

ATTESTATION OF ACADEMIC STAFF - OPPORTUNITY OR BARRIER IN CAREER DEVELOPMENT

Venelin Terziev¹ and Marusya Lyubcheva²

¹Full Member of the Russian Academy of Natural History, Professor, Eng., D.Sc. (National Security), D.Sc. (Economics), D.Sc. (Social Activities), Ph.D.
Kaneff University Hospital, Rousse, Bulgaria
Russian Academy of Natural History, Moscow, Russia

vkterziev@gmail.com

²Associate Professor, Ph.D., University "Prof. d-r Assen Zlatarov", Bourgas, Bulgaria
milyubcheff@gmail.com

Abstract

The criteria for attesting the academic staff are part of the respective regulations of the autonomous higher education institutions. They shall lay down the entire procedure for carrying out this process. With the introduction of the new Law on the Development of Academic Staff in the Republic of Bulgaria and the Regulation for its implementation, criteria for registration in a national portal with certain criteria were introduced. With these actions the Bulgarian Ministry of Education wants to unify the minimum requirements for holding academic positions and obtaining scientific degrees. At the next stage, the policy in this respect involves greater funding of the scientific work relevant to the attestation of academic staff.

This study aims to establish the prerequisites for changing the attestation system, the possibilities for its linking with the financing of scientific research activities, as well as the perspectives for career growth.

Keywords: attestation, academic staff, barrier, career development.

1. INTRODUCTION

The definition of Open Science states that it is a summarizing concept of the movement that aims to make research and research results accessible to all interested people, amateurs and professionals. It includes the publication of open research works, campaigns for open access, the encouragement of scientists to practice open-notebook science, and the facilitation of scientific work and the publication of scientific knowledge in general (Terziev, Lyubcheva, 2022a).

The movement dates back to the 17th century with the advent of the first scientific journals, when the public need for access to scientific knowledge led groups of scientists to start sharing resources and working collectively (David, 2004a). Today, there is a debate about the extent to which scientific information should be shared (Nielsen, 2011). The conflict is between the desire of scientists to have access to shared resources and the desire of individuals to earn when others use their resources (David, 2004b).

An article in the journal "Az Buki", issue 1/2021, under the title "Open science - the mission is possible" makes an attempt to justify this possibility in Bulgaria (2021):

The introduction of open access to scientific information and scientific data in our country is related to the

priorities set in national strategic documents for the development of science, research, innovation and dissemination of scientific achievements. The Operational Plan for implementation of the first stage of the National Strategy for Research Development in the Republic of Bulgaria 2017 - 2030 and the national concept for application of the principle of open access to scientific information analyse the trends in the development of open science and set the necessary steps, actions and preconditions for approving the open access initiative. The creation of the Bulgarian portal for open access to scientific information is an important step in the process of development of open science in our country. The portal is maintained by the Minister of Education through the National Center for Information and Documentation (NACID) in implementation of a European recommendation dated April 25, 2018 on access to scientific information and its storage. The Bulgarian Open Science Portal is part of the implementation of the large-scale task to unite and freely access all results of research in Bulgaria, funded by public funds. In addition, all scientists who wish to provide open access to their publications are encouraged to publish in the portal and its repository, even if they are not publicly funded. This will ensure the widest possible access to scientific publications and this will contribute to the development of science and its dissemination among society. Joint efforts and coordinated actions of all interested people will create the conditions for the success and sustainability of open science in Bulgaria (Terziev, Lyubcheva, 2022a).

According to the Universal Declaration of Human Rights adopted by the United Nations, each person has the right to freely participate in the cultural life of society, to enjoy the arts, participate in scientific progress and enjoy its achievements. Everyone has the right to protect their moral and material interests that are the result of any work of science, literature or art of which they are an author. The genesis of open science movement is based on the inalienable human rights defined in Art. 27 of the UN's Universal Declaration of Human Rights. The phenomenon is multi-layered and has gained global importance nowadays. A number of organizations at global, regional, national and institutional level are involved in open science. The main ones are few. At the 40th session of the UNESCO General Conference, the Member States instructed the organization to develop an international tool for setting open science standards in the form of a recommendation. This process is expected to lead to the adoption of the document in 2021. The Organization for Economic Cooperation and Development (OECD) published a report entitled: "Making open science a reality". It reviews policies in this field. Evidence of the impacts of the promotion of open science and open data is analysed. Legal barriers and solutions for greater access to research data are also explored. It describes the key participants and their roles and evaluates the progress in the OECD and selected not-member countries based on a study of the latest policy trends (Terziev, Lyubcheva, 2022a).

The European Union has made the greatest progress in promoting open science as movement, politics and culture. A number of European Commission's initiatives and documents are tracing the way for turning the open science into reality. Amongst the leading documents is the Amsterdam call for action towards open science from 2016. It describes clearly and in detail the steps to be taken, as well as the EC recommendation dated 25 April 2018 on access to scientific information and its storage. For the purposes of the movement, a platform for open science policy has been set up, where latest news, events, publications on the subject are uploaded. Open science is often defined as a summarizing term that includes various actions aimed at removing the barriers for sharing any kind of output, resources, methods and instruments at each stage of the scientific research process. Open access to publications, open research data, open-source software, open cooperation, open review, open research notebook, open educational resources, open monographs, citizen science and research group funding are the main features of open science. This is a continually developing initiative that covers various movements aimed at sharing all types of science resources. In the publication "Open innovation, open science, open to the world - a vision for Europe", the European Commission defines open science as a "a new approach to the scientific process based on cooperative work and new ways of diffusing knowledge by using digital technologies and new collaborative tools. The idea captures a systemic change to the way science and research have been carried out for the last fifty years: shifting from the standard practices of publishing research results in scientific publications towards sharing and using all available knowledge at an earlier stage in the research process". The EU-funded project FOSTER is aimed at fostering the practical implementation of open science in "Horizon 2020". Its primary aim is to contribute to a real and lasting shift in the behaviour of researchers and to ensure that Open Science becomes the norm, by providing resources for practical guidelines and trainings in the same-name portal to help researchers. The Open Science manual states "Open Science is the practice of science in such a way that others can collaborate and contribute, where research data, laboratory notes and other research processes are freely available, under terms that enable reuse, redistribution and reproduction of the research and its underlying data and methods. In other words, Open science is transparent and accessible knowledge that is shared and developed through collaborative networks". Open access is one of the main aspects of Open Science. Among the first major steps in its support is the Budapest open access initiative since February 2002. The definition states "free internet access that allows all users to read, download, copy,

distribute, print, search or connect the full texts of these articles examining the indexing content, transfer them as software data or use them for any other legitimate purpose without financial, legal or technical barriers other than those who are an integral part of receiving access to the Internet. The only limit to reproduction and dissemination and the only copyright aspect in this area should be the authors' right to control the integrity of their work and the right to be duly recognized and cited". Budapest's initiative was followed by Bethesda statement on open access publishing from 20 June 2003, drafted at a meeting held at the headquarters of the Howard Hughes Medical Institute in Chevy Chase, Maryland. The principles are designed to "stimulate discussion within the biomedical research community on how to proceed, as rapidly as possible, to the widely held goal of providing open access to the primary scientific literature". A little later, in October 2003, the Berlin Declaration on Open Access to Knowledge in the field of Natural sciences and Humanities was issued. The aim is to stimulate the easily accessible distribution of knowledge to educate the society through free online access in a sustainable and interactive network with interoperable software. Open access is defined as a practice for providing online access to scientific information that is free and reusable. In the context of research and development, open access to scientific information relates to two main categories – scientific publications (mostly reviewed research articles published in academic journals) and research data (unpublished data or raw data acquired during scientific research). There are two main recommended ways to provide open access via self-backup, or so-called "Green Road" - the author or his representative deposits the published article or the final reviewed manuscript in an online repository before, simultaneously or after its publication (Terziev, Lyubcheva, 2022a; 2021).

There are many documents that define relationships and positions in education and science – from laws and normative documents to regulations, standards, ordinary rules and many more. Each such document has a precise and certain place in terms of meaning and content. Within a specific frame, everyone develops pursuant to these systems – teacher, lecturer, scientist ... which is needed, yet an insufficient condition, to be a good teacher, lecturer and scientist. The teacher, the lecturer, the scientist teaches, distribute and share knowledge. And knowledge is a special category. It is not a fruit or vegetable to be sold or exchanged. Knowledge is a "great event" and this is how we should refer to it – as to something great.

2. WHAT ARE THE PECULIARITIES OF KNOWLEDGE?

The Oxford English Dictionary defines knowledge as: facts, information and skills acquired through the experience or education, the theoretical or practical understanding of the subject, or what is known in a given area as a whole or awareness, acquired by experiencing a fact or situation.

To know means a lot, and a little. You know a lot, but the knowledge limited to one's personal space remains only individual possession. It brings relatively little benefit to others and society. The power of knowledge is in its sharing – either verbally expressed, spread, taught or written. The more you distribute the knowledge, the more useful it is for a society and its development, it becomes alive. The shared knowledge is fundamental to human survival and development. Shared knowledge generates new ideas, creates opportunities and prospects, removes limits, creates new products and enables any development. In the business environment, shared knowledge is an invaluable resource and a driving force for the functioning of market relations, from which the end user always wins (Terziev, Lyubcheva, 2022a).

It is not accidental that open educational and scientific spaces are created, which even cover political and social initiatives (European Open Science cloud, European Research Area, etc.).

3. HOW DO WE SHARE KNOWLEDGE?

In order to share knowledge, you have to master it, you should not only possess someone else's knowledge that you have realized, analysed, rationalized, but you should enrich it with your opinion, comment, or your own knowledge, acquired with your own efforts. Knowledge is shared in many ways, often not defined as such. Teaching and research work are defined as fundamental in knowledge sharing.

To teach, distribute and share knowledge with others requires many other things (skills, experience, competencies, mastery of communication channels, various amplifiers, etc.) that cannot be read or found in laws and regulations. Beyond the documents it is required to have certain qualities like specific and quality creative energy, dedication, self-sacrifice, understanding, empathy, sympathy, lust for learning, indomitable spirit, desire for discovery, indefatigability, constant striving for improvement, intransigence and many other purely professional features. In order to be a good teacher, you do not have to read the textbooks or ask the right questions to evaluate your students, to have your lectures in the classroom and laboratory and write a number of publications to follow the path of academic growth. Being a good teacher and scientist is a mission that only few can pursue. That is why I believe that to be a good teacher means to be able to share knowledge so that it reaches many people and in a way that will create new knowledge. Then there is a point in living for and with knowledge. For those who share knowledge this is their essence and meaning, it is their

belief. Is everyone capable of this – to fully devote yourself to the point of exhaustion or not being able to do so? And even if you do not have such opportunity, for a number of reasons, this is a matter of your own development.

However, knowledge is not only shared through teaching. Knowledge sharing is performed in many ways outside of school and university. And these methods are no less important, because they create an environment and a network for process continuity. This has long been invented and we only apply these methods without thinking about the significance they bring, the effects they create and the influence they make. Conferences, seminars, congresses are the places where knowledge is shared. The same knowledge can and should be shared on many different forums. And there is nothing wrong or unnatural about that. The same knowledge can be described in many scientific, and not only scientific journals, and there is nothing wrong about that either. Thus, it reaches a much larger and more diverse audience, finding its users. This way it stimulates new ideas and creates followers.

Does knowledge need followers? One, I hope, rhetorical question that has an unambiguous answer. Yes – in order to be shared, knowledge must have its followers. Otherwise, how certain ideas, thoughts, deliberations or theses will reach a certain community and how will they become a necessity? This is a contribution that not everyone can and does make. It is very fashionable to talk about “influencers” today. There is no greater “influencer” than shared knowledge. As long as we give it a chance and do not limit it – due to a lack of understanding and a desire to put it in frame. And even worse – to put chains on it that will keep it where someone has decided is its place. There have been such times and periods, but today, we hope they are over.

Today, in the period of transition from automated to digital systems, the distribution of knowledge takes place in different ways, with the help of different methods and techniques than a century ago. Naturally, the most important of them is learning – formal, non-formal, informal, which takes place in and out of school. Furthermore, the school is supported by many additional methods for distribution of knowledge – organized or unorganized, individual or collective. Many lecturers, scientists, researchers, managers and various specialists analyse this topic and there is always something different and interesting in their opinions regarding the different types of knowledge and the different ways of its distribution.

At the same time, many managers not only analyse, but also create rules by which knowledge is distributed and shared, and when everything is put in a certain framework, it fades and brings relatively little added value. When managers create the framework “you can - you cannot”, “you get - you do not” and this framework is formalized to the degree of favouritism or elimination, to the degree of creating friendly circles, to the degree of creating an academic layer without much contribution to knowledge, but with possibilities for distribution of influence – then knowledge also loses its main purpose, it loses a lot. It loses because the manager “gets” a bonus for everyone who is below him in the hierarchy to become “visible”. It doesn't matter where you rank on the list of authors, only the number is important.

True knowledge does not follow this pattern. It tries to come to the surface in different ways – informally, personally, with its own style. It enters new audiences, appears in front of new listeners and fulfils the mission of sharing and distribution. Whether this type of knowledge will receive a title or recognition is a matter of approach. Maybe, but not for sure! Is this type of knowledge useful? Yes, because it creates. Does not participation in various competitions through which we strive to engage young people to pursue teaching or research count as knowledge sharing? Why do we do this? Because today we lack leadership in knowledge. Leaders and not managers attract young people. Leaders do not share knowledge in order to be liked, but to create followers of knowledge. They are innovators and they are different. They are liked if they are attractive, if they know a lot, if they know how to communicate, if they carry the charisma of the knowledge they have. And isn't this a new reading?

Knowledge, which is distributed through various means, such as books, magazines (of various kinds), newspapers, electronic platforms and the Internet, means familiarity with certain content, information about facts of various kinds and allows for understanding, associativity, reasoning, perception and discovery. Certain and different processes start from knowledge. Of course, all these considerations do not provoke a violation of the rules, but seek that change that will create new models of knowledge sharing. Knowledge management and artificial intelligence are part of this unexpected but unavoidable process.

Every mean of knowledge distribution can be referred to as knowledge sharing. To my mind, it is the sharing of knowledge that makes it alive, active, useful, working, effective, ensuring the development not only of the relevant factual resource, but also generating a new one. Every teaching activity, no matter where – at school, university, training center or scientific structure – is an activity of knowledge distribution and sharing. But not everyone who does it gets to the top of sharing. Knowledge sharing is a network activity, as the

network grows to huge sizes, requiring strict systematization and consolidation by topic in order to be able to cover and to continue its development. On the one hand, teachers and scientists teach knowledge accumulated so far, on the other hand, by expressing their own opinion or adding their own research and studies, they enrich and further develop it. With a small amount of knowledge, like it was at the beginning of its accumulation, each newly discovered fact was usually named after the person responsible. This is how many laws in science that bear the names of their discoverers appeared. This is how the “Eureka” exclamation reached many people, but is it possible to achieve similar effect today with a publication that will be read by a limited number of people (and in some cases only by the authors)? With the accumulation of vast knowledge that are even difficult to systematize, this does not always happen, or only happens in special cases of serious discoveries and contributions. Recognition of the contribution of anyone who has added even a little new knowledge is done differently. Thus, the citation of the contribution becomes an important element of the evaluation of this contribution to the development of knowledge.

Nowadays, when knowledge and science occupy huge space in economic, social, research life and social development in general, it is becoming increasingly difficult to track contributions. Evaluating contributions to the development of knowledge before you, before your own work, is not so important for documentation as it is important from the point of view of recognition, of ethics in relation to everyone who has contributed their own development to the development of knowledge. Therefore, the evaluation of the contribution is inextricably linked to the sharing of knowledge. The difference between evaluation and sharing is that you evaluate and distribute the evaluated knowledge as an original, but in sharing you put your own understanding or create “new developed knowledge”. “I believe that each of us possesses useful knowledge that he or she can share with others and even should do it at every opportunity to help those pursuing the same professional path – just as he or she received assistance and guidance from the more experienced colleagues in the beginning. From my own experience the best programmers, designers, businessmen, coaches and others like being asked questions and give advice to people who are just starting their careers, changing professions or need other types of help. However, they are rarely asked because many people think that these experts are “unreachable” and are afraid to just write to them asking a question”, said Silvina Furnadzhieva, the site's founder (2022b; Terziev, 2021b; 2021c; 2021d).

Shared knowledge becomes part of every creative path, i.e., you can share it with different audiences, in different ways, adequate to those audiences, and that's how you participate in the process. In this sense every way is important and valuable.

Sometimes sharing knowledge would not be possible when a research paper is published in our own university edition and only in Bulgarian. An unbiased assessment in this regard would be that the users of such knowledge are limited to the circle of our colleagues and a very small number of people outside. Different means of knowledge sharing like publishing and distributing it in various scientific publications, platforms, presentations at conferences and seminars and last but not least in different languages, help expand it. The limited use of the Bulgarian language is a kind of barrier and even an obstacle to the transfer of knowledge. Examples in this direction include translations of a number of Bulgarian writers and authors (which have been translated into dozens of languages), as well as of scientific publications presented with the same content in a number of scientific journals. The SSRN research platform provides detailed information of this nature, which in practice proves to be an effective amplifier for knowledge transfer. Otherwise, it will remain in a closed system, and it needs to be perceived, affirmed and, last but not least, to be recognized by the community (Terziev, Lyubcheva, 2022a).

4. DO WE REGULATE KNOWLEDGE SHARING?

We share knowledge verbally and in writing. In verbal knowledge sharing we can omit names, dates, positions, but it is not the same in written works. There, every name and year is important, in order to follow not only the ethical norms of the recognition of achievements, but also to provide that systematization which is important from a factual point of view. There every author's opinion is significant, that is not “taken” from anyone, i.e. - this is the actually created knowledge, which becomes part of the general. This is where we encounter the terms “citation”, “self-citation”, “plagiarism”, “self-plagiarism” – frightening terms that can not only confuse knowledge sharing, but can also destroy one's destiny. The first two terms are, of course, surmountable and in some cases “re-used” - either out of reinsurance or out of a desire to create prestige in terms of analyticity. When it comes to using the methods of publishing, this can also be expressed by sharing your previous experience (research) and in fact each subsequent work is an upgrade of the previous one. Such sharing can and is done more than once and it does not in any way violate the norms for the distribution of knowledge. And this is important because it is not just sharing. This is an upgrade and it becomes part of the general development of knowledge. In today's science, this is called self-citation.

The other two concepts can be compared to a scientist's and a teacher's guillotine or to sending them to a

not very favourable group, which marks them as harmful or even expels them from the system. “Non-plagiarism” is a skill, but “plagiarism” is an inability to share knowledge. It is true that no one has the right to boast with other people's achievements and other people's knowledge. However, it is a matter of consideration whether someone's knowledge is enriched and further developed, whether it creates value or benefits society (Terziev, Lyubcheva, 2022a).

When it comes to “self-plagiarism” it is difficult for me to give a definition – an author plagiarizes himself ... If plagiarism literally means using someone else's work, then self-plagiarism is the use of one's own work. Something like an autoimmune disease. Is knowledge suffering from this?

5. CHANGES IN THE HIGHER EDUCATION SYSTEM OF BULGARIA

Attempts to implement changes in our education have often made us face artificial challenges. The failed transition to democracy in Bulgaria has turned education from a value of national importance into one with fading functions and education itself into a field of relentless experiments and controversy engaging a large number of target groups – universities, schools, teachers, students, parents, state authorities, politicians. We realize the risks of the new idea of the Ministry of Education and Science in Bulgaria to restructure higher education, but we will share the statement we stand for anyway. And this is the statement that education is at the heart of regional development, and higher education is the foundation of smart growth, providing we still comply with the priorities of the European Union and the world, which, even though modified in accordance with Covid or green deals, cannot refute this claim. There are several definitions that must be remembered though, not only as titles but as content, and one of them, perhaps the most important, is sustainable development. There can be no sustainable development unless every system is involved and every element becomes part of this process and participates in its realization. Higher education is such system. The second major system is regional development. We will not dwell on other systems, although they are very important and should not be neglected. Why we turn to these two systems and what the connection with the reform in higher education is (Terziev, Lyubcheva, 2022a; Terziev, 2021b; 2021c; 2021d).

- Education, incl. higher education is the foundation for the development of the state and the state consists of regions and their balanced development is absolutely necessary.
- Every strategic view of the development of a country begins with these two systems – where they prepare human resources, i.e. the human capital of the state and where this capital is realized.
- These two systems determine the possibility of a balanced distribution of the population on the territory of the state.
- The use of state resources throughout its territory depends seriously on these two systems and this is not only sustainable development, it is part of national security.
- The artificial relocation of existing elements of an important system on the territory of the state have never been successful and functional for development.
- When talking about higher education and regional development, we should stop believing the mantra that everything outside the capital is a province and of lower quality.
- The good interaction between these two systems gives people a high degree of freedom and the right to choose.
- For two decades we have been talking about the development of a knowledge-based economy, where higher education and regional development are pillars of such an economy.
- Each reform includes an assessment of traditions, current situation and prospects /the bad thing is that the forecasts do not work for us easily/.

We will not follow the whole chronology of changes in higher education in Bulgaria, which went through the establishment and development of higher institution, institutes and universities in many regions of the country to provide a basis for regional development through various transformations of public and private higher education, through the quest for every big city to have a college or university, until the discovery of over fifty such structures. Not all stages of this development are successful, unfortunately, but at the moment they are a fact. We will not follow the chronology of all strategies for the development of higher education either, where the development of the regions is connected in some way with the development of higher education, culminating in the strategy for smart specialization, which later became the basis for centres of excellence and centres of competence to come up with the idea of such consolidation, which could deprive many regions of independent universities, which today have significant academic potential and are well used

in some regions.

If so far we have advocated the academic potential of universities to be seriously included in all development policies of individual regions, then starting from today this will no longer be a valid thesis, because the probability of consolidated structures to maintain the potential of structures in each region is not very high. Both from the point of view of the academic staff and from the point of view of students, who have always strived for the central structures, for a hierarchically higher institution, believing that the quality there is higher.

We know that on a European and global scale, the innovation potential of a region is linked to the structures of science and higher education. Through an irrational consolidation, this potential will be increasingly centralized, and if we connect this trend with the idea of research universities, where more financial resources would obviously be concentrated, the result of this reform is by no means encouraging for regional development.

Reform in higher education is necessary and urgent. It should focus on modernizing teaching methods and content and adapting them to modern social and technological development. Objectively, it is not possible for Industry 4.0 to develop with Education 2.0 without, of course, taking the literal meaning of the words, but in many places the quality of higher (and not only) education can be identified with such identification. However, this does not mean that the created potential should be neglected, but it should be supported and directed to the development of both the regions and the state in accordance with its potential and specific characteristics. To the question whether there are many universities in Bulgaria, the easiest answer is "yes", the easiest measure that could be applied - reduction. This answer would not be accurate enough and correspond to the respective realities and especially to the defined claims for development. We know that the evaluation of universities has been done, but the scientific measurements of the results are hardly correct and objective enough to rely on and that it would give everything for sustainable and intelligent development. There are many other indicators needed (a set of indicators and criteria), some existing but neglected, others not yet used to make such an assessment. But this is also the easiest measure for young people to migrate to the centre, which is already overcrowded and the gradual disappearance of certain regions and areas is a worrying fact and tendency.

A far better measure is the creation of university networks the organization of which has already started, but they are with megastructures – they work differently, they increase flexibility, mobility, connectivity and provide a multiplier effect to eliminate emerging deficits and solving specific problems with common efforts and potential.

Some time ago we conducted a study on the needs of several regions in Bulgaria for staff with certain knowledge, skills and qualifications and saw the many problems the regions have to face. But they are not related to the large number of universities, yet to the state's inability to organize policies so that the economy and education move in sync and work in synergy. Unfortunately, these studies were not considered important by any institution, and the right decision was to do such studies for all regions in the country and to identify measures that need to be developed and due to which the policies would focus on strong regional development, which: preserves the regional human capital, raises the potential of the region, improves the innovative infrastructure, creates a balance in the economic development of the country.

But the study was not conducted by pro-government organizations and therefore was not noticed. It is different to carry out targeted public procurement that decide specific cases for specific interests, which is most often used in the implementation or more precisely in motivating the implementation of national policies.

Probably such a solution is more convenient than endless and often unproductive discussions or oppositions, which is understandable. This is certainly the case in centralized democracies. Because it is known that those whose status is preserved will be happy to remain silent at the risk of changing the nature of the decision, others will be afraid of losing the minimum they have left. Satisfaction is for the big structures, which will develop at the expense of many of the others, but the big problems remain.

There are good practices in Europe and the world in which educational institutions related to the arts are managed by the relevant Ministry of Culture. Undoubtedly, the capacity there, both methodologically and practically, is higher than in the Ministry of Education and Science. Moreover, in Bulgaria the secondary schools of arts are managed by the Ministry of Culture and the completion of this process as well as the higher schools in the field of art are structures of the same ministry (Terziev, Lyubcheva, 2022a).

6. THE ATTESTATION OF LECTURERS AT BULGARIAN UNIVERSITIES

Attestation is a type of assessment and a way to attribute what is deserved to the intellectual and creative

work of scientists and researchers at Bulgarian universities. A major problem in this assessment is its objectivity and the creation of a sufficiently clear and truthful system of criteria to give this assessment. So far, each higher education institution has created the rules for such assessment based on the autonomous management status of the higher education institution.

With the change of policy, which was introduced by the Law on the Development of Academic Staff in the Republic of Bulgaria and the Rules for its Implementation, some kind of system with registration regime was introduced, which gives certain opportunities for development. It is difficult to make accurate analysis whether this system works, because it is not yet fully operational and has a very high inaccuracy in reflecting the scientometric data of the relevant scientists and researchers.

In his research, Associate Professor Rosen Rusev made the following conclusion: "The ranking of institutions in prestigious lists is made mainly on the basis of quality publications or creative achievements, and not on the basis of "participation in projects", "number of PhD students", or "number of textbooks" (which in our country are requirements for pursuing a Professor degree). The current law does not sufficiently stimulate publication research and creative-innovative activities. Instead, it spends the energy of academic workers on activities that are not so specific to their profession and allows loopholes for growth with less quality research and creative-innovative contributions (with textbooks, scamped doctoral students, collegial citations, a name written under some project, etc.). The outcome I propose - in view of the nature, purpose and modern dynamics of the academic profession - is the absolute priority of research and creative-innovative publications in academic publications in well-established prestigious lists. By "absolute priority" I mean that such publications can compensate for all other requirements for career advancement, the latter becoming optional and within a certain limit (2022c).

7. IS THERE A STRATEGY FOR BULGARIAN EDUCATION?

In recent months, there are obviously accumulating and escalating problems in every field - educational, economic, cultural. It is no coincidence that we put education first - because, in fact, education is the foundation not only for personal development, but also for the development of every state, of every nation. If there is something wrong with the education system, it inevitably affects all other systems. We often ask ourselves why we don't have luck with the government of the state - and the answer is so simple - because these are the people "produced" by our educational system. Of course, practice and many other factors have place here, but the main reason is in the foundation. And no matter how many strategies we produce, no matter how strategic frameworks we draw up, today it's more than obvious that we miss something, that we underestimate something, and another we overdo, and the big picture is distorted enough. But the word is about education. What we do well, what we lack to bring the system to such positions, of which it itself will not be ashamed, and the other systems will be grateful for the quality it creates in the face of each of its graduates. Even if we take only the last few important theses discussed in the field of education - 1) the duration of the school year at secondary schools (starting a school year, for example, on 7 September); 2) changing curricula and programmes, 3) bringing universities together, 4) a new methodology for assessing academic staff. Each of these topics requires independent consideration, but it is also important to consider them together, because they cause oppositions that have recently been decisive in the development of the system. There is hardly any thesis to unite and create a consensus with which to move towards a certain development. Moreover, there is a very key message in the Strategic Framework for the Development of Education by 2030, and this is "Education for Sustainable Development". Another question is how this definition is understood.

And if we really want to summarise, the four examples for discussion have a lot in common, and this is the crucial role of education in sustainable development. However, whether the way these are formulated, presented and discussed are reliable enough to identify them as belonging to education for sustainable development, fulfilling the objectives of the strategic framework, which form the quality needed for development in general.

Duration of education: the starting date of the school year is not determining (although we are adherents of tradition). It is more than crucial and important to have an appropriate structure of classes during the school year, a balanced allocation of time, the creation of an appropriate environment for teachers and students, maximum attention to the educational, rather than purely administrative procedures, structure and content of curricula and programmes. And all this, arranged by law and procedures, and not carried out in a piece by a minister or other responsible administrator. Undoubtedly, initiatives for changes in education are important, but given the conservativeness of the system and the complex relationships in the learning process /interdisciplinary, age, transitions of educational degrees/, any change must be well planned and implemented in accordance with the strategic documents. And in Bulgaria we have enough strategic documents. Good process management will not cause any disturbances or a long period of time for the

teacher and parent community to be taken away in discussions on whether and why to move the beginning of the school year.

Curricula and programmes are the most essential part of the standard-serving system, the development of which uses a huge expert resource that, unfortunately, is often changing but again in pieces, which leads to chaos, deficits and excesses that neither students nor teachers need. The continuous discussions, which establish the need for changes, the reduction of purely informational content, which shifts one main task of education, namely to educate and create thoughtful, creative personalities, often overflows from empty to empty. I.e. the main change should consist of setting a new common standard for curricula and programmes, which also includes requirements for expert staff entitled to participate in this procedure. In this case, neither the rules on matriculations and external assessments will change each year, nor will there be any ambiguities in which discipline what should be studied and what the result should be. The currently formalised attitude to this process has turned it into pure administration and transfer of close content to different standards. It is precisely to overcome this problem that the National Qualifications Framework was created, but it is applied with an understanding of each discipline and curriculum and its integration into the common learning process. The question of what, how and how much to study is fundamental, and here again we have to answer the question why the Institute of Education was closed, whose task is exactly to investigate, analyse and create, i.e., to organise this process.

Higher education is also no exception to attempts to manage in piecemeal and with sporadic changes. Perhaps one of the most changed laws is that of higher education. Despite the creation of other laws related to the development of academic staff, regardless of the available strategy for higher education, the initiatives to piecemeal change again present the academic community with ambiguities, challenges and discomfort. Again, we should not ask the question whether there are many or few universities in Bulgaria, but what these universities do and how they meet the national interests of the country and the main task of creating the necessary potential for the development of the country in accordance with the social economic changes in the world. We also should not forget that it is namely the higher education that should give the freedom to develop science, which is difficult to honour in everyday frameworks - today we do not need it, but tomorrow it suddenly proves to be extremely necessary. It's a top pilotage to run higher education and science, but not to administer it in a purely clerical manner as is often done. The proposal to unite universities is obviously part of an attempt to improve quality, but if it is made to stress the system, if it suggests how unnecessary universities are, or how much the academic community does not meet the requirements of the state, then it will not be effective and the result is already here. The same result was caused by the new methodology for the assessment of academic staff. In the presence of an independent law for the advancement of the academic staff and all other laws and regulations, to be decided that the academic staff will be subject to condition - either accept the proposal for a new methodology, prepared personally by the Minister, or the university remains without funding. It looks like a criminal procedure - here they do nothing at universities, so they don't deserve the money they get from the state budget. The measure is coercive and applies to the most free and democratic community. If all this is subject to requirements that are made taking into account all parameters of educational research tasks of universities, in no case will there be such a negative result as the reaction of the academic community. The scientometric indicators are important, very important, but in order to achieve these scientometric indicators, there are several factors that the state and the Ministry of Education and Science should have considered in a different manner - only two of them: a scientist can pay for a publication in a prestigious publication with an impact factor magazine - an undeniable fact! A foreign magazine, a private publishing house, yes, with great prestige, but now turned into a fetish. Can everyone do that? And do they have to do that? At the same time, how many of these prestigious impact factors affect our social development, the development of our regions, the formation of economic growth? Doesn't such a requirement become an internal circulating procedure for building ratings that are not actually real and in which other factors fade away? And they're not insignificant at all. And doesn't this raise again the question of downplaying our national priorities, national publishers, the quality of our Bulgarian education? Are we directing everything outside, and here remain those who can't, but there are also some who don't want to be like this? Because they have a different kind of responsibility to their country. Perhaps that is why it is often decided to send Bulgarian scholarship holders to prestigious foreign universities. That is, we clearly say - "our education does not work, so we will educate the best abroad." The sense of subordination of the system to external factors is very strong at the moment. There is no doubt that we need to compare with international standards, but everything needs to be sufficiently balanced and take into account all environmental factors. And here you have to take into account the age factor very carefully, because drastic changes in procedures sometimes say "who has been habilitated by now, ok, from now on - other rules". Yes, there are different categories of lecturers - some for years have not defended a doctorate, others who after a defended doctorate are not allowed further, third with little contribution but tolerated in their growth. But hasn't this been seen before? Has this not been part of many electoral and other developed programs

and strategies? When there is an imbalance, it inevitably affects, it can demotivate, disrupt relationships, discourage the system, and that means that we don't need either strategy, nor plans.

Measuring science and assessing the quality of education are complex processes. They are not ordinary measures and weights. We all know that there is absolutely nothing in this process. Neither reviews, which do not always correspond to principal criteria, nor juries, which are not always impartial, nor the targeting of plagiarism, which is not yet understood in substance. Sometimes in "high approaches" are hidden not very high goals. And at the core of everything is knowledge, cognition, and this must be valued not unilaterally, but multidirectionally. The more knowledge is shared, the more legitimate becomes the process of its assessment. If the rules are good enough, if no one does partial experiments, of which unfortunately we have seen enough over the past 30 years and many more "if", but this should suggest otherwise - every system needs systematic rather than adhoc management.

8. CONCLUSION

There is no doubt that there is an urgent need of a reform that would replace the dysfunctional and problematic autonomy. Undoubtedly, many of the policies in this area so far have not produced the best solutions, and even worse, the results are not of high quality. But this is exactly what requires the next reform to be designed to truly satisfy the regional development of the country and to do so with clear criteria that promote quality – with a clear and synchronized legal framework, accreditation policy, quality criteria for academic staff, which include along with scientific measurement indicators other important elements leading to the development of institutions and regions and many other steps in this direction. It is not possible to initiate such a reform without the participation of the academic community, local and regional authorities. No one should be afraid of public discussion, no matter how difficult it may be, if there are sufficient and reasonable arguments. Currently, such public discussion is almost non-existent or, if there is one, on a purely departmental basis (Terziev, 2021b; 2021c; 2021d; Terziev, Lyubcheva, 2022a).

The questions that need to be asked clearly and loudly remain:

- What basis was used to make this decision?
- Are there other alternatives to the consolidation of universities, which would bring administrative, technical and technological problems at all levels and at all existing structures? Unified structures located 500 km away, although in the digital age, will not be very easy to manage. It would be even harder to control them.
- What was and will be the role of the National Higher Education Card?
- How does this reform fit in with balanced regional development?
- Won't there be a similar result as from the closure of schools in certain regions?
- The management of megastructures, although very tempting, does not cause a concentration of power and resources, which the government in our country does not always do well.
- Which country of the European Union has implemented such centralization of higher education?

A number of other questions can be asked, and the answers will be part of the planned changes in the legislation related to higher education in Bulgaria.

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