

OPINION

Regarding the competition for the academic position of “Associate Professor” in professional field 3.6 “Law,” scientific specialty “Administrative Law and Administrative Procedure,” announced in State Gazette No. 104/December 5, 2025, for the needs of the University of Economics – Varna, Department of Legal Sciences, with candidates: Senior Assistant Professor Dr. Diana Rumenova Dimitrova and Senior Assistant Professor Dr. Zhivka Stoyanova Mateeva

By Prof. Dr. Galina Ognyanova Yolova-Paskaleva, Department of Legal Sciences, University of Economics – Varna, field of higher education 3. Social, Economic, and Legal Sciences, professional field 3.6 “Law,” scientific specialty “Labor Law and Social Security”

Basis for preparation: Order No. RD-06-21/January 26, 2026, of the Rector of the University of Economics – Varna, appointing the members of the academic selection committee for the academic position of “Associate Professor” in professional field 3.6 “Law,” scientific specialty “Administrative Law and Administrative Procedure,” announced in State Gazette No. 104/ 5.12.25 for the needs of the University of Economics – Varna, Department of Legal Sciences, and the decision of the first meeting of the jury held on 16.02.2026.

I. Competition Details

The competition for the academic position of “Associate Professor” is in the field of higher education 3. Social, Economic, and Legal Sciences, professional field 3.6 “Law,” scientific specialty “Administrative Law and Administrative Procedure,” announced in the State Gazette No. 104/ 5.12.25 for the needs of the Department of Legal Sciences.

II. Candidates in the Competition

There are two candidates in the competition: Senior Assistant Professor Diana Rumenova Dimitrova, Ph.D., and Senior Assistant Professor Zhivka Stoyanova Mateeva, Ph.D. The documents submitted by the candidates are fully in compliance with the Law on the Academic Staff of the Republic of Bulgaria (RASRB), the Regulations for the Application of the RASRB, and the Regulations for the Development of Academic Staff at the University of Economics – Varna (PRASIUV). The candidates have been admitted to the competition as meeting the minimum national requirements for the academic rank of “associate professor” in the field of higher education in which the competition is announced pursuant to Art. 2b, paras. 2 and 3 of the Higher Education Act, as well as the additional quantitative requirements of the University of Economics – Varna under Article 2b, para. 5 of the Higher Education Act, in connection with Article 101 of the Regulations on the Development of Academic Staff at the University of Economics – Varna (RDAS-V).

III. Candidate Information and Personal Profile

Diana Dimitrova graduated from high school in 1990 at the First Language High School in Varna, and in 1999 she earned a bachelor’s degree in Law from the Ruhr University Bochum in Germany. The candidate’s teaching career began and has continued at the University of Economics – Varna, where she joined as a full-time assistant professor in 2013. Her academic development has involved progression through various academic positions, and she has served as a senior assistant professor since 2017. In 2017, he received his Ph.D. based on his defended dissertation titled: “Legal Regime of the Public Procurement Contract” (Diploma No. NS-106 / June 26, 2017).

He has been a member of the Union of Scientists – Varna and the Society of Juridical and Administrative Sciences since 2024.

Zhivka Mateeva earned her bachelor’s degree in Law in 2003 from VSU “Chernorizets Hrabar.” The candidate began her teaching career at the University of Economics – Varna, where she joined as a full-time assistant professor in 2009. Her academic development has involved progression through various academic positions, and she has served as a senior assistant professor since 2016. He received his Ph.D. as a doctoral student at the Institute of Legal Studies—Bulgarian Academy of Sciences based on his defended dissertation titled: “Administrative and Legal

Protection of Personal Data” (Diploma No. 000687/02.02.2016). He is a member of the Union of Scientists—Varna.

IV. Quantitative and Substantive Characteristics of the Presented Scholarly Works

In the competition for the position of associate professor, candidate *Senior Assistant Professor Diana Dimitrova, Ph.D.*, is participating with 53 publications, including:

- An independent monograph (habilitation thesis) – “The National Agency for Evaluation and Accreditation as a Specialized State Body for Ensuring the Quality of Higher Education”;
- 3 monographs (individual chapters in collective monographs)
- 4 studies, of which 2 are individual;
- 11 articles, of which 5 are individual;
- 25 reports, of which 15 are individual.

In addition to her academic publications, the candidate has contributed to 8 textbooks and teaching aids.

The main monograph by Assoc. Prof. Dr. Diana Dimitrova, titled “The National Agency for Evaluation and Accreditation as a Specialized State Body for Ensuring the Quality of Higher Education,” is 232 pages in total, divided evenly into three chapters: an introduction, a conclusion, a bibliography, and appendices. It is written in clear and accessible language at the appropriate academic level. The topic chosen by the author is undoubtedly timely and significant for legal theory. The study presents a comprehensive, in-depth examination of the specific nature of the NAQA as a specialized state agency, outlining a complete framework for the analysis of the applicable national legal framework in the following aspects: - formal-legal and doctrinal analysis of the structure, powers, and legal nature of the acts issued by the NAEA and judicial review thereof, and - the oversight exercised by the agency to ensure the quality of higher education. The monograph based on this research may also be useful in the practice of higher education institutions, judicial bodies, the Ministry of Education and Science, regulatory authorities, and

others. In this sense, the analyses, the systematic approach, and above all, the conclusions of the study fully correspond to and substantiate its scientific thesis, namely—the existing need for a comprehensive clarification of the issues and problems related to the functions and activities of the National Agency for Assessment and Accreditation (NAAA) in ensuring the quality of education offered by higher education institutions, given the significant public interest in the quality of Bulgarian higher education and the need to bring it into line with the standards and guidelines for quality assurance in the European Higher Education Area. It can be summarized that the presented monograph fills significant gaps in legal doctrine and the theory of administrative law, as there has been a lack of comprehensive and in-depth research in this specific area of administrative law to date. At the same time, the study is particularly relevant both in terms of the evolving regulatory framework concerning the nature, powers, and functions of the National Agency for Assessment and Accreditation (NAAA), and in light of the need for a high-quality and stable policy that ensures the quality of Bulgarian higher education. The subject matter is addressed at the appropriate academic level, established academic concepts are handled correctly, and scientific conclusions and findings are derived and formulated in an adequate and well-reasoned manner.

The most significant contributions of this monograph are as follows:

- A chronological overview of the development of the regulatory framework governing the activities of the National Agency for Assessment and Accreditation (NAAA) is presented; as part of the historical and comparative legal analysis, all amendments to the Higher Education Act and the regulations governing the agency's activities—which were adopted (and amended) accordingly—are compared.
- The interaction of the Agency with other bodies entrusted with functions in the field of higher education is examined in a manner justified within the context of the scientific thesis, given the importance of the proper organization and coordination of their activities for achieving the goals of the state policy for the development of higher education and the improvement of its quality.
- A comparative legal analysis was conducted of foreign legislative provisions from countries with legal systems similar to Bulgaria's and from countries with different legal traditions. The analysis identified similarities and differences regarding the type of legislative act governing the relationships, the type of accreditation bodies, and the

mandatory nature of accreditation, on the basis of which proposals for the adoption of best practices were substantiated.

- The functions, competencies, and powers of the Agency's bodies have been classified and systematized with a view to establishing their place within their respective organizational charts, particularly regarding the analysis of whether the distribution of these functions and powers is balanced. In this regard, the nature and types of the procedures and controls exercised and carried out have also been clarified.
- The nature and legal character of the acts issued by the governing bodies of the NAOA have been clarified, with a clear distinction drawn between internal and administrative acts. The latter is of not only theoretical but also substantial practical significance, given the finding that administrative acts (in this case, individual administrative acts) are subject to judicial review, whereas challenges to internal acts are admissible through administrative court proceedings when such acts affect the rights, freedoms, and legitimate interests of citizens or legal entities.
- A broad empirical basis for the analysis, given the review of judicial practice—a total of 68 decisions by regional administrative courts and the Supreme Administrative Court—from which practically significant conclusions and generalizations are drawn.
- In a systematic and consistent manner, conclusions, generalizations, and *de lege ferenda* proposals are drawn and substantiated at every stage and aspect of the study, collectively providing a comprehensive response to the research thesis, objectives, and tasks.
- Undeniable practical orientation of the normative and doctrinal analysis, given that the study emphasizes the potential to assist higher education institutions during procedures conducted before the agency and the NAOA itself; in this sense, the comprehensive study and the solutions it proposes for issues of priority practical significance are well-founded. In this regard, the author rightly emphasizes and substantiates the thesis that the creation of a stable regulatory framework, consistent with the standards and guidelines in the European Union, on the one hand, as well as its understanding and proper application by the supervisory bodies, on the other, aims both at the proper performance of the functions entrusted to them and at the lawful conduct of higher education institutions' activities.
- The issues analyzed have been organized in a way that fully reflects the author's view that the need for a comprehensive and systematic study of the Agency, as a specialized national

government body responsible for the evaluation, accreditation, and quality control of higher education is of paramount importance for improving oversight of higher education institutions with regard to ensuring and enhancing the quality of the education they offer, as well as conducting it in accordance with the standards and guidelines for quality assurance in the European Higher Education Area.

- The results of the study are clearly and accurately presented and can serve both to refine legal theory and to inform the necessary legislative adjustments in this field.

In conclusion, it can be summarized that the author has conducted a valuable normative analysis at the required doctrinal level, which is an indisputable strength and has significant practical importance for the further development of theoretical frameworks. Such a study is undoubtedly innovative for our legal doctrine, which also confirms its relevance and significance for the theory of administrative law.

The research output of Assistant Professor Diana Dimitrova, Ph.D., falls entirely within the scope of the announced competition; it is noteworthy that her research articles, studies, and reports appear in established, peer-reviewed and indexed journals, with four of the candidate's publications appearing in journals indexed in the world-renowned scientific databases Scopus and/or Web of Science.

In the presented publications, Dr. Dimitrova demonstrates an ability to formulate and defend scientific theses. The research topics are explored at a high academic level, distinguished by the depth of the scientific analysis; based on established doctrinal principles, the author derives well-reasoned theoretical positions and well-founded, appropriate proposals *de lege ferenda*, thereby advancing legal theory in the specific field of her scientific interests.

I believe that the publications submitted by the candidate, Senior Assistant Professor Dr. Dimitrova, for this competition fully correspond to and fall within the scope of the academic discipline "Administrative Law and Procedure." Some of them are the result of independent research, while those co-authored demonstrate Dr. Dimitrova's strong teamwork skills, as well as her comprehensive examination of the subject matter, combining interdisciplinary aspects from various branches of law or academic fields.

Assistant Professor Dr. Zhivka Mateeva is participating in the competition for the position of associate professor with a total of 42 publications, including:

- An independent monograph (habilitation thesis) – “Administrative and Legal Aspects of Public Enterprises – Non-Commercial Companies”;
- 3 monographs (individual chapters in collective monographs)
- 1 independent study,
- 8 articles, of which 6 are independent;
- 24 papers, of which 19 are independent.
- 5 textbooks and teaching aids (co-authored).

The main monograph, „Administrative and Legal Aspects of Public Enterprises—Non-Commercial Companies “, comprises a total of 194 pages, divided evenly into three chapters, an introduction, a conclusion, and a bibliography. The study presents a comprehensive, in-depth examination of the specific characteristics of public enterprises and the related administrative and legal elements, public functions, and governmental powers, thereby outlining a complete framework for the study of the applicable national regulations. In this sense, the analyses, the framework, and above all, the conclusions of the study fully correspond to and substantiate its scientific thesis, namely that public enterprises—non-commercial companies—are economic legal entities with specific characteristics, carry out executive and administrative activities, are subject to constant supervision, and exercise administrative coercion.

In summary, this monograph fills a gap in legal doctrine and administrative law theory, as there have been no comprehensive and in-depth studies in this specific area of administrative law to date.

The most significant contributions of this monograph are as follows:

- A well-founded and comprehensive legal analysis of the regulatory framework governing public enterprises—non-commercial companies—has been conducted, covering all possible aspects of their characteristics, functions, activities, legal acts, and authority
- A precise definition and author's analysis are provided of specific institutions and concepts pertaining to public enterprises—the concept of a public enterprise, the concept of the functions related to its activities and their systematics, as well as the characteristics and features of supervision, in light of the need for their proper understanding and practical application, particularly for the purposes of internal and administrative control.
- In a systematic and consistent manner, conclusions, generalizations, and *de lege ferenda* proposals are drawn and substantiated at every stage and aspect of the study, collectively providing a comprehensive response to the research thesis, objectives, and tasks.
- Undeniable practical orientation of the normative and doctrinal analysis, given that the study analyzes all public enterprises—non-commercial companies—existing at the present time
- The issues analyzed are organized in such a way as to fully reflect the author's view that, on the one hand, the economic activities carried out by public enterprises do not hinder the exercise of governmental functions and tasks, and on the other—that a proper understanding of the nature and activities of these entities cannot be isolated from a comprehensive state policy that requires timely updating.
- The results of the study are clearly and accurately presented and can serve both to refine legal theory and to inform the necessary legislative adjustments in the relevant field.

The research output of Assistant Professor Dr. Zhivka Mateeva falls entirely within the scope of the announced competition; it is noteworthy that her research articles, studies, and reports have been published in established, peer-reviewed, and indexed journals, with one of the candidate's publications appearing in a journal indexed in the world-renowned scientific information database Web of Science. In addressing general and specific administrative-legal topics, the work is approached at the appropriate scientific level; established scientific concepts are handled correctly, and scientific conclusions and findings are derived and formulated in an adequate and well-reasoned manner.

A comparative analysis of the candidates' scientometric data leads to the following conclusion: the data declared by Assistant Professor Dr. Dimitrova in the Report on Compliance with the Minimum National Requirements for the Academic Position of "Associate Professor" in Higher Education Field 3. "Social, Economic, and Legal Sciences," pursuant to Article 2b, paragraphs 2 and 3 of the Higher Education Act, are as follows: for indicator group "G"—489.9 points (minimum 100 points) and for indicator group "D"—650 points (minimum 50 points).

The information declared by Assistant Professor Dr. Mateeva in the Report on Compliance with the Minimum National Requirements for the Academic Position of "Associate Professor" in Higher Education Field 3. "Social, Economic, and Legal Sciences," pursuant to Article 2b, paragraphs 2 and 3 of the Higher Education Act, are as follows: for indicator group "G"—396.67 points (minimum 100 points) and for indicator group "D"—465 points (minimum 50 points).

At the same time, according to the "Quantitative Requirements for the Position of Associate Professor" at the University of Economics – Varna, as described in the Reference Document pursuant to Article 2b, paragraph 5 of the Higher Education Act for competitions announced by December 31, 2025, Senior Assistant Professor Dr. Mateeva's scores are 215 for scientific reports and 85 for scientific articles and studies. For Senior Assistant Professor Dr. Dimitrova, these scores are 208.8 and 146.6, respectively.

V. Identification of Scientific Contributions

The contributions presented by *Assistant Professor Dimitrova* are of a scientific and applied scientific nature. I consider the candidate's contributions to be genuine, significant, and enriching to existing legal theory and practice.

The most important ones are as follows:

1. This is the first comprehensive and in-depth study of the topic in Bulgarian legal scholarship to examine the interplay between legal aspects and those related to human resources management. It brings together both individual elements of the judicial system from a doctrinal, comparative law, multidisciplinary perspective, as well as their analysis in the context of digitalization and the need for urgent and adaptive legislation—"Digitalization in the Judiciary,"

pp. 50–68, and Chapter Seven, “Legal Relations of Employees in the Administration of the Judiciary”

2. Doctrinal and theoretical analysis and examination of the impact of digitization on educational processes—its reflection on the educational process, as well as the digital educational services provided by higher education institutions; well-founded conclusions, specific legislative proposals, and recommendations on the application of regulations in the field of higher education have been drawn—Digitalization in the Field of Higher Education, pp. 59–88, In the monograph: Andreeva, A., Yolova, G., Dimitrova, D., Radev, E. Legal Aspects of Digitalization in Higher Education and Labor Relations. Varna: Knowledge and Business, 2024, 174 pp. - (Monograph Series Knowledge and Business; Vol. 25)

3. Based on an analysis of the regulatory framework and empirical methods employed (survey, in-depth interviews, participation in discussions, content analysis of documents), conclusions, summaries, and recommendations for improving the work of the judicial administration have been drawn; interdisciplinary study—Dimitrova, D., Dimitrova, D., Koleva, V. Educational Needs of the Judicial Administration in the Context of Digitalization. Strategies for Policy in Science and Education: Scientific Journal, Sofia: Az Buki, 32, 2024, 4, 395–419.,

4. Analysis of specific aspects of public procurement, the judiciary, oversight exercised by state authorities over higher education institutions, contracting authorities, employers, the judiciary, etc., harmonization of national legislation with that of the EU, and the impact of European legislation on national legislation (Andreeva, A., Dimitrova, D. Control over compliance with procedures in the conduct of public procurement in the Republic of Bulgaria. Proceedings of the Union of Scientists – Varna. Series: Humanities, 2017, 1, 14–19., ISSN (print) 1310–63761; Dimitrova, D. Impact of Bulgaria’s EU Membership on the Development of Bulgarian Legislation in the Field of Public Procurement. Scientific Papers of the Institute for the State and Law, Sofia: BAS, XVI, 2017, 176–190., ISSN (print) 1314-6459; Andreeva, A., Dimitrova, D., Dimitrova, D. Specific Features of the Legal Regime Governing Public Procurement Conducted by Higher Education Institutions in Bulgaria. Izvestiya. Journal of the University of Economics – Varna, Varna: Nauka i Ikonomika, 62, 2018, 1, 58–73., ISSN (print) 1310-0343, ISSN (online) 2367-6949; Andreeva, A., Dimitrova, D. Violations of Labor Legislation—Grounds for Exclusion from Public

Procurement. *Izvestiya. Journal of the University of Economics—Varna*, Varna: Science and Economics, 63, 2019, 1, 25–39., ISSN (print) 1310-0343, ISSN (online) 2367-6949; Dimitrova, D. The Inspectorate to the Supreme Judicial Council as a Body of the Judiciary with Control Functions in Bulgaria. *Perspectives of Law and Public Administration*, Bucharest : ADJURIS. International Academic Publ., 13, 2024, 4, 518-527., ISSN((online) 2601-7830

5. There is growing interest in the latest issues surrounding digitalization and AI, with research exploring various aspects of their nature, stages of development, and the impact of their implementation on the operations of public institutions, as well as their implications for legal institutions, the risk of infringing on the rights of parties, and the need to acquire new knowledge and skills (Andreeva, A. , Yolova, G., Dimitrova, D. Computer Technology and E-health. Trends and Regulatory Framework. *Economics and Law*, Blagoevgrad: South-West Univ. Neofit Rilski Publ. House, 2, 2020, 1, 43–48., ISSN (print) 2682-972X; Dimitrova, D. Digitalization in the Judiciary and Educational Needs. *Izvestiya. Journal of the University of Economics - Varna*, Varna: Science and Economics, 65, 2021, 4, 409–424., ISSN (print) 1310-0343, ISSN (online) 2367-6949; Andreeva, A., Dimitrova, D. Teaching Law Disciplines in the Digital Age—a Symbiosis Between E-Learning Materials and Relation to Legal Practice. *INTCESS 2023—10th International Conference on Education & Education of Social Sciences*, January 23–25, 2023, Istanbul, Turkey: Hybrid Conference: Proceedings Istanbul: Ocerint Publ., 2023, pp. 191–196, ISBN (online) 978-605-72065-0-3; Kuyumdzhiev, I., Andreeva, A., Dimitrova, D. Digital Administrative Services Provided by Higher Education Institutions to Students—Challenges and Best Practices at the University of Economics—Varna. *15 Years of Administrative Justice in Bulgaria: Problems and Prospects: Collection of Papers from a National Roundtable*, June 15, 2022, Varna: Science and Economy, 2022, 111–122., ISBN (print) 978-954-21-1122-1; Andreeva, A., Yolova, G., Dimitrova, D. On the Boundary Between Rest Time and Working Hours in a Digital Environment. *Digital Economy, Business Analytics, and Big Data Analytics Applications: Conference proceedings*, Cham: Springer Publ., 2022, 733–739. - (Book Ser. Studies in Computational Intelligence; 1010

6. Research in the field of education management as a branch of administrative law (special part) – the need to update provisions and requirements and the role of higher education (Dimitrova, D., Dimitrova, D. Role of Higher Economic Education for the Development of Economic Activity

in Varna. *Izvestiya. Journal of Economics, Management and Informatics, University of Economics – Varna*, 67, 2023, 1, 24–40., ISSN (online) 2367-6957; Dimitrova, D., Dimitrova, D. On the Relationship Between Secondary and Higher Education in the Field of “Judicial Administration” in the Republic of Bulgaria. *Vocational Education: Scientific Journal = Vocational Education: Bulgarian Journal of Educational Research and Practice*, Sofia: Az-buki, 26, 2024, 1, 45–60., ISSN (print) 1314-555X, ISSN (online) 1314-85671; Dimitrova, D., Dimitrova, D. Higher Education in the "Judicial Administration" Program—A Prerequisite for Effective Justice. *Proceedings of ADVED 2023—9th International Conference on Advances in Education, Online Conference October 16–17, 2023, Istanbul: Ocerint Publ., 2023, 17–24., ISBN (online) 978-605-72065-3-4*

7. A study of the impact and application of mediation (in its public law aspects) in education, in the resolution of disputes related to consumer rights, as well as court referrals to mediation and the introduction of mandatory “court-ordered mediation” (Dimitrova, D. *Introduction of Mandatory Court Mediation in Bulgaria and Good European Practices. De Jure*, Veliko Tarnovo: St. Cyril and St. Methodius University of Veliko Tarnovo, 14, 2023, 2 (27), 234–248., ISSN (print) 1314-2593, ISSN (online) 2367-8410; Dimitrova-Markovska, D., Dimitrova, D. *Applicability of Mediation in Resolving Disputes Related to Consumer Rights. Court Mediation—Problems, Challenges, Prospects: Collection of Research Papers from an International Scientific Conference, Veliko Tarnovo, November 8, 2024. Veliko Tarnovo: Faber, 2025, pp. 162–174, ISBN (print) 978-619-00-1911-4; Dimitrova, D. Referral to Mediation by the Courts—Trends and Prospects. Mediation in Various Spheres of Society: Collection of Papers from the National Scientific Conference, May 11, 2022, Varna: Science and Economy, 2022*

8. Contributions to professional practice: Training sessions conducted as an instructor in the following courses: “Family Mediation. Communicating with Parents in Parental Conflict” at Ekohan Energy Ltd. in 2025, “Basic Concepts and Practical Aspects of the Application of the Administrative Procedure Code in Regional Administration” at the Regional Administration – Varna in 2025.

In summary, it can be concluded that the candidate is an exceptionally productive researcher with a high level of expertise in the relevant scientific field, a rigorous and meticulous researcher; and in this sense, her research work is of an indisputably high academic standard, fully

meeting the quantitative and qualitative requirements of ZRASRB and PRASIUV for the academic position of “associate professor.”

Dr. Dimitrova’s publications have received a remarkable number of citations from national and international scholars, including in journals indexed in Scopus and/or Web of Science. Thus, of the 50 points required under Group D indicators, the points accumulated from the declared citations total 650, significantly exceeding the established minimum. At the same time, as evidenced by the information provided by the candidate regarding registration in Google Scholar with over 250 citations, h-index 8, i-10-index 6, registration in Web of Science with 5 citations and h-index 1, and registration in Scopus with 7 citations and h-index 2.

The attached data are undoubtedly an indication of the very high scientific popularity of the research and its recognition in scientific circles.

The contributions presented by *Assistant Professor Dr. Zh. Mateeva* in the publications submitted for the competition are as follows:

1. A study of the nature, role, and activities of specialized administrative bodies that exercise the state’s executive authority and assist in coordinating state policy in the relevant field (Publications No.: 7.1; 9.2; 21.2; 26.7; 29.10)
2. By systematizing and comparing legal definitions contained in the normative acts of current national and European legislation, new concepts have been identified, and specific definitions, principles, and administrative-legal institutions have been further developed, supplemented, and expanded, with a view to filling the existing theoretical gap, standardizing terminology, avoiding discrepancies between individual legislative acts, and preventing the incorrect application of legal provisions. (Publications No: 7.1; 8.1; 10.3; 12.1; 15.4; 18.7; 19.8; 28.9; 34.15; 35.16; 36.17)
3. Examining the nature and significance of control/supervision over compliance with regulatory acts, the mechanisms for its implementation, and the application of administrative liability in the relevant field of application. (Publications No: 7.1; 13.2; 16.5; 17.6; 29.10; 37.18)
4. Clarifying and analyzing judicial review of administrative acts with a view to emphasizing the importance of administrative justice in ensuring compliance with and

enforcement of legislation and the effective protection of citizens' rights and legitimate interests. (Publications No: 20.1; 24.5; 30.11; 31.12).

Dr. Zhivka Mateeva's publications have also received a remarkable number of citations from national and international scholars, including in journals indexed in Scopus and/or Web of Science. Thus, of the 50 points required under Group "D" indicators, the points accumulated from the declared citations total 465, clearly exceeding the established minimum.

In summary, it can be concluded that the candidate is an exceptionally productive scholar with a high level of expertise in the relevant scientific field, a diligent researcher, and in this sense, her scientific and research work is of an indisputably high academic standard, distinguished by the depth of her scientific analysis and the research results achieved; in this sense, in both quantitative and qualitative terms, she fully meets the requirements of ZRASRB and PRASIUV for the academic position of "associate professor."

VI. Participation in Research Projects and Academic Forums

Senior Assistant Professor Dr. D. Dimitrova has extensive experience in research projects, both as a principal investigator and as a member of a research team. Among these, I would highlight the following: Principal Investigator of National Project 57/2022, "Legal Relationships and Status of Persons in the Judiciary in the Context of Digitalization," resulting in: 1 monograph, 2 studies (one indexed in Web of Science), 1 article, and 3 conference papers (two indexed in Web of Science). Member of the team on a project funded by the National Science Fund (NSF) under Grant No. KP-06-N45/7 2020 on the topic "Digitization and Digital Competencies – Trends and Innovative Practices in Higher Education and the Labor Market," resulting in: 2 monographs and 16 articles and papers, of which 4 are indexed in Web of Science or Scopus.

Work on research projects demonstrates both the candidate's ability to successfully lead projects and her ability to collaborate on current and significant research topics.

As a coordinator and member of the Mediation Council at the University Mediation Center at the University of Economics—Varna, she served as a member of the research project team and

a member of the scientific council for the annual scientific conference “Mediation in Various Public Spheres,” as well as an organizer and evaluator of student essays in the annual student essay contest on the topic “Mediation as I See It.”

Senior Assistant Professor Dr. D. Dimitrova has extensive and well-established experience in organizing academic forums (over 15 national academic conferences and roundtables), including the nationally recognized conferences “Law and Business in Contemporary Society” and “Mediation in Various Spheres of Society.”

Assistant Professor Dr. Zhivka Mateeva is a member of the research team for Scientific Project No. 49/2021 at the University of Economics on the topic “Data Protection in Higher Education”; Research Project No. 50/2021 at the University of Economics on the topic “Managerial and Legal Aspects of Innovation and Sustainability in Times of Crisis”; Research Project at the University of Economics No. 137/2015 on the topic “Commercial Insolvency – Legal and Economic Theoretical and Applied Aspects.” Project Leader – Scientific Events – Scientific Research Project at the University of Economics No. 200/2017 on the topic “The Role of Law in the Modern Economy,” as well as participation as a member of the organizing committee for a total of 8 national scientific conferences on “Law and Business in Modern Society.”

VII. Quantitative and Qualitative Assessment of Teaching and Instructional Work

As evidenced by the submitted documents, *Senior Assistant Professor Dr. D. Dimitrova* has a full teaching load for the relevant academic year in accordance with the university’s regulations. She teaches lectures and seminars in the Bachelor’s degree program in the subjects of Administrative Law and Procedure, Organization of Judicial Administration, Mediation and Alternative Dispute Resolution, etc., as well as in the Master’s degree program—Public Procurement, Contracts and Public Procurement, Mediation and Soft Skills, Institutional Framework and Management of Educational Organizations, Legal and Ethical Principles in Advertising and Media Communications, Public-Private Partnerships and Tenders. He teaches the core course Fundamentals of Law in English, as well as lectures and seminars in English on the subjects of Business Law and International Commercial Law. He has extensive teaching experience at foreign universities through the Erasmus+ program, as follows: University of Dubrovnik, Croatia, in 2025; University of Florence, Italy, in 2024; National University of Distance

Education, Madrid, Spain in 2023, Baku Business University, Azerbaijan in 2019, Catholic University of Leuven, Brussels, Belgium in 2017.

Teaches courses in English to Erasmus+ students at the University of Economics – Varna, as well as courses in English to students at other universities – the Higher School of Insurance and Finance – a program with the University of Sheffield and Varna Free University “Chernorizets Hrabar”.

She serves as the coordinator for the University of Economics – Varna in a joint international executive education certificate program titled “Business Development and Leadership in an International Context” offered by the University of Economics – Varna, the University of Economics in Bratislava, and the Bucharest University of Economic Studies.

The above demonstrates Dr. Dimitrova’s substantial teaching and academic work. In addition to her direct involvement in the educational process, she actively works with students to prepare them for participation in student academic conferences, legal essay contests, competitions, and other activities that motivate students to deepen their knowledge and build on their interest in legal matters according to their major. She provides academic guidance and reviews bachelor’s theses in the “Judicial Administration” program Judicial Administration, and serves as an academic mentor for the practical training of students in the Judicial Administration program.

Dr. Diana Dimitrova is an established and highly respected faculty member whose work has been highly rated both during university evaluations and in the annual student satisfaction survey. She teaches courses in the regular undergraduate and graduate programs. She has significant and successful practical experience, participating in university management and advisory activities at various levels - Deputy Head of the Department of Legal Sciences from 2024 to present, member of the Commission for the Recognition of Higher Education Obtained at Foreign Universities from 2019 to present, member of the Ethics Committee (secretary) 2019–2024, member of the General Assembly of the University of Economics—Varna, coordinator of the Mediation Center from 2020 to present, member of the Mediation Council from 2020 to present, Member of over 25 working groups established by order of the rector to update internal regulations and perform other tasks; participation in public procurement committees at the University of Economics – Varna. Certified mediator with additional specialization in commercial mediation,

registered in the Unified Register of Mediators at the Ministry of Justice under number: 20190531001.

In her capacity as Deputy Head of the Department of Legal Sciences, she maintains contacts with representatives of the legal profession to ensure that students benefit from the connection between theory and practice. Her participation in four educational projects with representatives from the legal profession (with the District Court of Varna, the Regional Court of Varna, the Administrative Court of Varna, and the Court of Appeals of Varna) is part of this effort.

Dr. Dimitrova's teaching is distinguished by a high standard of instruction, the successful application of various practice-oriented models, and the integration of theoretical knowledge with specific practical skills. My years of working with the candidate give me reason to confirm that she is an exceptionally conscientious, rigorous, and responsible instructor, as well as a collegial researcher who is respected by her students and colleagues.

In summary, the teaching and academic work of Senior Assistant Professor Diana Dimitrova fully meets—both in terms of quality and quantity—the requirements of PRASU.

The foregoing gives me grounds to state that the candidate in this competition possesses the necessary teaching experience and level of preparedness to hold the academic position of “associate professor.”

As evidenced by the submitted documents, *Assistant Professor Dr. Zh. Mateeva* has a full teaching load for the relevant academic year in accordance with the university's regulations. She teaches lectures and seminars at the University of Economics – Varna at the bachelor's level, the most important of which are Administrative Law and Procedure, Access to and Protection of Information, Organization of Judicial Administration, Local Government and Self-Governance, Administrative and Legal Protection of Personal Data, Fundamentals of Law, as well as the Master's degree program in the discipline of Information Security and Protection.

She is the course instructor for the disciplines “Access to and Protection of Information” and “Administrative and Legal Protection of Personal Data.”

At the same time, Dr. Mateeva regularly supervises students participating in student research competitions at the University of Economics – Varna, as well as supervising students in the preparation of their bachelor's theses in the Judicial Administration program. She has also gained teaching experience through the Erasmus+ program at the Catholic University of Leuven in Brussels, Belgium, from 2016 to 2017.

Dr. Mateeva's teaching is distinguished by a high standard of instruction, the successful application of various practice-oriented models, and the integration of theoretical content with specific practical skills. My years of working with the candidate give me reason to confirm that she is a responsible, fair, and rigorous instructor, as well as a collegial researcher who is respected by her students and colleagues.

In summary, the teaching and research work of Senior Assistant Professor Dr. Zh. Mateeva is fully in line—both in terms of quality and quantity—with the requirements of PRASIUV.

From 2018 to the present, Senior Assistant Professor Dr. Zh. Mateeva has also served as the Data Protection Officer at the University of Economics – Varna, and in this capacity, she has successfully integrated her practical experience with the theoretical training of her students.

The foregoing gives me reason to state that Dr. Mateeva possesses the necessary teaching experience and level of preparedness to hold the academic position of “Associate Professor.”

VII. Plagiarism

No instances of plagiarism, inaccurate data, and/or improper citation of other scholarly works were found in the scholarly papers submitted for the competition by Senior Assistant Professor Diana Dimitrova, Ph.D.

No instances of plagiarism, incorrect data, and/or improper citation of other scholarly works were found in the scholarly papers submitted for the competition by Senior Assistant Professor Dr. Zhivka Mateeva.

VIII. Critical Comments and Recommendations.

Regarding Assoc. Prof. Dr. D. Dimitrova - Given that I have participated in the review of a large portion of Assoc. Prof. Dr. D. Dimitrova's publications at the primary level—the Department of Legal Sciences—I have no specific comments or recommendations regarding their content. I believe it would be beneficial for the candidate to maintain the high scientific level achieved in her research and to utilize her accumulated experience in developing interdisciplinary research, and consequently, to initiate the development of scientific-applied projects.

Regarding Assoc. Prof. Dr. Zh. Mateeva – I believe she should focus her publications on specialized scientific journals, as well as those indexed in Web of Science or Scopus.

IX. Assessment of Compliance with Requirements and Conclusion.

In conclusion, it can be summarized that the candidates comply with the mandatory requirements of the Law on the Development of Academic Staff in the Republic of Bulgaria (LDASRB), the Regulations for the Implementation of the Law on the Development of Academic Staff in the Republic of Bulgaria, including the Minimum National Requirements, as well as the Regulations on the Development of Academic Staff at the University of Economics – Varna.

In this regard, and in accordance with the requirements of the ZRASRB and its implementing regulations:

- Candidates hold a doctoral degree.
- They have submitted an independent monograph, as well as other publications (monographs, studies, articles, reports, textbooks, and teaching aids) in specialized scientific journals.
- They meet and significantly exceed the minimum national requirements for holding the academic position of “associate professor” in professional field 3.6 “Law” with respect to all categories and overall.
- No plagiarism has been found in the publications submitted for the competition.

A comparison of the two candidates leads to the following conclusions:

1. **Predominant scientometric indicators for Assoc. Prof. Dimitrova, Ph.D.** – as already mentioned, in the Report on the fulfillment of minimum national requirements

for holding the academic position of “associate professor” in the field of higher education 3. “Social, Economic, and Legal Sciences,” pursuant to Art. 2b, paras. 2 and 3 of the Higher Education Act, are as follows: for indicator group “G”—489.9 points (minimum 100 points) and for indicator group “D”—650 (with a minimum of 50 points), while the scores declared by Senior Assistant Professor Dr. Mateeva in the Report on the fulfillment of minimum national requirements for holding the academic position of “associate professor” in the field of higher education 3. “Social, Economic, and Legal Sciences,” pursuant to Art. 2b, paras. 2 and 3 of the ZRASRB, are as follows: for indicator group “G” – 396.67 points (minimum 100 points) and for indicator group “D” – 465 points (minimum 50 points). At the same time, according to the “Quantitative Requirements for the Position of Associate Professor” at the University of Economics – Varna, as described in the Reference Document pursuant to Article 2b, paragraph 5 of the Higher Education Act for competitions announced by December 31, 2025, Senior Assistant Professor Dr. Mateeva’s scores are 215 for scientific reports and 85 for scientific articles and studies, respectively. For Senior Assistant Professor Dr. Dimitrova, these scores are 208.8 and 146.6, respectively, with the points from scientific articles and studies being nearly twice as high.

2. **Senior Assistant Professor Dimitrova** is participating in the competition with a larger number of publications, 53 in total, and it is noteworthy that the number of scientific articles outweighs the number of articles by Senior Assistant Professor Mateeva. Senior Assistant Professor Dimitrova has 4 publications in journals indexed in Web of Science or Scopus, compared to 1 for Senior Assistant Professor Mateeva, as well as a greater number of contributions to the development of textbooks and teaching aids.
3. **Senior Assistant Professor Dr. Dimitrova** has the highest number of citations—the points accumulated from the declared citations total 650, significantly exceeding the established minimum, compared to 450 points for Senior Assistant Professor Dr. Zh. Mateeva. At the same time, as evident from the information provided by Dr. Dimitrova regarding her registration in Google Scholar with over 250 citations, h-index 8, i-index 6, registration in Web of Science with 5 citations and h-index 1, and registration in Scopus with 7 citations and h-index 2.

4. **Senior Assistant Professor Dimitrova reported broader participation** in the organization of academic forums and events—more than 15, compared to the 8 reported by Senior Assistant Professor Mateeva.
5. **Senior Assistant Professor Dr. Dimitrova has demonstrated significantly broader and more extensive expertise than the other candidate, in accordance with the additional criteria set forth in Article 112, Paragraph 5, Items 1 and 2 of the Regulations on the Appointment of Academic Staff** - extensive teaching experience at foreign universities under the Erasmus+ program, as follows: University of Dubrovnik, Croatia in 2025, University of Florence, Italy in 2024, National University of Distance Education, Madrid, Spain in 2023, Baku Business University, Azerbaijan in 2019, Catholic University of Leuven, Brussels, Belgium in 2017, lecture courses in English for Erasmus+ students at the University of Economics – Varna, as well as lecture courses in English for students at other universities – Higher School of Insurance and Finance – a program with the University of Sheffield and Varna Free University “Chernorizets Hrabar”; he serves as the coordinator for the University of Economics – Varna in a joint international executive education program for certification in “Business Development and Leadership in an International Context” (Executive Education Certificate Program “Business Development and Leadership in an International Context”) organized by the University of Economics – Varna, the University of Economics in Bratislava, and the Bucharest University of Economic Studies.

A particular strength of Assoc. Prof. Dimitrova is her tenure in the core discipline of Foundations of Law taught in English, as well as her development of curricula and delivery of lecture courses at the bachelor’s and master’s levels, also in English.

At the same time, Assistant Professor Dimitrova has demonstrated successful practical experience by participating in the management and evaluation of the university at various levels - Deputy Head of the Department of Legal Sciences from 2024 to present, member of the Commission for the Recognition of Higher Education Obtained at Foreign Universities from 2019 to present, member of the Ethics Committee (Secretary) 2019–2024, Member of the General Assembly of the University of Economics—Varna, Coordinator of the Mediation Center from 2020 to present, Member of the Mediation

Council from 2020 to the present; member of over 25 working groups established by order of the rector to update internal regulations and perform other tasks; participation in public procurement committees at the University of Economics – Varna; Certified mediator with additional specialization in commercial mediation, registered in the Unified Register of Mediators at the Ministry of Justice under number: 20190531001.

Conclusion

The reasons cited for her merit—based on the primary and secondary criteria, as well as the positive evaluations of the activities and scientific work of Senior Assistant Professor Dr. Diana Dimitrova—provide grounds for concluding that her indisputable scientific and applied – practical achievements of her research, her excellent and established expertise, as well as the overall assessment of her professional qualities, fully meet the quantitative and qualitative requirements for holding the academic position of “associate professor,” pursuant to Article 2b, paragraphs 2 and 3 of the Higher Education Act, the Regulations for the Implementation of the ZRASRB, and the Regulations for the Development of the Academic Staff at the University of Economics – Varna. Senior Assistant Professor Dimitrova is a productive researcher with a high level of expertise in her field, a rigorous and meticulous researcher; in this regard, her research work is of an indisputably high academic standard and, in both quantitative and qualitative terms, fully meets the requirements of PRASIUV for the academic position of “associate professor.”

Based on the foregoing, I confidently propose to the esteemed members of the academic jury that Assoc. Prof. Dr. Diana Rumenoa Dimitrova be selected for the academic position of “Associate Professor” in Higher Education Field 3. “Social, Economic, and Legal Sciences,” Professional Area 3.6. “Law,” scientific specialty “Administrative Law and Administrative Procedure,” that Senior Assistant Professor Dr. Diana Rumenoa Dimitrova be selected, and that her appointment be proposed to the Faculty Council of the Faculty of Finance and Accounting at the University of Economics – Varna.

18.03.2026 г.

Заличена информация съгласно
ЗЗЛД и регламент (ЕС) 2016/ 679

Prof. Dr. Galina Yolova-Paskaleva



Вх. № 20-440 / 18.03.2026

OPINION

By Assoc. Prof. Emil Yordanov Radev PhD, University of Economics – Varna,
“Legal Studies” Department

According to decision of the Scientific Examining Jury, appointed by Order of the
Rector of University of Economics - Varna №ПД 06 – 21 / 26.01.2026 г.

1. General information

- The opinion is drawn up by: Assoc. Prof. Emil Yordanov Radev PhD, University of Economics – Varna, “Legal Studies” Department;

- Basis for drawing up the opinion: decision of the Scientific Examining Jury, appointed by Order of the Rector of University of Economics - Varna №ПД 06 – 21 / 26.01.2026 г.

2. **Information about the competition:** competition for occupying the academic position Associate Professor in the in the field of higher education “**Social, Business and Legal Studies**”, professional field 3.6 “**Law**”, scientific specialty “**Administrative Law and Administrative Procedure**” announced in **State Gazette No. 104/05.12.2025** for the needs of the “Legal Studies” Department at the Faculty of “Finance and Accounting”

3. Candidates in the competition

Within the announced deadline for the competition, two candidates submitted their application documents: 1. **Diana Rumenoza Dimitrova**, Chief Assistant Professor in “Legal Studies” Department in University of Economics – Varna (вх. №ПД20-158/30.01.2026 г.) and 2. **Zhivka Stoyanova Mateeva**, Chief Assistant Professor in “Legal Studies” Department in University of Economics – Varna (вх. №ПД 20-190/04.02.2026 г.).

3.1. Diana Dimitrova

The candidate **fully meets and significantly exceeds the minimum national requirements, according to Art. 2b, Para. 2 and 3 Development of the Academic Staff in the Republic of Bulgaria Act (DASRBA)** in the frame of the field of higher education “Social, Business and Legal Studies” in professional field 3.6. “Law”

indicator	points of the candidate	minimal requirements	difference
Group A (A)	50	50	0
Group C (B)	100	100	0
Group D (Г)	489.9	100	389.9
Group E (Д)	650	50	600
Total	1289.9	300	989.9

The candidate in the competition **fully meets and significantly exceeds also the additional quantity requirements of the UE-Varna according to Art. 2b, Para. 5 of DASRBA**

Indicator	points of the candidate	minimal requirements	difference
Scientific reports	208.8	30	178.8
Scientific articles and studies	146.6	80	66.6
Total	355.4	110	245.4



The candidate **meets also the requirements according to Art. 101 of the Regulation of the Development of the Academic Staff in the UE-Varna (RDAS UE-Varna)**: holding the academic position Chief Assistant Professor since 2017 (more than two years); presented a published monograph in specialist academic publications; it does not repeat the work submitted for being awarded the higher education and academic degree of Doctor of Philosophy; meets the minimum national requirements for holding the academic position "Associate Professor", according to Art. 2b, Para. 2 and 3 DASRBA, as well as the requirements for holding the academic position "Associate Professor" in UE-Varna according to art. 2b, Para. 5 DASRBA; the academic work is free of plagiarism that has been proved under a statutory procedure.

3.2. Zhivka Mateeva

The candidate **fully meets and significantly exceeds the minimum national requirements, according to Art. 2b, Para. 2 and 3 Development of the Academic Staff in the Republic of Bulgaria Act (DASRBA)** in the frame of the field of higher education "Social, Business and Legal Studies" in professional field 3.6. "Law"

indicator	points of the candidate	minimal requirements	difference
Group A (A)	50	50	0
Group C (B)	100	100	0
Group D (Г)	396.67	100	296,67
Group E (Д)	465	50	415
Total	1011.67	300	711.67

The candidate in the competition **fully meets and in scientific reports exceeds the additional quantity requirements of the UE-Varna according to Art. 2b, Para. 5 of DASRBA, and in scientific articles and studies meets the additional quantity requirements**

indicator	points of the candidate	minimal requirements	difference
Scientific reports	215	30	185
Scientific articles and studies	85	80	5
Total	300	110	190

The candidate **meets also the requirements according to Art. 101 of the Regulation of the Development of the Academic Staff in the UE-Varna (RDAS UE-Varna)**: holding the academic position Chief Assistant Professor since 2016 (more than two years); presented a published monograph in specialist academic publications; it does not repeat the work submitted for being awarded the higher education and academic degree of Doctor of Philosophy; meets the minimum national requirements for holding the academic position "Associate Professor", according to Art. 2b, Para. 2 and 3 DASRBA, as well as the requirements for holding the academic position "Associate Professor" in UE-Varna according to art. 2b, Para. 5 DASRBA; the academic work is free of plagiarism that has been proved under a statutory procedure..

I. Diana Dimitrova

4. Information about the candidate:

She graduated the First Language High School "Hristo Kabakchiev" in Varna with German Language and Master Degree in "Law" in the Ruhr University Bochum, Germany. In 2017 she successfully defended Dissertation on "Legal Regime of the Public Procurement Contract" and was awarded the higher education and academic degree PhD in the scientific specialty



“Administrative Law and Administrative Procedure”, for which this competition has been announced, Diploma No. NS-106/June 2, 2017 (verified in the NACID registry of academic positions and dissertations 01.03.2026).

At the present moment she is occupying the academic position Chief Ass. Prof. in the “Legal Studies” Department of the UE-Varna since 2017. She was Ass. Prof. (2013-2017) and honorary Ass. Prof. (2010-2012) at the same Department. Chief Ass. Prof. Diana Dimitrova is a lecturer with many years of experience in higher education and teaches lectures and seminars in full-time, distance, and part-time programs at the bachelor’s and master’s degrees in subjects related to the announced competition

In addition to her work related to the educational process, she is also actively involved in administrative duties: Deputy Head of the “Legal Studies” Department, Coordinator of the University Mediation Center, member of the Mediation Council, member of the Commission for the Recognition of Higher Education Obtained at Foreign Universities, member of the Ethics Committee (secretary), and member of over 25 working groups formed by order of the Rector to update internal regulations and perform other tasks.

She also has practical legal experience as legal counsel at the UE-Varna (2019–2021), attorney-at-law (2008–2019), legal counsel at Expressbank (2004–2008), and legal consultant at Alpha Bank (2011–2012).

Her scientific research interests lie in the fields of Administrative Law and Administrative Procedure, Education Management, and Artificial Intelligence.

She is fluent in German at the C2 level (having earned a master’s degree in law from a German university), English at the C1 level (she teaches in English), and Russian at the B1-C1 level, which allows her to keep abreast of international academic developments and best practices, as well as to collaborate on projects with foreign universities and participate in teaching mobility under the Erasmus+ program.

5. Description of the scientific work

For participation in the present competition Chief Ass. Prof. Diana Dimitrova presented a list of total 53 publications as follows:

- 4 monographs – 2 as sole author and 2 as co-author with total of 537 p.
- 4 studies - 2 as sole author and 2 as co-author with total of 125 p.
- 11 articles – 5 as sole author and 6 as co-author with total of 151 p.
- 25 reports – 15 as sole author and 10 as co-author with total of 239 p.
- 8 textbooks and teaching aids – 1 as sole author and 7 as co-author with total of 365 p.
- 1 other publication (scientific – popular article) with total of 5 p.

The research papers presented do not duplicate those submitted for the award of a doctoral degree or for the appointment to previous academic positions.

The presented by the candidate habilitation work - the monograph The National Evaluation and Accreditation Agency as a Specialized State Body for Quality Assurance of Higher Education Varna: Science and Economy, 2025, 232. - (Bibl. Prof. Cani Kalyandziev; Book. 103). ISBN(print) 978-954-21-1192-4 is the first of its kind comprehensive legal study of the NEAA as a specialized body for assessment, accreditation and quality control of the activities according to Art. 6 of the Higher Education Act (HEA) by examining a highly relevant topic with a view to improving the quality of higher education in Bulgaria. The monograph is 231 pages long and consists of an introduction, three chapters, a conclusion, a bibliography, and appendices.



Chapter 1 examines in a historical comparative legal aspect the legal framework of the NEAA. A comparative legal study with other countries is also made. Chapter Two is devoted to the powers of the NEAA bodies and analyses also the accreditation and project evaluation procedures and types of control. Chapter Three examines the acts of the governing bodies of the NEAA, adopted within the framework of their powers, establishing their legal substance. Judicial review of the acts is also examined. On the basis of the analysis in the individual parts, summaries, conclusions and proposals de lege ferenda for improving the legislation are drawn

Numerous issues are examined arising from our legislation, relating both to the organization, structure, and legal status of the National Evaluation and Accreditation Agency, as well as to the legal regime of its activities. These issues affect all higher education institutions in the country, their academic staff, and the students enrolled in them. This justifies the need for such a work, which theoretically enriches legal doctrine but also has practical significance—to assist higher education institutions during proceedings before the agency and the NEAA itself in the conduct of its activities, as well as the courts and other bodies that enforce the regulations related to the NEAA.

The monograph is published in a specialized scientific publishing - "Science and Economy" Bibl. Prof. Tsani Kalyandzhiev, was discussed in primary unit (copy of the protocol № 4/05.11.2024), was reviewed by 2 habilitated persons – Prof. Galina Yolova PhD and Ass. Prof. Slavi Genov PhD and solves a significant scientific problem at a high level – is in accordance with the requirements of Art. 112, Para. 2 RDAS UE-Varna as well as the definition in § 1 p. 10 of the additional regulations of DASRBA.

Based on the defended dissertation is published a monographic research on "Legal regime of the public procurement contract" – also in the field of the competition.

In the chapters three "Digitalization in the Judiciary" pp. 50-68 and seven "Legal relations of the employees in the administration of the judiciary" pp. 140-156 in the monograph "Legal Relations and Status of Persons in the Judiciary in the Conditions of Digitalization" a normative analysis is made of the regulations about the electronic jurisdiction, the actual possibilities of the "judicial AI" are examined, as well as the legal relations of the employees of the administration of the judiciary – ground of arising, requirements for the candidates, rights and obligations, reasons for termination.

Chapter two "Digitalization in the sphere of higher education" pp. 59-88., in monograph "Legal Aspects of Digitalization in Higher Education and Employment Relations" examines the digitalization in the sphere of higher education. The impact on the educational process is being examined, as well as the digital educational services, provided by the higher schools.

Two of the presented studies are as sole author – "Structure and Powers of the National Agency for Evaluation and Accreditation – Retrospective Analysis and Contemporary Legal Regulation" and „Legal regulation and tendencies of the digital education services in the higher schools ". Two studies are as co-author "Human Resources Management in the Judicial Administration in the Context of Digitalization - Managerial and Legal Aspects" and "Educational Needs of the Judicial Administration in the Context of Digitalization" the second one is in a publication cited and indexed in world-renowned scientific databases with scientific information - *Web of Science*.

Five of the presented scientific articles are as sole author: 15.2.; 19.6.; 21.8.; 22.9. и 24.11., and „The Inspectorate to the Supreme Judicial Council as Body of the Judiciary with Control Functions in Bulgaria“ is in a publication cited and indexed in world-renowned scientific databases with scientific information - *Web of Science*.

Six of the scientific articles are as co-author: 14.1.; 16.3.; 17.4.; 18.5.; 20.7. и 23.10.



15 as sole author scientific reports: 29.5.; 32.8.; 33.9.; 34.10.; 35.11.; 37.13.; 38.14.; 39.15.; 40.16.; 44.20.; 45.21.; 46.22.; 47.23.; 48.24. и 49.25.

10 scientific reports as co-author: 21.1.; 26.2.; 27.3.; 28.4.; 30.6.; 31.7.; 36.12.; 41.17.; 42.18. и 43.19., and "Artificial intellect: Regulatory Framework and Challenges Facing the Labour Market" and "On the Boundary Between Rest Time and Working Hours in a Digital Environment" are in publications cited and indexed in world-renowned scientific databases with scientific information - *Scopus and/or Web of Science*.

8 textbooks and teaching aids: as co-author 1) Administrative Law and Procedure; 2) Administrative Law and Procedure: Tasks, cases, tests [for the students of UE-Varna]; 3) Organization of the Judicial Administration (tasks, cases, tests); 4) Criminal Law and Criminal Procedure: tasks, schemes, cases, tests [for the students of UE-Varna]; 5) Principles of Law; 6) Principles of Law: Tasks, cases, tests; 7) The Mediation in the higher education: short guide and one as sole author: International Trade Law. Tasks, cases, tests.

One other publication as co-author: "Program Judicial Administration profession with many possibilities: Short guide for applying for program Judicial Administration in University of Economics – Varna.

The textbooks are intended as lecture material, the teaching aid – tasks, cases and tests are with practical direction for using in the seminars. In the parts of Diana Dimitrova are demonstrated a skill for presenting the material, a clear style, and a coherent and clear exposition.

The scientific production is substantial and with significant volume, and its quality should be highly evaluated given its well-organized structure, clear methodological framework, the depth of the research, the analysis of current, complex, and significant problems for modern science and practice, conclusions, summaries, and proposals for their resolution, as well as numerous original contributions. Some of the publications are interdisciplinary in nature and combine the study of scientific and applied scientific problems in the field of national and European /as well as of individual countries/ legislation. The analysis in various fields in the works, as well as their interdisciplinary nature, demonstrate a high level of erudition, proficiency in handling the subject matter, and its interpretation. High evaluation is also to be given from a linguistic and stylistic perspective. Taken together, these scholarly works reveal a deep scholarly interest in the field of the competition – Administrative Law and Procedure.

It should be noted, that one of the studies, as well as two of the reports as co-author are in publication cited and indexed in world-renowned scientific databases - *Web of Science and/or Scopus*. High evaluation deserve also the single author article in a Judicial edition "Perspectives of Law and Public Administration", cited and indexed in world-renowned scientific databases with scientific information - *Web of Science*, as well as the single author studies in judicial editions – journals *Norma* and *De Jure*.

The scientific production of the candidate is in the field of the announced competition, the presented publications are in acknowledged cited and indexed publications, registered in the National reference list of contemporary Bulgarian publications with scientific review, maintained by NACID, as well as in publications cited and indexed in world-renowned scientific databases with scientific information - *Web of Science and/or Scopus*.

6. Identification of the of contributions in the candidate's research work

The candidate's publications submitted for the competition demonstrate numerous scientific and applied scientific contributions, the most significant of which are:

The habilitation work - "The National Evaluation and Accreditation Agency as a Specialized State Body for Quality Assurance of Higher Education"—possesses a number of



qualities and is distinguished by numerous scientific and applied scientific contributions. It represents the first comprehensive study of its kind on the NEAA as a specialized body for the evaluation, accreditation, and quality control of activities under Article 6 of the Higher Education Act. The topic is highly relevant and analyzes problems related to the current legislation regulating both the organization, structure, and legal status of the National Agency for Evaluation and Accreditation, as well as the legal regime for its activities. The study concerns all higher education institutions in the country, their academic staff, as well as the students enrolled in them. Among the contributions of the work, the following should be noted:

- A periodization of the development of the regulatory framework regulating the activities of the NEAA, thereby providing a clear understanding of the legal problems that have arisen, how they have been addressed, and the direction in which our legislation should be optimized;
- classification and systematization of the functions, competence and powers of the agency's bodies (management and support bodies) with a view to determining their place in the agency's organizational chart, in terms of analyzing whether the distribution of these functions and powers is balanced;
- conclusions regarding the establishment of more stable evaluation criteria necessary to minimize subjectivity, as well as proposals for a clearer delineation in the legislation of certain functions of the Chair of the Accreditation Council;
- A comparative legal study and analysis of foreign legislative provisions from countries with legal systems similar to Bulgaria's and from countries with different legal traditions; the analysis identified similarities and differences regarding the type of legislative act governing these relationships, the nature of the accreditation bodies, and the mandatory nature of accreditation, on the basis of which proposals were made for the adoption of best practices and the optimization of activities related to quality control in higher education in Bulgaria;
- a broad empirical basis for the analysis—a review of case law from a total of 68 decisions by regional administrative courts and the Supreme Administrative Court, from which practically significant conclusions and summaries are drawn;
- clarifying the nature and legal character of the acts issued by the governing bodies of the NEAA, with the legal analysis of each of these acts being of particular significance - not only from a theoretical perspective but also of substantial practical importance, given the finding that administrative acts (in this case, individual administrative acts) are subject to judicial review, while challenges to internal administrative acts are admissible through administrative court proceedings when such acts affect the rights, freedoms, and legitimate interests of citizens or legal entities;
- formulated conclusions, summaries, as well as well-founded and well-reasoned proposals *de lege ferenda* based on the complex normative and scientific analysis.

The regulatory and doctrinal analysis is of not only theoretical but also practical significance, justified by its potential to assist higher education institutions during proceedings before the agency and the NEAA itself in the conduct of its activities, as well as the courts and other bodies that enforce the regulatory framework related to the NEAA. In this regard, the thesis is rightly emphasized and substantiated that, for the proper performance of the functions assigned to the supervisory bodies and the lawful conduct of higher education institutions' activities, it is necessary not only to establish a stable regulatory framework in line with European standards and guidelines, but also its understanding and proper application

The chapters in the collective monographs analyze current problems related to digitization in higher education and the judiciary (from an interdisciplinary perspective); based on this analysis, well-founded conclusions, specific legislative proposals, and recommendations



regarding the application of legal norms are drawn. The aspects of the monographic works serve not only legal doctrine, enriching it theoretically (in the candidate's chapters - the specialized administrative law literature in the fields of higher education and the judiciary), but are also useful for practice and, more specifically, for the parties in labour-law relationships, for higher education institutions, and for the judiciary, respectively.

A significant portion of the candidate's other publications also demonstrate originality and contributions. The single author studies listed under numbers 10.4. and 13.7. in the list of publications appear in established, peer-reviewed, and indexed legal journals; they systematize the functions and competencies of the NEAA and identify trends in the development of quality control in higher education, respectively, the legal framework for digital educational services is analyzed with a view to optimizing the process and establishing reliable protection of participants' rights, and an empirical study of student attitudes has been conducted, which is a valuable contribution to their practical optimization and the provision of reliable protection. The co-authored studies (nos. 11.5. and 12.6. – *Web of Science*) are interdisciplinary and address current and significant topics - educational needs and human resource management in the judicial administration in the context of digitalization. A key contribution is the use of empirical methods /survey research, in-depth interviews, participation in discussions, content analysis of documents/ and the proposals made for the protection of the parties in the proceedings and the improvement of the work of the judicial administration.

The articles and reports focus on public law, particularly administrative law. Some of them are devoted to problems analyzing various aspects of public procurement, the judiciary, state control of higher education institutions, contracting authorities, employers, the judiciary, the harmonization of national legislation with that of the EU, and the influence of European legislation on national legislation. Of particular significance and value are the studies on the latest issues in digitalization and AI - various aspects of their nature, stages of development, and the impact of their implementation in the operations of public institutions and their reflection on legal institutions, the risk of infringing on the rights of parties, and the need to acquire new knowledge and skills. Another category of publications of significant value consists of studies in the field of education management as a branch of administrative law – special part, the need to update regulations and requirements and the role of higher education. Also noteworthy are the publications in the field of mediation (in its public law aspects), which examine its application in education, in resolving disputes related to consumer rights, as well as court referrals to mediation and the introduction of mandatory "court-ordered mediation." The publications are distinguished by the depth of their analysis, the relevance of their topics, and the presentation of well-founded conclusions and proposals *de lege ferenda*.

Due to the large number of publications, it is not possible to provide an exhaustive list of the scientific and applied scientific contributions in the candidate's publications. Overall, Diana Dimitrova's body of work is distinguished by its high quality, relevance, and originality; it contains numerous scientific and applied scientific contributions entirely within the field of the announced competition - the field of administrative law, research on education management (administrative law – special part), digitalization in the activities of public institutions, etc.

A proof to the quality is also the fact that the submitted publications appear in acknowledged cited and indexed publications, registered in the National reference list of contemporary Bulgarian publications with scientific review, maintained by NACID, with one single author article and two co-authored papers appearing in publications cited and indexed in world-renowned scientific databases with scientific information - *Web of Science and/or Scopus*.



The candidate's citations also deserve high evaluation - with a minimum requirement of 50 points, 650 citation points have been submitted—11 of which are citations in scientific publications indexed in world-renowned scientific databases (Scopus or Web of Science), numerous citations in monographs and collective volumes, articles, and reports. The author's work is known not only within the academic (particularly legal) community in the country but also in other countries.

The candidate is a productive scholar, a diligent researcher with a high level of expertise in the relevant scientific field and high-quality scholarly output at the required high academic level, distinguished by the depth of the scientific analysis. The forms correctly completed by the candidate show a significant exceeding of the quantitative requirements across all indicators.

7. Participation in scientific projects and scientific forums

The candidate's participation in research projects related to the competition's topic and the results achieved in those projects also deserve high evaluation. The candidate was a member of the team for a project funded by the National Scientific Research Fund under Grant No. KP-06-N45/7 2020 on the topic "Digitization and Digital Competencies – Trends and Innovative Practices in Higher Education and the Labour Market," resulting in: 2 monographs and 16 articles and reports, 4 of which are indexed in Web of Science or Scopus.

This demonstrates, on the one hand, her ability to work as part of a team on an interdisciplinary project funded by the National Scientific Research Fund, which has achieved highly significant and well-regarded results. On the other hand, given that she was recruited as a member of a team involving several universities, this indicates that she is recognized and valued as a scholar in the relevant field.

Her work as Head of National Project 57/2022, "Legal Relations and Status of Persons in the Judiciary in the Conditions of Digitalization" also deserves high evaluation, showing the following results: 1 monograph, 2 studies (one indexed in Web of Science), 1 article, and 3 papers presented at international conferences (two indexed in Web of Science). This demonstrates that she possesses the necessary leadership and organizational skills to work with such a team and complete the project with significant scientific results.

The candidate has also participated as head or a member of the organizing committee for all projects related to the organization of academic forums, both at the "Legal Studies" Department and at the University Mediation Center. In most of these, she served as the editor of the published proceedings and is a member of the editorial board of the proceeding "The Mediation in the Different Public Spheres". Her participation as a member of the organizing committee for roundtables in the field of administrative law deserves special mention: "15 Years of Administrative Justice in Bulgaria - Problems and Prospects" "Administrative Law – Contemporary Trends in Adjudication and Doctrine," resulting in the publication of conference proceedings. She has actively participated in various research projects and other activities organized by the department in collaboration with the Municipality of Varna, courts, the Commission for Protection against Discrimination (CPD), the Research Institute at the University of Economics – Varna, the Commission for Personal Data Protection, and the Institute for State and Law at the Bulgarian Academy of Sciences. All of this demonstrates the candidate's ability to work in a team and his active participation in all of the department's academic forums and projects, as well as in those outside the department and the university.

8. Teaching work

High quantitative and qualitative evaluation deserves also the teaching work of the candidate. She teaches lectures and seminars in various disciplines at the bachelor's and



master's degrees, with a significant portion of them in the field of the competition – „Administrative Law and Procedure“, „Organization of the Judicial Administration“, „Principles of the Public Law“, „Customs Law“, „Public Procurement“, „Tenders and Competitions“ and other. She participates as member of interdisciplinary teaching teams (about the legal aspects of the problems) in different disciplines “Regulation and Ethics of the Digital media and PR”, “Digital PR – Strategies and Practices”, “Institutional frame and management of the educational organizations”, “Legal and Ethical Principles of the advertisement an media communications”. She has been involved in the development of numerous educational programs (for example Administrative Law and Procedure, Organization of the Judicial Administration, Customs Law, Administrative-Legal Services), including for disciplines in English (for example “Principles of Law, “Intellectual Property”, “Law of EU”, “International Maritime Law”, “Human Resources in the Maritime Business”, “International Trade Law”).

The textbooks and teaching aids, and teaching materials submitted for evaluation are of high academic value and aligned with the needs and curricula of the respective disciplines (which does not preclude their use for teaching at other universities or organizations), with special attention to be paid to those in the competition's field: a textbook on “Administrative Law and Procedure” a teaching aid on “Administrative Law and Procedure: Tasks, Cases, Tests”, “Organization of Judicial Administration (Tasks, Cases Tests).” One of the other workbooks is in the field of public law, “Criminal Law and Criminal Procedure: Tasks, Diagrams, Cases, Tests,” and one is a single author workbook on “International Trade Law.”

Over the past two years, she has had a full teaching load, with particular attention deserved for her course in the competition's subject area, “Administrative Law and Procedure,” which had a workload of 40 hours last year.

The candidate has also been invited to teach at other universities—VFU “Chernorizets Hrabar” where for the past two years he has taught “Bases of Law” in English, and his teaching of “Introduction to Law” in English as part of the University of Sheffield program at the Higher School of Insurance and Finance in Sofia should also be highly regarded.

The fact that the candidate has been invited by colleagues to lecture on legal issues in other disciplines and in courses taught in English, as well as at other universities and organizations, demonstrates that the candidate's teaching methods and high standard of instruction are recognized and valued not only at the University of Economics - Varna but also at other institutions of higher education.

His work with young researchers – students defending bachelor's thesis and doctoral students also deserves high recognition; he has worked with doctoral students on two research projects and has supervised students who have successfully defended their theses.

The candidate has participated in a number of teaching mobility programs, which also deserves high recognition – University of Dubrovnik, Croatia 2025; University of Florence, Italy 2024; National University for distance education Madrid, Spain 2023; Business University Baku, Azerbaijan 2019; Catholic University Leuven, Brussels, Belgium 2017. She participated as a lecturer in the Russian-Bulgarian Online Summer School 2021 “The Law and Economy in partnership between Russian and Bulgarian Universities”.

9. Plagiarism

According to the check of the submitted habilitation work with the strikeplagiarism program no plagiarism was detected. All submitted for evaluation publications are in acknowledged cited and indexed publications, registered in the National reference list of contemporary Bulgarian publications with scientific review, maintained by NACID, as well as in publications cited and indexed in world-renowned scientific databases with scientific



information - *Web of Science and/or Scopus* or other foreign publications with scientific review and which requires that they be checked for plagiarism by the relevant editorial board/scientific council.

10. **Questions, critical notes and recommendations to the candidate**

I have following comments and recommendations to the candidate: to maintain the high academic standard of their research and to focus on studies of EU legislation and its transposition in Bulgaria, as well as publications aimed, where possible, at indexed and peer-reviewed world-renowned databases, and to continue participating in and leading research projects.

II. Zhivka Mateeva

4. Information about the candidate:

She graduated: 1999 bachelor degree „Business management – Management of company security“, 2003 master degree in Law and 2005 master degree „Border control and company security“. In 2016 she successfully defended Dissertation on “Administrative Legal Protection of the Personal Data” and was awarded the higher education and academic degree PhD in the scientific specialty “Administrative Law and Administrative Procedure”, for which this competition has been announced, № HC- 000687/02.02.2016 (verified in the NACID registry of academic positions and dissertations 01.03.2026).

At the present moment she is occupying the academic position Chief Ass. Prof. in the “Legal Studies” Department of the UE-Varna (since 2016), before that she was Ass. Prof. (2009-2016) and honorary Ass. Prof. (2007-2008) at the same Department, as well as honorary Ass. Prof. (2004-2007) and Inspector (1999-2007) in VFU “Chernorizets Hrabar”. Chief Ass. Prof. Zhivka Mateeva is a lecturer with many years of experience in higher education and teaches lectures and seminars mainly in full-time programs at the bachelor’s degree in different subjects.

She is also involved in administrative duties as of 2018 being the Data Protection Officer in the UE-Varna.

She has identified as her area of research interest Administrative Law and Administrative Procedure, Protection of Personal Data, Protection of Classified Information, Access to Public Information.

She is fluent in English at the B1 level and Spanish at the A1 level.

5. Description of the scientific work

For participation in the present competition Chief Ass. Prof. Zhivka Mateeva presented a list of total 42 publications as follows:

- 4 monographs – 1 as sole author and 3 as co-author with total of 327 p.
- 1 study - as sole author with total of 14 p. (listed in the list of her publication by NACID as article)
- 8 articles – 6 as sole author and 2 as co-author with total of 87 p.
- 24 reports – 19 as sole author and 5 as co-author with total of 201 p.
- Presented 5 textbooks and teaching aids – as co-author with total of 214 p., evaluated shall be only 3 of them, because 3 of the presented teaching aids are edition of the same book “Principles of Law – tasks, cases, tests” (2 and 3 edition), of which only one shall be evaluated, so the total would be around 143 p.

The research papers presented do not duplicate those submitted for the award of a doctoral degree or for the appointment to previous academic positions.



The presented by the candidate habilitation work - the monograph „Administrative and legal aspects of public enterprises – non-commercial companies“ Varna: : Science and Economy, 2024, 194. - (Bibl. Prof. Cani Kalyandzhev; Book. 96). ISBN(print) 978-954-21-1175-7 is a comprehensive study that examines and analyzes public enterprises – non-commercial companies within the meaning of Article 2, paragraph 1, item 3 of the Public Enterprises Act, which were established by special laws pursuant to Article 62, paragraph 3 of the Commercial Act as state-owned enterprises and have existed for the past 5–6 years. The monograph has a total of 194 pages and consists of an introduction, three chapters, a conclusion, a bibliography, and appendices.

Chapter One examines the legal nature of public enterprises—non-commercial companies. The concept of a “public enterprise” is clarified, with an emphasis on distinguishing public enterprises—non-commercial companies - from similar legal entities through an analysis of their legal nature. Chapter Two is devoted to issues concerning the functions performed by public enterprises - non-commercial companies, and the grounds and admissibility for their assignment are examined in detail. Chapter Three focuses on the management of state property, examining and analyzing the transfer of certain assets (property) to the public enterprise - a non-commercial company by the state as a legal relationship of a public-law nature. The state’s policy regarding its participation in public enterprises is also examined. Based on the analysis in the individual chapters, conclusions, summaries, and well-founded de lege ferenda proposals are made for improving the applicable regulatory framework.

A theoretical analysis has been conducted of the legal nature of public enterprises - non-commercial companies by identifying their administrative-legal elements, their functions that may be accompanied by authoritative powers, the functions of the Agency for Public Enterprises and Control (APEC) as the body responsible for coordinating their management and supervising their activities, and state policy in this area. The author has justified the theoretical need by pointing to the lack of similar research and the practical interest in their authoritative powers, as well as the opportunity to provide guidelines for improving state policy related to public enterprises - non-commercial companies given the examination of the reasons for their dissolution.

The monograph is published in a specialized scientific publishing - “Science and Economy” Bibl. Prof. Tsani Kalyandzhiev, was discussed in primary unit (copy of the protocol № 4/27.10.2023), was reviewed by 2 habilitated persons – Prof. Galina Yolova PhD and Prof. Rumen Kalchev PhD and solves a scientific problem at a high level – is in accordance with the requirements of Art. 112, Para. 2 RDAS UE-Varna as well as the definition in § 1 p. 10 of the additional regulations of DASRBA.

In the monograph “Data Protection in Higher Education”, the candidate authored Chapter 1, paragraphs 1.2 and 1.3; Chapter 2, paragraphs 2.1, 2.2, and 2.3; Chapter 4, paragraph 4.2. The legal nature of the right to personal data protection is examined; the categories of personal data processed by higher education institutions and the grounds for their processing; the rights of data subjects in the field of higher education, the conditions for exercising those rights, and the limitations on the rights of data subjects, as well as the recommendation to adopt a Code of Conduct in the field of higher education, including criteria and procedures for its approval.

In the monograph “Management and Legal Aspects of Innovation and Sustainability in Times of Crisis” Chapter Two (authored by Zhivka Mateeva) presents the Ministry of Innovation and Growth as a newly established institution in the field of scientific research and innovation and analyzes the new legislative framework in this area.



Seven of the articles of the candidate are as sole author: 11.4.; 12.1.; 13.2.; 14.2.; 15.4.; 17.6. и 19.8.

Two of the articles are in co-authorship: 16.5. и 18.7.

19 as sole author scientific reports: 20.1; 21.2.; 24.5.; 25.6.; 26.7.; 28.9.; 30.11.; 31.12.; 32.13.; 33.14.; 34.15.; 35.16.; 36.17.; 38.19.; 40.21.; 41.22. и 42.23., and Control in the Sphere of Personal Data Protection Exercised by the Inspectorate to the Supreme Judicial Council is in publications cited and indexed in world-renowned scientific databases with scientific information *Web of Science*.

5 scientific reports in co-authorship: 22.3.; 23.4.; 37.18.; 39.20. и 43.24.

3 textbooks and teaching aids: in co-authorship 1) Administrative Law and Procedure.; 2) Principles of Law.; 3) Principles of Law (tasks, cases, tests). Listed are 3 editions of the same teaching aid "Principles of Law - tasks, cases, tests" and according to the instructions by NACID for evaluation of compliance with the minimum national requirements: "When a candidate for an academic position is the author of the first and second revised editions of a book, monograph, textbook, or teaching aid, only one of the editions may be considered in the scientometric indicators".

The textbooks are intended as lecture material, the teaching aid – tasks, cases and tests are with practical direction for using in the seminars. In the parts of Zhivka Mateeva are demonstrated a skill for presenting the material, a clear style, and a coherent and clear exposition.

The scientific production is substantial and with significant volume, and its quality should be highly evaluated given its well-organized structure, clear methodological framework, the depth of the research, the analysis of current, complex, and significant problems for modern science and practice, conclusions, summaries, and proposals for their resolution, as well as numerous original contributions. Some of the publications are interdisciplinary in nature. High evaluation is also to be given from a linguistic and stylistic perspective. Taken together, these scholarly works reveal a deep scholarly interest in the field of the competition – Administrative Law and Procedure and specifically personal data protection. One of the reports is in publications cited and indexed in world-renowned scientific databases with scientific information - *Web of Science*.

The scientific production of the candidate is in the field of the announced competition, the presented publications are in acknowledged cited and indexed publications, registered in the National reference list of contemporary Bulgarian publications with scientific review, maintained by NACID, and one of the reports is in publications cited and indexed in world-renowned scientific databases with scientific information - *Web of Science*.

6. Identification of the of contributions in the candidate's research work

The candidate's publications submitted for the competition demonstrate numerous scientific and applied scientific contributions, the most significant of which are:

The habilitation work - "Administrative and legal aspects of public enterprises – non-commercial companies" possesses a number of merits and is distinguished by numerous scientific and applied scientific contributions. It constitutes a comprehensive study that examines and analyzes public enterprises - non-commercial companies within the meaning of Article 2, paragraph 1, item 3 of the Public Enterprises Act, which are established by special laws pursuant to Article 62, paragraph 3 of the Commercial Act as state-owned enterprises and have existed for the past 5–6 years. In the work is justified the relevance of the topic by the adoption of a new Law on Public Enterprises in 2019, which provides for the impossibility of establishing new public enterprises, the need for their restructuring, and consequently their uncertain future, as well as the



lack of a comprehensive study of an administrative-legal nature. Among the contributions of this work, the following should be noted:

➤ analyzing the concept of a “public enterprise” and distinguishing it from other public enterprises by examining their legal nature and formulating a definition of a public enterprise - a non-profit corporation;

➤ identifying and systematizing the specific administrative and legal elements of their legal status and their distinctive features through a comparative legal analysis of public enterprises - non-commercial companies and public organizations (such as agencies);

➤ systematization and classification of their functions;

➤ analysis of the acts of their governing bodies;

➤ systematization, characteristics, and features of supervision;

➤ well-founded proposals *de lege ferenda*;

➤ a broad empirical basis for the analysis - a review of judicial practice involving a total of 63 acts.

The regulatory and doctrinal analysis presented in this work is of both theoretical and practical significance, as it provides a basis for offering guidelines to improve public policy regarding public enterprises - non-commercial companies given the examination of the reasons for their dissolution, as well as the discussion of their administrative powers. The analyses, systematization, and conclusions align with the thesis of the monograph, which is that public enterprises - non-commercial companies constitute a form through which the state carries out economic and commercial activities.

Regarding the habilitation work, the following observations may be made: The study is interdisciplinary in nature, and the conferral of imperative powers on a small portion of these enterprises does not alter their essence as subjects of civil law engaged in economic activity (as noted by the author himself on p. 88) and this is precisely why they have been examined primarily from the perspective of private law. I believe it is unnecessary to discuss undisputed positions in legal doctrine in such detail (e.g., regarding the functions on pp. 73–77). Regarding the layout, in my opinion, the extensive tables in the first chapter (pp. 40–52) should rather be presented as appendices.

The chapters in the collective monographs analyze current issues in personal data protection: the legal nature of the right to personal data protection; the categories of personal data processed by higher education institutions and the grounds for their processing; the rights of data subjects in the field of higher education, the conditions for exercising those rights, and the limitations on the rights of data subjects, as well as a recommendation for the adoption of a Code of Conduct in the field of higher education, including criteria and procedures for its approval; the legal status of the Minister of Innovation and Growth and his/her powers, as well as the development and adoption of a new legislative framework on scientific research and innovation.

A significant portion of the candidate’s other publications also demonstrate a contributory nature.

The articles listed under numbers 11.4, 13.2, 15.4, and 18.7 in the list of publications examine various aspects of personal data protection and the employees administrators of personal data. Examined are the problems of protecting data subjects before the national supervisory authority; the principles of personal data protection and data subjects; and the specific nature of the personal data administrator, with these examinations having both theoretical and practical significance.



Articles 12.1, 14.3, 16.5, 17.6, and 19.8 examine various aspects of the activities of public bodies and public enterprises: the legal nature of the legal acts of the Commission for Personal Data Protection; the new legal framework for public enterprises in the Public Enterprises Act and its Implementing Regulations; administrative and legal means of consumer protection—administrative control and administrative liability; the supervisory activities of the Commission for Personal Data Protection; the role of state-owned enterprises in the national economy. The activities of specialized administrative bodies have been examined and analyzed, their powers have been systematized and classified, the control exercised has been analyzed, and certain practical problems have been examined; based on this, conclusions, findings, and proposals de lege ferenda have been formulated. The topics examined are timely, and the research contains scientific and applied scientific contributions.

The reports are in the field of public law, particularly administrative law. A significant portion of them is devoted to problems analyzing various aspects of data protection, as well as the national data protection authority, the CPDP. Some focus on government agencies, bodies, and enterprises (e.g., the agency responsible for implementing policy in the areas of e-government, the information society, and information technology, as well as network and information security; the State Agency for Scientific Research and Innovation; Service Delivery Center), access to public information, classified information, public procurement, accreditation, and others.

Also with this candidate due to the large number of publications, it is not possible to provide an exhaustive list of the scientific and applied scientific contributions in the candidate's publications. Overall, Zhivka Mateeva's body of work is distinguished by its high quality, relevance, and originality; it contains numerous scientific and applied scientific contributions within the field of the announced competition - the field of administrative law, data protection, protection of classified information, access to public information, etc.

The submitted publications appear in acknowledged cited and indexed publications, registered in the National reference list of contemporary Bulgarian publications with scientific review, maintained by NACID, with one sole author report appearing in publications cited and indexed in world-renowned scientific databases with scientific information - *Web of Science*.

The candidate's citations also deserve high evaluation - with a minimum requirement of 50 points, 465 citation points have been submitted - 3 of which are citations in scientific publications indexed in world-renowned scientific databases (Scopus or Web of Science), numerous citations in monographs and collective volumes, articles, and reports. The author's work is known within the academic (particularly legal) community in the country and also in other countries.

The candidate is a productive scholar, a diligent researcher with a high level of expertise in the relevant scientific field and high-quality scholarly output at the required high academic level, distinguished by the depth of the scientific analysis. The forms completed by the candidate show a significant exceeding of the quantitative requirements across almost all indicators.

7. Participation in scientific projects and scientific forums

The candidate's participation in research projects related to the competition's theme also deserves high praise. The candidate served as team leader for Research Project No. 49/2021 at the University of Economics – Varna on the topic "Personal Data Protection in Higher Education" and a member of the team for Research Project No. 50/2021 at the University of Economics – Varna on the topic "Management and Legal Aspects of Innovation and



Sustainability in Times of Crisis". This demonstrates the ability to work in a team as well as to lead one.

The candidate served as project leader for scientific events—SPC at the University of Economics No. 200/2017 on the topic "The Role of Law in the Modern Economy" and participated in the organizing committee of 1st, 2nd, 3rd, 4th, 5th, 6th, 7th and 8th National Conference "The Law and the Business in the Contemporary Society", 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025.

8. Teaching work

The candidate's teaching work also deserves high praise in terms of both quantity and quality. He teaches lectures and seminars in various disciplines, primarily at the bachelor's degree, some of which are in the field of the competition – „Administrative Law and Administrative Procedure“, „Access and protection of information“, „Administrative-legal protection of personal data“, „Local Self government and self governance“, „Security and protection of the information“.

She has been involved in the development of numerous educational programs for example Administrative law and procedure, Access and protection of information, Administrative-legal protection of personal data, etc.

The textbooks and teaching aids, and teaching materials submitted for evaluation are of high academic value and aligned with the needs and curricula of the respective disciplines one of them is in the competition's field: a textbook on "Administrative Law and Procedure".

According to the record for the past two academic years, during the 2023/2024 academic year she taught only courses in the field of private law—Civil Law and Procedure, and Family and Succession Law and during the 2024/2025 academic year, part of her teaching load is also in this field.

Her work in providing academic guidance to students participating in student research competitions and to students defending bachelor's thesis deserves high praise.

The candidate has only participated in training mobility at the Catholic University of Leuven in Brussels, Belgium, in 2016 and 2017.

9. Plagiarism

According to the check of the submitted habilitation work with the strikeplagiarism program no plagiarism was detected. All submitted for evaluation publications are in acknowledged cited and indexed publications, registered in the National reference list of contemporary Bulgarian publications with scientific review, maintained by NACID, as well as in publications cited and indexed in world-renowned scientific databases with scientific information - *Web of Science* or other foreign publications with scientific review and which requires that they be checked for plagiarism by the relevant editorial board/scientific council.

10. Questions, critical notes and recommendations to the candidate

Some comments and recommendations may also be directed to the candidate: she should take greater care in preparing and submitting the documents for the competition, as the attached images of publications (e.g., 9.2, 10.3, and 16.5) significantly hinder the process of reviewing and evaluating them. The teaching aids are also presented incorrectly, as two revised editions of the same aid have been submitted for evaluation.

My recommendation is that she works on publications aimed at legal journals as well, which will be useful for increasing the Bulgarian legal community's familiarity with the author.



11. Conclusion

As a conclusion both candidates **meet the requirements according to Art. 2b and 24 of DASRBA, as well as Art. 101 of the Regulation of the Development of the Academic Staff in the UE-Varna**: holding the academic position Chief Assistant Professor more than two years; submitted a published monograph in specialist academic publications; it does not repeat the work submitted for being awarded the higher education and academic degree of Doctor of Philosophy; meet the minimum national requirements for holding the academic position "Associate Professor", according to Art. 2b, Para. 2 and 3 DASRBA, as well as the requirements for holding the academic position "Associate Professor" in UE-Varna according to Art. 2b, Para. 5 DASRBA; the academic work is free of plagiarism that has been proved under a statutory procedure.

Although both candidates meet the minimum requirements, a comparison shows that, based on the minimum national requirements for the academic position of "Associate Professor" Diana Dimitrova has approximately 100 more points in Group D (Г) indicators and approximately 200 more points in Group E (Д) indicators than Zhivka Mateeva, and under the additional quantitative requirements of the University of Economics – Varna, she significantly exceeds the minimums for both scientific reports and articles and studies, whereas Zhivka Mateeva exceeds the minimums only for scientific reports. The quantitative comparison also is in favor of Diana Dimitrova - she submitted 53 publications for evaluation with a total volume of 1,422 pages, while Zhivka Mateeva submitted 42 publications with a total volume of 772 pages.

As noted above, the publications of both candidates contain a number of scientific and applied scientific contributions and are distinguished by their high quality, relevance, and originality. As evident from the points awarded for each type of publication, those in world-renowned scientific databases - Web of Science and/or Scopus are awarded 30 points. If we assume that this is one of the indicators of quality, a qualitative advantage should be noted for Diana Dimitrova, who has submitted 4 publications in Web of Science and/or Scopus (a total of 65 points from publications in Web of Science and/or Scopus), while Zhivka Mateeva has only one in Web of Science (a total of 30 points from a publication in Web of Science). Studies are awarded 15 points - and here, too, a qualitative advantage should be noted for Diana Dimitrova, who has submitted 4 studies, while Zhivka Mateeva has only one (listed in the list of her publications at NACID as an article). I also consider Diana Dimitrova's publications in specialized legal journals - Norma and De Jure to be a qualitative advantage, whereas Zhivka Mateeva's publications appear in economic journals. Based on the foregoing, in my opinion the candidate Diana Dimitrova should be given preference in terms of both quantity and quality.

Pursuant to Art. 27, Para. 4 of the DASRBA, where conditions are equal under Art. 26, Para. 1 of the DASRBA, the scientific jury shall also take into account the overall score obtained from the evaluation of additional indicators applicable to the relevant field. Some of these are related to teaching activities, while others are related to research activities. Accordingly, Art. 112, Para. 5 of the RDAS UE-Varna introduces certain additional indicators.

Teaching activities

- Art. 112, Para. 5 item 1 a of the RDAS UE-Varna auditory activities - developing lecture courses; innovations in teaching methods; arranging fieldwork outside the University of Economics—Varna, etc.: Based on this criterion, I give preference to candidate Diana Dimitrova, who has developed and teaches lecture courses and seminars at the "Bachelor's" and "Master's" degree programs, supervises the practical training of students in the program "Judicial Administration", and co-teaches courses with lecturers from other departments, which



demonstrates that the candidate's teaching methods and high standard of instruction are recognized and valued at the university. Zhivka Mateeva has developed and teaches lecture courses primarily at the bachelor's degree;

- Art. 112, Para. 5 item 1 b of the RDAS UE-Varna published educational materials - solo authorship or co-authorship of textbooks and teaching aids: Here again, the advantage lies with candidate Diana Dimitrova, who has submitted one co-authored textbook and two teaching aids in the field of the competition, while candidate Zhivka Mateeva has submitted only one textbook in the field of the competition;

- Art. 112, Para. 5 item 1 c of the RDAS UE-Varna work with students and doctoral students, including collaboration with them on research projects, supervision of thesis students, etc. Both candidates have noted their work with students and supervision of thesis students, but the advantage goes to Diana Dimitrova, who also mentioned working with doctoral students within the framework of research project NP 57/2022 and AD No. KP-06-N45/7 2020, as well as mentoring and preparing students to participate in a national mediation competition for students;

- Art. 112, Para. 5 item 1 d of the RDAS UE-Varna performed teaching mobility and activity in foreign universities – again the advantage is for the candidate Diana Dimitrova, who performed several teaching mobilities: University of Dubrovnik, Croatia 2025; University of Florence, Italy 2024; National University for distance education Madrid, Spain 2023; Business University Baku, Azerbaijan 2019; Catholic University Leuven, Brussels, Belgium 2017. She participated as a lecturer in the Russian-Bulgarian Online Summer School 2021 “The Law and Economy in partnership between Russian and Bulgarian Universities”, as well as is lecturer in VFU “Chernorizets Hrabar” in “Bases of Law” in English and she was lecturer in “Introduction to Law” in English as part of the University of Sheffield program at the Higher School of Insurance and Finance in Sofia. Her work at foreign universities demonstrates her proficiency in modern teaching methods as well as foreign languages, which I also consider to be one of her advantages. Zhivka Mateeva submitted Certificates of performed training mobility in Catholic University Leuven, Brussels, Belgium 2016 and 2017.

Scientific research activities

- Art. 112, Para. 5 item 2 a of the RDAS UE-Varna – participation in research projects; presentations at international and national scientific conferences; membership in prestigious national and international scientific organizations, etc. In my opinion Diana Dimitrova has the advantage in this regard as well, since one of the projects in which she participated was funded by the National Scientific Research Fund and not only an internal project at the UE – Varna, and she has also listed significant results achieved from the projects in which she participated and was head of - published monographs, studies, and articles, some of which are included in world-renowned scientific databases - Web of Science and/or Scopus. She has presented papers at international and national scientific forums (including those with a legal focus); in addition to being a member of the Union of Scientists – Varna, she is also a member of an international association in the field of Administrative Law - the Society of Juridical and Administrative Sciences. Candidate Zhivka Mateeva has listed participation only in projects at the University of Economics – Varna; she has not listed project results and is a member only of the Union of Scientists – Varna;

- Art. 112, Para. 5 item 2 b of the RDAS UE-Varna scientific and scientific-applied research – in this regard, candidate Diana Dimitrova has a certain advantage (as noted above),



but both candidates have submitted publications with scientific and applied research contributions that deserve high praise and should not be underestimated;

- Art. 112, Para. 5 item 2 c of the RDAS UE-Varna other publications (print and electronic), including publications in international journals – only candidate Diana Dimitrova has listed this type of publication;

- Art. 112, Para. 5 item 2 d of the RDAS UE-Varna participation in organizing and program committees of scientific conferences: and based on this criterion, I consider that candidate Diana Dimitrova has an advantage, as she has participated in organizing committees or led scientific conferences organized by both the department and the University Mediation Center; her participation in organizing committees for conferences with an administrative-legal focus is also noteworthy. She is also a member of the editorial board of the publication "The Mediation in the Various Public Spheres" and has indicated her participation in various scientific projects and other activities organized by the department in collaboration with the Municipality of Varna, courts, the Commission for Protection against Discrimination (CPD), the Research Institute at the University of Economics – Varna, the Commission for Personal Data Protection, and the Institute for the State and Law at the Bulgarian Academy of Sciences. Candidate Zhivka Mateeva has noted her participation in organizing committees and her leadership of scientific conferences organized by the department;

- Art. 112, Para. 5 item 2 e of the RDAS UE-Varna consulting and expert services. Here, too, Diana Dimitrova has the advantage; as a lawyer and legal advisor, she has provided both consulting and expert services, and has also conducted practical training sessions as a lecturer - at the Regional Administration Varna and Ekohan Energy Ltd. She has also carried out such activities as a member of numerous working groups formed by order of the rector to update internal regulations and perform other tasks; she has participated in public procurement committees at the UE – Varna; and she is a certified mediator, coordinator, and member of the Mediation Council. Candidate Zhivka Mateeva has listed her activity as a data protection officer at the UE – Varna.

The evaluation of the additional criteria also clearly shows a significant advantage for candidate Diana Dimitrova.

In light of the above, I consider that candidate Diana Dimitrova meets the requirements of the Development of Academic Staff in the Republic of Bulgaria Act, the Regulation for its Implementation, and the Regulation of the Development of Academic Staff at the University of Economics—Varna, having a substantial advantage over the other candidate, Zhivka Mateeva, not only in terms of quantity and quality but also across all other indicators. Based on the overall assessment, I believe that **Chief Assistant Professor Dr. Diana Rumenova Dimitrova** possesses all the necessary qualities, research, and teaching experience to hold the academic position of "Associate Professor," and I propose that the scientific jury adopt a decision to recommend to the Faculty Council of the Faculty of Finance and Accounting at the University of Economics – Varna that **Chief Assistant Professor Dr. Diana Rumenova Dimitrova** be elected to the academic position of "associate professor" in professional field 3.6 "Law," scientific specialty "Administrative Law and Administrative

16.03.2026

Заличена информация съгласно
ЗЗЛД и регламент (ЕС) 2016/ 679

Assoc. Prof. Emil Radev PhD

REVIEW

From: Prof. D.Sc. Jivko Ivanov Draganov, Department of International Law and EU Law,
Law Faculty of the University of National and World Economy

Subject: competition for the academic position of "associate professor" in the field of
higher education 3. Social, economic and legal sciences, professional field 3.6.
Law, scientific specialty "Administrative law and administrative procedure",
announced by the University of Economics – Varna, promulgated in SG issue
104 from 05.12.2025

1. Information about the competition

The competition is announced for the needs of the Department of Legal Sciences of
the University of Economics - Varna. I participate in the scientific jury according to Order
No. RD-06-21/26.01.2026 of the Rector of the University of Economics - Varna.

Two candidates have been admitted to the competition, as follows (in alphabetical
order): Chief Asst. Prof. Dr. Diana Rumenova Dimitrova and Chief Asst. Prof. Dr. Zhivka
Stoyanova Mateeva.

2. Regarding the candidate Chief Assistant Professor Dr. Diana Rumenova Dimitrova

2.1. Information about the candidate

Chief Assistant Professor Diana Dimitrova holds a Master's degree in Law from the
Ruhr University - Bochum, Germany since 1999. In 2017, she obtained the degree "Doctor of
Law" in the scientific specialty "Administrative Law and Administrative Procedure" from the
VFU "Chernorizets Hrabar". She has worked as a legal advisor and as a legal consultant in
two banks, and from 2008 to 2019 she practiced as an attorney at law. The candidate's

academic career began in 2010, as part time assistant professor in the Department of Legal Sciences of the University of Varna.

In 2013, she was appointed as a full-time assistant professor, and from 2017 to this moment she holds the academic position of "chief assistant professor" in the same department. In the period 2019 - 2021, she also worked as a legal advisor at the University of Economics - Varna. Along with her teaching and research activities, chief asst. prof. Diana Dimitrova participates in the work of various bodies and units of the University of Economics - Varna. She is the Deputy Head of the Department of Legal Sciences (from 2024 to present), was a member of the Ethics Committee (2019-2024), is a member of the Commission for the Recognition of Higher Education Acquired Abroad (from 2019 to present) and of the Mediation Council (from 2020 to present). Chief Assistant Professor Dr. Diana Dimitrova is also a member of the editorial board of the collection "Mediation in Different Public Spheres". She is fluent in German, English and Russian.

2.2. Fulfilment of the requirements for holding the academic position

The candidate in the announced competition, Chief Assistant Professor Dr. Diana Dimitrova, fulfills the minimum national requirements for occupying the academic position of "associate professor" in the field of higher education 3. Social, economic and legal sciences, professional field 3.6. Law. From the Reference-declaration presented by Chief Assistant Professor Dr. Diana Dimitrova, the following fulfillment of the indicators is established. Under letter "A" - dissertation work for awarding PhD - "Legal Regime of the Public Procurement Contract" - 50 points. Under letter "B" - habilitation work "The National Agency for Assessment and Accreditation as a Specialized State Body for Ensuring the Quality of Higher Education" - 100 points. Under the letter "G" - a total of 489.9 points out of the minimum required 100 for the professional field "Law". Under the letter "E" - citations - 650 points.

From the Reference - declaration submitted by the candidate for fulfillment of the quantitative requirements for holding the academic position of "associate professor" and the University of Economics - Varna, the following performance is established: under indicator 1. Scientific reports - 208.8 points; under indicator 2. Scientific articles and studies - 146.6 points. The sum of points of the candidate Chief Assistant Professor Diana Dimitrova significantly exceeds the established minimum requirements.

2.3. Teaching

The candidate, Chief Asst. Prof. Dr. Diana Dimitrova, has the necessary teaching experience in the field of the announced competition. The submitted Reference for the academic workload shows that for the academic years 2023/2024 and 2024/2025 she has a total of 502 hours of teaching (lectures and seminars) in the Bachelor's and Master's degree programs. Chief Asst. Prof. Diana Dimitrova has lectured and given seminars in the disciplines "Administrative Law and Process", "Mediation and Extrajudicial Disputes", "Criminal Law and Process", "Fundamentals of Law", "Public Procurement", etc.

2.4. General characteristics and contributions of the presented scientific works

For her participation in the competition, Chief Assistant Professor Dr. Diana Dimitrova has presented a habilitation thesis, three co-authored monographs, two studies as sole author and one co-authored, published in non-refereed journals with scientific review, one co-authored study published in a journal indexed in Scopus, a total of three articles published in scientific volumes, refereed and indexed in world-renowned databases with scientific information, of which one as sole author and two co-authored, and a total of thirty-three articles and reports published in non-refereed journals with scientific review or published in edited collective volumes, of which over 20 as a sole author.

Over 10 of the publications are in English. The majority of the candidate's scientific work is devoted to current problems of administrative law and the administrative procedure from the field of public procurement and of higher education, the remaining part of the research is focused on issues of labor law, mediation as means of alternative dispute resolution, etc. The subject of analysis in some of the research is also the European Union legislation.

a. General characteristics and contributions of the candidate's habilitation work

The candidate's habilitation work "The National Agency for Evaluation and Accreditation as a Specialized State Body for Ensuring the Quality of Higher Education" is a study of the status, functions, powers and activities of the NEAA as a specialized state body for evaluation, accreditation and control of higher education institutions. The work is 232 pages long and includes an Introduction, three chapters, Conclusion and appendices. The literature used contains 113 scientific publications in Bulgarian, Russian and English. Chapter one is devoted to the analysis of the NEAA as a specialized state agency, its

structure and its interaction with the organs of the central executive branch in the exercise of its powers. A comparative study of the regulation of the activities of assessment, accreditation and control of higher education institutions in Switzerland, Germany and the USA has also been carried out. The second chapter analyzes the powers of the NEAA, the accreditation procedures and the control that the NEAA exercises in relation to higher education institutions. In the last chapter, the author examines the acts of the NEAA bodies and the judicial control over them. The methodology used includes historical, comparative, dialectical and critical-analytical methods.

The study has both theoretical and practical significance. The structure allows for a complex and in-depth analysis, to reveal the shortcomings of the current regulations and to make proposals for their overcoming. Among the more significant theoretical contributions of the work can be pointed out the detailed and comprehensive analysis of the NEAA as a specialized state body for assessment, accreditation and control; the classification and systematization of the functions and powers of the NEAA; the classification of the bodies, etc. The analysis of the different types of accreditation procedures and types of control is also a contribution. As another contribution, the analysis of the legal essence of the acts of the NEAA governing bodies should be indicated, as well as their comparison and distinction from internal acts and administrative acts.

As a result of the study, Chief Assistant Professor Diana Dimitrova substantiates the thesis of the need to change the criteria for evaluating higher education institutions, through which the subjective element in their evaluation and in the accreditation procedures to be overcome. The proposals for the refinement of some of the functions of the Chairman of the Accreditation Council should also receive support. Accreditation and control procedures should not create an additional administrative burden for higher education institutions and the proposals for their improvement have important practical significance.

The detailed analysis of case law, as well as the comparative legal study of accreditation and control procedures in Switzerland, Germany and the USA can also be highlighted as contribution of the dissertation work. Last but not least, a contribution of the work with applied significance is that the analysis will assist higher education institutions in their participation in the NEAA procedures, as well as in appealing the Agency's acts.

b. General characteristics and contributions of the candidate's other publications

In addition to her habilitation work, the candidate, Chief Assistant Professor Diana Dimitrova, has presented a significant number of other scientific publications, including co-authored monographs, sole and co-authored studies, articles and reports. Some of them are in journals indexed in Scopus and Web of Science. Due to their big number, I will only focus on some of them here, without belittling the qualities and contributions of the other publications.

The articles dedicated to the regulation of certain problems of public procurement: "Specificities in the legal regime of public procurement conducted by higher education institutions in Bulgaria", 2018, "Control over compliance with the order when conducting public procurement in the Republic of Bulgaria", 2017; as well as the reports "Administrative criminal liability of the contracting authority for violation of the order for conducting public procurement", 2017 and "Normative measures against forms of discrimination when conducting public procurement", 2018, can be considered as contribution for the development of the scientific studies in the field of administrative law and for the practice.

As a contribution of the candidate's scientific work, the application of an interdisciplinary approach in scientific research and the addressing of problems in the field of human resource management and digitalization in the judicial system in the study "Human resource management in judicial administration in the conditions of digitalization - managerial and legal aspects", 2023; and of digitalization in higher education in the study "Legal framework and trends of digital educational services in higher education", 2024 can be noted.

The numerous publications in the field of mediation can also be noted as contribution, including "Introduction of Mandatory Judicial Mediation in Bulgaria and Good European Practices", 2023; "Applicability of Mediation in Resolving Disputes Related to Consumer Rights", 2024; "Referral to Mediation by the Courts - Trends and Prospects", 2022, etc. Last but not least, the candidate's scientific work, which is aimed at studying the role of artificial intelligence in law enforcement in "Possibilities for the Use of Artificial Intelligence in the Activities of the Judiciary", 2024 and in relation to the regulation of labor market relations in: "Artificial intellect: Regulatory Framework and Challenges Facing the Labour Market", 2019, should receive a positive assessment.

2.5. Remarks and recommendations

In the habilitation thesis, and in the entire presented scientific work of the candidate, some repetitions in the subject of scientific research are observed. For example, although in §1.1. of Chapter One of the habilitation thesis the author comprehensively traces the development of the regulatory framework of the NEAA, in §2.1. of Chapter Two she returns to the development of the regulatory framework again, albeit only regarding the powers of the NEAA and the governing bodies. It is advisable to follow a systematic approach and when a certain issue is investigated, it should be exhausted in the appropriate place. At the same time, in addition to the habilitation thesis, the development of the legal framework of the powers of the NEAA is also the subject of analysis in the study "Structure and Powers of the National Agency for Assessment and Accreditation - Retrospective Analysis and Contemporary Legal Framework", 2022.

3. Regarding the candidate Chief Asst. Prof. Dr. Zhivka Stoyanova Mateeva

3.1. Information about the candidate

Chief Asst. Prof. Dr. Zhivka Mateeva graduated in Law from the Faculty of Law of the VFU "Chernorizets Hrabar" in 2003. She holds a Bachelor's degree in "Business Management" from 1999 and a Master's degree in "Border Control and Corporate Security" from 2005 from the same university. In 2016, she obtained the doctoral degree in Administrative Law and Administrative Procedure from the Institute for the State and the Law at the Bulgarian Academy of Sciences. The academic development of Chief Asst. Prof. Dr. Zhivka Mateeva began in 2004, as a part-time assistant professor in administrative law and administrative procedure at the VFU "Chernorizets Hrabar". In 2009, she was appointed to the academic position of full time assistant professor at the University of Economics – Varna, and since 2016 she has held the position of "chief assistant professor" at the same university. Since 2018, Chief Asst. Prof. Mateeva is also a data protection officer at the University of Economics - Varna. She is a member of the Union of Scientists - Varna. She is fluent in English and Spanish.

3.2. Fulfilment of the requirements for holding the academic position

The candidate in the announced competition, Chief Assistant Professor Dr. Zhivka Mateeva, meets the minimum national requirements for occupying the academic position of "Associate Professor" in the field of higher education 3. Social, economic and legal sciences, professional field 3.6. Law. The Reference-declaration submitted by Chief Assistant

Professor Dr. Zhivka Mateeva establishes the following fulfillment of the indicators. Under letter "A" - dissertation for awarding doctoral degree - "Administrative Legal Protection of Personal Data" - 50 points. Under letter "B" - habilitation thesis "Administrative Legal Aspects of Public Enterprises - Non-Commercial Companies" - 100 points. Under letter "G" - a total of 396.67 points out of the minimum required 100 for the professional field "Law". Under letter "E" - citations - 465 points.

The Reference - Declaration of fulfillment of the quantitative requirements for the academic position of "Associate Professor" and the University of Economics - Varna submitted by the candidate establishes the following fulfillment: by indicator 1. Scientific reports - 215 points; by indicator 2. Scientific articles and studies - 85 points. The sum of points of the candidate Chief Assistant Professor Zhivka Mateeva exceeds the established national minimum requirements and the quantitative requirements of the University of Economics - Varna.

3.3. Teaching

The candidate, Chief Asst. Prof. Dr. Zhivka Mateeva, has the necessary teaching experience in the field of the announced competition. The submitted Reference for the academic workload shows that for the academic years 2023/2024 and 2024/2025 she has a total of 514 hours of teaching, of which 228 hours of lectures and 286 hours of seminars in the Bachelor's Degree Programme. Chief Asst. Prof. Zhivka Mateeva has given lectures and seminars in the disciplines "Administrative Law and Procedure", "Administrative Legal Protection of Personal Data", "Access to Information Protection", "Fundamentals of Law", "Civil Law and Procedure" and "Civil Status of Persons" and "Family and Inheritance Law".

3.4. General characteristics and contributions of the presented scientific works

For her participation in the competition for associate professor, the candidate, Chief Assistant Professor Dr. Zhivka Mateeva has submitted a habilitation thesis, three co-authored monographs, one study, eight articles, of which 6 are of sole authorship and two are co-authored, 24 reports from scientific conferences, of which 19 are of sole authorship and 5 are co-authored, 2 textbooks and 3 teaching materials in co-authorship. Several of the articles and reports are in English, with some of the publications being in collections that are refereed and indexed in world-renowned databases of scientific information (Web of Science), and the

rest are published in specialized journals with scientific review or in edited collective volumes.

The scientific production of Chief Asst. Prof. Zhivka Mateeva is mainly in the field of administrative law and administrative procedure. A significant part of the research is devoted to various aspects of personal data protection. Another group of publications refers to the regulation of the activities of public enterprises that are not commercial companies. The scope of the candidate's scientific research also includes issues of public procurement, judicial control over administrative acts, commercial and banking bankruptcy, consumer protection, etc. Chief Asst. Prof. Mateeva is a co-author of textbooks on Administrative Law and Process and on Fundamentals of Law, as well as 3 books with study materials on Fundamentals of Law.

a. General characteristics and contributions of the candidate's habilitation work

The candidate's habilitation work "Administrative and Legal Aspects of Public Enterprises - Non-Commercial Companies" is a monographic study of the legal framework of public enterprises, which are established by a special statute. The work is 194 pages long and consists of an Introduction, three chapters, Conclusion and appendices. The literature used includes 132 scientific publications, of which 117 are in Bulgarian and the rest are in English. In the Introduction, the author justifies the relevance of the research and defines the thesis, goals, objectives, object and subject of the study. In Chapter One, the candidate in the competition analyzes the content and attempts to clarify the concept of "public enterprise". For this purpose, a distinction is made between public enterprises – commercial companies, on the one hand, and institutions, on the other. The second chapter consists of an analysis of the functions of public enterprises established by a special statute, the nature of the acts of their bodies and the legal grounds for assigning public functions to public enterprises that are not commercial companies, as well as of the combination of conducting economic activity with activity in the performance of public functions. In Chapter Three, the author examines the regulations governing state property management in relation to the activities of public enterprises that are not commercial companies. The state policy in the field of public enterprises, the functions of the Public Enterprises and Control Agency and the legal mechanisms for supervising the activities of public enterprises established by a special law are analyzed.

The habilitation work is an original study of issues that have both scientific and applied significance and has many contributions. This is the first monographic study of public enterprises that are not commercial companies in the Bulgarian scientific legal literature. Among the contributions of the thesis should be mentioned the attempt to refine the concept of "public enterprise" and the proposal for the introduction of a normative definition that would accurately reflect its features and legal essence.

The comparison and distinction between public enterprises that are established in the form of commercial companies and public enterprises established under a special statute and the comparative analysis between the latter and the public bodies, as well as the derivation of the main specifics in relation to their functions, their financing, etc., can be noted as contributions.

The systematization and classification of the functions of public enterprises that are not commercial companies when applying various criteria should be positively assessed. A significant contribution, which has both scientific and applied significance, is the study of the grounds for assigning public functions and the factors that are of decisive importance for the admissibility of the performance of public functions by public enterprises that are not commercial companies.

Among the contributions of applied significance, one can also highlight the analysis of the coordination and control activities of public enterprises and the supervision of their activities and their acts.

Last but not least, the proposals for improving the legislation are a contribution, especially with a view to the assessment of the restructuring or preservation of the activities of the public enterprises.

b. General characteristics and contributions of the candidate's other publications

The candidate's scientific production covers a wide range of issues in the field of administrative law and the administrative procedure and contains numerous contributions to the development of legal science and practice. In addition to the original contribution regarding the analysis of the regulation of public enterprises established by a special statute, Chief Assistant Professor Zhivka Mateeva has researched current issues regarding the structure and activities of state bodies with special competence, which have not been the subject of detailed analysis until now.

Among the contributions are the candidate's publications, which systematize and classify the powers of specialized state bodies, including: "The New Body for Implementing Policy in the Field of Electronic Governance, Information Society and Information Technologies, and Network and Information Security", 2023; "Essence of Control over the Protection of Classified Information, Implemented by the State Commission for Information Security", 2020; "Legal Nature and Role of the New State Agency for Research and Innovation in the Republic of Bulgaria", 2021, etc.

The contributions of applied significance include the candidate's research dedicated to the judicial review of administrative acts in the articles: "Judicial Review of Decisions and Refusals to Provide Access to Public Information", 2022; "Appealing the Actions of an Administrator or Processor of Personal Data through Judicial Procedure", 2020; and "Judicial Review of Decisions of the Supervisory Authority for Personal Data Protection", 2019.

As contributions should be also noted the critical analysis of the practice and the proposals made by the candidate for improving the regulatory framework, as well as the study of problems related to law enforcement in various areas of administrative activity in the publications "Notification of Personal Data Breach", 2021; "Conditions for Lawful Personal Data Processing by Data Controllers as per the General Data Protection Regulation", 2019, etc.

3.5. Remarks and recommendations

I consider the term "non-commercial companies" used to be inaccurate and creates prerequisites for terminological and conceptual confusion and mixing with other legal concepts that have different content. The Act on Public Enterprises refers to state-owned enterprises established by special statutes, and the Commercial Act refers to state-owned enterprises that are not commercial companies. It is understandable that the applicant intends to use the term "non-commercial company" for brevity, but this creates the conditions for confusion and incorrect perception of the nature of the enterprises in question as type of companies. Indeed, "non-commercial" clearly indicates that the enterprises in question are not commercial companies, but the term "company" does not correspond to the legal form of the enterprises in question. The corporate form of legal entities is provided for only in the Commercial Act, and accordingly it is incorrect to use it for legal entities under public law that are not companies.

OPINION

From: Prof. Dr. Veselina Kanatova-Buchkova
Institute for the State and the Law at the Bulgarian Academy of Sciences

Subject: Competition for the academic position of “Associate Professor” in Administrative Law and Administrative Procedure in Professional Field 3.6 Law at the University of Economics – Varna

Grounds for submitting the opinion: Participation as a member of the scientific jury for conducting a competition for the academic position of “Associate Professor” in Administrative Law and Administrative Procedure in Professional Field 3.6 Law at the University of Economics – Varna, in accordance with Order No. RD 06-21/26.01.2026 issued by the Rector of the University of Economics – Varna.

Two candidates are participating in the competition – Chief Assistant Professor Dr. Zhivka Stoyanova Mateeva, with a habilitation thesis titled “*Administrative Aspects of Public Enterprises – Non-Commercial Companies*” (2024), and Chief Assistant Professor Dr. Diana Rumenova Dimitrova, with a habilitation thesis titled “*The National Evaluation and Accreditation Agency as a Specialized State Body for Ensuring the Quality of Higher Education*” (2025).

I. Information about the candidate Zhivka Mateeva

Zhivka Mateeva graduated in Law from Varna Free University “Chernorizets Hrabar” in 2003. She obtained a Bachelor’s degree from the same university in 1999 in “Business Administration” – Corporate Security Management, as well as a Master’s degree in “Border Control and Corporate Security” from the same institution. She completed her doctoral studies in Law at the Institute for the State and the Law at the Bulgarian Academy of Sciences in the period 2013–2016. In the period 2004–2007 she worked as a part-time assistant in “Administrative Law and Administrative Procedure”, and from 2008–2007 in “Fundamentals of Law”. Since 2009 she has been an assistant, respectively a Chief Assistant Professor at the University of Economics – Varna. She is a member of the Union of Scientists – Varna.

II. General Characteristics of the Submitted Work “Administrative Law Aspects of Public Enterprises – Non-Commercial Companies” (2024)

The main work with which Chief Assistant Professor Dr. Zhivka Mateeva participates in the competition is titled “*Administrative Aspects of Public Enterprises – Non-Commercial Companies*.” The submitted work comprises a total of 197 pages and is structured into three chapters, including an introduction, conclusion, and a bibliography containing 132 titles by Bulgarian and foreign authors. The work constitutes an independent and comprehensive study of a specific institution of public law with an interdisciplinary character.

Public enterprises – non-commercial companies, established by a special law pursuant to Article 62, paragraph 3 of the Commercial Act, represent a specific form of state governance through

which the executive power participates in civil turnover and indirectly regulates, by means of its authoritative powers, legal relationships atypical for administrative law.

The subject of the research is highly relevant, not only because it has not been previously examined in administrative law theory, but also due to the adoption of the new Public Enterprises Act, which does not provide a detailed regulation of public enterprises that, in practice, will act as “legal successors” of state enterprises – non-commercial companies.

In this sense, the work is of a fundamental theoretical nature with regard to the characterization of public enterprises as commercial companies performing public functions and through which the state implements its policies in various spheres of public life. This circumstance in itself gives the study an overall contributory character.

It should also be noted that not all state enterprises established under Article 62, paragraph 3 of the Commercial Act will be restructured into public enterprises, as the author points out, since a certain category of state enterprises has a specific subject of activity that requires their preservation. An example of such an enterprise is the State Enterprise “Radioactive Waste.”

Chapter One of the monograph examines the legal nature of public enterprises – non-commercial companies, clarifying the very concept of a “public enterprise.” The concept is analyzed from the perspective of the different types of public enterprises under the Commercial Act and the Public Enterprises Act, with emphasis placed on distinguishing public enterprises – non-commercial companies from similar legal institutions.

The absence in the Public Enterprises Act of a definition of “public enterprise” is highlighted, particularly in light of the fact that such a definition exists under European Union law, as well as the varying meanings attributed to the term in special legislation. I agree with the proposed definition of a public enterprise as a legal entity within the meaning of Article 2, paragraph 1 of the Public Enterprises Act, established on the basis of an act of the executive authority or another normative act for the performance of activities, over which the state, either directly or through its public authorities, exercises dominant influence and manages in the interest of citizens and society.

This definition also determines the nature of public enterprises as organizations performing public functions within the meaning of Article 21, paragraph 1 of the Administrative Procedure Code, and therefore acting as administrative bodies. In this regard, I have also pointed out that public enterprises are “legal successors” of state enterprises and, as such, exercise authoritative powers through administrative acts.

For this reason, I fully support, as noted by the author, the “earlier theoretical developments” both regarding the nature of the act of the Council of Ministers by which sole-owned commercial companies with state participation are established, as well as the view that administrative powers are delegated (transferred) by virtue of their establishment.

A significant contribution in Chapter One is the analysis distinguishing public enterprises – non-commercial companies from public organizations – institutions, a term used in numerous administrative law regulations.

Chapter Two examines issues related to the functions performed by public enterprises – non-commercial companies, as well as the grounds and admissibility for their assignment. I find that, from a theoretical perspective, a significant contribution of the study is the issue of “state functions” as a competence of administrative bodies, which is considered in two aspects – as a set of authoritative powers and on the basis of the doctrine of the legal personality of administrative bodies.

I share the author’s view that the functions assigned to state enterprises (including public ones) are public functions. This chapter provides a classification of the types of functions of state enterprises – consultative functions, qualification functions, and organizational functions – which are systematized according to their substantive content and the sphere of public life to which they relate.

An analysis is carried out of the acts of the governing bodies of public enterprises – non-commercial companies, concluding that they have an administrative nature in cases where the public enterprise performs activities related to the organization and management of entities outside the personnel structure of its organizational framework.

A contribution of the study is also the examination of the grounds under various special laws on the basis of which public functions are assigned to state enterprises, including with regard to their monopoly and dominant position.

Chapter Three examines the issue of state property management, including the provision of certain assets (property) by the state to public enterprises – non-commercial companies, viewed as a legal relationship of a public law nature. The state policy regarding its participation in public enterprises is also discussed. The functions of the Public Enterprises and Control Agency as an administrative body for coordinating the management of public enterprises are analyzed. The supervision over the activities and acts of public enterprises – non-commercial companies is also examined.

In the procedure, the candidate also participates with three co-authored monographs, two studies, eight scientific articles, twenty-four scientific reports, and five textbooks and teaching materials.

Chapter Two examines issues related to the functions performed by public enterprises – non-commercial companies, as well as the grounds and admissibility for their assignment. I find that, from a theoretical perspective, a significant contribution of the study is the issue of “state functions” as a competence of administrative bodies, which is considered in two aspects – as a set of authoritative powers and on the basis of the doctrine of the legal personality of administrative bodies.

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In the procedure, the candidate also participates with three co-authored monographs, two studies, eight scientific articles, twenty-four scientific reports, and five textbooks and teaching materials.

I. Information about the candidate Diana Dimitrova.

Diana Dimitrova graduated in Law in 1999 from Ruhr University Bochum, Germany. She completed her doctoral studies in Law at Varna Free University in the period 2014–2017. In the period 2010–2013, she worked as a part-time assistant at the University of Economics – Varna, and since 2013 she has been an assistant, respectively a Chief Assistant Professor at the same university. In the period 2008–2019, she practiced as a lawyer at the Varna Bar Association. She is a member of the Union of Scientists – Varna, as well as of the Society of Judicial and Administrative Sciences.

II. General Characteristics of the Submitted Work “The National Evaluation and Accreditation Agency as a Specialized State Body for Ensuring the Quality of Higher Education” (2025)

The main work with which Chief Assistant Professor Dr. Diana Dimitrova participates in the competition is titled “*The National Evaluation and Accreditation Agency as a Specialized State Body for Ensuring the Quality of Higher Education.*” The study comprises a total of 194 pages and is structured into three chapters – an introduction, conclusion, and a bibliography, including 113 scientific sources by Bulgarian and foreign authors.

The main issue identified by the author as the subject of the study is not the status of the National Evaluation and Accreditation Agency (NEAA) as a specialized administrative body exercising

powers in the field of higher education, but rather the state policy related to the quality of higher education—specifically the accreditation procedure itself and the acts by which it is completed. These are regarded as instruments for exercising control over higher education institutions, through which the quality of higher education is ensured.

In **Chapter One** of the study, a review of the legal framework related to the NEAA since its establishment in 1995 is carried out. Amendments to the secondary legislation concerning the NEAA are listed, noting that the main sources are the Higher Education Act and the Rules for the Operation of the NEAA. It is pointed out that the current legal framework is supplemented by other sources, such as the Rules of Procedure of the Committee on Objections and Complaints of the NEAA and the Working Rules of the same committee, which regulate its status, structure, functions, organization of work, and the obligations of its members.

The issue of the normative nature of these acts has not been examined. As noted by the author, these acts are adopted by decision of the Accreditation Council of the NEAA and determine the organization and activities of the auxiliary and advisory units of the Agency, raising the question of whether they can be considered sources of law.

The interaction between state bodies in the field of education is also analyzed, indicating that the NEAA and the Accreditation Council perform a number of powers assigned to them by law (the Higher Education Act) or by an act of the Council of Ministers (the Rules for the Operation of the NEAA). This necessitates a high level of organization and coordination between them for the effective implementation of the Agency's activities and those of its bodies, as well as for achieving the objectives of the state policy for the development of higher education and the improvement of its quality.

It is necessary to strengthen cooperation between the different levels, to ensure subordination of the acts of lower-level bodies to those of higher authorities, as well as the possibility of exercising control. At the same time, coordination from top to bottom by the Council of Ministers and the Minister of Education towards the NEAA is required.

The author notes that the National Assembly adopts a Strategy for the Development of Higher Education; however, the nature of this strategy as an act of the legislative body—binding on other authorities—is not examined, nor are the legal consequences of its non-implementation (depending on its legal nature), or the manner of resolving conflicts between the strategy and the acts and actions of other administrative bodies. I believe that examining this issue would further enhance the contributory value of the research.

Chapter One also includes a comparative analysis of the legal framework in other countries.

In **Chapter Two**, an approach similar to that in Chapter One is adopted, examining the amendments to the Higher Education Act related to the powers of the National Evaluation and Accreditation Agency (NEAA). It is pointed out that the powers of the NEAA, granted within the scope of its competence in performing its functions assigned by the state, pursuant to Article 11, paragraph 1 of the Higher Education Act, concern the evaluation, accreditation, and quality

control of the activities of higher education institutions. This determines the nature, scope, and methods for exercising the Agency's powers.

The powers of the Accreditation Council of the NEAA are systematically examined, with its functions classified into three main groups—constitutive, regulatory, and supervisory functions—as well as the powers of the Chairperson of the NEAA, the Deputy Chairperson for post-accreditation monitoring and control, and the auxiliary bodies. This chapter also analyzes the accreditation procedure as an administrative process aimed at assessing the quality of the education provided.

In **Chapter Three**, the acts of the NEAA are examined. It is noted that these include, on the one hand, accreditation decisions and project evaluation assessments, and on the other hand—criteria and methodology for evaluation and accreditation, specific evaluation and accreditation procedures and related documentation, as well as rules and documents concerning the activities of the Agency and its bodies. The author points out that these acts may be regarded as related to ensuring the quality of higher education in Bulgaria.

Although they are issued by a state body (the Accreditation Council or the Chairperson), they are not presumed to have the character of administrative acts. I share the view that the rules governing the operation of auxiliary bodies are not normative administrative acts, but rather internal administrative acts organizing their functioning.

The author identifies as debatable the issue of the nature of the Rules for the Operation of the Committee on Objections and Complaints with regard to objections; however, it is not entirely clear what is meant by “debatable,” nor what the author's position is regarding the existence of a “quasi-administrative appeal” against accreditation decisions or project evaluation decisions of the Accreditation Council.

“The provisions concerning objections are, however, debatable. According to Articles 13–29 of the Rules for the Operation of the Committee on Objections and Complaints, a ‘procedure for examining objections before the committee’ has been introduced. This procedure determines the manner of reviewing objections, deadlines, methods for clarifying facts and circumstances, collecting evidence, and adopting specific decisions. It is expressly stated that the committee does not initiate proceedings where the matter raised is not within its competence or where court proceedings on the same issue are already pending (Article 16 of the Rules). The objection is directed against decisions concluding evaluation and accreditation procedures, including those concerning proposed evaluations, as well as against violations occurring during the conduct of evaluation and accreditation procedures.”

In the procedure, the candidate also participates with six studies, eleven scientific articles, twenty-five scientific reports, and eight textbooks and teaching materials.

In conclusion, both candidates meet the requirements of Article 53 of the Academic Staff Development Act in the Republic of Bulgaria, have numerous scientific publications in various fields of public law, and demonstrate active teaching engagement. However, in view of the

contributory nature of the main monographs, I find that the monograph *“Administrative Aspects of Public Enterprises – Non-Commercial Companies”* prevails.

On this basis, I propose to the scientific jury that the academic position of “Associate Professor” in Administrative Law and Administrative Procedure in the field of higher education 3.6 “Law” at the University of Economics – Varna be awarded to Zhivka Mateeva.

Prof. Veselina Buchkova

VESELINA

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Заличена информация съгласно
ЗЗЛД и регламент (ЕС) 2016/ 679

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OPINION

By Assoc. Prof. Dr. Konstantin Vasilev Pehlivanov, Associate Professor of Higher Education 3. Social, economic and legal sciences, professional field 3.6 Law (Administrative Law and Administrative Process) at the Faculty of Law of Plovdiv University "Paisii Hilendarski", Department of Public Law Sciences

Under the procedure for obtaining the academic position of Associate Professor in Higher Education Area 3. Social, economic and legal sciences, professional field 3.6 Law, scientific specialty 'Administrative law and administrative process'

Host structural unit: Faculty of Finance and Accountancy, University of Economics - Varna

Primary unit: Department of Legal Studies

The competition announced in SG No 104/05.12.2025

Applicants: Chief Assistant Dr. Zhivka Stoyanova Mateeva and Chief Assistant Dr. Diana Rumenova Dimitrova

The opinion is presented by a member of the scientific jury appointed by Order № RD-06-21 of 26 January 2026 of the Rector of the University of Economics - Varna and in connection with a decision of the scientific jury taken by Protocol № 1 of 16 February 2026.

Dear members of the scientific jury,

I present my conclusions on the substance of the applications submitted in the competition for the academic post of associate professor.

Since the admissibility of the two applications from the point of view of the science of the minimum national requirements and the additional requirements of the University of Economics - Varna was already subject to assessment by the scientific jury with a decision under Protocol № 1, I present my conclusions only on the merits of the assessment carried out.

My opinion is divided into three parts: 1. Assessment of the candidate Zhivka Stoyanova Mateeva independently; 2 assessment of the candidate Diana Rumenova Dimitrova independently and 3. comparison and formulation of final assessment and ranking. Both applications, as far as the formulation of a job offer is concerned, were assessed on the basis of three parameters: 1. educational and educational and scientific degrees; 2. experience in the same or similar position and 3. quantity and quality of scientific production.

About the candidate Zhivka Stoyanova Mateeva:

1. By criterion educational and educational and scientific degrees

The applicant has a Master's degree from 2003, Varna Free University, and a PhD degree from 2016 (Institute for the State and Law at the Bulgarian Academy of Sciences), and the doctorate is from the same professional field under which it is applied for, and Article 24(1)(1) of the Promotion of Academic Staff I Republic of Bulgaria Act is sufficed, as well as from the same scientific specialty under which it is applied (Administrative Law and Administrative Process). Two further diplomas were presented: a Bachelor's degree in Corporate Security Management from Varna Free University and a Master's degree in Border Control and Corporate Security, again from VFU.

2. By criterion of professional experience, the candidate has been an assistant since 2009 and a chief assistant since 2016 is a data protection officer at the University of Economics, Varna. Certificates are presented for numerous trainings and qualifications in its field, including abroad. The attached report shows a total workload of more than 500 hours in subjects related mainly to administrative law, but also to civil law. There is a serious participation in projects and developed curricula.

3. Quantity and quality of scientific production – the following monographs – 4, studies – 1, articles – 8, reports – 24, textbooks – 2, teaching aids – 3 have been requested. As can be seen from the summaries, there is an attached dissertation with the sole author the candidate, and in the others she is a co-author. He is also a co-author in textbooks and textbooks. There is a scientific bias towards the subject of personal data protection (mainly) and access to public information.

4. Conclusion

Based on my overall assessment of the scientific production and teaching activities of the candidates in the competition, I believe that the applications of Chief Assistant Professor Dr. Diana Rumenova Dimitrova and Chief Assistant Professor Dr. Zhivka Stoyanova Mateeva meet the requirements of the Act on the Development of the Academic Staff in the Republic of Bulgaria (ZRASRB), the Regulations for the Implementation of the ZRASRB and the additional requirements of the University of Economics - Varna for holding the academic position of "Associate Professor" in "Administrative Law and Administrative Procedure" and should be admitted to participate in the election of the Scientific Council of the Faculty of Finance and Accounting.

The teaching experience of the candidates is completely comparable and none of them enjoys advantage on this basis. According to the requirements of Art. 27, para. 3 of the Act on the Development of the Academic Staff in the Republic of Bulgaria, candidates are assessed in accordance with the results of the references submitted by them on the fulfillment of the minimum national requirements and the additional requirements of the relevant university, as well as on the basis of the candidates' presentation at the final meeting.

From the information in the references for fulfilling the minimum national requirements, the following assessment of the candidates in the competition can be made. According to the indicators under letter "A" - dissertation for awarding doctoral degree and under letter "B", the candidates have an equal number of points. The candidate Chief Asst. Prof. Dr. Diana Rumenova Dimitrova collects 489.9 points under group of indicators "G", which take into account the publication activity of the participants in the competition, with 50 points being obtained from articles and reports published in scientific journals, referenced and indexed in world-renowned databases of scientific information (Scopus or Web of Science). According to the same criterion of the minimum national requirements, the candidate Chief Asst. Prof. Dr. Zhivka Stoyanova Mateeva collects 396.67 points, or 90 points less. According to the indicator of the minimum national requirements under the letter "E" - citations, the candidate Chief Asst. Prof. Dr. Diana Dimitrova has 650 points, and the candidate Chief Asst. Prof. Dr. Zhivka Mateeva - 465 points, or 185 points less. When assessing the publication activity and citation of scientific work, a certain advantage is established in favor of the activity of the candidate Chief Asst. Prof. Dr. Diana Rumenova

Dimitrova.

As can be seen from the references on the fulfillment of the quantitative requirements of the University of Economics - Varna, on indicator 1. Scientific reports, Chief Asst. Prof. Diana Dimitrova has 208.8. and Chief Asst. Prof. Zhivka Mateeva - 215 points; and on indicator 2. Scientific articles and studies, the candidates have 146.6 points and 85 points, respectively. Although on the first indicator, the candidate Chief Asst. Prof. Dr. Zhivka Mateeva has 6.2 points more, on the second, the candidate Chief Asst. Prof. Dr. Diana Dimitrova has 61.6 points more, or in total, the sum of the points on the two indicators of Chief Asst. Prof. Dr. Diana Dimitrova is 55.4 points more than the sum of the points of Chief Asst. Prof. Dr. Zhivka Mateeva.

Because of the higher number of points on the minimum national and on the requirements of the University of Economics - Varna, at this stage of the competition, Chief Asst. Prof. Dr. Diana Dimitrova should be ranked first. Chief Asst. Prof. Diana Dimitrova also receives an advantage in terms of her involvement in administrative, organizational and managerial activities within the University of Economics - Varna: holding the position of deputy head of a department, her participation in university committees, in the editorial board of a scientific publication, etc.

In view of the above, I propose to the scientific jury, provided that at the final meeting the candidate answers satisfactorily the questions posed by the jury members, to adopt a decision to rank first in the announced competition and accordingly to propose to the Scientific Council of the Faculty of Finance and Accounting of the University of Economics - Varna, Chief Assistant Professor Dr. Diana Rumenoa Dimitrova to be elected to the academic position of "Associate Professor" in the field of higher education 3. Social, economic and legal sciences, professional field 3.6. Law, scientific specialty "Administrative Law and Administrative Procedure".

10.03.2026

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Prof. D.Sc. Jivko Draganov

I appreciate the highly represented habilitation work 'Administrative aspects of public enterprises - non-commercial companies'. The matter, as far as I know, has been studied by only one other author (Atanas Georgiev, Law Faculty of Ruse University theoretically difficult and with practical conclusions).

About the candidate Diana Rumenova Dimitrova:

1. By criterion of educational and educational and scientific degrees, she has obtained a Master's degree at the Ruhr University - Bochum, Germany, a Doctor of Laws from Varna Free University, a scientific field of Administrative Law and an administrative process. The requirement of point 1 of Article 24(1) of the Act has been met.

2. Professional experience as a full-time assistant at the Legal Studies Department since 2013 (previously a part-time assistant) and as a Chief Assistant since 2019. He works as a legal adviser and lawyer. She was actively involved in the preparation of students and graduates, was a mentor, worked on projects. She taught several disciplines. She has participated as a lecturer in teaching mobility in the Erasmus programme. Again, there are about 500 hours of study workload.

3. By scientific output: presents a monographic work 'The National Evaluation and Accreditation Agency as a specialized state body for ensuring the quality of higher education', conducting a qualitative analysis of the authority's competences and providing a useful overview of the case-law. Presents a monograph based on a defense dissertation and a list of publications. Exceeds the other candidate in the number of studios (6). He co-authored three monographs.

Summary and comparison of the two applications:

Applications are almost equal. Their teaching experience is almost equal, and so is their work experience.

The quantity of scientific production shows a slight predominance for Diana Dimitrova, especially in the number of studios.

In the acquired educational and qualification degrees, the candidate Zhivka Mateeva has a slight predominance, but in view of their orientation, I do not see how this benefits the Department that requested the announcement of the competition. Both applications have a doctorate in the direction of the scientific specialty and no one has an advantage.

Diana Dimitrova has useful experience in Erasmus and higher language training, which I find useful for the Faculty and the Department of Legal Sciences. She has extensive experience in university administration and the development of academic and administrative documentation.

In summary: on the basis of the data above, I arrive at the following ranking with minimum priority:

1. Diana Rumenova Dimitrova
2. Zhivka Stoyanova Mateeva

And I propose that the scientific jury take a decision to propose to the Faculty Council of the Faculty of Finance and Accountancy of the University of Economics - Varna to adopt a decision to elect Diana Rumenova Dimitrova to the academic position of associate professor in the field of higher education 3. Social, economic and legal sciences, professional field 3.6 Law (Administrative Law and Administrative Process).

I note that, for the sake of exemplary equality, my opinion may be influenced by the presentation of the candidates at the open closing session of the scientific jury.

With respect

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(Assoc. Prof. konstantin Pehlivanov, PhD)

17.03.2026

Plovdiv