

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

O P I N I O N

by Assoc. Prof. Dr. Mariya Valkova Hristozova, Medical University – Plovdiv, Faculty of Public Health, Department of Health Care Management, Field of Higher Education 3. Social, Economic and Legal Sciences, Professional Field 3.6 Law

Subject: 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 Program *"Administrative Law and Administrative Procedure"*.

Author of the Dissertation: Hari Harutyun Hovagimyan - PhD student in independent training at the Department of Public Law Sciences, Faculty of Law, Plovdiv University "Paisii Hilendarski"

Title of the Dissertation: "Professional chambers in bulgarian healthcare "

Scientific Supervisor: Assoc. Prof. Dr. Konstantin Pehlivanov

Reason for submitting the Opinion: Order No. RD-22-1463/22.07.2026 of the Rector of Plovdiv University "Paisii Hilendarski" and a decision of the scientific jury, taken under Protocol No.1 / 24.07.2026

DEAR MEMBERS OF THE SCIENTIFIC JURY,

By Order No. RD-22-1463/22.07.2026 issued by the Rector of Plovdiv University "Paisii Hilendarski", I have been appointed as an external member of the Scientific Jury in the procedure for the defense of the dissertation entitled "Professional chambers in bulgarian healthcare" for the acquisition of the educational and scientific degree „**Doctor**“ (PhD) in the field of higher education: 3. Social, Economic and Legal Sciences, professional field: 3.6. Law, doctoral program "Administrative Law and Administrative Procedure ".

I hereby present this opinion, having been commissioned by a decision of the esteemed Scientific Jury at its inaugural meeting (Protocol No. 1/23.07.2026), to prepare an opinion of the submitted dissertation for the acquisition of the dissertation and the accompanying set of documents.

I. Brief biographical data on the PhD candidate

Harry Hovagimyan has interdisciplinary and in-depth professional and academic training in the fields of medicine, law and economics. His education began with a degree in "Radioelectronics" at the Vocational Technical School of Electrical Industry - Plovdiv (1996-1998), then continued at the Medical University - Plovdiv, where he acquired a Bachelor's degree in "Dental Technology" (1999-2002) and a Master's degree in "Dental Medicine" (2010-2014). He subsequently upgraded his qualification by acquiring the 3rd degree qualification of a construction technician from the Center for Vocational Training "Construction and Architecture" in Sofia (2015). Hari Hovagimyan successfully completed a master's degree in "Health Management" at the Higher School of Agribusiness and Regional Development - Plovdiv (2017-2018), acquired a Master's degree in "Law" at the Plovdiv University "Paisiy Hilendarski" (2012-2018), as well as a specialization as a mediator at the Mediation Association (2020).

His professional experience includes managerial and practical work as a manager in the field of construction and architecture at "Emily 1881" Ltd. (2007), manager and dental practitioner at AIPDP "VITADENT 2010-Dr. Harry Hovagimyan" Ltd. (2010), legal associate at the "Angelova-Hovagimyan" law firm (2021), lecturer in legal disciplines and health economics at the Center for Professional Training at the Medical University - Plovdiv (2020), as well as an expert at the District Court - Plovdiv (2024).

The candidate has a broad professional profile, combining in-depth expertise in the fields of dentistry, law, healthcare and economics, which provides him with an excellent theoretical and practical basis for in-depth scientific research.

II. General description of the submitted materials

The candidate has submitted a full set of documents as required by the Development of the Academic Staff in Republic of Bulgaria Act (DASRBA), the Regulations for its Implementation and the Rules for the Development of the Academic Staff of Plovdiv University "Paisii Hilendarski". The abstract correctly and accurately reflects the main characteristics and results of the research, allowing to form a clear idea of its subject, goals, objectives, methodology, relevance of the problem being developed, scientific novelty and practical significance of the results obtained. The abstract is translated into English, traditionally used in the professional field. A reference to the PhD candidate's publications is attached to the set of documents - a total of 3, which meet the minimum national requirements.

III. Topicality and significance of the researched topic

The presented dissertation is dedicated to an extremely significant, current, fully disputable and at the same time debatable topic in the Bulgarian legal doctrine and practice – the legal nature, structure and functions of professional organizations in the field of healthcare in the Republic of Bulgaria. In the modern healthcare system, these organizations occupy a key place, but as far as I know, to date they have not been the subject of in-depth independent scientific research. The relevance of the topic is undeniable, especially in the context of the progressive development of science and technology, which requires precise definition of the role, functions, powers and responsibilities of all subjects in healthcare. The significance of the work is also deduced from the

clearly defined gaps and imperfections in the regulatory framework, for the overcoming of which justified proposals *de lege ferenda* have been formulated. Given the above, the dissertation deserves high praise, is distinguished by originality and contains scientific and applied scientific results of a contributing nature.

IV. General characteristics and evaluation of the dissertation work

The dissertation work has a total volume of 212 pages, includes a table of contents, an introduction, four chapters, scientific contributions, a conclusion and a bibliography. The structure is logical and consistent, allowing to cover the diversity of the functions of professional organizations regulated in various normative acts. The exposition is very well systematized, with the individual parts building a logical connection between the theoretical statements, the analysis of the current law and a reasoned critical assessment. The bibliography lists a number of sources from the Bulgarian and international doctrine, which the PhD candidate has thoroughly researched. The 215 footnotes included ensure a reliable scientific apparatus and objectivity of the study.

The introduction defines as the main goal of the scientific research the implementation of a thorough legal review and analysis of the current legislation and public law aspects in the formation, functioning and future development of medical professional organizations in the Republic of Bulgaria. To achieve the stated goal, the PhD candidate has clearly and precisely formulated the relevant scientific tasks. The dissertation work uses general and special methods of scientific research, which are applied adequately. Particular attention is paid to the legal nature and administrative-legal status of professional organizations, the nature of the public powers exercised by them and the legal regime of their acts. The organizations of various medical specialists, established as non-profit legal entities, as well as the legal liability of professional organizations and their members, professional control, issues of ethical responsibility and deontology are examined in detail.

Chapter one presents a precise and comprehensive overview of the historical development of professional organizations in the Republic of Bulgaria, which provides the necessary basis for understanding their contemporary status. The systematized overview of the regulatory framework and its evolution enriches the legal doctrine and has a **contributing character**. The central place in the study is occupied by the analysis of the legal essence of professional organizations as special public law structures, which are distinguished both from ordinary non-profit legal entities and from classical state bodies. This part of the work is of a pronounced **contributing character**, since the candidate successfully builds a theoretical model for distinguishing professional organizations and clarifying their place and role in the contemporary public law system.

As a **scientific result**, the comparative law analysis of the current positive law regarding the status of the Bulgarian Medical Association, the Bulgarian Dental Association, the Bulgarian Pharmaceutical Association, the Bulgarian Association of Healthcare Professionals and other professional organizations stands out, which clearly shows the differences between statutory professional organizations and those established as non-profit associations. In this regard, the candidate skillfully derives modern definitions of the concepts of "professional organization" and "regulated profession", which are of essential importance for the correct interpretation and application of the regulatory framework.

Chapter two is dedicated to the functions of professional organizations, their bodies, registration and membership, continuing education and other important issues on the topic. Particularly valuable is the developed comprehensive systematization of the activities of the

organizations under study - registration, disciplinary, ethical, educational and contractual activities, as well as the clarification of their importance for the regulation of the profession. The presented comprehensive review of the specific powers, legal framework, current problems and weaknesses of each professional organization (including contractual relations with the NHIF, disciplinary liability, regional imbalances and staff shortage) is distinguished by its **scientific and applied nature**.

Chapter three has fundamental importance for the subject of the scientific research and from a general theoretical point of view is distinguished by **significant scientific value**. The systematized review, analysis and classification of the various types of acts of professional organizations, including their codes of ethics, show the diligence of the PhD candidate to cover all aspects of the topic and has a marked contribution. The presented differentiation of the acts of professional organizations and their delimitation by specific features have **significant scientific value** (e.g. professional normative act and by-law normative act, acts of national and regional bodies of professional organizations). The comparative legal review of professional normative acts and by-law normative acts with those from the systems of Germany and France should be highly appreciated. The analysis of judicial control over the acts of professional organizations has broad practical applicability.

Chapter four examines the digitalization of professional organizations in the context of modern processes of e-government and transformation of healthcare. In its entirety, this part of the work has a **pronounced contribution**, as it contains an analysis of important topics for modern healthcare, such as: the development of e-healthcare, the functioning of the National Health Information System, the role of electronic identity, the application of artificial intelligence in the healthcare sector and the protection of personal data in the context of digitalization. I support the conclusion of the PhD candidate that the current normative and organizational model of professional organizations in healthcare lags behind the pace of digitalization and e-healthcare, which requires adapting the legal framework to increase administrative and professional efficiency.

The PhD candidate's approach to conduct empirical research through a questionnaire survey among medical specialists from different professional fields is interesting. The results obtained provide an objective assessment of the functioning of professional organizations, the level of trust in them, the effectiveness of control mechanisms and the need for legislative changes. In this way, the theoretical analysis is supplemented with practical data, which serve as a basis for formulating conclusions and proposals for updating the legal framework. The presented critical analysis of the current legislation is distinguished by a pronounced **contribution**.

At the end of the chapter, reasoned proposals *de lege ferenda* are presented for improving the legal framework regarding mandatory membership, disciplinary proceedings and the interaction between state institutions and professional organizations, which testifies to the applicability of the PhD candidate's theoretical conclusions.

The dissertation ends with a conclusion that correctly summarizes the scientific results.

The remaining publications of the PhD candidate also contain **contributions and practical and applied results**.

No evidence of plagiarism or unlawful appropriation of third-party authorial works has been established, nor have any plagiarism alerts been filed.

V. Critical remarks and recommendations

I have no critical remarks concerning the content of the materials submitted in this procedure. I recommend that the PhD candidate popularize the results obtained and the proposals *de lege ferenda*

by publishing a monograph that will contribute to enriching the knowledge of the academic and professional community.

VI. Conclusion

The submitted dissertation entitled "**Professional chambers in bulgarian healthcare**", **authored by Hari Harutyun Hovagimyan**, contains scientific, applied-scientific and practical results that represent an original contribution to science and satisfy all requirements of the Development of the Academic Staff in Republic of Bulgaria Act, the Regulations for its implementation and the respective Rules of Plovdiv University "Paisii Hilendarski". The PhD candidate Hari Harutyun Hovagimyan possesses in-depth theoretical knowledge in the field of administrative law and the administrative process, combined with an analytical view of the legal framework and the ability to conduct independent research.

On the basis of the above, I conclusively render my positive evaluation of the submitted dissertation and propose that the honourable scientific jury award Hari Harutyun Hovagimyan the educational and scientific degree of Doctor in the Higher education area 3. Social, Economic and Legal Sciences, Professional direction 3.6 Law, doctoral program "Administrative Law and Administrative Procedure".

16.09.2026 г.

Prepared the opinion:
(Assoc. Prof. Dr. Mariya Hristozova)