

STATEMENT

by Prof. Dr. Ivan Todorov Todorov, PhD – Professor of Administrative Law and Administrative Procedure

on a dissertation for the award of the educational and scientific degree “**Doctor**” in the field of higher education 3. Social, Economic and Legal Sciences, professional field 3.6 Law, doctoral programme “*Administrative Law and Administrative Procedure*”

Author: *Hari Harutyun Hovagimyan*

Topic: “*Professional Organisations in Bulgarian Healthcare*”

Academic supervisor: *Assoc. Prof. Dr. Konstantin Vasilev Pehlivanov*

1. General presentation of the procedure and the doctoral candidate.

By Order No. RD-22-1463/22.07.2026 of the Rector of Plovdiv University “Paisii Hilendarski” (PU), I have been appointed a member of the scientific jury for the procedure for the defence of a dissertation on the topic “Professional Organisations in Bulgarian Healthcare” for the acquisition of the educational and scientific degree “Doctor” in: field of higher education 3. Social, Economic and Legal Sciences, professional field 3.6 Law, doctoral programme “Administrative Law and Administrative Procedure”.

The author of the dissertation is Hari Harutyun Hovagimyan – a doctoral candidate in independent study at the Department of Public Law Sciences, with academic supervisor Assoc. Prof. Konstantin Vasilev Pehlivanov, PhD.

The set of materials in hard copy submitted by Hari Harutyun Hovagimyan complies with Art. 36(1) of the Regulations for the Development of the Academic Staff of PU and includes the following documents:

- application to the Rector of PU for the opening of the procedure for the defence of a dissertation;
- curriculum vitae in European format;
- minutes of the departmental council concerning the report on readiness to open the procedure and the preliminary discussion of the dissertation, and an opinion of the academic supervisor;
- dissertation;
- abstract;
- list of scientific publications on the topic of the dissertation;
- copies of the scientific publications;
- report on compliance with the minimum national requirements;
- declaration of originality and authenticity of the attached documents;
- declaration of originality and of the results achieved.

The doctoral candidate has submitted 3 publications.

The doctoral candidate has impressive practical experience in the field of his dissertation.

2. Relevance of the topic.

The topic of the dissertation is fundamental and clearly relevant. In today’s world, an increasing number of persons and organisations are empowered, through their bodies, to issue administrative acts. Professional organisations in the field of healthcare issue some of the most significant acts in this sphere. Yet in Bulgaria there is no comprehensive administrative-law study in this area. At present, professional organisations face serious new challenges in connection with digitalisation and the application of artificial intelligence.

3. Knowledge of the problem.

The dissertation demonstrates in-depth theoretical and practical knowledge of the topic,

stemming from the doctoral candidate's practical experience and the substantial scholarly apparatus he has used.

4. Research methodology

The doctoral candidate combines a detailed analysis of each individual issue with a synthesis expressed in significant legal generalisations. He skilfully and coherently combines legal doctrine with extensive case law. He competently and comprehensively applies the various methods of legal interpretation – systematic, logical and grammatical. He employs detailed comparative legal analysis. A specific method is the empirical study conducted among representatives of the medical professions, which makes it possible to identify both the strengths and the weaknesses of the legal framework.

5. Characteristics and assessment of the dissertation and its contributions

The dissertation is distinguished by an excellent combination of in-depth analysis of the legal framework, the introduction of numerous practical examples and empirical research, and comparative analysis of the legal framework.

The work makes a number of significant legal contributions.

The author provides an exhaustive classification of the types of legal acts of professional organisations, establishing significant interactions between these acts. In this way, it is precisely determined to which acts a particular administrative-law regime may be applied. The author's concept of hybrid professional acts is particularly significant and clearly constitutes a contribution. The doctoral candidate substantiates the thesis that there are no sufficiently clear criteria for determining the legal nature of professional acts and, accordingly, the procedure for challenging them.

The author very successfully links his classification to the procedural rules under which the respective types of acts of professional organisations are challenged. This builds a coherent system covering the entire process of issuing and challenging each type of act of professional organisations.

The doctoral candidate convincingly defends the thesis that professional regulatory acts are an autonomous category of regulatory acts, the reference criterion being the fact that they do not derive from original state law-making competence.

I consider that the thorough comparative legal analysis, accompanied by legally significant conclusions, constitutes a very serious scientific contribution. This analysis is of exceptional importance for improving the legal framework governing professional organisations.

The author's study of how digitalisation in itself does not affect the protection of personal data in healthcare constitutes a contribution. The author very aptly defends the thesis that personal data protection is not capable of restricting digitalisation. The conclusion follows that digitalisation has the potential to provide an even higher level of personal data protection.

With very well-founded arguments, the author develops the thesis that the application of artificial intelligence in issuing acts affecting the rights and legitimate interests of medical professionals should remain under human control.

The empirical study conducted by the doctoral candidate constitutes a definite scientific contribution. This is something very rarely done in legal research. In this way, the Author identifies a number of significant problems in the legal framework.

The author's *de lege ferenda* proposals are a significant scientific contribution. The most significant proposals concern improving the legislative status of professional organisations, increasing transparency and oversight in the performance of their activities, and substantially improving the legal framework for digitalisation and the use of artificial intelligence.

I was unable to find any significant weaknesses in the dissertation.

Perhaps the author might consider whether *“regulatory acts of professional organisations should be regarded as a specific instrument of delegated public regulation which functions outside the classical system of state regulatory acts”*. Where, by express statutory delegation, a professional organisation issues a regulatory act, that regulatory act is an integral part of the system of regulatory

acts and, as an act in force, it is irrelevant who adopted it. According to §1, item 11 of the Electronic Governance Act (EGA), “*Persons performing public functions’ are ...and other persons and organisations through which the State exercises its functions and which have been entrusted with this by law.*” And according to §1, item 1 of the Administrative Procedure Code (APC), “*Administrative body’ is a body belonging to the system of the executive power, as well as any holder of administrative powers empowered on the basis of a law*”. In other words, by law the respective bodies of professional organisations are administrative bodies.

A purely technical remark – footnote number 155 (155. <https://lex.bg/laws/ldoc/2135180800>) refers to a legal act, whereas the dissertation discusses something accepted in legal theory.

The author could also reflect on the thesis that individual acts of professional organisations “*are close in their legal nature to individual administrative acts*”. In my opinion, they are individual administrative acts, not merely close to them. They are issued by persons on whom the law has conferred this power and they meet all the characteristics of an individual administrative act under Art. 21 of the APC.

These remarks can in no way affect my categorical and exceptionally high assessment of the dissertation.

6. Assessment of the publications and the personal contribution of the doctoral candidate.

The publications reflect the important contributions of the dissertation.

7. Abstract.

The abstract accurately and in detail reflects the main conclusions and proposals set out in the dissertation.

8. Recommendations for future use of the dissertation’s contributions and results.

The author’s recommendations and conclusions are extremely useful for both theory and practice, and the work should be widely disseminated among practising lawyers and the academic community.

CONCLUSION

The dissertation contains significant scientific contributions and **meets all the requirements** of the Development of the Academic Staff in the Republic of Bulgaria Act (DASRBA) and the Regulations for the Implementation of the DASRBA.

The doctoral candidate Hari Harutyun Hovagimyan **possesses** in-depth theoretical knowledge and very serious professional skills in the doctoral programme “Administrative Law and Administrative Procedure” and demonstrates the qualities necessary for conducting independent scientific research.

On the basis of the above, with full conviction I give my categorical ***positive assessment of*** the dissertation and ***propose to the honourable scientific jury to award the educational and scientific degree “Doctor”*** to Hari Harutyun Hovagimyan in the field of higher education 3. Social, Economic and Legal Sciences, professional field 3.6 Law, doctoral programme “Administrative Law and Administrative Procedure”.

30.09.2026

Statement prepared by:

Prof. Dr. Ivan Todorov