

To
The Chairperson of the Scientific Jury,
Appointed by Order No. RD-22-1463/22.07.2026
24 Tsar Asen Street
4000 Plovdiv

OPINION

by Prof. Momchil Stefanov Mavrov, PhD

Area of Higher Education 3. Social, Economic and Legal Sciences,
Professional Field 3.6 Law,
Professor at the Faculty of Public Health, Medical University – Sofia

Regarding: Dissertation thesis on the topic “*Professional Chambers in Bulgarian Healthcare*” authored by Hari Harutyun Hovagimyan **for the award of the educational and scientific degree of “Doctor” (PhD)** in Area of Higher Education 3. Social, Economic and Legal Sciences, Professional Field 3.6 Law, Doctoral Program “Administrative Law and Administrative Procedure” at the Department of Public Law Sciences, Faculty of Law, Paisii Hilendarski University of Plovdiv, with Scientific supervisor Assoc. Prof. Konstantin Pehlivanov, PhD.

DEAR MEMBES OF THE SCIENTIFIC JURY,

By Order No. RD-22-1463/22.07.2026 of the Rector of Paisii Hilendarski University of Plovdiv, I was appointed as an external member of the scientific jury in a procedure for the defense of the educational and scientific degree of “Doctor” in Area of Higher Education 3. Social, Economic and Legal Sciences, Professional Field 3.6 Law, Doctoral Program “Administrative Law and Administrative Procedure”. By decision of the scientific jury, I was tasked with providing an opinion in the present procedure.

1. Brief information about the Doctoral Candidate

Hari Hovagimyan possesses a rich interdisciplinary profile and significant academic preparation, combining higher education in dental medicine, law, health management, and economics. His professional practice encompasses many years of work as a doctor of dental medicine and manager of a healthcare facility, managerial experience in other sectors, as well as activity as a lecturer in legal disciplines, legal associate, and court-appointed expert. This broad theoretical and practical foundation provides him with deep expertise for successfully conducting scientific research in the field of public law sciences and healthcare management.

2. General remarks on the submitted materials

Regarding the admissibility of the procedure, Hari Hovagimyan has submitted all necessary documents. The presented abstract correctly reflects the structure of the dissertation and outlines the main contributions of the conducted research. It has been translated into English, traditionally used in this professional direction. In addition to his dissertation, the doctoral candidate has presented 3 scientific publications, thereby fulfilling the minimum national requirements. These scientific papers are directly related to the subject of the dissertation and reflect key aspects of its individual chapters.

Having reviewed the materials submitted in the procedure, I accept that the doctoral candidate meets the minimum requirements of the Development of the Academic Staff in the Republic of Bulgaria Act (DASRBA), the Regulations for the Implementation of the DASRBA, and the Regulations of Paisii Hilendarski University of Plovdiv.

3. General characteristics and evaluation of the dissertation thesis

The presented dissertation comprises **212 pages** and includes an *introduction, four chapters, scientific contributions, a conclusion, and a bibliography*. The work is of contributing value to Bulgarian legal doctrine, as it represents the first in-depth study of its kind dedicated to the legal status, competence, and acts of professional chambers in healthcare in the Republic of Bulgaria

The research is highly relevant, especially in the context of the intensive digitalization of healthcare, the implementation of the National Health Information System (NHIS), the advent of artificial intelligence (AI), and the need to strictly guarantee patient safety and personal data protection. The author successfully overcomes existing regulatory gaps and contradictions in practice, formulating valuable *de lege ferenda* proposals for improving legislation.

The structure of the dissertation is characterized by logical consistency, allowing for precise coverage of the multi-faceted activity of professional chambers, regulated in a number of special laws. The exposition is systematized, enabling a smooth transition between theoretical propositions, the analysis of positive law, and the critical evaluation of legal reality.

In the introduction to the dissertation, the author convincingly substantiates the relevance and significance of the chosen topic, precisely defining its object, subject, aim, and specific objectives. In support of the main objective, the candidate applies a synergistic methodology combining normative, historical, and comparative legal analysis, the examination of case law, and an independent empirical study among medical specialists

Chapter One traces the historical development of the subject matter under study and builds the concept of professional chambers as a distinct type of public-law corporation with compulsory membership, exercising delegated public functions. A contributing moment is the skillful combination of theoretical analysis with historical context, which is of particular importance for the author's substantiated thesis that the legal regime of professional chambers is imperatively determined by special laws, rather than by the general rules of the Non-Profit Legal Entities Act.

Special attention is given to the constitutional legal framework and the historical significance of compulsory membership through the prism of case law. A main contributing element of the chapter is the derivation and systematization of the essential characteristics of the organizations under consideration, thereby precisely distinguishing them both from state administration and from classic private-law associations.

Chapter Two is dedicated to a detailed administrative-law analysis of the public-law powers statutorily entrusted to professional chambers in Bulgarian healthcare. In it, the candidate subjects to a systematic review key functional areas – the maintenance of professional registers and the constitutive nature of membership, the exercise of disciplinary activity, the implementation of ethical responsibility and professional ethics, the organization and control over continuing professional development, participation in negotiating the National Framework Agreement (NFA) with the National Health Insurance Fund (NHIF), as well as operational integration into the National Health Information System (NHIS). The main scientific outcomes and contributions in this part of the work consist in proving the predominantly public-law nature of the assigned functions, which are exercised on the basis of statutory delegation in the public interest. The author argues the constitutive nature of registration as a legal filter for the legitimate practice of the profession, clarifies the nature of disciplinary and ethical proceedings, and substantiates continuing professional development as a public-law obligation aimed at reducing medical errors.

Chapter Three occupies a central place in the dissertation, subjecting to an in-depth legal analysis the concept, legal framework, classification, and judicial review of acts of professional chambers. In it, the author proposes his own definition of the concept of a “chamber's act” and builds a comprehensive classification of acts according to their legal consequences. Special attention is paid to the distinction between acts of professional chambers and subordinate legislative acts. A comparative legal analysis with European models is presented, along with a discussion on the increased influence of European Union law. On this basis, the main contributing results of the study are constructed. Of prominent significance is the understanding derived from case law that access to judicial review is determined by the actual legal consequences of the act and its external effect, rather than by its formal qualification or designation. This thesis is of exceptional value for the work, as it offers a clear legal criterion for differentiated judicial review and for ensuring legal certainty.

Chapter Four examines contemporary challenges facing professional chambers related to the digitalization of healthcare. In it, the author undertakes an in-depth analysis of the functioning of the NHIS, the application of electronic identity, legal guarantees in processing sensitive health data, and the potential entry of artificial intelligence (AI) systems in exercising ethical and administrative oversight. The exposition is enhanced by an independent empirical survey conducted among 222 medical specialists, which reveals serious structural and managerial deficits, low transparency, a crisis of trust, and a discrepancy between the normative model and the practical functioning of professional chambers in Bulgarian healthcare. Based on the analysis of the current framework, reviewed case law, and empirical survey results, the PhD student formulates a comprehensive and contributing set of proposals *de lege ferenda* for improving the legal framework.

At the end of his work, the PhD candidate sets out a standalone section in which he systematizes and formulates the scientific and applied outcomes of his overall dissertation. Such a structural approach deserves high praise, as it gives logical completeness to the study and conclusively highlights the contributing nature of the achieved scientific results. In this part, fundamental conclusions from the work are derived and proposals for updating current legislation are formulated. For its part, the conclusion of the dissertation provides a summary evaluation of the subject matter, successfully synthesizing the main findings, confirming the established aim, and proving the significance of the thesis defended by the author.

I consider that the presented dissertation entitled “Professional Chambers in Bulgarian Healthcare” possesses high value, is distinguished by originality and systematic analysis, and fully meets all requirements of the DASRBA, the Regulations for the Application of the DASRBA, and the relevant Regulations of Paisii Hilendarski University of Plovdiv.

The remaining scientific publications of Hari Hovagimyan are distinguished by the same scientific value and original approach, combining a clear formulation of the research questions, in-depth analysis, and specific proposals for improving the regulatory framework.

With a view to the future dissemination and publication of the research work, I strongly recommend that the author expands the systematized exposition in places into a smoother analytical text and integrates the graphically presented survey results with a deeper theoretical commentary.

To achieve higher precision in the scientific research, it would be useful for the cited normative acts and their terminology to be strictly aligned with the current regulatory framework, including reviewing references to internet resources of uncertain reliability.

I recommend that the doctoral candidate continues his research in the field and publishes his dissertation, given its unquestionable scientific and applied value for the activities of professional chambers.

4. Conclusion

In view of the above and considering the statutory requirements, I confidently give my positive assessment and propose to the scientific jury to award the educational and scientific degree of “Doctor” to Hari Harutyun Hovagimyan in Area of Higher Education 3. Social, Economic and Legal Sciences, Professional Field 3.6 Law, Doctoral Program “Administrative Law and Administrative Procedure” at Paisii Hilendarski University of Plovdiv.

30 September 2026

PROF. MOMCHIL MAVROV