Law, government decree) have a preliminary impact assessment (without commenting on the quality of the evaluation) and opinion of the "Modernization of the Administration" Directorate. How would the doctoral student comment on this fact and signal what it is for?

Conclusion

The dissertation is an original research on a current and significant topic in terms of scientific and applied science. The author convincingly proves that the performance of expert and qualitative impact assessments will contribute to the adoption of better normative acts, which is of crucial practical importance for improving the quality of public administration as a whole. The dissertation student shows high scientific competence on the given problem, through the demonstration of in-depth theoretical knowledge, skills to formulate, plan and conduct independent scientific research and to generate original, justified and working solutions. The research thesis has been proven, and the tasks have been solved. Concrete contributions of a

scientific and scientific-applied nature have been received, which are a basis for the sustainability of the research and which outline opportunities for development.

The above gives me the reason to give a positive assessment of the dissertation. I recommend to the respected members of the scientific jury to support a decision **FOR** awarding the educational and scientific degree “Doctor” (PhD) in the professional field 3.3 "Political Sciences", PhD program "Public Administration" of **Vesela Stefanova Politova**.

June 12, 2024
Sofia

(sig):
Assoc. Prof. Dr. Alexander Valkov