

REVIEW

By Prof. DSc. Darina Peeva Zinovieva, Plovdiv University "Paisii Hilendarski" concerning a doctoral thesis 'Professional Chambers in Bulgarian Healthcare' **by Hari Harutyun Hovagimyan**

Faculty of Law, Plovdiv University "Paisii Hilendarski"

area of higher education 3. Social, economic and legal sciences, professional field 3.6. Law /Administrative law and administrative process/, with scientific tutor Assoc. Prof. Dr. Konstantin Pehlivanov

1. General data

Doctoral student Hari Hovagimyan has a degree in dental engineering, bachelor's degree at the Medical University of Plovdiv. He then obtained a master's degree - a doctor of dentistry master's degree at the same university. He then graduated in law and obtained a master's degree in law from Plovdiv University 'Paisii Hilendarski'. Additionally, he holds a Master's degree in Health Management; he is a mediator, obtained that qualification at the Mediation Association, Sofia.

Hari Hovagimyan is a manager of a medical institution and at the same time is registered as a lawyer at the Plovdiv Bar Association. He is a lecturer in legal disciplines and health economics at the Center for Vocational Training at the Medical University of Plovdiv. He is an expert at the Plovdiv District Court and prepares expert reports for the needs of the judicial system. Hari Hovagimyan has been a doctoral student since 2025 at the Department of

Public Law at the Faculty of Law of Plovdiv University 'Paisii Hilendarski'. The work was discussed in the Departmental Council and proposed for public defence. The procedural order has been observed and the relevant scientific and metric indicators required by the applicable legislation have been met.

2. Assessment of the dissertation

The dissertation entitled 'Professional Chambers in Bulgarian Healthcare' makes a real contribution to both the doctrine and the practice of Administrative Law (special part - healthcare management).

My argument is that for the first time in the doctrine in unified content are analyzed in depth and in connection with all issues concerning professional chambers in healthcare that are established and operate on the territory of our country. Mainly the attention and focus is on the structure, creation and activity of the Bulgarian Medical Union and the Bulgarian Dental Union, given that they have largest number of members.

Very good is the historical review made by the author. Special attention is paid to the specificity, which is related to the establishment of the Bulgarian Medical Union - with a law, but in the case of the succession of a former active union at the beginning of the 20th century, which has interrupted its activities. After a period of absence of legal regulation, it is resumed through the analyzed law in the dissertation.

The author has made a very detailed and in-depth review of the historical development of the legislation on professional organizations, which acquires

a comprehensive idea of their nature and goals in separate periods, up to the present.

Next, a very good analysis was made of the functions of these organizations with regard to compulsory membership in the exercise of the profession, with a view to imposing disciplinary penalties as an expression of internal verbal control.

I consider as a contribution the analysis of the so-called 'ethical' responsibility that public health researchers have so far dealt with, but in such detail and specificity, the research by lawyers is only incidental.

Chapter Three is very well developed. In my view, this is the part containing the most significant contribution, since it analyses precisely the acts issued by professional chambers. It is also a contribution in view of the heterogeneous practice so far, for many years there were conflicting opinions on their status, as well as a number of important issues such as whether they are legal in nature, whether they are sources of law, whether they are issued through delegated powers, etc. The analysis in these details is very thorough and I consider the conclusions to be correct.

An author's contribution is Hari Hovagimyan's classification of what he calls 'hybrid' acts of professional organisations. It clarifies in detail the concept of a hybrid word act by presenting its features and commenting on the legal effect of issuing them.

It is precisely on the occasion of the dissertation study that the dissertation contains many good ideas, both of a practical and of a doctrinary nature.

Chapter Four contains an analysis of digitalization in healthcare and related , issues concerning the activities of professional organizations. Against the

backdrop of a mass of analyses and studies regarding digitization and electronicization in law, here the author Hovagimyan has focused his analysis on the NZIS system, ethical control and personal data protection. Special attention is paid to the protection of personal data, as in healthcare they have the legal characteristic of 'sensitive' data within the meaning of the GDPR, the Health Act and the Personal Data Protection Act.

All conclusions and suggestions are very well reasoned. I appreciate the author's assertion that human control in data processing should be overridden and that artificial intelligence should be used as an aid.

An interesting idea of the author is at the end of the work to include empirical analyses and statistics that illustrate his conclusions in the work.

In summary, the importance of the study and its depth should be highlighted. In addition to the analysis above, I add other contributing elements of the dissertation, such as the conclusions on the powers conferred on professional organizations by the public authority, the comparative analyses of European models of professional self-regulation in healthcare, the reflections on the public-corporate nature of this type of chambers, the importance of the activities related to the professional training of members, their participation in the conclusion of the National Framework Contract.

Specific proposals *de lege ferenda*, which I appreciate positively, are the following:

- the normative detailed definition of the concept and content of the status of professional organisations,
- the regulatory clarity for each administrative act issued by the professional organisation
- the precise analysis of the rules on reporting from their activities,
- the improvement and expansion of administrative services by electronic means.

Dissertation thesis is of high quality and value. There is no research on this scale. The author handles the Administrative Law matter and the matter in the Medical Law freely, binds it logically, consistently and precisely. The contributions are undisputed and, for these reasons, the entire dissertation should be assessed positively.

The author also presents three scientific publications, separate from the dissertation. I appreciate them positively and take into account their contribution.

In conclusion:

In view of the above, I give my **positive assessment** of the dissertation thesis 'Professional Chambers in Bulgarian Healthcare' by Hari Harutyun Hovagimyan. I believe that the requirements of the legislation have been met and I propose that the scientific jury award the scientific and educational "Doctor" to Hari Harutyun Hovagimyan in the area of higher education 3.

Social, economic and legal sciences, professional direction 3.6. Law
/Administrative law and administrative process/.

1.09.2026

Reviewer:

/Prof. DSc. Darina Zinovieva/