

STATEMENT



By

Assoc. Prof. Anita Atanasova, PhD

In

the capacity of a member of the scientific jury regarding the

dissertation defence of

Imren Gendzh-Salatova,

University of Economics – Varna

by order of the Rector № RD-06-24/27.01.2026 and by

decision of the scientific jury, taken at the first meeting on 09.02.2026, on the topic

" Problems of Accountability in Non-Profit Entities"

General Presentation of the Dissertation

The dissertation is presented in a form and volume corresponding to the specific requirements of the Regulations for the Development of the Academic Staff of the University of Economics – Varna. The dissertation contains: a title page, table of contents, introduction, body, conclusion, including a summary of the results obtained, bibliography, and appendices. A declaration of originality for the dissertation submitted for defence has been provided.

Compliance with the Minimum National Requirements for the Award of the Educational and Scientific Degree "Doctor," pursuant to the Act on Development of the Academic Staff in the Republic of Bulgaria

The doctoral candidate meets the minimum requirements according to the Act on Development of the Academic Staff in the Republic of Bulgaria for the award of the educational and scientific degree "Doctor." The doctoral student has been dismissed with the right to defence after successfully passing the doctoral exams. The defence is being conducted within the legally established timeframe. There are three publications directly related to the topic of

this dissertation and others related to the broader field of accounting and business analysis. The candidate has participated in scientific conferences.

Structure and Content of the Dissertation

The presented dissertation consists of a table of contents, three chapters, an Introduction, a Conclusion, a Bibliography, and numerous appendices. The first two chapters are theoretical, while the third is dedicated to empirical research. The presented dissertation is a thorough and committed study on the assigned topical subject. It has clearly outlined parameters in both theoretical and empirical aspects. The object, subject, purpose, tasks, methods, and hypotheses are well-formulated and consistently developed throughout the work. The author's attitude and position are evident.

The theoretical parts describe in depth the essence of non-profit entities, their classification, characteristics, regulatory framework, and similar associations abroad for the purpose of comparison. The peculiarities of non-profit accounting and the specific problems associated with it are systematically investigated. A system of key performance indicators for the activities of non-profit organizations is proposed.

The empirical part presents different research approaches. On one hand, the public reports of certain non-profit entities in Bulgaria for 2020–2024 were examined. The study includes a regulatory, logical, and financial-accounting analysis of the reporting of the entities under consideration. On the other hand, a survey was conducted in 2025 among organizations with questions aimed at the issues of accountability, statistically processed.

The study includes not only accounting and financial statements but the overall accountability of the studied organizations. Part of this reporting is not financial-accounting in nature but is an important and indispensable element of the general system of problematic reporting for non-profit organizations. The specifics of these organizations necessitate the inclusion of non-financially measurable indicators in the study.

Numerous literary sources related to the researched topic have been used and duly cited. The style of expression and the language used are appropriate for a scientific work. The graphic layout is good. The chosen structure is suitable and logically justified. The abstract briefly and truthfully reflects the essence of the dissertation.

Scientific and Scientific-Applied Contributions in the Dissertation

The work offers a serious scientific review and logical analysis of the theoretical foundations and regulatory framework of the activities of non-profit organizations and, on that basis, the regulatory framework of their reporting and accountability. A comparative analysis between the national and international regulatory frameworks and practices in the studied field has been performed. Approaches for improving the existing reporting and regulatory framework of the non-profit companies are proposed with numerous specific suggestions.

As a result of theoretical and empirical analysis, a model for distinguishing between the business and non-profit activities of enterprises, a valuation model, and a model for disclosing volunteer labour are proposed.

A comprehensive model for evaluating the activities of non-profit organizations is proposed, including a system of key performance indicators for assessing the activities of non-profit entities across various areas of non-profit activity. A sample activity report for these organizations is presented.

A serious empirical study on the problems of accountability in non-profit organizations has been carried out, with corresponding adequate conclusions and recommendations resulting from the research. To my knowledge, such a study in this specific field is the first of its kind in Bulgaria.

The dissertation could serve as a basis for regulatory changes in the field of non-profit reporting, as well as assist practice in certain unclear matters.

Verification for Plagiarism

No plagiarism was found by me in the dissertation or the abstract. The author has used numerous literary sources, which she has cited duly or referred to with a full bibliographic description.

Critical Remarks and Recommendations

Every work can be further developed according to the views and interests of the author. I think it is appropriate to consider a modified version of publications for practitioners, and perhaps even a Guide for Reporting in Non-Profit Organizations. It is possible to deepen the scientific research of the issues with a wider range of organizations, including by areas of different non-profit activities and sources of funding. In doing so, additional research methods

could be applied. There are many issues in the field of control, analysis, and management accounting in relation to non-profit organizations that are fertile ground for research. On the other hand, the regulatory framework for reporting and accounting obviously needs changes. The candidate can be proactive in this process. These statements are suggestions and recommendations for future work rather than a criticism of the work presented for defence.

Questions to the Candidate

1. In your opinion, how can more detailed and less formal disclosure of the activities of non-profit entities be encouraged? What else should be mandatory to disclose for non-profit entities that is not currently officially required?

2. Which areas in the reporting of non-profit organizations do you find critically important and, at the same time, insufficiently regulated, developed, or unclear? How do you think they should be improved and what are the mechanisms for this?

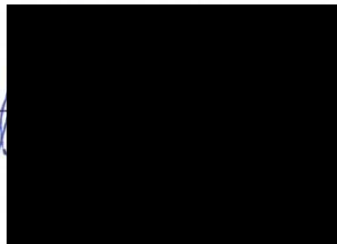
Conclusion

In conclusion, I express my **positive opinion** regarding the dissertation submitted for defence and propose that the educational and scientific degree "Doctor" be awarded to Imren Gendzh-Salatova.

17.03.2026

City of Varna

Assoc. Prof. Anita Atanassova, PhD:





О P I N I O N

Prepared by: *Assoc. Prof. Galina Chipriyanova, PhD*
D. A. Tsenov Academy of Economics – Svishtov
Department of Accounting
Scientific specialty "Accounting, Control and Analysis of
Economic Activity (Accounting)"

Regarding: dissertation for the award of an educational and scientific degree of "Doctor" in Professional Field 3.8. Economics, Doctoral Programme "Accounting, Control and Analysis of Economic Activity"

Basis for the submission of this review: participation as a member of the scientific jury for the defense of the dissertation, in accordance with Order No. RD-06-24/27.01.2026 of the Rector of University of Economics – Varna and the decision of the scientific jury.

Author of the Dissertation: *Imren Sevim Gendzh-Salatova*
Dissertation Topic: *Problems of Accountability in Non-Profit Entities*

1. Information about the doctoral candidate

Imren Sevim Gendzh-Salatova was enrolled in a full-time doctoral programme, state-funded, in the Field of higher education 3. Social, Economic, and Legal Sciences, Professional field 3.8. Economics, Doctoral programme "Accounting, Control, and Analysis of Economic Activity", for a period of three (3) years, from February 1, 2018, to February 1, 2021, in accordance with Order No. RD17-380/13.02.2018 of the Rector of University of Economics – Varna. By Order of the Rector of the University of Economics – Varna No. RD17-392/09.02.2021, Imren Sevim Genj-Salatova was expelled with the right to defend her dissertation within a period of five years, starting from 01.02.2021. By Order of the Rector of University of Economics – Varna No. RD17-35/02.02.2023, the dissertation topic was changed from the former title "Problems of Financial Accountability and Performance Assessment in Mining

Industry Enterprises” to the new title “Problems of Accountability in Non-Profit Entities”.

2. General presentation of the dissertation

The dissertation entitled “Problems of Accountability in Non-Profit Entities” demonstrates the characteristics of an academic research study and is presented in a completed and coherent form. The dissertation comprises 312 standard pages, including a table of contents, a list of abbreviations, an introduction, a main body structured into three chapters, a conclusion, a bibliography, and 12 appendices. The research incorporates 8 figures and 27 tables.

The formulated topic, “Problems of Accountability in Non-Profit Entities”, is **suitable** for a doctoral dissertation.

The reviewed study is **relevant** to both theory and practice. In contemporary conditions, non-profit entities perform important social functions in areas such as social services, education, healthcare, culture, environmental protection, and the promotion of human rights, thereby contributing to the provision of public goods. Non-profit entities constitute a specific group of economic actors that do not distribute profits among founders, members, or governing bodies, operate for public or private benefit, and are primarily financed through donations, project funding, and membership fees. Although the doctoral candidate refers to the work of other authors, her own stance on the subject matter is clearly **recognizable** in relation to theirs.

The **objective** of the study: to present the characteristics and analyse the problems of accountability of non-profit entities in Bulgaria, and on this basis to propose solutions for their resolution in order to enhance the transparency, comparability, and usefulness of accountability information for stakeholders – is **clearly defined**.

The **object** of the study comprises Bulgarian non-profit entities established under the Law on Non-Profit Legal Entities, operating in various social spheres – such as social services, education, culture, healthcare, etc. – while the **subject** of the study is the specific characteristics of accountability in non-profit entities, examined in its regulatory, theoretical, and practical aspects.

The main thesis of the dissertation, that the accountability of non-profit entities registered under the Law on Non-Profit Legal Entities in Bulgaria is characterized by regulatory, methodological, and organizational problems that

limit the quality of information necessary for decision-making by the organizations themselves, donors, funding institutions, supervisory bodies, regulators, and the state, is **substantiated**.

The dissertation formulates and tests 4 hypotheses.

The figures and tables presented in the study effectively **visualize the author's ideas** and illustrate the conducted research, summaries, and interrelationships within the exposition.

There is a logical coherence between the main conclusions and the content of the individual sections of the dissertation.

The text is supported by numerous citations from the **literature**. A comprehensive bibliography of 217 sources is included, comprising foreign-language publications, regulatory documents, and online materials. The sources are used appropriately, with full adherence to the principles of academic ethics.

3. Publications and participation in scientific forums

The doctoral candidate has presented six independent publications, three of which are related to the topic of the dissertation: one scientific article and two scientific reports. According to the candidate's declaration, the publications related to the dissertation meet the minimum national requirements for obtaining a doctoral degree (PhD) in the field of higher education 3. "Social, Economic, and Legal Sciences", in accordance with Article 2b of the Law on the Development of the Academic Staff in the Republic of Bulgaria. The candidate has also participated in scientific forums.

4. Assessment of the structure and content of the dissertation

The dissertation is distinguished by clear and academically sound expression, precise terminology, and a consistent style, which enhance its scientific value.

The study provides a comprehensive overview of the theoretical and regulatory foundations of accountability in non-profit entities, systematizing the key legal and organizational features that define their operation. The dissertation offers an in-depth analysis of the existing regulatory framework and examines the main classification characteristics of these entities, as well as the range of users of their accountability information. A comparative analysis of foreign models and best practices in non-profit accountability is conducted, laying the groundwork for formulating guidelines for the development and harmonization of reporting approaches in an international context. In this regard, the dissertation outlines opportunities for establishing a more coherent

global framework for the accountability of non-profit entities, aligned with the increasing demands for transparency, accountability, and public trust.

The dissertation analyses the current problems in the accountability of non-profit entities. Solutions are justified concerning the formation of accounting policies and the development of an individual Chart of Accounts tailored to the specific nature of their activities. The author explains the characteristics of the capital structure and financial results of these entities, revealing significant accounting specifics in their formation and presentation. Accounting for assets, settlements, revenues, and expenses is examined in detail. Special attention is given to the accounting of additional economic activities conducted by non-profit entities. Particularly important are the conclusions regarding the methodological peculiarities and common difficulties in preparing annual financial statements, as well as the in-depth analysis of the content, purpose, and role of the annual activity report of non-profit entities. Provisions related to the evaluation of the performance and effectiveness of these entities are highlighted. The problems and prospects for reporting volunteer labour in the annual activity report are also identified.

A targeted empirical study on the problems of accountability in non-profit entities in Bulgaria has been conducted. A clear research methodology has been developed, with its advantages and limitations outlined. Particular attention is given to issues arising from regulatory requirements and the specific characteristics of reporting objects in non-profit entities, including difficulties in the differentiation between economic and non-economic activities. A significant focus of the study is the examination of applied financial and non-financial indicators, as well as established practices for disclosing information in the annual financial statements and annual activity reports of Bulgarian non-profit entities. In this context, the role of the annual activity report is substantiated as an instrument for accountability and transparency. Problems and prospects for reporting volunteer labour are also highlighted.

An appropriate **scientific toolkit** was employed during the study, thereby fulfilling the 7 established objectives and achieving the main goal of the dissertation. This provides a basis for qualifying the obtained **results as having both scientific and applied scientific significance**.

The abstract entitled “Problems of Accountability in Non-Profit Entities” is of sufficient length – 37 pages and fully corresponds to the structure, content, and research results of the dissertation.

5. Identification and evaluation of scientific and applied scientific contributions in the dissertation

I agree with the six scientific-theoretical, scientific-applied, and methodological contributions, which enrich research in the field of accountability of non-profit entities and hold practical significance. The summary in the abstract objectively reflects the doctoral candidate's achievements of both scientific and scientific-applied nature.

6. Confirmed or unconfirmed plagiarism in the dissertation and abstract

According to the information provided from the plagiarism check using specialized software, no matches indicative of plagiarism were found in either the dissertation or the abstract.

7. Critical comments, recommendations, and questions

Alongside the undisputed merits of the dissertation, certain opportunities for further enhancement can be noted. In some sections, the author's argumentation could be presented more clearly. A more in-depth examination of the strategic implications of the proposed regulatory and methodological changes on the development of non-profit entities would have strengthened the original contribution of the study. These observations do not diminish the overall positive assessment of the dissertation, which enriches scientific knowledge and contains significant ideas and results.

8. Questions for the doctoral candidate

I have no further questions for the doctoral candidate.

9. Conclusion

The dissertation entitled "Problems of Accountability in Non-Profit Entities" represents a timely and in-depth study with clearly defined scientific merits and contributions. Based on a quantitative and qualitative assessment of the work, I express a positive opinion and support the awarding of the educational and scientific degree of Doctor to Imren Sevim Gendzh-Salatova in Professional field 3.8. Economics, Doctoral programme "Accounting, Control, and Analysis of Economic Activity".

March 10, 2026, Svishtov

Signature:



OPINION

by Associate Professor Iva Bankova Moneva, PhD

Regarding: Dissertation for the award of the PhD educational and scientific degree in professional field 3.8 "Economics", doctoral program "Accounting, Control, and Analysis of Economic Activity"

Author of the dissertation research: Imren Sevim Gendzh-Salatova, PhD candidate from the Department of Accounting at the University of Economics – Varna

Topic of the dissertation research: "Problems of Accountability in Non-profit Entities"

Grounds for presenting the opinion: Participation as a member of the academic jury, Order No. RD – 10-3 / 08.01.2026 of the Rector of the University of Economics – Varna

I. General Presentation of the Dissertation

The dissertation consists of 312 pages, including 277 pages of main text and 12 appendixes. Its structure follows the traditional academic format and includes an introduction, three chapters, a conclusion, and a bibliography. The organization of the work and its core content are aligned with the topic, as well as with the object, subject, and aim formulated in the introduction. The research tasks, hypotheses, and limitations are clearly defined. The bibliography comprises 46 sources in Bulgarian, 141 foreign sources, 24 normative documents, and 6 internet sources, all cited accurately and appropriately.

No deviations from the norms of academic and professional ethics have been identified.

The abstract is composed in accordance with the requirements and reflects the main sections of the dissertation.

II. Assessment of the Relevance, Form, and Content of the Dissertation

The topic of the dissertation is timely and significant, as nonprofit enterprises occupy an important place in socioeconomic life, and their accountability is a key instrument for transparency, trust, and good governance. Nevertheless, the regulatory and methodological framework in Bulgaria remains fragmented, and practical difficulties persist. In this context, the dissertation offers applicable and relevant solutions. The research hypotheses are clearly formulated and subsequently confirmed or rejected, which supports the assessment of the dissertation as a completed and coherent scientific study.

The research methodology is appropriate and correctly applied. The author demonstrates solid knowledge of the examined issues, and the discussion is developed both conceptually and at a practical/applied level. A notable weakness is a certain degree of descriptiveness in some paragraphs, as well as the limited scope of the empirical sample (12 financial statements and 37 activity reports, which are useful but not fully representative of the sector).

The work is of very high quality from a technical, graphical, and stylistic standpoint. The volume is optimal, and the chapters are proportionally structured.

Some of the author's views have received public exposure. The doctoral candidate has independently published six papers, which interpret issues developed in the dissertation. Each of them reflects specific aspects of the

dissertation, thereby allowing essential parts of the research to be tested prior to its final completion and defense.

III. Scientific and Applied Contributions of the Dissertation Research

I find that the contributions of Imren Gendzh-Salatova in the dissertation are:

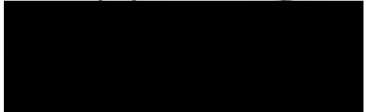
1. Identification of regulatory and methodological gaps in NAS 9 and the related regulations.
2. Systematization of international best practices and proposals for their adaptation in Bulgaria.
3. Development of a model for the structure and content of the annual activity report of nonprofit legal entities.
4. A model for assessing the activity and effectiveness of nonprofit organizations.
5. A model for valuing and disclosing volunteer labor, which represents an innovation in Bulgarian academic literature.
6. Empirical demonstration of the relationship between regulatory ambiguities and practical difficulties in nonprofit accounting.

IV. Critical Remarks, Questions, and Recommendations Regarding the Dissertation

My recommendation to the PhD candidate is that in his future work, he should further deepen the practical and applied issues developed in the present dissertation, as their relevance and importance will continue to grow.

V. Summary Evaluation of the Dissertation and Conclusion

The dissertation possesses the necessary scientific significance for a doctoral thesis, which gives me grounds to consider it a completed scholarly work. As a member of the academic jury, I give my **positive vote** of the dissertation titled “Problems of Accountability in Non-profit Entities” by Imren Sevim Gendzh-Salatova , and **I propose to the academic jury that he be awarded the educational and scientific degree “PhD” in the scientific specialty “Accounting, Control, and Analysis of Economic Activity.”**


Assoc. Prof. Iva Moneva, PhD

Varna,

10 March 2026