Reimbursable Advisory Services Agreement on Public Expenditure Review in Science, Technology and Innovation and Support for Building Evidence-based Approach for the National Strategic Framework in Education 2030

PILLAR 2: Support for Building an Evidence-Based Approach for the National Strategic Framework in Education 2030

Early Childhood Education and Care, General Education, and Inclusion: Situation Analysis and Policy Direction Recommendations

BG05M2OP001-4.001-0008 "Provision of information and publicity activities of the Operational Programme Science and Education for Smart Growth, evaluations and studies of Operational Programme Science and Education for Smart Growth and preparation for the next programming period" under priority axis 4 "Technical Assistance" of the Operational Programme Science and Education for Smart Growth"

WORLD BANK GROUP

Bulgaria Early Childhood Education and Care, General Education and Inclusion

Situation Analysis and Policy Direction Recommendations

EUROPEAN UNION
European Structural and Investment Funds

OPERATIONAL PROGRAMME
SCIENCE AND EDUCATION FOR SMART GROWTH

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ABBREVIATIONS AND ACRONYMS

AES	Adult Education Survey
CPD	Child Protection Department
CPD	Continuous professional development
CPSA	Compulsory pre-school age
CSA	Compulsory school age
CVET	Continuing Vocational Education and Training
CVTS	Continuing Vocational Training Survey
DSA	Directorate for Social Assistance
EASA	Executive Agency for Social Assistance
EC	European Commission
ECD	Early childhood development
ECEC	Early childhood education and care
EQF	European Qualifications Framework
ESL	Early School Leavers
ESIF	European Structural and Investment Funds
EU	European Union
EUMS	European Union Member State
GoB	Government of Bulgaria
ISCED	International Standard Classification of Education
ITE	Initial teacher education
LLL	Lifelong Learning
MES	Ministry of Education and Science
MH	Ministry of Health
MLSP	Ministry of Labour and Social Policy
MRDPW	Ministry of Regional Development and Public Works
MS	Member State
NAVET	National Agency for Vocational Education and Training
NP	National program
NPDE	National programs for development of education
NSI	National Statistical Institute
OP	Operational Program
OPSESG	Operational Program for Education and Science
PSEA	Pre-school and School Education Act
RDE	Regional Department of Education
SABER	Systems Approach for Better Education Results
SES	State educational standards
SLP	System level project
STEM	Science, technology, engineering, and mathematics
SRPELES	Strategy for Reducing the Proportion of Early Leavers from the Education System
UNCRC	United Nations Convention on the Rights of the Child
UNESCO	United Nations Educational, Scientific and Cultural Organization

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UNICEF	United Nations Children's Fund
VET	Vocational Education and Training
WB	World Bank
WHO	World Health Organization

Executive Summary

This Report was prepared under the Reimbursable Advisory Services (RAS) Agreement of February 12, 2020 (effective as of June 10, 2020), signed between the International Bank for Restructuring and Development (The World Bank) and the Ministry of Education and Science of the Republic of Bulgaria with registration number "Д01-69/12.02.2020. The RAS is designed to support two activities: (1) Public Expenditure Review in Science, Technology and Innovation and (2) Building Evidence-based Approach for the National Strategic Framework in Education 2030. This report is under the second activity and part of the situation analysis of the education system.
It focuses on **Early Childhood Education and Care, General Education and Inclusion.**

The analysis is aiming to inform the draft Strategy for Education 2030 and the drafts on 2020-2027 ESF Operational program for education and MES operational instruments as National Programs for Development of Education (NPDEs). The analysis covers:

- three policy areas addressing directly preschool and its wider ECEC context; (i) a review of key policy outcomes and trends by bringing both national and international evidences; (ii) a review of the 2014-2020 strategic tasks and goals addressing preschool and (iii) analysis of the mix of instruments implemented by MES to address developmental goals and systems needs in preschool in Bulgaria.
- general education and the most recent policies introduced to address key challenges: (i) access, especially early school leaving challenges and the gap between big urban- cities, small urban-towns and suburbs, and rural areas, (ii) standards and quality, mainly flagging curriculum implementation challenges, learning outcomes and teachers' competencies; (iii) equity, discussing vulnerable schools and the GoB efforts to support them; and (iv) relevance of skills for productivity, including the importance of incentives to motivate both teachers and students.
- Recommendations deriving from each of those analytical areas have been proposed.

Overall, the Bulgarian education system has been through a transition and continues to be modernized. New policies have been enacted and programs have been implemented to overcome challenges associated with both schooling and learning. Specifically, the government has been proactive in laying out the foundations and enabling policy conditions to strategically improve outcomes in preschool and general school education for all children.

The Government of Bulgaria (GoB) introduced several measures to provide socio-economic support during COVID-19 and make necessary adjustments in the education sector. The Bulgarian education system faces several specific challenges from before the pandemic, like lack of adequate sanitation, access for disabled students, guaranteeing standards across provision (rural/urban), high drop-out rates especially in rural areas, and overcrowding in schools and classrooms in urban areas. Even though Bulgaria has widespread internet connectivity in the context of the pandemic, other enabling foundations for remote learning, such as basic digital skills and electronic devices for students, teachers, and parents, are limited. Additional challenges include the large number of parents who work and face difficulties keeping their children at home if schools are closed. Some of the measures introduced included the "hot lunch program", financial assistance for families with children, specifically for education, the purchase of electronic devices, and enhancement of connectivity.

The main elements transversal to the Strategic Framework for the Development of Education, Training, and Learning in the Republic of Bulgaria (2021 - 2030) developed by the Ministry of Education and Science are the inclusion of vulnerable students and the use of evidence-based decision to invest smartly and efficiently in learning. The strategic vision for Bulgarian's Education 2030 reflects the importance of investments in creating core competencies and socio-emotional skills that lead to literacy

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and proficiency in the areas that are needed by society and the economy. Various parts of the system need to be aligned toward learning, and this may require important commitment across stakeholders.

Pre-school education has a long tradition in Bulgaria with a developed network of state providers, established standards on workforce and school readiness, while other child development aspects are less recognized as direct preschool outcomes. The new concept of pre-school (PSEA 2016) is focused on childcare and school readiness and the SES on pre-school education refer also to results related to the emotional and social development. Yet, legacy from the past, also focusing on subject oriented knowledge and related skills, remains. Learning through play is promoted as a key approach on stimulating early-learning but still the system is away from introducing child development and early-learning monitoring and lags behind pre-school systems that focus efforts on benefiting from child progress data to inform both pre-school- and school-stage development.

Broader ECEC and preschool policies are not well aligned and are still developed and delivered as separate, sector-defined interventions. A content-related coherence between the provision of nursery care and pre-schooling is still weak, if any, although most of the nursery groups are situated in kindergartens, which by default are pre-school institutions. Various ECEC institutions and services function under different sector specific legislations and within sector-demarcated administrative structures and financial provisions. Overall, Bulgaria needs to strengthen the coherence between concept and practices across the different ECE provisions.

Successive reforms promoting equity and preschool participation have been introduced as political and national priorities, but Bulgaria is still challenged to meet the EU 2020 goals on education coverage and drop-outs. In parallel with successful reforms that closed institutionalized residential care for vulnerable children[1], the GoB gradually introduced compulsory preschool for five and six years old (adopted in 2010, fully enforced from 2012[2]) and for four years old (2020). Those key steps in education reforms have been aligned with transition periods to support local provision and with marginal attempts to diversify provision modalities. While overall the capacity of the system is balanced with isolated needs for pre-school places in big cities and the capital, Bulgaria is still challenged to ensure coverage of preschoolers at similar rates as EU and is still lagging behind the goals set. In addition to methodological issues related to data collection and tracking of preschoolers, a key challenge that has been systematically addressed through specialized policy investments, is to establish a sustainable set of services addressing the needs of economically marginalized and culturally specific populations as Roma.

In the context of this universality of the approach for pre-school, affordability of the preschool services emerges as a pertinent financial burden and as a conceptual contradiction, especially for specific groups of the population, that become more exposed by the current epidemiologic and economic crisis. A key financial distinction between universal public pre-school and school education is associated with the co-payment approach applied for preschool provisions, accepted by Bulgaria's financing policy, regardless of unsatisfactory coverage outcomes and concept disbalances, as an appropriate approach contributing to universality goals. Municipalities (in their role of providers) are traditionally allowed to charge fees for the non-compulsory stages (2 and 3 years old) and "maintenance or care" component of the service[3]. Variations of kindergarten fees range broadly between municipalities directly confronting the equity policy flagship reforms. While typically, the municipal rules envisage reduced fees for certain categories of

1 And promoted foster care and community-based services that are close to family-environment.
2 § 9. Of the transitional and Final Provisions of the People's Education Act (abolished).
3 To remind: the fee charged by the municipal kindergarten compensate most of all for the costs of the meals received by children in the kindergartens. Fees might contribute also to costs for 'overheads, provided environment for recreation and games' as specified in the court practice. see the section on Dimensions of Access and Equity.

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vulnerable children or parents[4], specific vulnerable groups are pushed back due to affordability constraints. Bulgaria has tackled this through a bridge financing (ESF) without a clear stated vision on how this discrepancy will be further addressed. In the context of financial instability, MES will have to consider (i) merging EU and national funds to address the socio-economic aspects of this unbalanced policy approach and (ii) updating and renovating the overall concept and implementation approach for the existing social support packages addressing families with children.

To secure the provision of standards and to promote competence-based learning goals for education, MES introduced variety of changes aiming at stimulating workforce professional development but restrained to match those efforts with result-oriented monitoring that address classroom practices, needs and curriculum implementation. Workforce in preschool has progressively become younger than in school education and is demonstrating specific needs that the continuous professional program design is still not recognizing. While MES increased investments in workforce continuous professional development, the programs haven't been linked to results-oriented models that reinforce the attention to classroom level application allowing for a superficial attention to inputs – number of people, number of trainings, number of trainers, potential number of students' coverage – that do not address the ambitious goals stated by MES on education reform.

National programs for development of education are under-recognizing the specificities of preschool education and will need to be better aligned with preschool needs where specific goals should address specific targets and vision for preschool education. Currently preschools are eligible for unproportionally lower than the schools NPDE funds and the administrative efforts to access national reform/innovation funding seem inadequate for the scope and amounts offered.

To follow its vision and address current needs, Bulgaria will critically depend on EU funding contributions that need to address both existing challenges but also contribute to key policy development zones. The financial trends are demonstrating that limited national funds are being engaged for reform-oriented investments (National Programs for Development of Education and similar national instruments) and that the ESF instruments (operational programs) are providing a nurturing platform for systemic interventions that address policy tasks in their complexity. The pre-school policy mix has been gradually extended mostly by adding pre-school modules to school-designed interventions (especially within NPDE) but this approach cannot be sustained since the preschool education needs to grow out of the shadow of the school one (both in terms of funding and conceptualization). The first pre-school designed system level intervention (OPSESG), Active Inclusion in the Pre-school Education System (2019-2021), has been an important breakthrough and MES needs to follow that approach to secure sustainable and system level impact investments.

Existing challenges related to enrolment in pre-school education affect retention and completion in general education. Participation in general education in Bulgaria has been declining in recent years, and the high share of Early School Leavers (ESL) and out-of-school children and adolescents is of concern. In 2018 net enrolments in secondary education were at 86 percent, and ESL increased from 12.5% in 2013 to 13.9% in 2019. Many East European countries have not achieved their ESL national targets set for 2020, including Bulgaria. This is the best argument for continuing the development of policies, programs, and actions to tackle ESL and achieve the target in the long term with three conditions: investing early, better targeting and integrated interventions.

4 The example could range from reduction of the fees for siblings/twins, to orphans, to foster children to children to children of parents with disabilities/reduced labour capacity or parents with very low incomes.

The education system has made progress in recent years in key areas such as curriculum, funding, recruitment and teacher training, and digital learning. However, the positive results did not have the expected pace of improving education quality and equity and reached unevenly different levels of education.[5] Thus, the share of children at risk of exclusion who are underachievers, who are not attending or even dropping education s continues to be a significant challenge in primary and secondary education. Especially children coming from socio-economically disadvantaged areas, Roma children and those with disabilities and/or SEN have significantly lower chances of successfully completing compulsory education and accessing higher levels of education; this state of affairs has a substantial long-term effect, both individually and socially, affecting Bulgaria's economic development potential.

Initiatives tackling the digital divide and bringing innovative teaching practice into reality continue to be implemented but need more systematic investment and integrated strategy. The number of digital devices used in classroom education (such as laptops, computers, video projectors, cameras, and smartboards) is still lagging other European countries and mechanisms to ensure its utilization in instruction and improved learning are not universal. On average, in all ISCED levels, schools have around two times lower chances to be highly digitally equipped and connected than the European average (European Commission, DG CNECT, 2019). Specific investments of local Government helped some schools to be better equipped for using digital technologies in learning. At the same time, high-speed connectivity has a slightly higher share at all ISCED levels than the European average. However, there are high differences among schools, as most local governments do not have the means to support investment programs in education, and national programs are developing at a slow pace. Therefore, innovative practices used for teaching result from rather specific initiatives of teachers or schools, rather than an outcome of specific national programs/policies. As in the case of student's views on various digital competences, the outcomes of the national report concerning schools with strong policies and strong support to use digital technologies in teaching and learning and promotion of professional development need to be considered with care (European Commission, DG CNECT, 2019).

The increased achievement gap and learning loss due to the current pandemic can cause long lasting effects if not tackled systematically in the new strategic framework. Students who fall behind in education will be demotivated and at a higher risk of dropping out of school. The loss in household incomes due to COVID-19 will also test households' ability to keep students in school, increasing out-of-school youth, and hindering the transition to post-secondary education. Hence, Bulgaria needs to protect education spending, ensure remediation to recover learning losses, prevent student dropouts, expedite the digital agenda, more focused professional development, and invest in building a resilient education system for other crises in the future.

An inter-institutional program to address the growing number of out-of-school children and adolescents was created. According to UNESCO the most significant increase occurred among children of primary age education. While in 2010, only 450 were recorded out of school, in 2018 this figure went up to almost 40,000. Data from the MES points out to even higher figures, and in July 2017, it announced that 206,378 children and adolescents aged 5 to 18 are not enrolled in school (including drop-outs). The MES-lead response of more than 1,300 local teams carried out home visits and enrolled for first time 52,104 school-aged children, out of witch 2,386 dropped out again. Overall MES reports 2,6732 children reintegrated in the system. The economic shock created by the current pandemic can increase the school dropout rate in the medium term, particularly for disadvantaged students, so these mechanisms should be enhanced and strengthened. A key lesson learned from the system in place, setting it up as a multi-sectoral integrated local team was critical for success. In response to the pandemic MES introduced a series of responses addressing

5 Although the students following the new curricula have not yet graduated and no complete set of data from national examinations is available (there is for grade 7) the available data, also from international studies allows to reach such conclusion.

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the most vulnerable to distance learning[6]. Further improvements could be introduced to the engagement of parents and the local community in working with local teams, reconsider a compliance approach, introduce incentives and rewards, provide remedial support and strengthen the socio-emotional skills for these students.

Students in Bulgaria leave school early for various reasons, including personal, family, school, and social factors. ESL is often linked to parents abroad' mobility, trans-frontier work that is hard to be recorded, or other seasonal work. There is a consistent gap between big urban- cities, small urban-towns and suburbs, and rural areas, and persistent inequality between cities, towns, and rural areas. Some progress can be noted in the last years. The gap between ESL rates in cities and rural areas decreased from 26 percent in 2014 to 16 in 2019, mainly due to the introduction of EU funds under education related OPSESG projects. There is also a high variation and disparities among regions, and demographic factors, such as migration, aging, and low-birth rates further complicate the picture as the economic activity is limited; living standards are low, areas socially decline, and education starts to be seen as unattractive. In addition, lack of data exchange among the Member States on continuity of education abroad makes children be considered dropout from a national system.

The Harmonized Learning Outcomes indicator (combining PIRLS and PISA outcomes) shows that Bulgaria performs above the expected, given its income level. This is because of the strong learning outcomes at the primary level in comparison to countries with similar income, as evidenced by PIRLS and TIMSS. The 2018 PISA results demonstrate high shares of underachievers, 47% in reading, 44% in natural science, 47% in mathematics, and 32% of low achievers in all three subjects, far from the strategic target set at the national level. Systemic responses, in addition to curriculum changes, need to be addressed to resolve learning challenges. Such interventions may be the provision of additional educational support for children and students provided as part of the education package or increased value of National Programs for Development in Education. Still Bulgaria is behind EU comparators on Learning Outcomes and the latest TIMSS 2019 results show a decrease in performance

Repetition rates and the results of students' regular assessments (at classroom level) are additional data sources for analysis of the students' existing level of competencies. However, data needs to be combined with the students' other characteristics to better target support measures. Teachers need to be more supported through training, mentoring, and coaching programs to understand how to create and manage learning contexts that can develop and adequately assess the specific competencies indicated in subject syllabi.

A mapping of workforce dynamics[7] and needs led by DG Reform, MES and the World Bank highlighted the need for better aligned policy addressing both ageing and qualification investments directly addressing learning needs. In Bulgaria, teachers above 55 years old accounts for more than one-third of the total teaching population at this level in 2018/2019, a sharp increase from 2007/2008, and students aiming to become teachers, enrolling in a pedagogy program have a lower GPA than the average GPA of all general/specialized pedagogy tracks. The minimum salary for teachers has been increased starting in 2019 and under EU-funded project it was possible to have fee reimbursed for teachers training. However, a clear assessment mechanism for the graduates of pedagogical tracks must successfully measure the key competencies acquired and required to start their teaching career.

[6] Free access to technical devices; free access to electronic content through establishment of free Wi-Fi connection for families with low socio-economic status; amendment in the regulation for school funding allowing the school budget to cover expenses for internet access to students; engaging the social workers and mediators in support activities to students that do not have access to electronic learning through distribution of teaching materials and maintaining communication between the school and the family.

7 Bulgaria Teaching Workforce Policy Note and Recommendations.

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Regarding inclusion, in 2018, MES, for the very first time, allocated nearly 12 million EUR (24 million BGN) for schools and kindergartens to work with children and students from vulnerable groups[8]. In 2018, funds were provided only for children in preschool and primary education while in 2019 secondary students were added. This new approach for the state budget financing is systemic and not project-based, after consultations with families, organizations, institutions that work with vulnerable students.

Introducing per capita financing and providing an adequate budget for education allowed Bulgaria in the last years to prevent further increases in the inequality learning gap. Compared with neighboring east European countries, Bulgaria is investing around 4.1% of the GDP in education at the upper level of the scale, spending more than Romania, Greece, or the Check Republic.

Institutional capacity development and accountability of both preschool and school institutions has been introduced as a concept, but the system needs to establish strong systemic plan on institutional level support, management and accountability policies. MES learning accountability policies seems to be underdeveloped and relying on the external evaluation introduced by PSEA (external Inspectorate on Education). In the same time the system functions in accountability and institutional developments needs improved focus and efforts to contribute to competence-based learning ambitions. MES will have to introduce practices that strengthen leadership programs, institution level support, and start to build a clear concept on how to operationalize the PSEA regulations for result-based funding. The 2018 World Bank proposals and operational proposals (following RAS on School Value Added Measurement) are still relevant for Bulgaria as the system has not invested in any specific steps to address institutional support and accountability policies.

Bulgaria has many of the components of a monitoring and evaluation system in place, but gaps and limited usage could be addressed. The National Electronic System for Preschool and School Education (NESPSE-НЕИСПУО) is used for collecting on schools, kindergartens, and personal development support centers. However, there are important data gaps. Attributes related to ethnicity/minority, especially Roma, student family income, disabled students in mainstream schools, education infrastructure status and characteristics, vulnerable schools, and vulnerable students should be collected. These attributes are important in monitoring learning outcomes, in performing impact analysis that can show attribution of specific interventions and programs with specific results. Furthermore, most data collected remains closed, and policymakers do not yet utilize data to the fullest for decision making.

8 Standard for Financing, art. 52a

Introduction

This Report was prepared under the Reimbursable Advisory Services (RAS) Agreement of June 10, 2020, signed between the International Bank for Restructuring and Development (The World Bank) and the Ministry of Education and Science of the Republic of Bulgaria with registration number "Д01-69/12.02.2020. The RAS is designed to support two activities: (1) Public Expenditure Review in Science, Technology and Innovation and (2) Building Evidence-based Approach for the National Strategic Framework in Education 2030. This report is under the second activity and part of the situation analysis of the education system. It focuses on **Early Childhood Development, General Education and Inclusion.** It reflects comments of MES and EAOPSESG received as of February 25, 2021.

The World Bank Systems Approach's assessment methodology was used to make a structured diagnostic of the education system and assess its orientation and ability to achieve the intended national goals over the cycle of the last education strategy and operation program. It covers the strategy and policy framework for each subsector, articulating both EU-wide objectives and Bulgaria's main strategic direction. It examines the principal dimensions that, together, determine the performance of the system in relation to access and completion; equity; quality and relevance; and financing and governance. The analysis concludes with a discussion on past, current and future EU-financed support to the sector. The chart below describes the framework for the assessment. Overall, the diagnostic is based on:

1. Review of outcomes based on the results framework of the previous strategy and assess what was and was not achieved. This will include gaps analysis, relevant comparisons, efficiency and returns on investments, perceptions,
2. Review of effect of new policies and public actions during the last decade and its ability to enhance the enabling conditions to improve education system outcomes.
3. Systematic review of programs and investments and its implementation strategies during the life cycle of the strategy and the OPSESG 2014-2020. This review will investigate program formulation, indicators identification and utilization, monitoring and evaluation methods and processes, measuring of program impact on beneficiaries during the life of the process, improvement processes, assessment of implementation process at the different levels.
4. Identifying factors associated will progress or lack of it, provide lessons learned, and policy recommendations.

The methodology of investigation and analysis behind this report include: relevant policy documents, strategic frameworks, operational program, relevant progress reports, studies and papers; interviews with local experts, focus groups and technical discussions with experts in the ministry of education and the executive agency; program evaluation and impact assessment (goals, processes, outcomes) documents based on available information; assessment of relevant political economy dimensions and organizational commitment.

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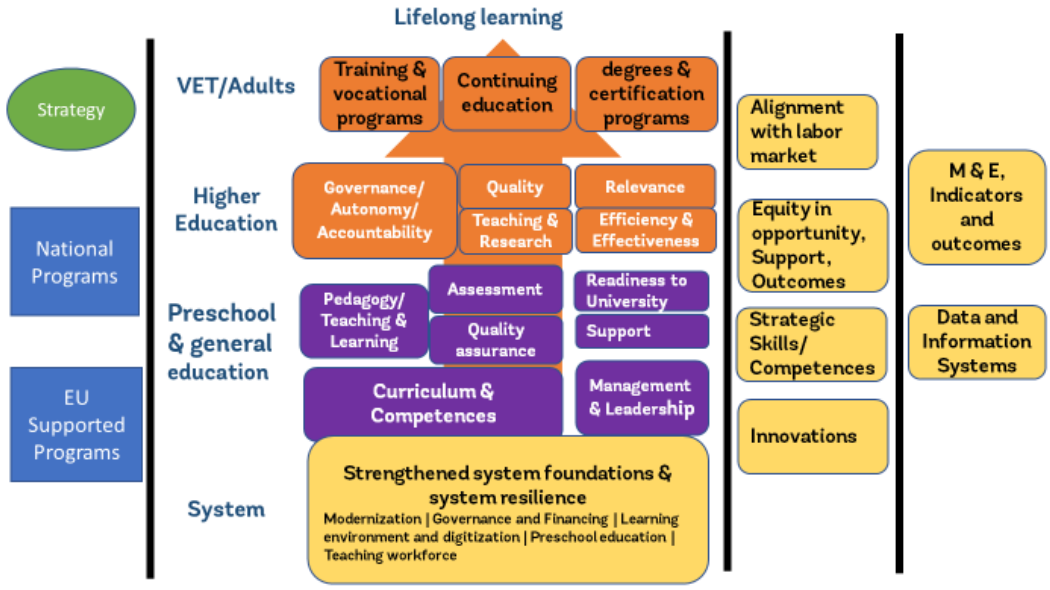
Figure 1 Analytical conceptual framework for the assessment of the education system in Bulgaria



Country context and COVID19 Developments

Bulgaria entered the European Union (EU) in 2007 and was consequently affected by the region's economic crisis in 2010-2012. However, GDP growth has picked up since 2014 and accelerated to 3.7 percent in 2016-18, due in part to a dynamic export sector which took advantage of improving external conditions and an expanded share in global trade. In 2019 it stood at 3.4%. Bulgaria features a young, energetic local private sector that successfully competes internationally in machine-building, automotive parts, information technology, and outsourced business activities. According to the updated International Monetary Fund (IMF) forecasts from April 2020, due to the COVID-19 outbreak, GDP growth is expected to fall by 4% in 2020, and pick up to 6% in 2021, subject to the post-pandemic global economic recovery.

Traditionally an agricultural country, Bulgaria shifted to a considerably industrialized country. The agricultural sector only accounts for 3.6% of GDP and employs 7% of the workforce (World Bank, 2019). The main crops are sunflowers, tobacco, and wheat. The industry represents 23.8% of the GDP, and 30% of the workforce is employed in the industrial sector, estimated to contribute to 14% of GDP (World Bank, 2019). However, the most dynamic sectors are textile, pharmaceutical products, cosmetic products, mobile communication, and the software industry. The tertiary sector has more than doubled its contribution to the country's economy since 1990, accounting for 59.2% of the GDP and employing 63% of the workforce. Tourism is one of the fastest-growing sectors, with more than 9.3 million tourists visiting the country in 2018, accounting for 11.7% of GDP and 11% of total employment.

Overall, the Bulgarian economy still struggles with low employment and labour force participation. Challenges are posed by a persistently low employment rate, which is amongst the lowest in Europe at 52 percent (see Figure 1). While this has steadily increased over time, it has slightly declined since late 2019. The national Europe 2020 employment target is 70 percent for the population aged 20-64. For Bulgaria, low labour participation means that out-of-the-labour-force working-age people do not contribute to economic growth.

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Figure 1. Employment rate recorded between 2012 and 2020 in Bulgaria

Source. https://tradingeconomics.com/bulgaria/employment-rate , 2020

Bulgaria has a population of seven million people, with 76 percent living in the urban area, which is expected to decrease by half a million until 2030 and by one million until 2050, according to Eurostat, requiring a better balance between policy reforms in education and the economy. Bulgaria's population has been declining significantly in the last two decades, mostly attributable to a low birth rate and emigration, and is aging rapidly. The dependency ratio in Bulgaria in 2020 is 47.3 %, and it explains the pressure on the productive population imposed by the dependent part of the population. Less than half of the population must produce for the other half represented by children and elderly people and must stay in large percent employed. The negative demographic trends associated with weak public social, health and education services delivered poses one of the main challenges for designing, funding, and implementing future systems. In addition, the living standards for people in danger of marginalization, exclusion, discrimination, and unemployment may deteriorate and need more robust support. If current projections hold, the total number of school-aged children and youth will decline rapidly, prompting the need for education reforms that address quality, access, equity, and relevance. The declining working and student populations have immediate and long-term implications for Bulgarian's human capital and macroeconomic agenda to promote employment and economic growth.

Under the pandemic: Bulgarian government introduced measures to provide socio-economic support during COVID-19. The east European countries are at similar points of the Covid-19 pandemic, economic impacts, capacities of the healthcare systems, and reopening schools. There is no right answer, and the decision-makers must make trade-offs based on their specific country situations. In the case of schools, decisions are made mainly based on the safeguarding readiness of schools (extra space capacity to allow for social distancing and the staff reserves); health and sanitary situation of schools; availability of internet connection and access to it; as well as the readiness of teachers and students for online classes, both in terms of skills as well as devices. The Bulgarian education system faces several specific challenges like lack of adequate sanitation, access for disabled students, minimum quality standards in rural schools, where dropout rates are also highest. Overcrowding in schools and classrooms from urban areas is another key challenge for physical distancing when operating in multiple shifts. These overcrowded units need additional space (new mobile classrooms) or temporary locations.
Even though Bulgaria has widespread internet connectivity, other enabling foundations for remote learning, such as basic digital skills and electronic devices for students, teachers, and parents, are limited. Another constraint is that one in four teachers reports a high level of need for professional training on the use of ICT skills for teaching *(OECD, TALIS 2018)*. The digital education status in the Bulgarian education system is aligned with the European level as many policies are already in place, and in some instances, Bulgaria is quite advanced, i.e., recognition of learning through certification (see Box 1).

The education sector in Bulgaria is specifically affected by the Covid-19 pandemic given the following clarifications:

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- A large number of parents who return to work face difficulties in keeping their children at home while schools are closed, especially the younger ones
- Vulnerable Bulgarian children (poor, living in rural areas, Roma, children with special education needs, with disabilities, children of returning migrants) are becoming even more vulnerable after the pandemic as they lack at home or in their community, access to basic services
- Bulgarians from the diaspora are returning due to the employment prospects in Europe, and their children need re-enrollment
- The learning gap is increasing as a consequence of school closures. Vulnerable children without proper access to online education, learning environments, to parental support are most affected by the pandemic. The dropout rate will increase in the context of school closures
- The curriculum has been partially covered, and only a few students could compensate through tutoring, parental support, or private education.

The Government initiated measures to tackle Covid-19 in all sectors, as described below.

Small and medium enterprises (SMEs) benefited from governmental economic support during the pandemic through the form of grants under the Operational Program "Innovation and competitiveness" (measure 3-10, 30-150), grants for maintaining employment in the transport and tourism sectors and measure 60/40 financed by national funds and Support to mitigate Unemployment Risks in an Emergency (SURE) Instrument. Under the measure "Employment for you", employers from all economic sectors, except for agriculture, could hire for three months the unemployed persons, under the Operational Program "Human Resources Development" prioritizing again hospitality and transport sectors, the most affected. "Hotels and restaurants" and "Travel agency and operator activities; other travel and reservation activities." Farmers and stockbreeders received support from the state fund "Agriculture."

Start-up and fast-growing companies active in key areas such as innovation, digitalization, biotechnology, robotics, information technology, pharmacy, etc. received financing with a maximum amount of up to EUR 800 thousand quasi-unit investments provided by existing venture capital funds.

From August, the salaries of social workers increased by 30%. The standards for social services increased, such as homes for the elderly, homes for people with disabilities, homes for residential services, day care centers for children, family-type accommodation centers, etc. This allows municipalities to increase social workers' salaries, auxiliary specialists, speech therapists, educators, and teaching staff by up to 20%.

The "Hot Lunch" program for people in need has been extended, and nearly 29,000 adults, people with disabilities, and incomes below the poverty line will receive a hot lunch by the end of the year.

At the beginning of the pandemic, the Operational Program "Human Resources Development" provided an additional BGN 45 million to expand health care until the end of 2020. Thanks to this, 30,000 adults and people with disabilities in 240 municipalities receive food, medicine, or assistance to provide administrative services and another 12,500 for social and health services.

One-time assistance of BGN 375 for families with children who find it challenging to meet their health, utilities, or other vital needs due to unpaid parental leave is granted. Parents of students up to 7th grade who have reached the age of 14 and families with one or both parents who have lost their job but are not entitled to unemployment benefits can also receive a one-time benefit of BGN 375.

Parents in Employment Project for working families and their unemployed relatives receive childcare subsidies. So far, 7,600 applications have been submitted, and 4,154 babysitters have been appointed.

Monthly assistance is allocated for families with children under 14 in closed kindergartens and schools if both or one of the working parents cannot work remotely from home and are unable to take paid leave. They receive a monthly allowance through the end of 2020, which varies from BGN 610 to 915, according to the number of children.

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Healthcare. In the sector, the Government increased the salaries of first-line workers, as the increase will be 30% for 6,000 people. **Medical specialists involved in the fight against COVID-19 receive a** monthly net remuneration of BGN **1,000 as of the end of 2020.**

Education. The Government provided one-time assistance of BGN 250 for students enrolled in eighth grade for the school year 2020/21 for families with average monthly income lower than BGN 450. The funds can cover part of the costs before starting school - for clothes, textbooks, or school supplies.

Publication of Guidelines for the work of the school education system during the school year 2020 - 2021 in the conditions of covid-19, which established that education is to be in person, health and safety that need to be in place in the schools, preparation for remote learning and the provision for vulnerable pupils in those cases.

Box 1. Digital Education Status in Bulgarian Schools

In place

- Use an European key competence definitions for **digital competence**
- The development of digital competence is included at all three education levels (primary, lower and upper secondary) as a **compulsory distinct subject**
- Explicitly included **learning outcomes** related to all five digital competence areas: information and data literacy, digital content creation, communication and collaboration, safety, and problem solving. The learning outcomes are concentrated within a specific distinct subject listed in subject curricula, accompanied by a specific amount of instruction time.
- **General teacher competence frameworks** include digital competences among those considered essential for all teachers before in the preservice training.
- The top-level authorities are involved in the provision of **continuing professional development** in the area of digital education as national initiatives focusing on different aspects of digitalization in society.
- The digital competences are assessed at upper secondary level at school through **national testing for all students**
- Information on recognition of digital competences on **certificates** awarded at the end of secondary education is only in three European systems (Bulgaria, Malta and Romania) applied to all students.
- **Technology-supported national tests** at upper secondary level
- **Monitoring and evaluation** of the digital strategy implementation is done regularly.

Needs

- Investment in digital **infrastructure** is still an important need identified in relation to digital education and therefore a major focus of the current and future strategies
- Investments in **professional training** on ICT skills for teaching for at least 25 percent of teachers
- Increase the **quality** of teaching for better digital learning outcomes
  - *Extract from European Commission/EACEA/Eurydice, 2019. Digital Education at School in Europe. Eurydice Report. Luxembourg: Publications Office of the European Union.*

Purchase of devices: At the beginning of April 2020, the Ministry of Education allocated BGN 2 million for internet in Roma neighbourhoods. Five hundred laptops with mobile internet cards for teachers from the telecoms - BTC and "A1 Bulgaria" were also ordered. The total value of the contracts signed after negotiated procedures without prior notice is over BGN 2.2 million with VAT. According to the regional education

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departments' data, about 10% of the students do not have their own electronic devices. This problem is extremely acute among the poor Roma families. Some of the schools cover a large percentage of students without their own devices. To solve the problem, the Council of Ministers approved BGN 14 million to purchase 16,000 devices. It is envisaged that another 80,000 devices will be purchased with funds from the European COVID Crisis Response Instrument REACT-EU. Following a suggestion of the Ministry of Education and Science on December 9 the Council of Ministers approved BGN 17 million to distribute among all the schools for buying disinfection materials and electronic devices for their students' needs.

Connectivity: Building of Wi-Fi networks in some of the country's largest Roma neighborhoods. Funding is from the program "Information and communication technologies in the preschool and school education". The Ministry requested BTC (Mobile operator) to build wireless networks for over BGN 978,000 with VAT in the neighborhoods with predominantly Roma population (most of them are from poor households). For the same amount, the telecom "A1 Bulgaria" will provide wireless internet in other Roma neighborhoods. An amendment to the funding ordinance was approved, which allowed schools to pay for internet connectivity of their students' families in distance learning.

Online platform: Support for schools in organizing the learning process during the state of emergency in the country using Teams MS for almost 90% of the schools in the country Teams integrates virtual face-to-face connections, enabling the application of files, homework in a common platform that is accessible on mobile devices, tablets, and personal computers.

Online lessons for preparation of exams: An educational series of lessons supporting high school graduates' preparation for the exam in Bulgarian language and literature was published by the Ministry of Education and Science on its YouTube channel. Films made by students were also uploaded.

Support for teachers: Psychologists from the preschool and school education system will provide psychological support to students, teachers, and parents who face various difficulties caused by the crisis with the spread of Covid-19. The specialists will work through specially created telephone lines, published on the Ministry of Education and Science website, and various applications for audio and video communication. Online free textbooks from grades 1 to 10 were provided, and TV channel BNT broadcasted school education content.

Digital Library: Establishing the National Digital Library to allow teachers to share and use electronic resources, lessons, and other materials.

Strong decentralization of the decision from central to the local level allowed schools to set their own plans for the daily organization of learning activities during pandemic based on the local situation, the number of students, and premises.

Mediators: MES has appointed 743 educational mediators and 101 social workers to participate in the Support for Success project. During school closure, the educational mediators and social workers will help improve the exchange of information between teachers and parents. They support students with homework. The teachers are trained to implement tools for early identification of students at risk to prevent further dropout. The school counsellors will provide career guidance to students from 5th to 7th grade. Students' career guidance will take place through both group and individual consultations to determine students' interests and preferences for certain professions.

MES spent BGN 7 million for pandemic measures by the end of September, including one million for extra teaching hours and preparing video tutorial and broadcasting teaching sessions, mediators, and social workers to provide learning materials and information to parents. Out of this amount, 3.5 million leva were spent on 1225 Covid-19 tests, 700 protective equipment, disinfectants, protective masks, gloves, thermometers, etc.; minor works, wireless networks, and the internet provision.

REACT-EU funding will be used to equip the schools with a concentration of vulnerable students with electronic devices for distance learning.

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EARLY CHILDHOOD EDUCATION AND CARE

This assessment of early childhood education and care (ECEC) in Bulgaria is focused on three main aspects of pre-school - as the only policy domain managed by the Ministry of Education and Science (MES) that addresses ECEC, as an initial stage of formal education that precedes school education, and as an essential component to lifelong learning policies. To comprehensively address the essential role of pre-school education within the mix of the above-mentioned human development policies, the analysis (i) examines system and policy level connections of pre-school education to ECEC and sheds light to the broader domain of early childhood development policies, (ii) examines specifics of ECEC policies and outcomes in the context of pre-school and school education policy reforms, and (iii) places the specific pre-school policy scope and objectives in the spectrum of life-long learning.

The objective is to present in a consolidated manner the existent evidences for policy outcomes and assess policy developments, to inform future policy steps and planning for specific programs addressing pre-school education steaming from both national and EU funding instruments, and to start the discussion on the approach and policy design needed to address the objectives of the strategic planning for education for the period until 2030. The report covers *lessons learnt* based on policy developments until 2020 and primarily addressing the strategic period (2014-2020), with specific focus on the period after the enforcement of the Pre-school and School Education Act (PSEA) in August 2016, maps key policy developments, highlights policy challenges and identifies approaches that have potential to add value to the ECEC domain beyond the formulated policy objectives.

To address the ECEC policy domain the analysis uses definitions established by the regulatory framework and basic concepts that are commonly used in the literature or in international and EU policy practice. Three key terms are presented forthwith in order to provide a clear conceptual structure:

Early childhood development (**ECD**): Although the term is widely used, there is no universally employed definition of ECD. ECD is commonly associated with its significance for the human developmental prospects.

> *According to the World Health Organization (WHO):* '[t]he early child period is considered to be the most important developmental phase throughout the lifespan. Healthy early child development (ECD)—which includes the physical, social/emotional, and language/cognitive domains of development, each equally important—strongly influences well-being, obesity/stunting, mental health, heart disease, competence in literacy and numeracy, criminality, and economic participation throughout life. What happens to the child in the early years is critical for the child's developmental trajectory and life course.[9]
>
> *UNICEF,* cross-referencing to earlier contributions, refers to ECD in its strategic plan for 2018-2021 as: 'Early childhood development is defined as the period from conception up to school entry. It is a unique window of opportunity for children's cognitive, social, emotional and physical development, which occurs as the result of the interaction between the environment and the child.'[10]
>
> *The World Bank has employed various* definitions of ECD, including the one referring ECD to child's growth and development starting from a woman's pregnancy through the child's entry to primary school. ECD interventions therefore include services for pregnant and lactating mothers, as well as young children and their families. These services are meant to address the health, nutritional, socio-emotional, cognitive, and linguistic needs during this age period. They are essential because a child's early life forms the basis for future learning, good health, and well-being, as well as the ability of the

9 WHO World Health Organization, Retrieved from: https://www.who.int/social_determinants/themes/earlychilddevelopment/en/
10 UNICEF (2018) EARLY CHILDHOOD DEVELOPMENT in the UNICEF Strategic Plan 2018–2021. Retrieved from: https://www.unicef.org/sites/default/files/2019-05/Early%20Childhood%20Development%20in%20the%20UNICEF%20Strategic%20Plan%202018-2021.pdf

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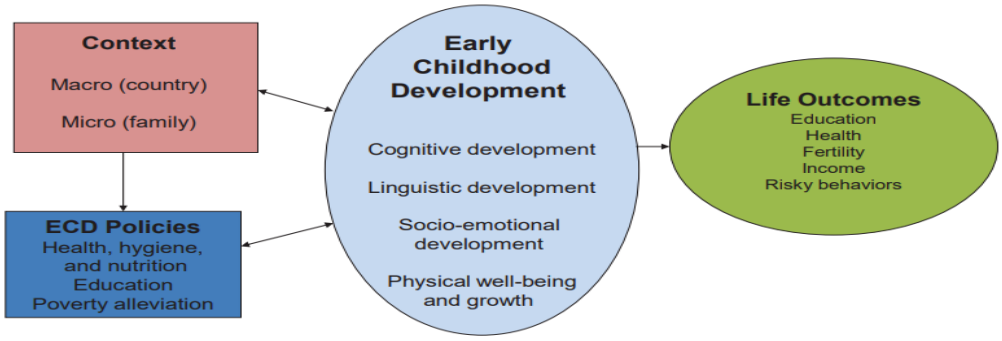
child to work well with others in adulthood.[11,12] As visualized by the chart and further argued in the publication,[13] understanding and analyzing ECD requires contextualizing. Within *Systems Approach for Better Education Results* ECD (SABER ECD) working paper series, the World Bank depicts the *ECD's policy and environmental framework*.[14]

Figure 2 'The Context for Early Childhood Development: Factors of Influence and Relation to Outcomes'



Reproduction from WB (2013) What Matters Most for Early childhood Development: A framework Paper[15]

Based on the reviewed definitions and on other existing definitions and considering the focus on Bulgaria, this assessment employs an adapted translation of an ECD definition, already applied in analyses in Bulgaria. *ECD refers to the process of human development that encompasses the period from birth to compulsory primary-school age, incorporates all-important developmental stages, takes place in any environment, strongly influences further stages of human's life and requires the best possible support for the child and its family from the whole society and every public institution*.[16] The present assessment addresses the ECD domain from a specific, narrower perspective, the one of the early childhood education and care and most of all, of its education-

11 WB (2014) Stepping up Early Childhood Development Investing in Young Children for High Returns. Retrieved from: http://documents1.worldbank.org/curated/en/868571468321240018/pdf/92988-REVISED-PUBLIC-WB-ECD-Mar2016-ENG-v2-web.pdf

12 Another example of definition given by the WB is 'Early Childhood Development (ECD) refers to the physical, cognitive, linguistic, and socio-emotional development of a child from the prenatal stage up to age eight. This development happens in a variety of settings (homes, schools, health facilities, community-based centers); and involves a wide range of activities from child care to nutrition to parent education. Providers of services can include public, private, and non-governmental agencies.' Source: WB (2010), Early Childhood Development, The World Bank Factsheets.

13 Ibid

14 WB 2013 What Matter Most for Early childhood Development: A Framework Paper. Retrieved from: https://openknowledge.worldbank.org/bitstream/handle/10986/20174/901830NWP0no5000Box385307B00PUBLIC0.pdf?sequence=1&isAllowed=y

15 Ibid. The reproduced item is Figure 2 on p.9. In turn this figure is an adaptation from Vegas, E., and L. Santibáñez. 2010. The Promise of Early Childhood Development in Latin America and the Caribbean. World Bank, Washington, DC

16 Adapted translation from: Iossifov, I., Banova, V., et al. (2018) Early Childhood Development in Bulgaria: Study of the Systems, Supporting Early Childhood Development, the Interrelations and Interactions between Them and with the Parents: Sofia: FZND (leading co-author, head of the research team). Published in Bulgarian: Йосифов, Й., Банова, В. и др. (2018) РАННОТО ДЕТСКО РАЗВИТИЕ В БЪЛГАРИЯ Изследване на системите подкрепящи ранното детско развитие, взаимовръзките и взаимодействието между тях и с родителите. София: ФЗНД. Available online, in Bulgarian: https://www.detebg.org/wp-content/uploads/2018/03/Ранното-детско-развитие-в-България-Изследователски-доклад.pdf

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cantered component and adds to previous publications namely SABER ECD Bulgaria Country Report[17] and Early Childhood Development in Bulgaria.[18]

Early childhood education and care (*ECEC*).[19] The interrelation between the concepts of ECD and ECEC, at least in this assessment is one of narrowing the scope and sharpening the focus. If ECD refers to all possible developmental aspects of the human being in their earliest years, ECEC is focused on the *provisions* that are at the same time *regulated and relate to all children 0-CSA.* By default, such arrangements are considered in the domains of care and education as also evident from the wording of the term.[20] The definition employed in this assessment is the prevailing in publications of the European Commission (EC). It defines ECEC 'as any regulated arrangement that provides education and care for children from birth to compulsory primary school age – regardless of the setting, funding, opening hours or program content – and includes center and family day care; privately and publicly funded provision; pre-school and pre-primary provision. 'The choice to adopt this definition of ECEC in the present assessment is grounded on at least two reasons: first, Bulgaria is a European Union Member State (EUMS) and the definitions used by the executive body of the European Union (EU) inevitably form part of the professional terminology, moreover the EU funding has a direct bearing on the Bulgarian ECEC subsector. Second, the fact that EC has consistently employed the same definition in different publications and the effort of the EU to position itself as a global leader in the field increase the chances for universal utilization of this definition.

Pre-school education: refers to *the educational process[21] of children in pre-primary age that takes place in institutions of the pre-school education system, namely kindergartens and preparatory groups established in schools*.[22] Children start attending primary school in Bulgarian in the year when they turn seven; therefore, when using the term pre-school aged children this text refers to children aged between three and seven.

17 World Bank. 2013. Bulgaria Early Childhood Development: SABER Country Report 2013. Systems Approach for Better Education Results (SABER) country report; 2013. Washington, DC. © World Bank. https://openknowledge.worldbank.org/handle/10986/20146 License: CC BY 3.0 IGO

18 Iossifov, I., Banova, V., et al. (2018) EARLY CHILDHOOD DEVELOPMENT IN BULGARIA A study of the systems supporting early childhood development, the interaction and cooperation between them and with parents SUMMARY. FZND: Sofia. Re-published online by Eurochild: Brussels. Retrieved from: https://www.eurochild.org/fileadmin/public/04_News/Members/Executive_Summary_ECD_in_Bulgaria_-ENG_ForOurChildren_5APR2018.pdf

19 This term is sometimes worded and respectively abbreviated differently: early childhood care and education, ECCE. This way it appears for example in the mentioned above SABER publications. There ECCE is not explicitly defined but from the context it is obvious that ECCE is meant has narrower than ECD, in line with the approach taken into this assessment.

20 EU (2014) Proposal for Key Principles of a Quality Framework for Early Childhood Education and Care, Report of the Working Group on Early Childhood Education and Care under the auspices of the European Commission: Brussels. Retrieved from: https://ec.europa.eu/assets/eac/education/policy/strategic-framework/archive/documents/ecec-quality-framework_en.pdf
and
EU (2014) Study on the effective use of early childhood education and care in preventing early school leaving. N° EAC/17/2012 Luxembourg: Publications Office of the European Union, 2014 Retrieved from: https://op.europa.eu/nl/publication-detail/-/publication/7548dd37-c626-4e2d-bd70-625edf707adc

21 art. 24 and art. 56 of the Pre-school and School Education Act (PSEA)

22 According to art 2 (3) the system of pre-school and school education encompasses not only kindergartens and schools but also Personality Development Support Centers (in Bulgarian: *центровете за подкрепа за личностно развитие*) and the Specialized Auxiliary Units (in Bulgarian: *специализираните обслужващи звена*). As seen from the exhaustive list of functions of the *Specialized Auxiliary Units* provided in art. 50 (1) of PSEA, these units do not interact directly with children and parents, despite being defined as institutions of the pre-school education system. The norm of the amended in Sept 2020 art. 56 (1) explicitly stipulates that the pre-school education takes place in kindergartens. The norm of the following art 56 (2) broadens the scope of educational institutions where compulsory pre-school education may take place with the preparatory groups in the schools. This is why the definition of pre-school here education refers only to the educational process taking place in these two institutions.

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ECEC's Sectoral Context

The ECEC normative framework, financing, operational management and provision in Bulgaria are shared by three public policy sectors: education, public health[23] **and social welfare and is developed as highly de-integrated policy**. This entails separate sectoral regulations, policy and administrative processes and bodies (ministries), specifics in policy implementation approach, management of subordinate path for provision of services and sector specific workforce requirements that influence and regulate the ECEC subsector. The intersectoral character of ECEC, similarly to the ECD policy domain, is still undercoordinated and fragmented both as policy coherence and implementation approach. Despite the existence of the State Agency for Child Protection (SACP),[24] a governmental body whose functional framework overarches the ECD domain, neither qua policy intention nor qua policy implementation is there a true intersectoral approach. A major requirement for intersectoral cooperation established in the ECEC normative framework[25] still has to be realized: namely an introduction of a joint regulation by MES and the Ministry of Health (MH). This prescribed by the law Ordinance has to establish '*standards for ECD*' to be applied when rearing, upbringing, socializing and teaching children in nursery groups within KGs. It has been worked upon and published for public consultation already in April 2017. Now, three years later, it could serve as an example for one of the challenges faced by the ECD policy domain: open discussions, initiatives and efforts by stakeholders that require further coordination to reach the expected result.

ECEC policy elements and governance are aligned with main lifecycle stages of childhood. The Ministry of Health is the primary responsible agency for the youngest children. It sets the national regulatory framework for the most common ECEC provision for the youngest children - the nurseries (0-2) and runs the remaining 13 Residential Institutions for Medical and Social Care for Children, RIMSCC (0-3).[26] The children still placed in RIMSCC are only 454 and their number has been decreasing throughout the programming period 2014/2020 in line with the policy of deinstitutionalization of child care. The nurseries are **not** considered pre-school education institutions where the leading workforce are medical professionals and the age span of children addressed is between three months and three years of age. The structural, operational and health-related requirements regulating the functioning of the nurseries are set in a by-law adopted by MH.[27] The infrastructural standards for nurseries are set by an ordinance[28] adopted by the Ministry of Regional Development and Public Works (MRDPW).[29] The nurseries could be municipal or private. Parents whose children attend the nurseries contribute financially through the fees they pay. These fees vary locally, also for the municipal nurseries, since for such nurseries the fees are set by the municipal authorities with the ordinances that regulate the local fees and the emoluments for services provided by the municipalities.

MES and the education regulatory framework cover, as a rule, the provision of ECEC to children aged between three and compulsory school age (CSA) where t**he main pre-school education institution is the *kindergarten*.** The status of the kindergarten as a primary provider of pre-school education is stipulated

23 Hereunder: health

24 SACP regulatory position and functions are reviewed in detail later in this section and in the part on Governance and Management

25 PSEA art. 24 (4)

26 According to NSI the Residential Institutions for Medical and Social Care for Children (RIMSCC) "are registered in accordance with the Health Institutions Act within the category "other health institutions" where medical and other staff conduct long-term medical supervision and specific care for children up to 3 years who suffer from chronical conditions and medico-social problems" [author's translation]. Retrieved from: https://www.nsi.bg/bg/content/3339/метаданни/домове-за-медико-социални-грижи-за-деца

27 Ordinance # 26/18.11.2008 regulating the structure and functioning of nurseries and kinder kitchens and the health requirements applicable to them. Published in Bulgarian, original title: НАРЕДБА № 26 ОТ 18 НОЕМВРИ 2008 Г. ЗА УСТРОЙСТВОТО И ДЕЙНОСТТА НА ДЕТСКИТЕ ЯСЛИ И ДЕТСКИТЕ КУХНИ И ЗДРАВНИТЕ ИЗИСКВАНИЯ КЪМ ТЯХ

28 Наредба № РД-02-20-3 от 2015 г. за проектиране, изпълнение и поддържане на сгради за обществено обслужване в областта на образованието и науката, здравеопазването, културата и изкуствата

29 The same by-law regulates the spacious requirements for the KGs and respectively it is reviewed below.

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by several norms in PSEA, the leading ones being art. 24 and art. 56. In addition to serving the three-to-CSA children, KGs can accommodate (i) *nursery groups* where the minimum age for a child to be enrolled is 10 months[30] and (ii) children aged two in KG groups *in line with the rules set by PSEA*.[31] After introducing this latter option for two-year-old children to attend pre-school education settings (that differ as concept and practice from nursery groups) Bulgaria ECEC approach faces the challenge to accommodate two different standards in provision – the nursery and the pre-school one. The legal provision[32] making possible for the KGs to run also nursery groups de facto preserved a status quo existing prior to the enforcement of PSEA in 2016. In 2018, out of 8676 groups in KGs, 866 were nursery groups[33] corresponding to 9,9%. In the three years prior to enforcement of PSEA the proportion of nursery groups in the KG were respectively 9.7% in 2015, 9.6% in 2014 and 9.5%; in 2013.[34] The remining more than 90 % of the KG groups have been serving the prescribed by PSEA pre-school function. By virtue of art. 56 (2) *compulsory* pre-school education may be provided also by schools where *pre-primary groups have been established*. The two main differences between the KGs and school preparatory groups are: a) the latter are organized by schools in their premises and b) generally schools provide pre-school education only to 5- and 6-year-old children.

With the amendment of PSEA from September 2020 the compulsory pre-school education was extended to four-year old children. Provision of pre-school education to the 4-year-olds is reserved only for the kindergartens. Schools may set preparatory groups for four-year-old children only in case there is no KG in the respective municipality. There is another potential restriction for the schools to run preparatory groups. By virtue of the same PSEA's norm, art. 56 (2), the mayor of the municipality is entitled to restrict the provision of compulsory pre-school education only to kindergarten(s). If provision of pre-school education takes place in a preparatory group in a school, the same state educational standards (SES) that are applicable for the KGs have to be observed. The vast majority of the pre-school institutions in Bulgaria are municipal (as a matter of exception there are state kindergartens (KGs) run by the Ministry of Defense[35]; the other legally admissible exception for setting state KGs is by virtue of an international treaty). There is a limited but gradually increasing number of privately-owned KGs: 106 in the 2019/2020 school year, '5 more than in the preceding school year'.[36] Still, the 4982 children in the private KGs constituted only 2.3% of all enrolled children in KG in Bulgarian in the 2019/2020 school year.[37]

The other pre-school education institutions -the overwhelming number of them- are the municipal kindergartens and school.[38] The section on the ECEC's Sectoral Context as well as various other sections below review in detail the contextual specifics of the pre-school education in Bulgaria including the interaction between national and local level.

Ministry of Labor and Social Policy and State Agency for Child Protection bear responsibility for safeguarding the wellbeing of all children throughout the ECD lifecycle and childhood. The SACP is meant to be the governmental institution responsible for child protection and safeguarding the rights of the

30 PSEA, art. 24 (3).
31 PSEA Art. 24 (2).
32 The mentioned above art. 24 (3) of PSEA.
33 Source: WB, file *All Schools & KG Grades and Groups*.
34 Source: ibid.
35 PSEA, article 35 (2), stipulates that
36 NSI (2020) Education in Republic of Bulgaria in 2019/2020 school year. NSI: Sofia. Published in Bulgarian, original title: НСИ (2020) ОБРАЗОВАНИЕТО В РЕПУБЛИКА БЪЛГАРИЯ ПРЕЗ УЧЕБНАТА 2019/2020 ГОДИНА НСИ: София. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Education2019_G60QZG9.pdf
37 Ibid.
38 Here are meant the schools with preparatory groups.

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child in Bulgaria. However, its capacity and functions are limited.[39] SACP is engaged in 'governing, coordinating and controlling'[40] but not in implementing specific child protection measures. The role of the SACP with respect to carrying out child protection measures is limited to 'developing and giving methodological instructions to the Child Protection Departments in the Directorates for Social Assistance'[41] as well as to 'organizing inspections for observance of the rights of the child by all state, municipal and private schools, kindergartens and nurseries, service units, medical establishments, Directorates for Social Assistance at the [Executive] Agency for Social Assistance and non-profit legal entities working in the field of child protection, and in case of violation of the rights - the Chairman of the SACP gives obligatory prescriptions'.[42] The operational units to set and control implementation of child protection measures are the Child Protection Departments[43]implementing both social assistance and child protection functions. By default, the CPDs[44] refer the (parents or other primary caretakers[45]) young children to providers of social services and supervise the implementation of the prescribed individual protection/assistance plans. Under this framework MLSP, through the regional structures of its EASA, carries out the provision of social-welfare and child protection component within the ECEC-mix and therefore shares responsibility, together with MH and MES, for the ECEC subsector in Bulgaria.

The table below visualizes the ECEC mix of provisions and responsibilities according to child and family needs presented through ECD lifecycle. The table is sketching the sectoral context and emphasizing the position of the pre-school education within the ECEC mix without having to provide a detailed picture on governance, management or implementation mix. The latter are addressed in detail below. [46]

39 Apart from its headquarters it has only three regional structures, namely 'territorial units of General Directorate Control of the Rights of the Child'. Source: SACP, Structure. Retrieved from: https://sacp.government.bg/%D1%81%D1%82%D1%80%D1%83%D0%BA%D1%82%D1%83%D1%80%D0%B0

40 Source: SACP, Activities Retrieved from:

41 Ibid.

42 Ibid.

43 'the Directorate for Social Assistance is competent governmental body with respect to child protection on local level and within it functions a Child Protection Department (CPD)

44 According to the norm of Art. 20 (2) of the *Regulations for Implementation of the Child Protection Act* it is the Directorate for Social Assistance that issues the written reference for provision of social services. But the preparation of this reference and the coordination and the parent is done by the respective 'social worker' who has opened the case (art. 15). The Director(ate) for Social Assistance "ratifies" (formally) the measure prescribed by the CPD.

45 Taking into account the dependability of children at ECD-age, the inevitable role of the parents for their development and that the social welfare of the young children is intrinsically linked the wellbeing of the family and household where they grow up, the provisions of social assistance are de facto channeled through their parents.

46 The function of the table is to help navigate through the ECEC subsector in Bulgaria and to clarify how and why the terms ECEC and pre-school education differ in meaning. A number of relevant aspects, data or important details on the structure, functioning and internal and external interactions of the subsector are provided later in the text, for example the place and the role of the local authorities and the local structures in organizing and implementing ECEC -and mostly: pre-school education- provisions.

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Table 1 ECEC in Bulgaria: demarcation of governance and provision by lifecycle group

Table 1 ECEC in Bulgaria: demarcation of governance and provision by lifecycle group

Early Childhood Education & Care

	MOES preschool education							MH nurseries & health policy						MLSP Social and Child Protection		SACP		Various	
	C	D	C	D	C	D	D	C	D	C	D	C	D	C	D	C	D	C	D
7/6					Compulsory/universal		Preparatory groups in schools			Targeted/specialized for a particular category of children (specific vulnerabilities aged 0-3)	Residence Institutions Medical and Social Care for Children	Compulsory/universal	Hospital and out of Hospital Care and Services Guaranteed by NHIF	Compulsory/universal	National Programs: e.g. Immunization, Children's health, etc.	Targeted/Specialized	Provision of social services and implementation of child protection measures for children at risk	Targeted/ Specialized	Child protection system	Targeted/specialized	Parental Programs: e.g. Parents in Employment, Program for Family Support, information campaigns and materials, etc.
5						KG groups	Exception: PSEA 56 (2)										Social services i) delivered @home; ii) residential type: e.g. Family-type Center for Children with Disabilities, Mother and Baby Unit, etc.; iii) other types: foster care, Day-care Center, Center for Community Support, etc.				
4			Non-Compulsor	KG groups																	
3	Non-Compulsory	Nursery groups in KG																			
2								Non-Compulsory	Nurseries												
1																					
0																					

Used Sources: World Bank. 2013. Bulgaria Early Childhood Development: SABER Country Report; Iossifov, I., Banova, V., et al. (2018) Early Childhood Development in Bulgaria; https://www.mariasworld.org/bg/programi/350-programa-za-podkrepa-na-semeistvoto.html; https://www.az.government.bg/pages/roditeli-v-zaetost/ Legend: **C = Coverage, D = Delivery**

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Financing

Key findings:

- *Against the backdrop of increasing amounts but flat proportion of expenditure as percentage of GDP and notably decreasing number of children in pre-school education the effectiveness of the policy investments should be gaining prominence.*
- *The funding for specialized policy investments in pre-school education has remained limited compared to the overall public expenditure on pre-school education and has been lagging behind the respective investments in school education.*
- *OPSESG empowered the system with resources for system level interventions that address policy tasks and reform processes that have not been a regular instrument for the system.*

ECEC financing in Bulgaria is a complex model of funding streams addressing at least three separate public systems and a number of providers and stakeholders. The ECEC policy composition shared by the health, social welfare and education sectors and respective administrative and methodological fragmentations are reflected in both the ECEC provision and funding. By far the sector of education plays the leading role in providing ECEC and financing it. The difference between the coverage and funds in education considerably surpasses the children served by the ECEC provisions run by the other sectors. If 2017 is taken as a reference year[47] the number of children directed to ECEC-provisions within the social welfare sector corresponds to only 1.1%[48] of the 220877 children enrolled in pre-schools.[49] The contributions of the other services and support run or directed by structures under the MLSP does not change notably the proportions.[50] The same year comparison with the sector of public health demonstrates that the budgetary allocations there for programs that might, among other, address also ECEC-aged children do not exceed 7%[51] of the BGN 490.3 million[52] expenditure on pre-school education. Local authorities' role to ECEC financing is twofold – to guarantee implementation of ECEC services delegated by the central level, and to govern on local provision. In the general case municipalities receive funds for running of core ECEC provisions including nurseries, KGs and preparatory groups in schools, planned social and health services under the scope of delegation. On education m*unicipalities receive financing* from the state budget in accordance with the State Educational Standard (SES) *for the*

47 The last year for which relevant data for provision of social services for ECEC-aged children could be found.
48 The 'number of the children [0-18] and families receiving social services in the community, including residential type [services] is 14079.' Only '2611 children aged 0-7' have received social 'services referred to from the CPD.' Source: FZND (2018) Early Childhood Development: Status, Policies, Practices, Directions. Analysis of Data on the Early Childhood Development in Bulgaria. Published in Bulgarian, original title: Ранното детско развитие: състояние, политики, практики, насоки. Анализ на данни за ранното детско развитие в България Retrieved from: https://www.detebg.org/wp-content/uploads/2018/10/Analiz_na_danni_za_ranno_detsko_razvitie_FZND_2018.pdf
49 See above the section on Access and Equity; the data for 17/18 school year (NSI) is quoted to here.
50 Within the other policy domain of MLSP, *reconciliation of professional and personal life,* where an ECEC-related intervention took place (the already mentioned project 'Parents in Employment' run by MLSP's Agency for Employment) the estimated proportion of financial resources directed to children in ECEC age is BGN 5.6 million (the total budget of BGN 50 million for all children 0-18 for all years adjusted for the proportion of ECEC aged children and number of years) in 2017. See above the introduction and the section on Access and Equity.
51 Total expenditure of BGN 20.991 million in 2017 for 'Medico-social care for children in disadvantaged situations, mother's and children's health' and BGN 13.021 million for 'Prophylactics and control of contagious diseases' which covers, among other, immunization programs also for children. Source: MH (2020) Budget for 2020 and Updated Budget Forecast for 2021 and 2022 in Program Format. Available in Bulgarian: БЮДЖЕТ ЗА 2020 Г. И АКТУАЛИЗИРАНА БЮДЖЕТНА ПРОГНОЗА ЗА 2021 И 2022 г. В ПРОГРАМЕН ФОРМАТ Retrieved from: https://www.mh.government.bg/media/filer_public/2020/01/16/biudzhet_za_2020_g_v_programen_format_na_ministerstvo_na_zdraveopazvaneto.pdf
52 Eurostat, educ_uoe_fine09. See also below.

Financing of the Institutions in the System of Pre-school and School Education[53] representing the vision that pre-school is an essential stage of formal education process. Being part of the same vision and served by the same normative framework, the pre-school education follows the same dynamics as the school education with respect to a number of financial aspects.[54] With respect to pre-school education, the transfers from the state budget cover the expenses for the renumeration of the educators, for their qualifications, other expenses specified in the national programs for development of education (NPDE) thus - the educational component of the ECEC- mix.[55] Municipalities act as *funding institutions*, (ii), with respect to several expenditure categories. The legislation stipulates that the KGs (PSEA art. 35(1)) and nurseries (Ordinance#26, art. 1(2)) are municipal or private. As owners, the municipalities are responsible for the capital expenditures (including building, expanding and maintaining) of the municipal nurseries, KGs and school premises where preparatory groups take place.[56] Further, article 1(3) of Ordinance #26 stipulates that '[t]he provisions for the children in the municipal nurseries and the functioning of the municipal children's kitchens is financed from the respective municipal budget.'[57] Similarly, *the care provisions for the children in KGs*[58] *are financed by the municipal budgets*.[59]

Table 2 Sources of funding in pre-school and school education in 2016 (%)

	Public	Private	International organizations
Early childhood education (ISCED 0)	93.0	7.0	0.0
Primary education (ISCED 1)	93.5	2.7	3.8
Lower secondary education (ISCED 2)	93.6	3.3	3.1
Upper secondary education (ISCED 3)	82.3	15.9	1.8

Source: WB calculations based on Eurostat (data code: educ_uoe_fine01).

Note: EU funding is included. Public multilateral organizations for development aid to education like multilateral development banks (the World Bank and regional development banks), the United Nations agencies and other intergovernmental organizations, bilateral development cooperation government agencies, and international nongovernmental organizations (NGOs) established in Bulgaria.

53 Set in the *Ordinance on the Financing of The Institutions in the System of Pre-school and School Education. Adopted by Decree of the Council of Ministers # 219/ 05.10.2017*

54 teachers' renumeration policy after 2016, the financial stimuli necessary to safeguard equal access to education taking in into account the geographic and demographic characteristics of the place where the educational institution is located (PSEA, art. 282(4)5.) and adjusting the unified expenditure standards accounting for 'the need of pedagogical specialist for realizing the activities [necessary] for upbringing and training of children and pupils/students' (PSEA, art. 282(4)5.).

55 The municipalities have different degrees of discretion vis-à-vis the transfers meant for kindergartens than the ones for the schools. See below.

56 As noted above, though, the state may allocate resources in the state budget to support municipalities to realize their KG/nursery-expansion programs. An example here is the Program for Building Extending and Reconstruction of Nurseries, KGs and Schools 2020-2022 which envisages at least BGN 35 million (50% of the indicative allocation) per year that should result in 60 KGs and nurseries (set as performance indicator). See also above the section on Access and Equity, the quoted examples with the State Budget for 2021 and the Expansion program of the Sofia (capital) municipality.

57 At the same time the nurseries, the children's kitchens and nursery groups in kindergartens are part of the delegated by the government provisions funded by the state budget within the 'Public Health Function' for which the government makes annually transfers to the primary budgetary authorities (in this case – the municipalities) by virtue of the Public Finances Act. There is no guarantee that the transfers form the state budget shall be stuffiest to cover the respective expenditures. The amounts of the transfers depend on the respective 'Unified Expenditure Standard' which is set by the Council of Ministers per delegated provision, annually. This is done per Decision of the Council of Ministers.

58 This, as already noted, includes expenses such as food, overhead, recreation etc. See the section on Access and Equity.

59 In addition, there are details that cam complicate the picture even further. If the children are few and respectively the necessary economies of scale are not realized in a scope to cover the actual municipal expanses required by the SES on Financing of Pre-school and School Institutions, the municipality has to contribute to these expenditures too. Or the nurses (qualified health professionals) in the kindergartens (which are pre-school education institutions) are employees of the municipalities.

A key financial distinction between public pre-school and school education is associated with the co-payment approach applied for pre-schools provisions. A key difference with public school provision is that municipalities are traditionally allowed to charge fees for public KG services targeting the non-compulsory provision and "maintenance or care" component of the service[60] The fees are set by the respective municipal councils that define the fees and taxes collected by virtue of the Act for Local Taxes and Fees. Typically, the municipal rules envisage reduced fees for certain categories of vulnerable children or parents.[61] The variations between municipalities with respect to how much is charged as kindergarten fees range broadly. The standard whole-day fee for a child in a KG or in a nursery group in Burgas is BGN 18 per month, whereas for the same service the fee in Sofia is BGN 60.[62] About 20% of the municipalities relieved the parents from paying no fees at all.[63] This aspect is further developed in the Access and Equity section.

In pre-school education, there is a limited number of private kindergartens that charge open-market-conform fees. Despite of the increase in the number of private KGs throughout the programming period from 75 in the 2013/2014 school year to 106 in 2019/2020 school year, the private kindergartens still served only between 1.4% (14/15) and 2.3% (19/20) of the children in the kindergartens. Funding for private kindergartens has been traditionally streamed from parental contributions. In 2016 PSEA opened options for private kindergartens to be subsidized by the state if they provide fee-free access to 20 % of the children. With the PSEA's amendment of September 2020 (and the Bill of the State Budget Act for 2021[64] that followed shortly thereafter) a new attempt has been made to engage private KG to extend their supply to families whose children are affected by the problems with availability of places in municipal kindergartens. [65] If the money received by parents[66] is sufficient to cover the KG fees for the private KGs or at least contribute enough to allow the parents to enroll their children, the proportion of participation in private KGs will grow much faster. For example, assuming that the private kindergartens will accommodate all '2281 3-to-6-year-old children awaiting place in a kindergarten' in Sofia, the coverage of the private kindergarten will increase by 58%.[67]

60 To remind: the fee charged by the municipal kindergarten compensate most of all for the costs of the meals received by children in the kindergartens. Fees might contribute also to costs for 'overheads, provided environment for recreation and games' as specified in the court practice. see above the section on Access and Equity.

61 The example could range from reduction of the fees for siblings/twins, to orphans, to foster children to children to children of parents with disabilities/reduced labor capacity or parents with very low incomes.

62 Ordinance for Setting and Administrating of Local Fees and Prices of Service on the Territory of the Municipality of Burgas Original title in Bulgarian: Н А Р Е Д Б А ЗА ОПРЕДЕЛЯНЕТО И АДМИНИСТРИРАНЕТО НА МЕСТНИТЕ ТАКСИ И ЦЕНИ НА УСЛУГИНА ТЕРИТОРИЯТА НА ОБЩИНА БУРГАС and ORDINANCE for Setting and Administrating of Local Fees and Prices of Service Provided by Sofia Municipality, Original title in Bulgarian: НАРЕДБА за определяне и администриране на местни такси и цени на услуги, предоставяни от Столична община

63 See above the Section on Access and Equity.

64 Both have been reviewed in detail in the section on Access and Equity.

65 See above, the section on Access and Equity.

66 In line with newly introduced art. 283 (12) PSEA, see also above.

67 2281 as proportion of the enrolled in 19/20 school year 4982 children in private KGs.

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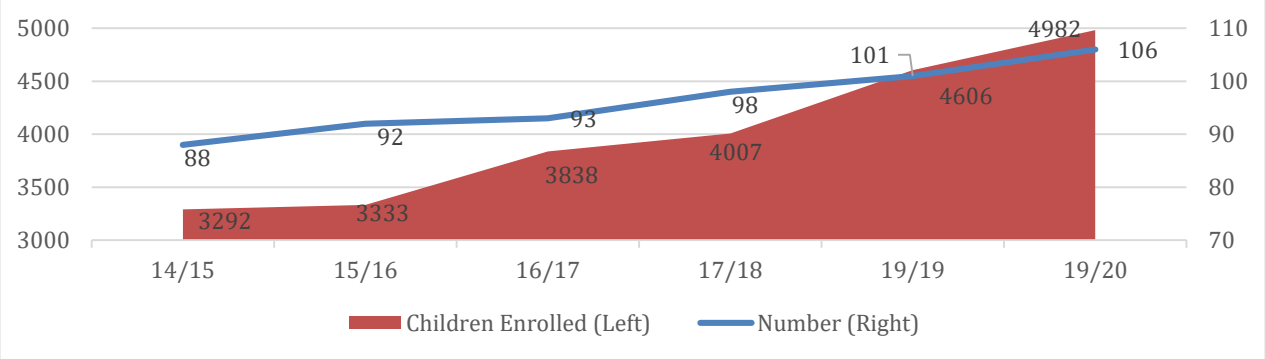
Figure 3 Private kindergartens and their ECEC provision role



Source: NSI (2015, 2016, 2017, 2018, 2019, 2020)

Four main funding instruments are targeting pre-school education and follow a unified approach with school education. Two of these four funding approaches, the EU funding and the NPDE, have been employed to provide resources for operationalizing the policy intentions in the outgoing programming period[68]**:**

- The main source is the national funding for provisions based on transfers to local governments as delegated activities by the state and it is following a double approach of unified standard and/or delegated budgets targeting directly pre-schools**.** The Ordinance on *the Financing of the Institutions in the System of Pre-school and School Education,* art. 2 (1), stipulates a unified approach in provision of funding to pre-school and school education by the state budget.[69] At the same time there are different components of the funding mechanisms. First and foremost, the state transfers provision of pre-school (and school) education, as delegated activity, to the municipalities. Respectively, resources are transferred too, and the municipalities are responsible to safeguard that the delegated pre-schooling take place in the municipal pre-school institutions in line with the general legislation. The state has left to the local authorities the discretion whether to employ a system of delegated budgets that channels resources to the KGs or to directly run their budgets. The budgets of the schools are always channeled to them and thus the schools by default operate delegated budgets, also with respect to their preparatory (pre-school) groups if they have any.
- A specific element of the national finding is the instrument specifically identified in art. 280 (3) PSEA as resources allocated in the state budget called *National Programs for Development of Education* (NPDE).[70] The NPDE are part of the policy mix meant to steers the development of the system in line with (priority) policy intentions. NPDE serve both pre-school and school education systems without having explicit norms safeguarding the scope or number of allocations to the pre-school systems. A number of NPDEs serve both pre-school and school education. However, with respect to the number of NPDEs serving only school or only pre-school education, the ones focused on schools significantly outnumber those on pre-school education. In the last four years there has been annually only one program specifically devoted to pre-school education out of 10 in 2017 (when the norm of art. 280(3)

68 They are reviewed in detail in the part of the text on the Policy Mix Addressing Pre-school in the Context of ECEC.

69 According to article 2 (1) Ordinance on *the Financing of The Institutions in the System of Pre-school and School Education the funding from the state budget is directed to:*

1. provision of the process of education and training of the children and students;
2. support for equal access and support for personal development;
3. development of the kindergartens, the schools and the centers for support for personal development;
4. implementation of national programs for development of education.

70 As just noted, (footnote 69), NPDE are also part of the SES on Financing *of the Institutions in the System of Pre-school and School Education.* Article 2 (1) Ordinance on *the Financing of The Institutions in the System of Pre-school and School Education*.

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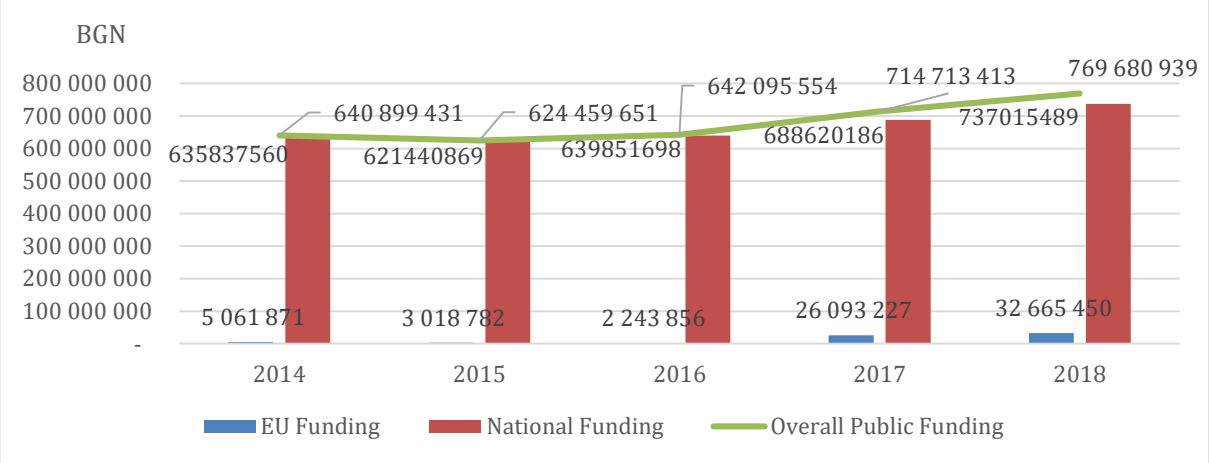
entered into force) and 21 in 2020. The specific NPDEs relevant to pre-school education are reviewed in detail in the policy mix section and the below.

- Another specific component of funding originates from the EU structural funds and reaches the system of (pre)school education though the Operational Programs (OP).[71] The focused to education instrument of the EU funding that address pre-school education in the outgoing programming period has been the Operational Program Science and Education for Smart Growth (OPSESG). Operationally, OPSESG contributions have been split between system-level projects (SLP) and competitive procedures. The main difference between the two is that the former, operating at the level of the whole system, reach pre-school institutions that otherwise do not have the capacity to submit project proposals and participate in competitive procedures. Unlike the NPDE which are primarily yearly planned, the OPSESG SLPs are multiyear interventions. Throughout the outgoing programming period there has been a SLP specifically focused on pre-school education as well as a couple of SLPs addressing simultaneously pre-school and school education. Some pre-school education institutions received funding through competitive procedures, but their number has been quite limited. A detailed overview of the role of OPSESG with respect to pre-school education is provided below.
- Finally, the direct municipal funding to education, including pre-school education, outlined above, including fee contributions from parents forms a funding component on its own.

The contribution of the EU funding to the Bulgarian pre-school education system has remained low throughout the programming period. The bulk of the expenditures for pre-school education came from the state budget and municipalities and the overall share of the EU contributions to the overall public funding in the period 2014-2018, although increasing, varied between 0.35% (2016) and 4.24% (2018).

Figure 4 National and EU funding in the overall public expenditures on pre-school education in Bulgaria



Source: WB, BOOST database

The transfers from the state budget and the financing from the municipalities that constituted an overwhelmingly high proportion of the resources directed to pre-school education in Bulgaria covered the routine expenditures and kept the pre-school education system running. The transfers from the state budget for delegated activities and the municipal funding served a purpose different from the EU funding's and NPDE's role.[72] The national funding, constantly accounting for well over nine tenths

71 The OPs are instruments serving the National Strategic Reference Framework which in turn has to comply with the general rules relevant to the EU structural funds.

72 NPDE, technically speaking are considered part of the national finding; it has to be noted, though, that their share has remained very low, too: with estimated allocations of between BGN 12.456 million (2016) and BGN 26.513 million (2020) for pre-school

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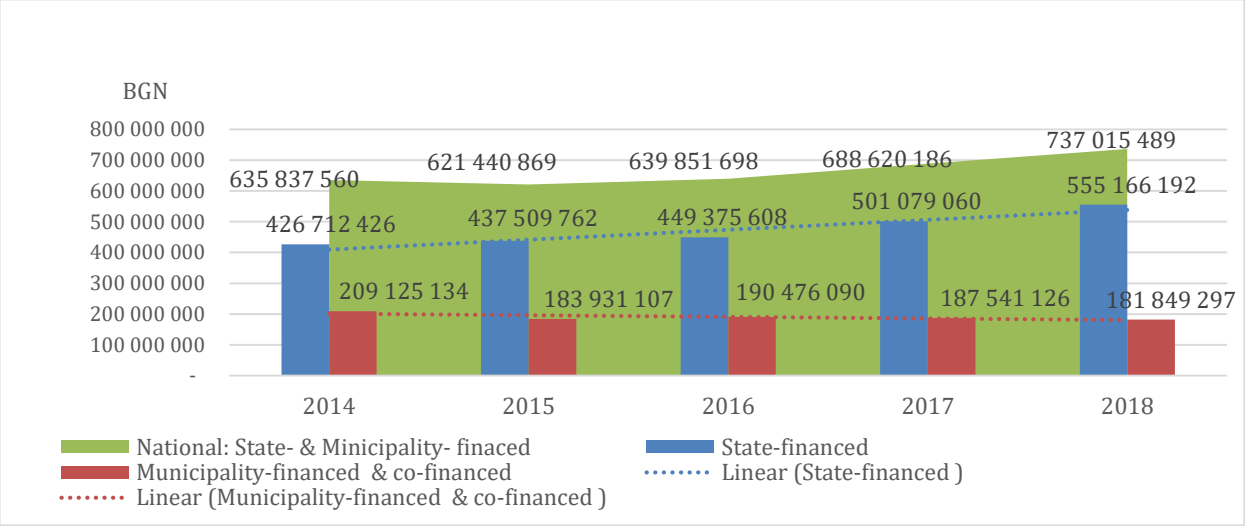
of the public expenditures on pre-school education in Bulgaria, ensured the routine functioning of the pre-school education system - workforce remuneration and associated expenses and direct provision costs.

The state budget continues to be the main source of funding[73] for the pre-school education and its role has increased. The transfers from the state budgets' have consistently exceeded at least twice the municipal contributions to the national expenditures on pre-school education. Within the programming period the amounts of the state transfers considerably increased and only within five years the proportion between state and municipal funding changed from 2 to 1 in 2014 to 3 to 1 in 2018. Although Figure 5 visualizes (the available) data) until 2018, the continuous expansion, also in 2019 and 2020, of the personnel expenditures makes inevitable that the trend continued also in the last two years of the programming period.[74]

Figure 5 State- and municipality-financed pre-school education



Source: WB, BOOST database

Municipal contributions to financing the pre-school education system have been declining in nominal and relative terms and their ability to keep pace with state's contribution and with relevant needs deserves to be examined. Municipal funding experienced slight but stable decrease between 2014 and 2018. This development, alongside the newly introduced *State Budget Program* on capital investments in nurseries, pre-schools and schools[75] opens space for questions about the overall capacities of the municipalities to meet their obligations with respect to financing pre-school education and most of all, vis-à-vis maintaining, modernizing and extending the necessary infrastructure.

The expenditure on workforce has been clearly and by far the dominant cost item in the Bulgarian pre-school education system. **And the only one that has been rising consistently throughout the period.** The running personnel costs, covered by state-budget transfers, constituted uninterruptedly

education, their part of the national expenditures on pre-school education stayed between 1.96% (2016) and 2.27 (2020) percentage points. For more detail see the part on Policy Mix Scope and Trends.

73 The programing period started with a decrease in the overall public expenditures on pre-school education but this trend was reversed in 2016. It has been the national funding that contributed to overcoming the decline of the expenditures on pre-school education. In 2016 the decisive factor was the municipal financing whereas in 2017 and in 2018 the expenditures increased thanks to the state budgets' transfers.

74 See below, in this section as well as in the section on Workforce Policies Addressing Pre-school Education for explanation why this is the case and what role of the personnel costs play in it.

75 Program developed by virtue of § 20 of Final Provisions of the State Budget Act for 2020. Source: Програма за изграждане, пристрояване, надстрояване и реконструкция на детски ясли, детски градини и училища 2020 – 2022 (mon.bg)

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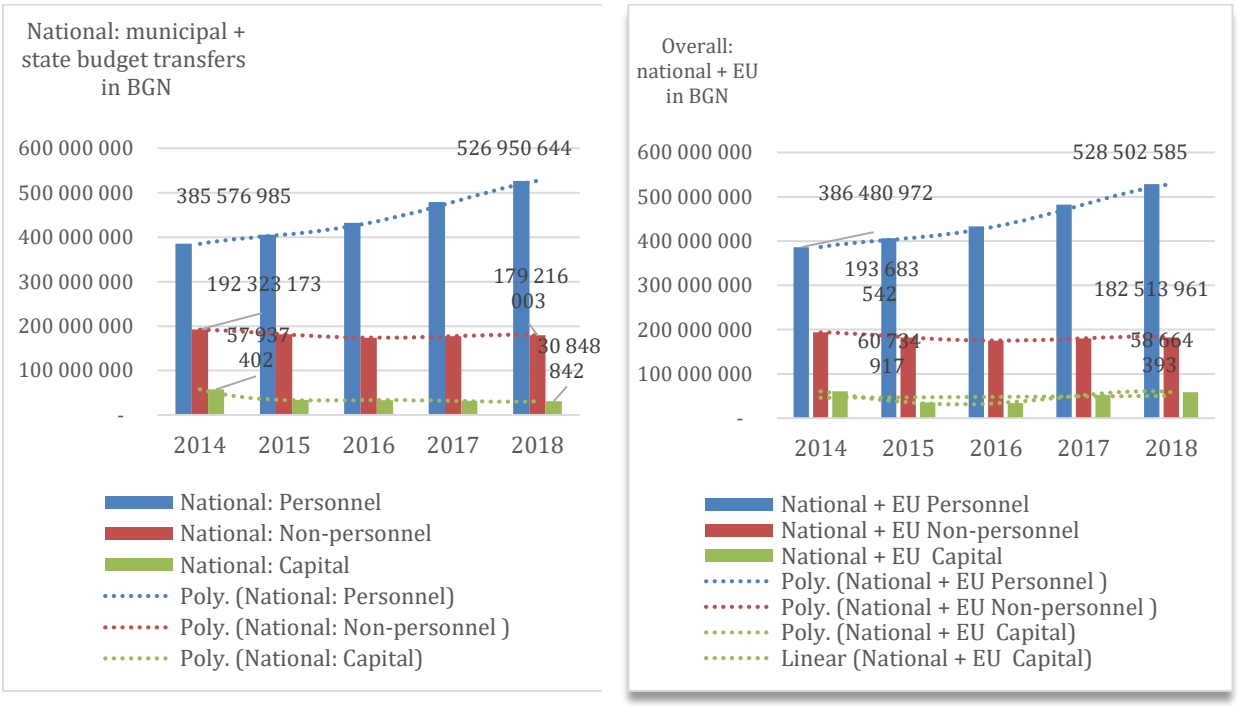
more than half of the expenditures for the pre-school education in the country. These are the only expenditure items that consistently grow over the years, while, both the capital investments and the costs for activities (non-personnel in Figure 6 have decreased between the beginning of the period and 2018. This tendency has made an already existing gap between the personnel costs and other expenditures ever bigger. The two parts of Figure 6 show that the EU funding did not change the expenditure structure of the Bulgarian pre-school education even though the EU funding has been prioritized differently from the national one (see for details Figure 34 in the part on the Policy mix). At best, the resources from the European Union allowed some mitigations in the declines of the capital and activity expenses to the extent that, with certain conditionality, the latter two expenditures might be qualified as stagnating between 2014 and 2018. Allocating a considerable proportion of the funding to workforce has left little space for meeting the infrastructural needs of the system as well as for the necessary upgrades and developments with respect to safeguarding learning outcomes and holistic development of the children which are the main normatively set objectives of the pre-school education[76] in Bulgaria.

Figure 6 Allocation of public funding by type of expenditure



Source: WB, BOOST database

Legislative safeguards on public financing for education in Bulgaria are not providing specific guarantees for pre-school separately. PSEA (2016) provisions on education financing enforced a guarantee that the state budget's financing for the state guaranteed activities (including national programs) in pre-school and school education cannot decrease on year-by-year basis neither in terms of nominal amounts (guarantee at least the same budget levels in case on GDP decrease) nor in terms of proportion of the GDP[77]. This translates into perpetual increases of public financing for education in economically 'good' years (when the GDP goes up) but is not specifying or guaranteeing levels for pre-school education.

[76] Art. 28 Ordinance 5 on Pre-school Education/ SES on Pre-school Education. This is reviewed below in detail, see for example in ECEC Concepts and Learning Standards / Curriculum

[77] PSEA, Art. 281.

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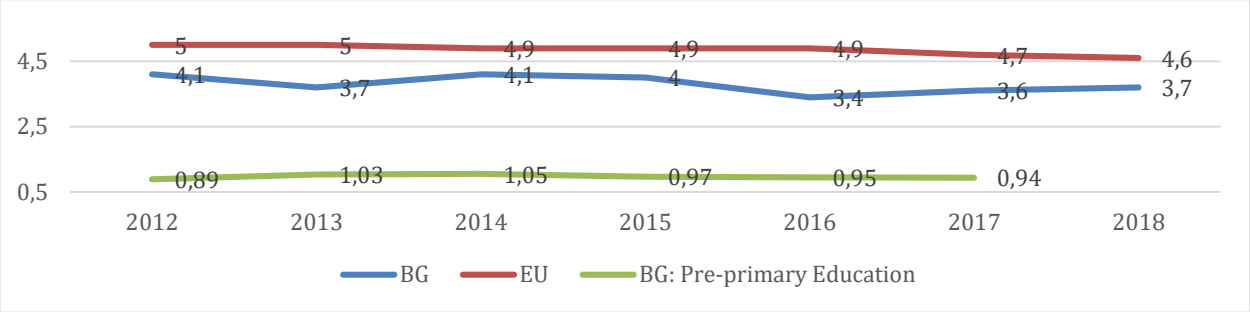
While the nominal expenditures on (pre-school) education increased on yearly basis, following the economic growth and PSEA (2016) regulations, expenses on pre-school remained flat and even went slightly down as percentage of GDP in the years after 2014. The period is characterized by expanding public budgets where the overall budget for education increased too. However, as proportion of the GDP the public expenditures on education remained lower in the period after the enforcement of PSEA than in the years preceding 2016 and are lower than the average for the EU.

Figure 7 Public expenditure on education as percentage of GDP



Sources: EU (2017, 2018, 2019) Education and Training Monitor Bulgaria
Eurostat: [educ_uoe_fine06]

The funding of pre-schools lagged behind the schools' one and this mirrors across public activities including in the NPDE where pre-school has remined underrepresented. The public expenditure on pre-school education as proportion of GDP - reached a pick in 2014 and even when the public expenditure on education went up (e.g., between 2016 and 2018) the trend for pre-school education remained downwards as seen from the Eurostat data provided so far. The continuous decrease in the relative expenditures (as % of GDP) on pre-school education in a period after 2016, when the overall decline of funding on education has been overcome, translates into a trend of pre-schools' funding lagging behind the schools'. Another sign of an opening gap between the financing of the school and pre-school education might be noticed with respect to resources directed to the policy mix. For example, examining the focus and the scope of the NPDE reveals that 9 out of 9 NPDEs were open to school education[78] but only 3 to pre-school education in 2016; five years later, by 2020 out of 21 NDEPs, 20 were open to school education vs. 10 - to pre-school education.

A trend of nominal increase of public expenditure per child characterizes the financing of pre-school education in the context of consistently decreasing number of children in both pre-school and school education. Children in Bulgarian kindergartens decreased with approximately 10 % between 14/15 and 19/20 school years. The public expenditure on pre-primary education in current prices in 2017 corresponded to 137% of the 2012's expenditure. This led to a remarkable increase of the relative expenditure per child/pupil/student. In the case of pre-school education, the trend remained positive every year in the period between 2012 and 2017, bar 2015 and in 2017 (the latest year for which Eurostat provides data) it is 141% of the 2012's.[79]

78 The total amount of resources allocated though NPDE was BGM 50.39 million in 2016 and BGN 139.65 million in 2020. Source: WB (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations (upcoming).

79 The increasing trend in financing of pre-school education per child was interrupted only once, it was uneven but for the whole period between 2102 and 2017 it averaged at 6.8% annually.

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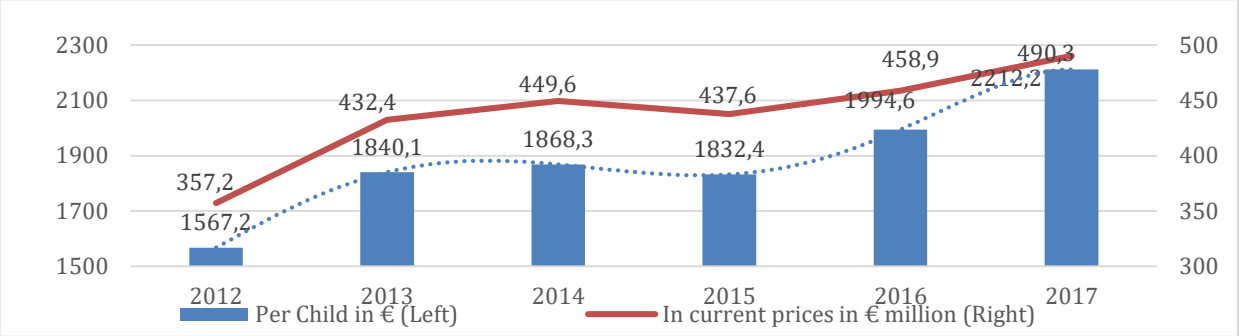
Figure 8 Public Expenditure on Pre-primary Education in Bulgaria



Source: Eurostat: [educ_uoe_fine04], [educ_uoe_fine09]

As the increased financing of the pre-school education has been taking place against the background of declining participation of children in it, both in absolute numbers and relatively, the question of policy efficiency and investment approach for pre-school stage remains central for Bulgaria. Did the increased spending for fewer children and the additional programs lead to improved child development, school readiness and later progress in general education outcomes? The analyses in the following sections provides evidences and outlines the need for development of a more effective and consistent policy that is packed with clear and strong data and analysis to guide reforms and address the relevant child development needs.

Pre-school Coverage and ECEC Aspects

Key points:

- *The pre-school participation in Bulgaria, which is among the lowest in the EU, has been on decline for the most of the outgoing programming period but there are signs that the negative trends might have been stabilized and even reversed at the end of the period.*
- *The challenge of decreasing coverage has received attention and made the pre-school (and school) enrollment a topic of key importance. Becoming a policy priority, it found also place in the respective implementation program packages.*
- *The nursery enrollment has been traditionally low in Bulgaria and increasing the nursery coverage might prove a promising strategy in contributing to the pre-school and school participation objectives.*
- *Bulgaria needs to improve data collection and better the information resources to benefit from specific analyses and planning, evaluate its approaches and design effective implementation strategies with respect to coverage.*

A decline in pre-school enrollment is evidenced by national and linked EU statistics throughout the 2014-2020 programming period. The compulsory enrollment registered in 2018 was 82.4% (Eurostat). The rate of pre-school enrollment in Bulgaria reached a peak some six years ago when in 2014[80] the tendency was reversed. This trend is reflected in two different indicators, presented respectively by Eurostat (compulsory stage) and by NSI (overall preschool stage). Eurostat reports higher enrollment since its dataset refers to 'the age group between 4-years-old - the starting age of compulsory education'[81] whereas NSI's datasets cover the pre-school coverage 3-6 years old and is reflecting the lower enrolment of 3 years old.[82] The enrollment rate has dropped with more than seven percentage points

80 The NSI datum for *2013* actually refers to the *2013-2014* school year, respectively the datum for 2014 is for 2014-2015 school year.
81 Eurostat. Retrieved from: https://ec.europa.eu/eurostat/tgm/graph.do?tab=graph&plugin=1&language=en&pcode=sdg_04_30&toolbox=type
82 Another difference is that Eurostat presents its data per calendar year, whereas NSI – per school year; this explains also what seems as a slight (visual) discrepancy in the graph in Figure 9 for 2013 and 2014; see also footnote 80.

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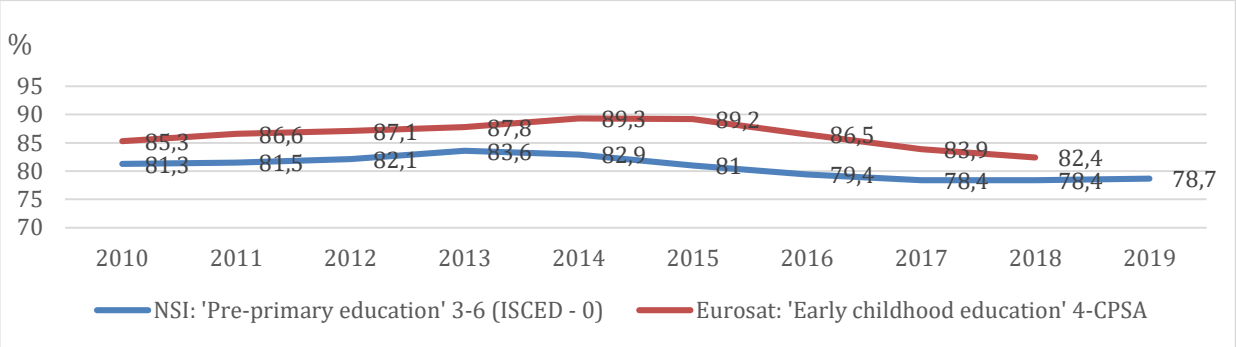
(from 89.3%) in four years (Eurostat). MES datasets are not offering alternative indicators to inform enrolment based on regular observation through MES system registers but estimates higher enrollment outcomes and some incorrectly reported data associated with EU migration trends.

Figure 9 Pre-school enrollment trend in Bulgaria



Legend: CPSA – compulsory primary-school age
Sources:
NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia;
NSI (2015) EDUCATION IN THE REPUBLIC OF BULGARIA 2015. NSI: Sofia;
NSI 2020 Education in Republic of Bulgaria in the school year 2019/2020;
Eurostat: https://ec.europa.eu/eurostat/tgm/table.do;jsessionid=kf5OgQSBYM7ZMoxlmUjPZWkN_Vbl-yHRwop6utBnHOfuvAD10v6p!-1033115467?tab=table&plugin=1&language=en&pcode=sdg_04_30

Bulgaria pre-school enrollment can't catch up with EU trends. Only three EUMS[83] had lower pre-school enrollment rates than in Bulgaria according to the latest available Eurostat data (2018). EU 2020 data reveal stagnating outcomes and systemic differences with comparators Czech Republic, Croatia, Estonia, the Netherlands, Romania, Slovenia, UK and others on enrollment and attendance in education at both school and pre-school levels. In ECEC enrollment comparators demonstrate a stable trend in maintaining and increasing the levels of enrollment which is still not observed in Bulgaria.'[84] According to Eurostat this trend has not been reversed since Bulgaria's accession to the EU and the gap between Bulgaria and the EU almost doubled (to 12.9 percentage). In the period after Bulgaria's accession the average pre-school enrollment rate in the Union has been rising gradually and by 2018 it reached 95.3% whereas the trend in Bulgaria was negative.[85]

83 Croatia, Greece and Slovakia. From the 13 countries that joined EU in and after 2004 only Slovakia and Croatia have lower pre-school participation rates accordong to the latest Eurostat data but in both the enrollment dynamics has been positive in the last 5 years. Croatia joint EU in July 2013 and between that year and 2018 it raised the enrollment rates with alomost 10 percentage points from 71.4% to 81%. Slovakia has practically catched up with Bulgaria with enrollment of 82.2% in 2018 (difference of 0.2 percentage points), increasing the pre-school participation from 77.4% in 2014. From the new EUMS (after 2004) the only other country, except Bulgaria, where negative tendency has been observed in the outgiong programming period (2014-2020) is Malta. But there, even after steep negative trend for four years, the enrollment rate still has been meeting the EU target of 95%; moreober the Maltian decline in pre-school participation started after reaching full pre-school education coverage in 2015.

84 WB (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations.

85 Source: Eurostat sdg_04_30

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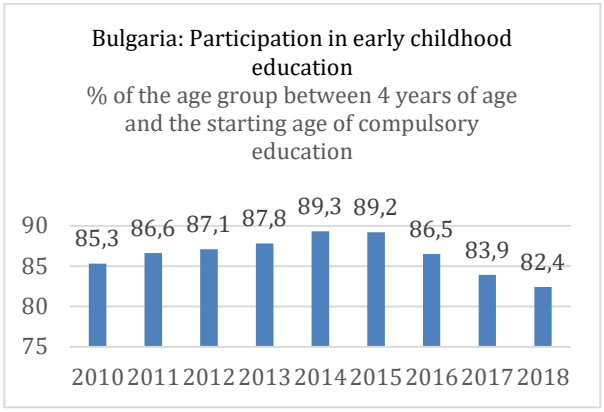
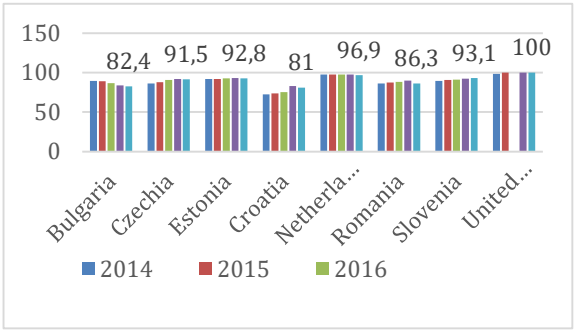
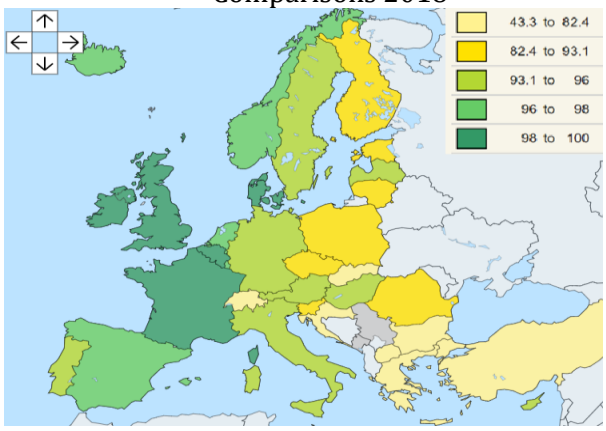
Figure 10 Bulgaria and EU 2020 indicators: Participation in early childhood education: % of the age group between 4 years of age and the starting age of compulsory education



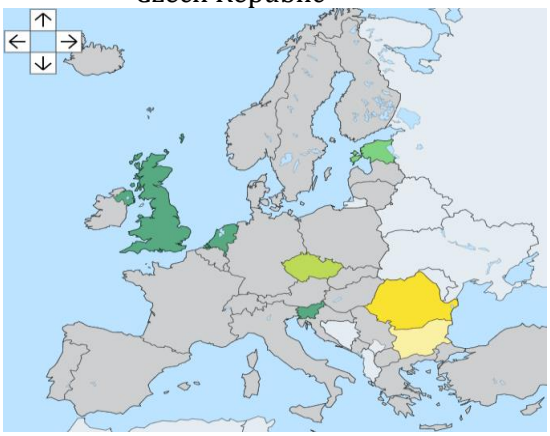
Comparisons: 2014–2018 dynamics (2018 data displayed)



Comparisons 2018



Selected comparators 2018: Estonia, Slovenia, Czech Republic



Source: Eurostat copyright of administrative boundaries: ©EuroGeographics; commercial redistribution is not permitted; last update: June 8, 2020; date of extraction: June 28, 2020 00:19:20 CEST; hyperlink to the map: https://ec.europa.eu/eurostat/tgm/mapToolClosed.do?tab=map&init=1&plugin=1&language=en&pcode=sdg_04_30&toolbox=legend; hyperlink to the graph: https://ec.europa.eu/eurostat/tgm/graph.do?pcode=sdg_04_30&language=en.

Bulgaria's challenges with coverage makes pre-school (and school) enrollment 'a topic of key importance in Bulgaria that dominates the policy priorities and the respective implementation program packages.'[86] Pre-school enrollment has found a prominent place in the overall policy planning and its expanding has been referred to in key documents including as a strategic goal in the National Strategy for Lifelong Learning (NSLLL).[87] The NSLLL and the package of related education strategies in 2014–2020 aimed at building a strong system focused on improving the participation in formal and informal education in line with the framework for European cooperation in education and training benchmarks. Policy targets that address schooling and the associated dropout and attendance profiles have dominated overall policy planning since 2014 and have influenced significantly the most innovative policy aspects related to digitalization; innovations; science, technology, engineering, and mathematics (STEM); and - civic culture. The review of NSLLL indicators relevant to pre-school and school education linked with relevant EU 2020 goals illustrates that, overall, the education system is still struggling to contribute to the package of EU 2020 indicators on both schooling and learning policy strands.

86 (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations.
87 (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations.

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Table 3 Bulgaria and EU 2020: NSLLL's indicators contribution to EU education policy targets[88]

EU 2020 goal (education)	Bulgaria 2020 goal (education)
Population ages 25–64 participating in lifelong learning—min 15%	Increasing the participation rate of those aged 25–64 in Lifelong Learning from 1.5% to 5% in 2020
	Share of public expenditures in education to improve lifelong learning participation rate from 3.4% in 2010 to 4% in 2020
Share of children ages 4 to compulsory school age in early childhood education and care (ECEC) – min 95%	Share of children ages 4 to compulsory school age in early ECEC—min 90% in 2020
Share of early school leavers from education and training lower than 10%	Share of early school leavers lower than 11% in 2020
	For *primary level* from 2.3% in 2011 to 1.5% in 2020
	For *lower secondary level* from 3.1% in 2011 to 2% in 2020
	Decreasing the share of illiterate people ages 15–19 from 2% in 2011 to 1.5% in 2020
	Decreasing the share of illiterate people ages 20–29 from 2% in 2011 to 1.5% in 2020
Share of 15-year-old students attaining below level 2 in reading, mathematics, and sciences lower than 15% (PISA)	Share of students ages 15 attaining below level 2 in reading and sciences is lower than 30% and lower than 35% in mathematics (PISA) in 2020

Various policy approaches addressing pre-school enrollment, retention and attendance have been put in place in the outgoing programming period 2014-2020. The introduction of new regulatory framework of pre-school and school education, with the enforcement of PSEA in 2016, re-affirmed the compulsory and free pre-school education for the five- and six-year-old children (art. 8 and art. 9). PSEA was amended in September 2020 to extend the compulsory pre-school education to the 4-year-old children. A *Mechanism for collaboration between the institutions aiming at inclusion and retention of children and pupils in compulsory pre-school and school education* was piloted in 2017[89] and permanently introduced in 2018.[90] The preschool aged between five and seven years of age are a priority group. MES analysis are showing decrease of children out of the compulsory education as a result of the activities[91]. The *Mechanism* is an unusual example of setting and institutionalizing a system of collaborative efforts in pre-school and school education as well as in the subsector of ECEC: the intersectoral teams in charge of the implementation of the *Mechanism* in each municipality include representatives from the education sector, the social welfare sector, the local authority and the regional department of the Ministry of Interior.[92] Representatives of other institutions and sectors might be engaged too if deemed necessary.[93] The regulatory measures were complimented by policy interventions[94] financed with national (National Programs, NPs) and EU (*Operational Programs, OPs*) resources. Two National Programs, both relevant to

88 Ibid

89 Decision of the Council of Ministers #373/05.07.2017 (in Bulgarian: Р Е Ш Е Н И Е № 3 7 3 от 5 юли 2017 година ЗА СЪЗДАВАНЕ НА МЕХАНИЗЪМ ЗА СЪВМЕСТНА РАБОТА НА ИНСТИТУЦИИТЕ ПО ОБХВАЩАНЕ И ЗАДЪРЖАНЕ В ОБРАЗОВАТЕЛНАТА СИСТЕМА НА ДЕЦА И УЧЕНИЦИ В ЗАДЪЛЖИТЕЛНА ПРЕДУЧИЛИЩНА И УЧИЛИЩНА ВЪЗРАСТ)

90 Decree of the Council of Ministers #100/08.06.2018 (full tittle of the by-law in Bulgarian: ПОСТАНОВЛЕНИЕ № 100 от 8 юни 2018 година ЗА СЪЗДАВАНЕ И ФУНКЦИОНИРАНЕ НА МЕХАНИЗЪМ ЗА СЪВМЕСТНА РАБОТА НА ИНСТИТУЦИИТЕ ПО ОБХВАЩАНЕ И ВКЛЮЧВАНЕ В ОБРАЗОВАТЕЛНАТА СИСТЕМА НА ДЕЦА И УЧЕНИЦИ В ЗАДЪЛЖИТЕЛНА ПРЕДУЧИЛИЩНА И УЧИЛИЩНА ВЪЗРАСТ)

91 Based on MES information (June 2021)

92 Ibid, article 3 (7).

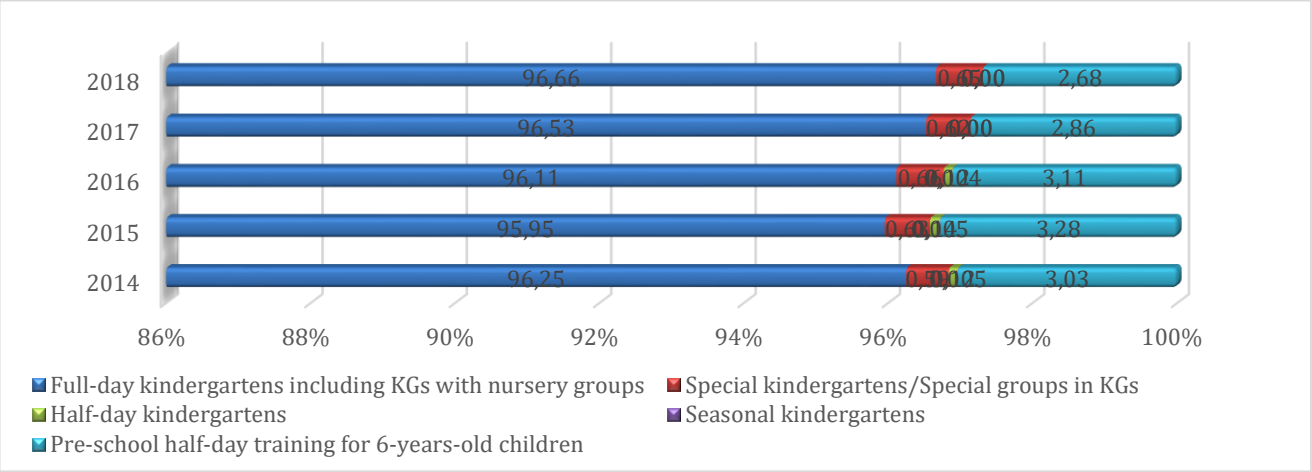
93 Ibid, articles 3 (8) and 3 (9).

94 They are reviewed in detail later on in the text.

supporting participation, have been specifically devoted to pre-school education: *NP Development of Pre-school Education* (2017 and 2018) and *NP We Succeed Together* (2019 and 2020). The system level project (SLP) *Active Inclusion in the Pre-School Education System* (2019-2021),[95] aims at increasing the chances of (vulnerable) children to enroll and remain into pre-schools. Measures in support of pre-school participation were incorporated also into broader interventions and regulatory regimes,[96] whose playing field exceeded the scope of pre-school education.

The public kindergarten is the predominant form of pre-school education institution in Bulgaria. As already reviewed above[97] the children in private KGs never exceeded 2.4% of the KG-enrolled children. The data on funding of the public pre-schools (Figure 11) shows that the full-day (municipal) KGs including KGs with nursery groups dominated the public provision of pre-school education.

Figure 11 Public pre-school provision national expenditures per type of pre-school institutions



Source: WB, BOOST database

The decrease in compulsory pre-school participation was put on hold in the 2018-2019 school year and modestly reversed in the 2019-2020. Although the individual impact of each of the interventions listed above is not possible to be assessed precisely, due to design approach and non-specific data and monitoring packages, the measures to lift the pre-school participation might have started to produce results. According to a preliminary publication of data by NSI the participation rate in 2019-2020 school year has ascended to 78.7%[98] after stabilizing in the previous two years at 78.4%.[99] In absolute numbers, though, the children enrolled in KGs in 2018-2019 were with 2000 fewer than in 2017-2018 school year[100] and in 2019-2020 - with another 1000 fewer than in the previous year. The inconsistency in the dynamics between the relative and the absolute numbers might be entirely explained by the negative demographic trend.

[95] Within the OP Science and Education for Smart Growth (OPSESG).

[96] For example: the *NP Together for Every Child*, designed to directly support the teams implementing the *Mechanism for inclusion and retention of children and pupils*. As an illustration for a regulatory measure could serve the amendment of Article 7(11)2. of the Family Allowance for Children Act.

[97] See the section on Financing.

[98] NSI 2020 Education in Republic of Bulgaria in the school year 2019/2020. Published in Bulgarian, original title: ОБРАЗОВАНИЕТО В РЕПУБЛИКА БЪЛГАРИЯ ПРЕЗ УЧЕБНАТА 2019/2020 ГОДИНА Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Education2019_G60QZG9.pdf

[99] NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia.

[100] Ibid

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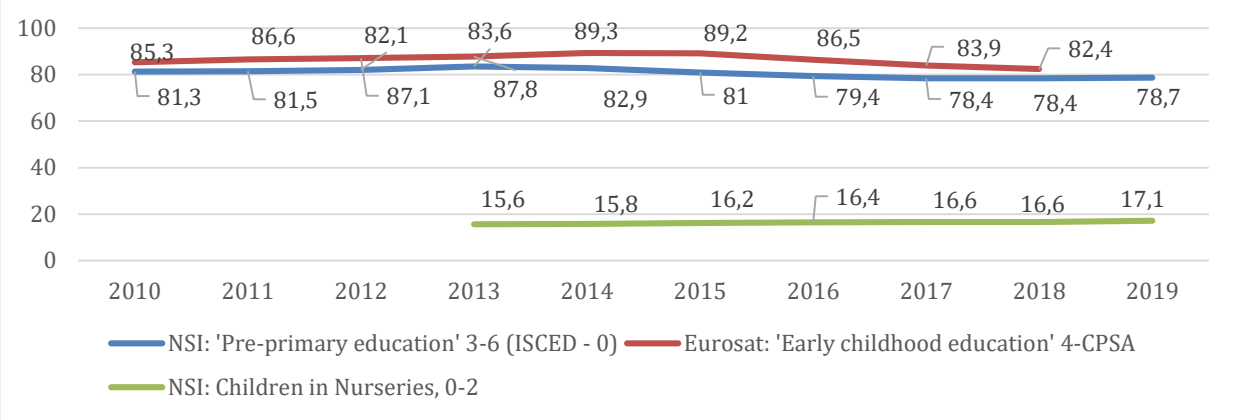
Figure 12 ECEC enrollment: nurseries and pre-schools

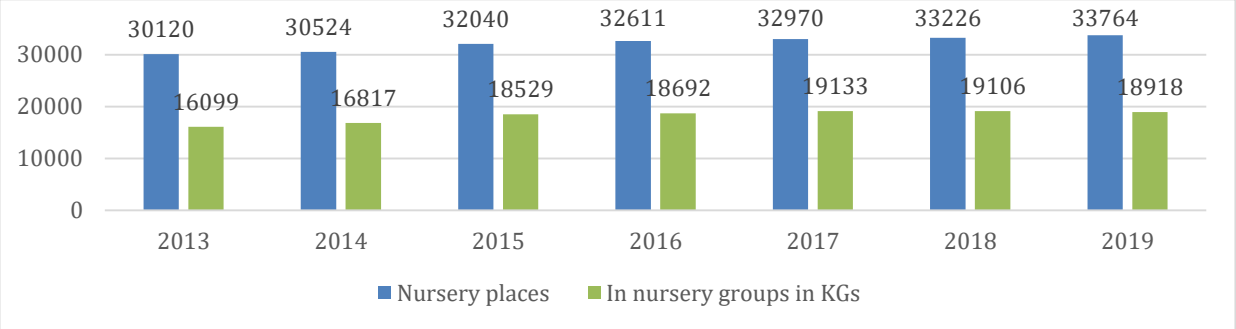


Sources: NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia
Eurostat: https://ec.europa.eu/eurostat/tgm/table.do;jsessionid=kf5OgQSBYM7ZMoxlmUjPZWkN_Vbl-yHRwop6utBnHOfuvAD10v6p!-1033115467?tab=table&plugin=1&language=en&pcode=sdg_04_30
NSI (2020) Nurseries in 2019. Published in Bulgarian, original title: НСИ (2020) ДЕТСКИ ЯСЛИ ПРЕЗ 2019 ГОДИНА. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Creches2019_PB1PNPP.pdf

The enrollment rates for younger children (0-2) in nurseries are traditionally lower in Bulgaria reaching 17 percentage in 2019. When sketching a more comprehensive picture for the whole ECEC subsector it has to be recognized that the enrollment rates of younger children (0-2) into nurseries or nursery groups have been much lower but on ascending trend and in 2019 they reached 17.1%.[101] The age structure of the children enrolled in nursery institutions is dominated by the two-year-old children: 80.9%, whereas the proportion of babies under one year of age is negligible: 0.02%. The long maternity leave, the promotion of other forms of parental care, including paternity leave, the tradition, and even some interventions are among the factors that might explain the low enrollment rates in nurseries and especially the absence of the babies.

While still directly regulated by MH, the mapping of provision is outlining MES as a key provider of nursery services throughout the programming period 2014-2020Error! Reference source not found.. The proportion of children in the nursery groups in KGs has been above the half throughout the programming period, ranging between 55.09 % in 2014 and 58.03% in 2017.[102]

Figure 13 Total number of nursery places and places in nursery groups in KGs (2013-2019)



Source: NSI (2020) Nurseries in 2019

101 NSI (2020) Children in Nurseries. Published in Bulgarian, original title: НСИ (2020) ДЕТСКИ ЯСЛИ ПРЕЗ 2019 ГОДИНА. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Creches2019_PB1PNPP.pdf

102 NSI (2020) Children in Nurseries. Published in Bulgarian, original title: НСИ (2020) ДЕТСКИ ЯСЛИ ПРЕЗ 2019 ГОДИНА. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Creches2019_PB1PNPP.pdf

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Increasing the nursery coverage might be a positive strategy in contributing to pre-school and school participation objectives but Bulgaria needs specific analysis and planning on the possible approaches and implementation. Political intentions to expand the coverage of pre-school education downwards have been stated[103] and supporting examples from other EUMS have been mentioned.[104] The rationale behind is: the earlier a child enrolls in an ECEC provision, the greater their chances to benefit optimally from pre-school education. Following the same logic, increasing the coverage of the younger children (0-2) by nurseries could and should be translated in the greater participation in pre-school education. The huge difference between the nurseries' and the pre-schools' coverage rates suggests that there is unutilized potential to support the pre-school enrollment by enlarging the proportion of younger children (0-2) into nurseries. In order to explore this opportunity Bulgaria will have to address first the challenges related to existing standards and basic coordination of provision approaches between health, social and education sectors (see curriculum).

Data collection and bettering the information resources to inform and manage ECEC coverage is a priority domain for improvement already identified by the GoB.[105] **Questions and concerns have been raised with respect to the available enrollment data.** A strategic policy document adopted by the Council of Ministers (CM)[106] admits with respect to the (pre-school) education that data mismatches or shortages might affect the analytical framework that serves as a basis for policy formulation. Specifically, the *Analysis of the Socio-Economic Development of Bulgaria* recognizes that the negative pre-school enrollment trend might be 'partially explained' by 'unregistered emigration'.[107] The degree to which the data shortages and inaccuracy might explain the registered enrollment decline in the outgoing programming period remains unspecified. As with other policy areas, the problem with data collection and information resources management with respect to pre-school enrollment has been related (also) to the fact that different governmental agencies gather, manage and utilize the information not necessarily in a coordinated manner. Data Relevant to enrollment should be collected by at least MES, MRDPW's General Directorate Civil Registration and Administrative Services[108] and the municipal administrations. In case of migration of children in compulsory (pre-)school age relevant information should be available also in the Ministry of Interior's General Directorate Border Police's databases. As part of the presented *Mechanism for collaboration between the institutions aiming at inclusion and retention of children and pupils in compulsory pre-school and school education*[109] three key data-flow processes have been introduced. They specifically aim at regular exchange of information between the institutions and coordination sanctions (art.1 (3) 5.), collaboration with respect to registering travel (abroad) and migration related to children in compulsory (pre-)school age (art.1 (3) 6.) and exchange of information and control related to medical documents justifying (pre-)school absence (art.1 (3) 7.).

In the context of ambitious policy steps addressing ECEC with focus on coverage, Bulgaria is putting a modest aim to increase pre-school participation with 4 percentage points by 2030. In the (draft of

103 This statement has been reported in various news media in December 2019. See for example: https://www.mediapool.bg/zadalzhitelnoto-obrazovanie-za-4-godishnite-shte-e-samo-v-gradinite-news301519.html or https://offnews.bg/obshtestvo/12-000-detca-ne-poseshtavat-preduchilishtna-gradinata-zadalzhitelna-z-717681.html

104 'The trend in Europe is for early coverage - in France, for example, the threshold is already 3 years old, added [Minister] Krassimir Valchev' Source: OFFNews (2019) 12 000 деца не посещават предучилищна, градината задължителна за 4-годишните от 2020/2021, Retrieved from: https://offnews.bg/obshtestvo/12-000-detca-ne-poseshtavat-preduchilishtna-gradinata-zadalzhitelna-z-717681.html

105 This point runs as a red thread throughout the thematic sections below.

106 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027 Adopted by Decision of Council of Ministers (# 196/11.4.19).

107 Ibid.

108 In Bulgarian: Главна дирекция „Гражданска регистрация и административно обслужване" (ГРАО) МРРБ.

109 Decree of the Council of Ministers #100/08.06.2018 (full tittle of the by-law in Bulgarian: ПОСТАНОВЛЕНИЕ № 100 от 8 юни 2018 година ЗА СЪЗДАВАНЕ И ФУНКЦИОНИРАНЕ НА МЕХАНИЗЪМ ЗА СЪВМЕСТНА РАБОТА НА ИНСТИТУЦИИТЕ ПО ОБХВАЩАНЕ И ВКЛЮЧВАНЕ В ОБРАЗОВАТЕЛНАТА СИСТЕМА НА ДЕЦА И УЧЕНИЦИ В ЗАДЪЛЖИТЕЛНА ПРЕДУЧИЛИЩНА И УЧИЛИЩНА ВЪЗРАСТ)

the) governmental National Development Program BG 2030 the pre-school participation goal is to increase the net enrollment ratio of 4-, 5- and 6-year-old children from 82.4% in 2018 to 86.3% in 2030. This is below the set targets for 90 percentage coverage in 2020 (see indicators above). Against the recognition and prioritization given to comprehensive pre-school education in a number of policy documents, statements and actions, the proposed moderate increase also provokes certain questions:

- The expected impact of the 2020 amendment to the PSEA introducing compulsory pre-school education for the 4-year-old children is expected to contribute to reaching much greater enrollment increase at latest in 2023, when it has to be fully enforced.
- It is signaling discrepancies between the proposed increase to 86.3% and its correspondence with targets set in a number of in strategic documents[110] and with the 95% target set in EC Communication on Achieving the European Education Area by 2025.[111]
- Another discrepancy is addressing the planed mainstreaming of the Mechanism as a primary instrument for addressing dropouts and the planning to support its implementation by ambitious EU programming.
- MES is implementing a focused reform to decentralization and empowerment of providers to develop specific policies addressing local community needs. This element is expected additionally to contribute to the Mechanism and to promote culture of proactive communication and provisions within the system that address key challenges such as enrollment.
- The draft of the Strategical Framework for Development of the Education, Training and Learning in Republic of Bulgaria (2021-2030) envisages much more ambitious goal with respect to pre-school enrollment, namely meeting the current EU target of 95% participation of children aged 4-CSA in pre-school education.
- Finally, from multisectoral perspective there is a list of measures encompassing social welfare and education addressing support for the most vulnerable groups with respect to education. Overall, this mix of policy responses and planning should be packed with strong institutional support for implementation and address much ambitious policy goals on enrollment and ECEC participation that in turn should lay down the foundation for higher-level policy goals.

The draft of the *Strategic Framework for Development of the Education, Training and Learning in Republic of Bulgaria (2021-2030)* pays specific attention to pre-school education and sets 95% participation target with respect to 4-CSA children and 91% participation of the 4-year-old children. Altogether 8 sets of activities/measures are listed under the *Goal of Effective Socialization of Children from Early Age*.[112] All of them aim at strengthening the ECEC provisions in the country and thus in broader sense stimulate greater pre-school coverage. Interpreted specifically with respect to participation, two of the measure clusters should have direct contribution to enlarging the pre-school coverage and three – indirect. The two clusters of measures with potential to directly contribute to participation are i) the additional teaching of Bulgarian to children whose mother tongue is different so that they are able to follow the language of instruction when entering school and ii) 'expanding of the general and additional support for children in kindergartens and pre-school education groups in schools and implementing inclusive care in nursery groups in nurseries and kindergartens'[113] Measures from both clusters have already been implemented through various policy approaches, some of them identified in the text above. Two of the three sets of measures indirectly affecting pre-school participation are related to parents and one is formulated as 'development and implementation of the ECD standards',[114] an already existing normative stipulation, referred to preciously in this section and in the Introduction. While most of the referred interventions serve stated strategic goals related to participation, it is difficult to establish a clear reference to realizing learning goals. Even when the design of some of the measures might lead to

110 e.g. National Strategy for Lifelong Learning for the Period 2014-2020: 90%, National Strategy to Stimulate and Increase Literacy (2014 - 2020): 90%

111 COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS on achieving the European Education Area by 2025

112 (Draft of) Strategical Framework for Development of the Education, Training and Learning in Republic of Bulgaria (2021-2030).

113 Ibid.

114 Ibid.

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results potentially contributing to better (future) learning outcomes, on the level of reporting it is difficult to establish if and to what degree learning goals have been served.

Dimensions of Access and Equity

Key points:

- *Despite the negative demographic trends that clearly affect also the ECEC-aged children and the continuing overcapacity of the pre-school provisions on national level, Bulgaria still experiences unmet local demand for places in pre-school-education institutions.*
- *The access challenges spread beyond the availability of places and have affordability dimensions too. Access and equality are often interrelated and successfully tackling them requires recognizing and addressing also root causes outside the domain of education.*

Despite demographic decline that is lowering the demand for pre-school education and within the trend of nominal increase of budget for pre-school Bulgaria is still facing challenges with the accessibility of pre-school services. Shrinking participation, already discussed, might be also influenced by different aspects related to access. The concept of *access*, refers to the *availability* of places for all children and the places' *affordability* for the children's parents or other primary caretakers[115]. GoB acknowledges that there are hindrances to pre-school education both in terms of availability and affordability[116].

The supply of pre-school education provisions has gone down throughout the outgoing programming period. In parallel with the decreasing number of children, the number of places available in the KGs has been descending every year since 2014. Between 14/15 and 18/19 school years the available places in the KGs were reduced with 12200.[117] For the period 2013-2018 the balance between the newly opened and the closed down KGs is negative and resulted in reduction of the number of kindergartens with 236 (11.4%)[118] And raised for the first time in 4 years in 2019-2020 when 6 new KG opened 5 of them - private.[119] T According to NSI there were 10036 KG groups in the 14/15 school year, 10115 in 15/16, 9576 in 16/17, 9355 in 17/18 and 9285 in 18/19 school year.[120] The number of children enrolled in KGs also has been on stable decline. According the latest data there were '217.9 thousand' [sic] children enrolled in KGs in 19/20 school year, which is 'a decrease of 0.4% in the number of children with

115 The definition here is adaptation of Van Belle's reference of 'accessibility […] to the ability of all children to attend education, which in the case of ECEC primarily means an obligation to make non-compulsory education affordable.' Van Belle, J., (2016) Early Childhood Education and Care (ECEC) and its long-term effects on educational and labour market outcomes Retrieved from: https://www.rand.org/pubs/research_reports/RR1667.html

116 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027. Adopted by Decision of Council of Ministers # 196/11.4.19.

117 NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia.

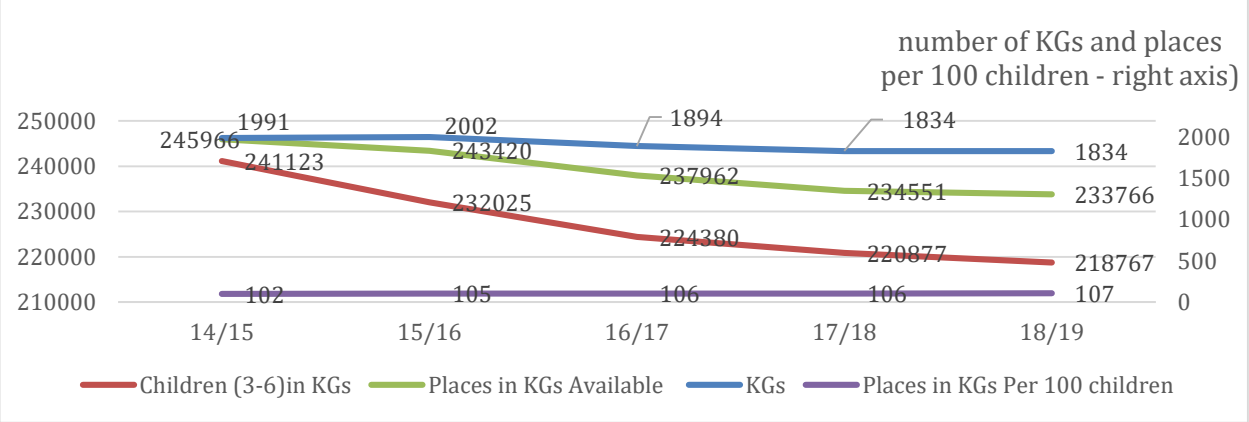
118 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027. Adopted by Decision of Council of Ministers # 196/11.4.19.

119 NSI 2020 Education in Republic of Bulgaria in the school year 2019/2020. Published in Bulgarian, original title: ОБРАЗОВАНИЕТО В РЕПУБЛИКА БЪЛГАРИЯ ПРЕЗ УЧЕБНАТА 2019/2020 ГОДИНА Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Education2019_G60QZG9.pdf

120 NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia.

respect to the previous school year.[121] Despite the decline in absolute numbers, the 2019/2020 school year marked a growth (0.3 percentage points) in participation rate[122] for the first time since 2014.[123, 124]

Figure 14 Pre-school capacity: supply and demand indicators 2014-2019



Sources: NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia.

Despite the registered decrease of pre-school provisions throughout the period, the pre-school education system functioned in the condition of oversupply. In 2014/2015 school year for every 100 children enrolled in the KGs there were 102 available places. This overcapacity surged next school year to 105% and then the positive capacity trend sustained, to reach 107% in 2018/2019 school year. [125]

Maintaining stable overcapacity against the background of declining enrollment signals that the system needs to accommodate solutions that are flexible and adapted to specific local dynamics in demand. In 2018 it was normatively established[126] that the maximal number of children per regular[127] kindergarten group should be 23. As shown below, Figure 14, throughout the period from 2014/2015 to 2019/2020 school year the average KG group was reaching or exceeding this maximum. However, between 2014/2015 and 2018/2019 school years, the difference between available places and enrolled children surged from 4843 to 14999.[128]

If in 2014/2015 against 245968 available places there were 241 123 children enrolled, in 2018/2019 against the 233766 available places there were 218767 enrolments. The growing difference within the *left axis* in Figure 14 visualizes a trend that indicates that there were no effective policy steps addressing either the dynamics of overcapacity at system level or its structure and while the number of enrolled children decreased with 10.2 percentage points the number of places in the kindergartens was reduced with just 5.2 percentage points.

121 NSI 2020 Education in Republic of Bulgaria in the school year 2019/2020. Published in Bulgarian, original title: ОБРАЗОВАНИЕТО В РЕПУБЛИКА БЪЛГАРИЯ ПРЕЗ УЧЕБНАТА 2019/2020 ГОДИНА Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Education2019_G60QZG9.pdf

122 Ibid. This is reviewed above, in the section on Pre-school Coverage and ECEC Aspects

123 NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia.

124 As already noted in the previous section: the seeming discrepancy between the decrease in the number of enrolled children and the increase of participation rate could be entirely explained by the negative demographic trend.

125 Ibid. Data for 19/20 not yet available.

126 Annex 7 to *Ordinance for Financing the Institutions in the Pre-school and School Education System*; adopted by Decree of the Council of Ministers # 219/05.10.2017

127 Apart from 'regular' there are also 'special' groups, respectively: for visually impaired children; for children with speech and language disorders; for hearing impaired children; for mentally retarded children and for children with multiple disabilities. The same Annex (see footnote 126) set also the maxima for these groups too. For each of them it is 11 places, except for the latter – where the maximum is stipulated at 6.

128 NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia.

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The nurseries, the main ECEC provisions for younger children, also function in condition of national overcapacity[129] **despite their much lower coverage.**[130] **The data shows notable regional differences too**. There were altogether 33764 nursery places in 2019 corresponding to *capacity*[131] of 17.9%. The provinces (област, [oblast]) with the highest capacity in the same year were Gabrovo (26.3%), Blagoevgrad (23.4%) and Vratsa (22.6%). There were 32185 children from three months up to three years enrolled in nurseries and nursery groups in KGs, corresponding to *coverage*[132] of 17.1% in 2019; the provinces with the highest participation rates were Gabrovo: 24.3%, Pleven: 22.2%, and Sofia (capital): 22.0%. Figure 15, although graphicly available only in Bulgarian, illustrates vividly the differences in the (under)utilization of nursery capacity per region.[133] The distribution of capacity between rural and urban nursery institutions (nurseries and nursery groups in KS) is clearly skewed in favor of the urban ones: out of 835 institutions, 718 ones with 31409 places have been situated in urban areas whereas only 117 institutions with 2355 places – in rural areas. The same ordinance of the Minister of Public Health[134] regulates normatively both the nurseries and the children's kitchen as ECEC provisions. The latter, too, could be private or municipal and the functioning of the municipal ones is financed by the municipal budgets.[135] The public provision of information on the functioning and scope of coverage of children's kitchens is scarce and does not allow reliable analysis.

Figure 15 Nursery capacity and coverage, 2019

Reproduced from: NSI (2020) Children in Nurseries. Published in Bulgarian, original title: НСИ (2020) ДЕТСКИ ЯСЛИ ПРЕЗ 2019 ГОДИНА.
Legend: Capacity: /Coverage: Provinces, from left to right: Toral for the country, Blagoevgrad, Burgas, Varna, Veliko Tarnovo, Vidin, Vratsa, Gabrovo, Dobrich, Kyustendil, Lovech, Montana, Pazardzhik, Pernik, Pleven, Plovdiv, Pazgrad, Russse, Silistra, Sliven, Smolyan, Sofia, Sofia (capital), Stara Zagora, Targovishte, Haskovo, Shumen, Yambol.

129 I.e. more available nursery places than enrolled children in nursery groups.
130 See the previous section on Pre-school Coverage and ECEC Aspects.
131 *Capacity* 'is calculated as the ratio of the number of places nurseries and nursery groups in the composition of the kindergarten per 100 children from population up to 3 years of age.' Source: NSI (2020).
132 *Coverage* 'is calculated as the ratio of children enrolled nurseries and nursery groups in the kindergarten, per 100 children from the population up to 3 years old.' Source: Ibid.
133 NSI (2020a) Children in Nurseries. Published in Bulgarian, original title: НСИ (2020) ДЕТСКИ ЯСЛИ ПРЕЗ 2019 ГОДИНА. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Creches2019_PB1PNPP.pdf
134 Ordinance # 26/18.11.2008 regulating the structure and functioning of nurseries and kinder kitchens and the health requirements applicable to them. Published in Bulgarian, original title: НАРЕДБА № 26 ОТ 18 НОЕМВРИ 2008 Г. ЗА УСТРОЙСТВОТО И ДЕЙНОСТТА НА ДЕТСКИТЕ ЯСЛИ И ДЕТСКИТЕ КУХНИ И ЗДРАВНИТЕ ИЗИСКВАНИЯ КЪМ ТЯХ.
135 Ibid, art. 1(3).

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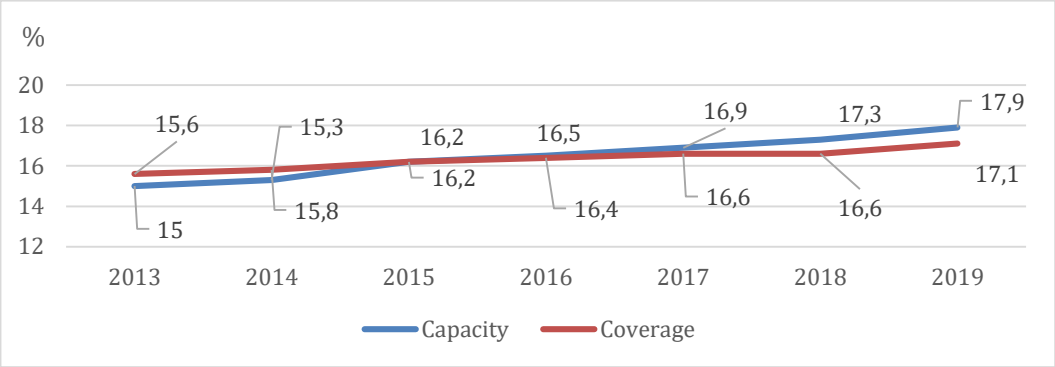
Sourse: NSI (2020) Nurseries in 2019

The dynamics in the proportion between nursery capacity and coverage underwent notable change and has been reversed within the outgoing programming period (2014-2020).[136] Just as with the pre-schools at the end of the programming period (2019) the available nursery places exceed the enrolled children: for every 100 enrolled children there are 105 available nursery places. But this was different in the beginning of the programming period 2014-2020: it started with under-capacity of nursery care. After reaching parity in 2015, the capacity of the nursery institutions surpassed their coverage and for the next 4 years the overacidity has been gradually growing, as Figure 16 demonstrates.

Figure 16 Dynamics of nursery capacity and coverage



Source: NSI (2020) Children in Nurseries

Despite the overcapacity on national level there are municipalities experiencing unmet demand for nursery places. While NSI data on available palaces (in nurseries and nurseries groups in KGs) and on actual enrollment evinces that nationally there is free capacity since 2015[137] unmet demand for nursery places continues to exist locally – as per October 2020 parents of 6644 babies and toddlers are on a waiting list to enroll their child in a nursery in Sofia.[138]

Similarly, the national overcapacity of KG places has been combined with strong regional differences and local shortages of pre-school places persisted. In the beginning of the period, in 14/15 school year, in two of the three statistical regions in the south of the country there was parity between capacity and coverage and in one of the regions (South-West) for every 100 children enrolled in KGs there were only 93 available paces, despite the national overcapacity. Reviewed on the level of province the data for the same school year shows that the under-capacity has been concentrated in the provinces where the four biggest Bulgarian cities are situated, thus in 4 out of the 28 Bulgarian provinces. For every 100 enrolled children there were KG 94 places in the province of Burgas (in South-East statistical region); 90 in the province of Plovdiv (South-Central): 87 in Sofia (capital province) (South-West) and 91 in Varna (North-East). The regional under-capacities have been dealt with throughout the programming period and the latest available data, for 18/19 school year, shows that in every statistical region of the country, including in the three southern ones, there were more places in the KGs than enrolled children. Progress has been registered also on level of province and although the under-capacity in three of the four mentioned provinces remained, they have been reduced, respectively to 93% in Varna; 95% in Sofia

136 NSI (2020a) Children in Nurseries. Published in Bulgarian, original title: НСИ (2020) ДЕТСКИ ЯСЛИ ПРЕЗ 2019 ГОДИНА. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Creches2019_PB1PNPP.pdf

137 This is addressed in detail in the section on Dimensions of Access and Equity.

138 Reported on 21.10.2020 in at least two publications e.g. https://news.bg/politics/novi-67-detski-gradini-v-sofiya-za-3-godini-planat-na-fandakova.html https://bnr.bg/post/101360468/fandakova-predlaga-programa-za-67-novi-detski-gradini-v-sofia-do-tri-godini

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(capital) and 93% in Plovdiv. The proportion between available places and enrolled in KG children reached 104% in the province of Burgas.[139] The insufficiency of supply of KG places in the two biggest Bulgarian cities might have a spill-over effect on their metropolitan areas. Apart from Rakovski (see below), two more municipalities experienced deficiency of KG places as well as had a relative high number of enrolled children: Maritsa, half-surrounding the city of Plovdiv and Kostinbrod, bordering the capital municipality of Sofia.

Obstructed access to pre-school education stemming from shortage of places in KGs concerns about one fifth of the municipalities. Municipal data reveals more nuanced needs picture. A mapping of needs at municipal level (total of 265 municipalities) is presented below for 18/19 school year. In brief the policy tasks and challenges are:

- *Overcapacity in majority of municipalities:* In 231 municipalities the supply of places surpasses the demand.[140] The policies addressing this big group need to focus on the mix of enrollment and combating drop out efforts under the policies undertaken by MES together with direct learning environment investments[141] and education policy goals.
- *Marginal supply in 9 municipalities:* A parity between the number of children enrolled and the available paces was present in nine municipalities.[142]
- *Under-supply in 25 municipalities:*

Table 4 Insufficient supply at municipal level: proportion between enrolled children and available KG places

- list the municipalities that experienced under-capacity (defined here as less available KG places than enrolled children) in 2018/2019 school year. 25 municipalities in Bulgaria faced lack of places – there the number of enrolled children exceeded the number of [officially] available places in 2018/2019 school year. According to the scope of unmet demand the 25 municipalities could be clustered in three groups, with the respective *need*:
  1. *Less than one KG group*: in eleven municipalities the demand did not exceed the normative size of one KG group: the shortage of places per municipality was lower than 23.
  2. *Greater than one KG group but less than one KG*: in 8 municipalities the shortage of places was between the normative maximum of one KG group (again: 23) and the average size of a KG in Bulgaria in 18/19: 119.[143]

[139] NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia.

[140] Measured by the number of children enrolled in KGs as reported by NSI Source: NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia.

[141] World Bank, Assessment and Recommendations on the Learning Environments in Pre-school, General Schools and Vocational Schools in Bulgaria

[142] Boynitsa, Byala Slatina, Loznitsa, Opan, Stara Zagora, Bozhurishte, Pirdop, Samokov, Chelopech. This list has been updated to reflect the latest data published by NSI. Source: NSI (2020b) Kindergartens, children, teaching staff, places and groups in the kindergartens by statistical zones, statistical regions, districts and by municipalities in 2018/2019 Published on 24.04.2020 in Bulgarian. Original title: Детски градини, деца, педагогически персонал, места и групи в детските градини по статистически зони, статистически райони, области и общини Retrieved from: https://www.nsi.bg/bg/content/3430/детски-градини-деца-педагогически-персонал-места-и-групи-в-детските-градини-по

143 NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA 2019. NSI: Sofia. According to the preliminary publication of NSI (2020b) Education in Republic of Bulgaria in the school year 2019/2020 in the 19/20 the average size of a KG in Bulgaria decreased to 118.

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3. *Greater than one KG*: Six urban municipalities faced unmet demand for KG places that exceeded 119. These were, once again, the four biggest cities in the country: Sofia, Plovdiv, Varna, Burgas, as well as the town of Rakovski (in the vicinity of the city of Plovdiv) and the city of Karlovo (also in the Plovdiv province). Given that the unmet demand was greater than the average size of a KG for the respective year it could be defined as *infrastructural need*.

Table 4 Insufficient supply at municipal level: proportion between enrolled children and available KG places

Children in KGs (enrolled)	Places in KGs			Regional needs		
	Available absolute numbers	Insufficient	Per 100 children[144]	Municipalities grouped by unmet demand		
44948	42827	-2121	95	Sofia (capital)	1	Greater than 1 KG
11447	9583	-1864	84	Varna	2	
11274	9686	-1588	86	Plovdiv	3	
7157	6787	-370	95	Burgas	4	
1594	1449	-145	91	Karlovo	5	
944	821	-123	87	Rakovski	6	
733	634	-99	86	Tvarditsa	7	Between 1 Kg group and 1 KG
514	420	-94	82	Bansko	8	
2166	2080	-86	96	Yambol	9	
219	180	-39	82	Varshets	10	
797	767	-30	96	Troyan	11	
332	302	-30	91	Sopot	12	
292	263	-29	90	Lyubimets	13	
152	125	-27	82	Breznik	14	
281	259	-22	92	Oryahovo	15	Less than 1 KG group
567	547	-20	96	Kostinbrod	16	
1078	1063	-15	99	Maritsa	17	
1322	1309	-13	99	Dimitrovgrad	18	
200	190	-10	95	Ugarchin	19	
81	75	-6	93	Tran	20	
128	124	-4	97	Belogradchik	21	
173	170	-3	98	Strumyani	22	
25	22	-3	88	Madzharovo	23	
340	338	-2	99	Sozopol	24	
21	20	-1	95	Georgi Damyanovo	25	

144 Shows the under-supply per municipality in %.

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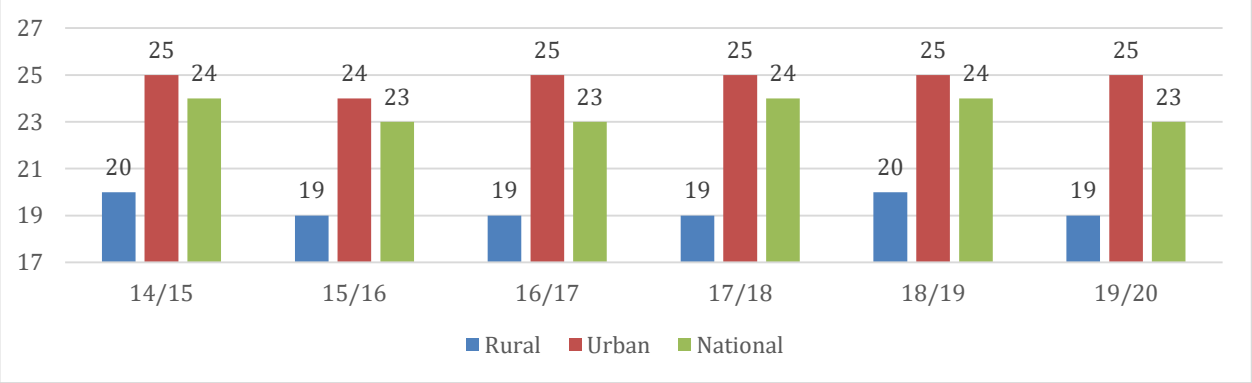
Based on NSI (2019)

4. **There have been notable differences in the size of the KG groups depending on the urbanistic characteristics of the location throughout the period.** Throughout the period the average size of a group was at the normative maximum (23) or slightly above it (24)[145] despite the constant decrease of enrolled children.[146] This can be related to the stable decrease of the number of KG groups.[147] A purposeful effort to maximize the utilization of the capacity of the system might be the probable explanation. However, the trend projected itself also in keeping the average size of the urban groups above the normative maximum throughout the period, almost constantly at 25. The only school year when the average number of children in the urban groups went slightly down (to 24) was 15/16; this was also the only year when instead of decrease, an increase was registered in the number of KGs (with about 5‰) and of KG groups (with almost 1%).[148] The average number of children in a rural KG group remained stable at 19 except for 2014/2015 and 2018/2019 school years, when it reached 20. Moreover, from all the listed in

Table 4 Insufficient supply at municipal level: proportion between enrolled children and available KG places

municipalities only three are entirely rural (without an urban settlement within their territories): apart from the mentioned above Maritsa, the other two are Strumyani with under-supply of 3 places and Georgi Damyanovo – 1 place.

Figure 17 Dynamics of KG group size: avarage size of a kindergarten group per school year



Sources: NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia.
NSI (2020) Education in Republic of Bulgaria in 2019/2020 School Year. NSI: Sofia

145 NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia and NSI (2020) Education in Republic of Bulgaria in 2019/2020 School Year. NSI: Sofia. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Education2019_G60QZG9.pdf See also Figure 17Figure 17

146 As pointed out above and shown in Figure 14Figure 14.

147 Ibid.

148 NSI (2015, 2016, 2017, 2018, 2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia and NSI (2020) Education in Republic of Bulgaria in 2019/2020 School Year. NSI: Sofia. Retrieved from: https://www.nsi.bg/sites/default/files/files/pressreleases/Education2019_G60QZG9.pdf

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The affordability of pre-school education in Bulgaria is hindered mostly by 'fees and hidden costs' that affect 'the most vulnerable groups.'[149] Affordability is considered a key prerequisite not just for pre-school education but for all ECEC provisions that comply to the standards.[150] -The affordability of ECEC-provision can be defined as making it 'available to all families *… at a price that each family can afford*'.[151] According to PSEA, art. 9 (1) '[t]he compulsory pre-school and school education at state-owned and municipal kindergartens and schools are free'. However, the free component refers only to provision of the education component while municipalities are charging fees for the "maintenance" or the 'care' component of the ECEC-mix. A Decision of the Pleven Administrative Court illustrates how the education and the care component of ECEC might be separated for the purpose of setting a kindergarten fee. This particular court decision specifies that 'the kindergarten fee [might] include expenses related to the daily rearing of the children [such as] – meals, overheads, provided environment for recreation and games.'[152] The free-of-charge education component has been extended to encompass the four-year-old children as per September 2020 - with the PSEA's amendment that made pre-school education compulsory also for these children - but the fees for the first KG group (the three-year old children) remain completely outside the legal provision of PSEA's art. 9.

Despite the narrowing down of the scope of the KG fee to the 3 years old and to the "maintenance/care" component for the 4, 5 and 6 years old the fees and other related expenses remain an affordability issue. There are parents and caregivers from the 'the most vulnerable groups' for whom it remains impossible 'to safeguard the inclusion of their children in the [ECEC] programs due to financial considerations.'[153] A recent study[154] explicitly focused on finding 'efficient ways to increase kindergarten participation of children in poor communities' concluded that 'offering free access to Kindergarten is the most cost-efficient strategy to encourage participation of disadvantaged children in Kindergarten.'[155] The study found that eliminating the kindergarten was not only cost-efficient but also *effective* and contributed 'significant increase in participation' to 'offering free access.'[156] Relieving parents from disadvantaged communities from the fees led to 'significantly increased kindergarten registration and attendance, reducing by half the proportion of children that are not registered, and increasing by about 20% daily attendance rate.'[157] No other stimulus piloted in the study (financial incentives conditional on children's attendance and additional information provision) could affect positively kindergarten participation.[158]

Separating nutrition component from early learning provision is another clear signal of the deeply fragmented approaches in ECEC separated between sectors where nutrition policies and food

149 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027. Adopted by Decision of Council of Ministers # 196/11.4.19.

150 See for example: ECDA (2012) Improving quality and affordability of pre-school education. The Early Childhood Development Agency of Singapore. Retrieved from: https://www.ecda.gov.sg/PressReleases/Pages/Improving-quality-and-affordability-of-pre-school-education.aspx NAEYC (1995) Quality, Compensation, and Affordability Retrieved from: https://www.naeyc.org/sites/default/files/globally-shared/downloads/PDFs/resources/position-statements/PSQCA98.PDF Gould, E., Whitebook, M., et al. (2019) Breaking the silence on early child care and education costs Published by Economic Policy Institute, Retrieved from: https://www.epi.org/publication/breaking-the-silence-on-early-child-care-and-education-costs-a-values-based-budget-for-children-parents-and-teachers-in-california/

151 NAEYC (1995) Quality, Compensation, and Affordability. Retrieved from: https://www.naeyc.org/sites/default/files/globally-shared/downloads/PDFs/resources/position-statements/PSQCA98.PDF

152 Pleven Administrative Court, Decision # 50, 10.02.2017 Published online, in Bulgarian: Административен съд Плевен РЕШЕНИЕ № 50, гр. Плевен, 10 Февруари 2017 г. Retrieved from: http://www.ac-pleven.org/docs/cases/d2017/83011717.htm

153 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027. Adopted by Decision of Council of Ministers # 196/11.4.19.

154 World Bank. 2017. Supporting Disadvantaged Children to Enter Kindergarten: Experimental Evidence From Bulgaria

155 Ibid. The capitalization and the emphasis (bolding) are of the authors of the study.

156 Ibid.

157 Ibid.

158 Ibid.

programs are not considered as an integrated component, essential for coherent ECEC provision addressing child development needs. Not only nutrition in formal KG provision is a subject of co-payments. Nevertheless that Bulgaria invested in strong nutrition standards to guarantee and address child development aspects and needs, nutritional policies are still not foreseen as an essential human development policy component and an ECEC segment. Similarly, the existing baby kitchen services and standards are in reality alienated from the ECEC package, the separated social support packages, parenting components and list of services that could promote child development, parenting and human development. In Finland the free school feeding program has achieved 50 years of implementation and is stated as one of the core components contributing to human resource development and its education aspects.

Fees and other related costs affect affordability of ECEC provisions beyond pre-school education with 47.6 percentage of unemployed restraining from ECEC services due to affordability. The fees' and other costs' limiting impact on access has to be acknowledged beyond the provision of pre-school education and in the wider context of 'early childhood programs.'[159] Fees might affect the coverage of ECEC services for younger children such as the nurseries and children kitchens, whereas hidden costs, such as transportation expenditures, the coverage of, for example, health programs such as the immunization one. But it remains difficult to assess to what extent parents' financial considerations affect the coverage of each of these provisions. There is no publicly available data on the impact of fees and other costs on the affordability of the services offered by children's kitchens nor is there data allowing assessing the extent to which fees might be a probable explanation for the mentioned above growing overcapacity of nursery services. The scope of denied or hindered access to ECEC provisions due to unaffordability is partly quantified by a NSI study (2018)[160] indicating that 49400 unemployed did not benefit from ECEC provisions for their children due to reasons related to the provisions themselves. In 47.6% (23800 cases) the reason was contributed to affordability: the fees were too high.

Various policy responses have been put in place in order to increase the affordability of pre-school education.

- By virtue of a decree of the Council of Ministers[161] all children in pre-school education are freely provided with educative booklets.[162] The financing is secured by MES and it is extended to all children enrolled in KGs and preparatory pre-school groups in schools, including in the private ones.[163] MES considers this to be 'long-term implemented financial policy [that] supports one of its fundamental objectives, [namely] safeguarding an equal access to pre-school education.'[164]
- The SLP Active Inclusion in the System of Pre-school education (BG05M2OP001-3.005) envisages 'provision of access to pre-school education by paying fees of 25000 […] children from vulnerable

159 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027. Adopted by Decision of Council of Ministers # 196/11.4.19.

160 Research conducted by NSI in 2018 on the reconciling work with family life; quoted in the Draft Proposal of the OP HRD 2021 – 2017.

161 DCM #79/13.04.2016 for free provision of educative booklets, textbooks and educative resource materials. (in Bulgarian: Постановление № 79 на МС от 13.04.2016 г. за осигуряване за безвъзмездно ползване на познавателни книжки, учебници и учебни комплекти)

162 On a different but related note: MES has approved educative booklets for the six educational domains for each of the four pre-school age groups. The assessment and approval procedures have been funded via NDPE; for details see Annex '*ECEC: List of NPDE and Respective Modules Addressing Preschool Education*', specifically: NP *Provision of Modern Educational Environment* (2018, 2019).

163 The financing for the educative books provided to the municipal and state KGs and schools are channeled through the *primary budgetary authorities*. (in Bulgarian: „първостепенни разпоредители с бюджет", the term in English as used in the Public Finance Act published by the Ministry of Finance is *budgetary authorities*).

164 Written communication by MES, February 2021, part of the feedback to the initial version of this report.

groups.'[165] The financial resources coving fees are planned 'for 30 months at BGN 30 per child,'[166] thus altogether BGN 22,500,000[167] should have been allocated. The last available a interim report does not state if and what part of this resource has been utilized.

- Other measures addressing affordability were stipulated in the September 2020 amendment to PSEA.[168] According to two new sections of the amended art. 283 the state supports the payment of the fees collected from the parents whose children are enrolled in state and municipal KGs by transferring financial resource to the municipalities[169] (art. 283 (9)); the municipalities have to allocate at least half of the received financial resource so that they completely relieve parents form paying fees (art. 283 (11)). The norm of 283 (11) however does not guarantee that all parents shall not pay KG fee anymore. This complicated construction is 'translated' into the Bill of State Budget for 2021 as follows: 'each municipality will receive BGN 174 per child in CSA and at least half of this financial resource has to be utilized for complete elimination of KG fees - for a specific group or for all children'.[170]

Reforms and innovations in management and provision mix are needed to address the remaining issues related to availability of KG places. There were various policy responses tackling the lack of KG places that still exist locally in Bulgaria. In a period (2013-2018) typified by reduction of number of KGs, KG groups and KG places and lessening demand, the opening of 47 new KG, 24 of them in the Sofia[171] (the capital province/municipality) attests for purposeful effort to restructure the system of pre-school education and adapt to demographic trends. The Bill of the State Budget for 2021 'envisages BGN 70 Million for building and renovation of KGs, nurseries and schools[172]' and it is reasonable Sofia to be among the biggest recipients. The mayor of Sofia presented a *Program for building kindergartens and nurseries 2020-2023 of the Capital Municipality* [Sofia] which envisaged that 67 new kindergartens would be built in the next three years; 31 were planned for 2021, while the building of 12 and the extension of other 4 have already started. The mayor has clarified that the capital municipality should continue to rely on support from the state budget as well as stated the intention to secure KG places for all children within 6 years.[173] The effort to completely satisfy the increased demand in the biggest cities and their metropolitan areas is reflected also in the draft OP Development of Regions 21-27 which foresees EU support for 'Education Infrastructure … including kindergartens' and 'Health and Social Infrastructure … including nurseries' in the 10 biggest urban municipalities in Bulgaria. At the same time no policy intention to invest in setting up or restore pre-school facilities in small and remote places without KGs has been stated. Policy response that safeguards right to *equal access to pre-school education* for every child aged 3-CSA regardless of the size of their town or village is needed[174] in order to prevent infringement of their rights

165 Contract # BG05M2OP001-3.005-0004-C01 Technical report # 2

166 Ibid.

167 22,500,000= 30*30*25,000

168 In addition to the noted above the amendment lowering the compulsory age for pre-school education and respectively extending the normative scope of art. 9 PSEA to cover the four-year-old children.

169 Actually, the financing is transferred to the primary *budgetary authorities*. In the case of the municipal KGs (the overwhelming majority of KG addressed in art. 283 (9): these are the municipalities.

170 Amalipe (2020) How Shall the Pre-school and School Education Be Financed in 2021 Published in Bulgarian, on Nov. 6th 2020, original title: Как ще бъде финансирано предучилищното и училищното образование през 2021-ва година Retrieved from: https://amalipe.bg/kak-shte-bude-finansirano-pred-obrazovanie/

171 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027. Adopted by Decision of Council of Ministers # 196/11.4.19.

172 Amalipe (2020) How Shall the Pre-school and School Education Be Financed in 2021 Published in Bulgarian, on Nov. 6th 2020, original title: Как ще бъде финансирано предучилищното и училищното образование през 2021-ва година Retrieved from: https://amalipe.bg/kak-shte-bude-finansirano-pred-obrazovanie/

173 Reported in multiple media on 21.10.2020 e.g. https://news.bg/politics/novi-67-detski-gradini-v-sofiya-za-3-godini-planat-na-fandakova.html https://bnr.bg/post/101360468/fandakova-predlaga-programa-za-67-novi-detski-gradini-v-sofia-do-tri-godini https://clubz.bg/105405-fandykova_obeshta_67_novi_detski_gradini_do_2023_g

174 The part of this section on Equity and the concluding paragraph outline why it is difficult to establish that the present measures addressing the pre-schooling of children in small and remote places safeguard *equal* access of *all* pre-school aged children.

and the principles of non-discrimination stipulated in Article 2 of the Convention on the Rights of the Child (UNCRC).[175]

Policy measures to address the provision of (demanded) KG places also relate to the needed investment in direct learning environment in pre-schools. Learning environment (LE) is not equally developed amongst schools and pre-schools' and among the 'identified areas of improvement' are 'outdoor sports and playground facilities to facilitate physical activities and healthy behaviour, especially with the focus on ECEC institutions, pre-school groups in the general education sector and primary schools' and 'special guidelines for direct LE when establishing pre-school groups in the framework of general education facilities in order to ensure safe, stimulating and comfortable environment for children transitioning from early childhood settings to school settings'[176] Against the backdrop of the needs identified in this report a recent change in the regulatory framework offers a discussion point about the balance between meeting availability needs and safeguarding LE standards. The Ordinance for Design, Implementation and Maintenance of Public Service Buildings in the Field of Education and Science, Healthcare, Culture and The Arts[177] that regulates the infrastructural standard for pre-schools was amended in September 2020[178] to relax the regulations relevant to KG. The requirements for KGs to have self-standing premises and yards have been lessened. According to the Ministry of Regional Development and Public Works that issued the Ordinance in 2015 and amended in 2020 the changes 'contribute to the reduction of the insufficiency of places in nurseries and kindergartens, by creating possibilities [such ECEC institution] to be established in parts of other buildings.'[179] Specific attention deserves the need to develop and monitor implementation of specific concept and standards regarding direct LE addressing all provisions – nurseries, kindergartens and preparatory groups in schools. MES datasets maintained by MES does not contain information on learning environments for pre-school groups in general education institutions, has limited information on direct learning environment aspects in kindergartens and is not linked to any data on nurseries.'[180] This indicates the difficulties when the provision of compulsory pre-school education takes place in schools and especially the challenges to adapt premises for 4-year-old children (in towns and villages without KGs: PSEA, art. 56(2)) in order to comply with the recently introduced compulsory pre-school education for these children.

The Interplay between Equity and Access

Addressing access-related challenges serves two strategic goals set for the system of pre-school education in Bulgaria: extending to participation (strategic goal set in the NSLLL) **and ensuring equal developmental chances for every child and support for social inclusion from early childhood age** (SEICSEM, SRPELES). 'All children have *the right to equitable learning opportunities* that enable them to

175 By virtue of Article 5 (4) of the Bulgarian Constitution UNCRC is part of the Bulgarian normative framework.
176 WB (2020b) Learning Environments in Bulgaria. Assessment and Recommendations on the Learning Environments in Pre-school, General Schools and Vocational Schools in Bulgaria. Forthcoming.
177 The Ordinance was issued by MRDPW and enforced in 2015 its original title in Bulgarian is: Наредба № РД-02-20-3 от 2015 г. за проектиране, изпълнение и поддържане на сгради за обществено обслужване в областта на образованието и науката, здравеопазването, културата и изкуствата (обн., ДВ, бр. 5 от 2016 г.; попр., бр. 13 от 2016 г.)
178 Amended by MRDPW per: Наредба за изменение и допълнение на Наредба № РД-02-20-3 от 2015 г. за проектиране, изпълнение и поддържане на сгради за обществено обслужване в областта на образованието и науката, здравеопазването, културата и изкуствата
179 News.bg 2020 Разрешиха помещения от детските градини да са в мазета. Published on 04.09.2020, retrieved from: https://news.bg/society/razreshiha-pomeshteniya-ot-detskite-gradini-da-sa-v-mazeta.html
180 WB (2020b) Learning Environments in Bulgaria. Assessment and Recommendations on the Learning Environments in Pre-school, General Schools and Vocational Schools in Bulgaria. Forthcoming.

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achieve their full potential as engaged learners and valued members of society.'[181] Realizing this right requires equal access to (quality) pre-school education. 'Equity can be described as the elimination of privilege, oppression, disparities, and disadvantage that historically have excluded those belonging to particular groups.'[182] In the Bulgarian context the components that still have to be eliminated are mostly related to *disparities, and disadvantage*. The rest of this section focuses on equity and how the unmet demand for, restricted affordability of and unrealized access to pre-school education turn themselves into equity challenges faced by the system of pre-school education in Bulgaria and affecting the developmental prospects of specific categories of children in the country.

The children affected by hindered access to pre-school education can be grouped by geographic and social-economic characteristics. Aspects related to i) geographic locations and ii) socio-economic background, including ethnically specific background, typified the profile of children and their families who have not been able to benefit from access to pre-school education in the outgoing programming period.

- Geographic aspects: this category of children and families consists of two specific groups. Both groups have been affected by lack of availability of pre-school facilities:
    1. The first group consists of children from various socio-economic backgrounds who live in the (four) biggest cities and whose demand has not been met due to insufficient pre-school infrastructure. As noted in the latest EU monitoring report 'a lack of facilities tends to particularly affect large urban areas';[183]

Table 4 Insufficient supply at municipal level: proportion between enrolled children and available KG places

Table 4 visualizes the latest published data on the scope of the unmet demand. There has been purposeful policy response to this challenge. Its two most notable components were: infrastructural - opening new kindergartens[184] and compensatory. The latter one has been introduced in the very end of the programming period in September 2020 with introducing art. 283 (12) of PSEA and effectively will be enforced from 2021. It aims to compensate 'the expenditures for rearing and training of children who have not been accepted due to lack of places in state and municipal KGs and schools.'[185] Art. 283 (12) stipulates that this measure will be applicable to all pre-school-aged children - from 3 to CSA.[186]

181 NAEYC (2019) Advancing Equity in Early Childhood Education Position Statement. Retrieved from: https://www.naeyc.org/resources/position-statements/equity-position
182 NCTE (2016) Equity and Early Childhood Education: Reclaiming the Child Retrieved from: https://cdn.ncte.org/nctefiles/equityearlyedbrief.pdf
183 EU Education and Training Monitor 2019 Bulgaria
184 This has been addressed earlier in this section.
185 Amalipe (2020) How Shall the Pre-school and School Education Be Financed in 2021 Published in Bulgarian, on Nov. 6th 2020, original title: Как ще бъде финансирано предучилищното и училищното образование през 2021-ва година Retrieved from: https://amalipe.bg/kak-shte-bude-finansirano-pred-obrazovanie/
186 Although this policy measure addresses a challenge whose root causes are access-related, it is equity-focused by nature. The measure does not seek to solve access insufficiencies, nor to address affordability hindrances (it is provided to all parents, including the ones not experiencing any difficulty to pay any KG/ECEC fee. It rather compensates parents whose children are denied access to pre-school education (in state and municipal KG) and therefore to their 'right to equitable learning opportunities'. The measure aims at remedying the inequity by providing resources that shall allow alternative access to pre-school education (e.g. in private kindergartens, where parents have to pay open-market-conform fees).

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2. The second group of children affected by lack of pre-school facilities is scattered around the country and it is typified by the fact that they live in small or remote places. Although the data is scarce, that allows identifying this group as the children and parents who still live in the places in 'small and medium sized municipalities' where 283 kindergartens ceased to exist in the five years prior to 2019.[187] This 'closing down of kindergartens in small and remote places' was, according to the GoB, a 'probable reason for limiting of the physical access of children' to pre-school education.[188,189] To minimize the impact of *limitation of the physical access*, resulting from previous policy to optimize the structure of the pre-school education system, the children in compulsory pre-school age (CPSA) are provided with free transport to the closest pre-school institution (art. 283(2)) and their parents are entitled to the same equity-focused policy measure envisaged in art. 283 (12). This way, one of effect of the September 2020 amendments of PSEA is the introduction of compulsory daily transportation of 4-year-old-children living in small and remote places without KG forth and back to pre-school facility outside their villages or towns. It also remains an open question whether, and if so, in how many of the *remote and small places without KGs* there are suitable substitute provisions where the granted by the government compensation (projected to be BGN 300 monthly per child for 2021)[190] could be invested to foster school readiness and 'holistic development of the child's personality'[191] who are in pre-school age but not in CPSA, i.e., the three-year-children.

- Socio economic aspects: The category of children and families experiencing economic barriers to access to pre-school education in Bulgaria covers 'children from disadvantaged backgrounds and Roma.'[192] Unlike the two groups listed above (under the geographical aspect), the issue faced by this category is primarily *affordability and in addition all aspects of the availability listed above imply*.

Inequity in participation in pre-school might result not only from hindered availability or affordability. Obstacle to accessibility can stem from wider socio-economic or socio-cultural contexts and if this is the case policy responses should take such backgrounds into account. According to the EC Monitoring report on Education in Bulgaria (2019), there are substantial regional '[d]isparities in enrollment'[193] in pre-school education (4-CSA) and this is illustrated by quoting NSI data for the best and worst performing provinces. The 'gross enrollment rate for children aged 3-6 ranges from 88.9% in [province] Blagoevgrad to 64.8% in [province] Sliven'. The opposing positions of Blagoevgrad and Sliven cannot be explained with availability reasons. The presented above data demonstrates that in both provinces the number of available places in the kindergartens exceeds the number of the enrolled

187 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027. Adopted by Decision of Council of Ministers # 196/11.4.19.

188 Ibid.

189 The wording of the governmental analysis as well as its function to inform and 'define the national priorities for the period 2021-2027' (source: Decision of Council of Ministers # 196/11.4.19) provides reasonable grounds for two more assumptions: i) it is recognized by the GoB that in the towns and villages where kindergartens have been closed (as well as in other places without KGs) there is a structural need of provision of pre-school education ii) this recognition results from a lesson learnt and the experience accumulated in the years between 2013 and 2018 led to reconsidering the policy of optimizing the structure pre-school education system by closing down kindergartens. The fact that despite the continuous decline of the number of children in pre-school age the trend of reducing the number of kindergartens was reversed by 2019 may serve as a validation for the two assumptions.

190 Amalipe (2020) How Shall the Pre-school and School Education Be Financed in 2021 Published in Bulgarian, on Nov. 6th 2020, original title: Как ще бъде финансирано предучилищното и училищното образование през 2021-ва година Retrieved from:
https://amalipe.bg/kak-shte-bude-finansirano-pred-obrazovanie/

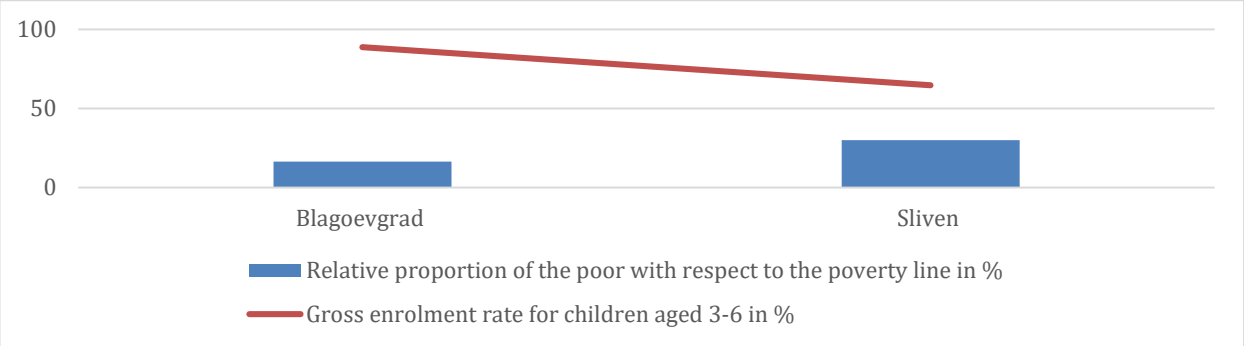
191 To remind, 'the pre-school education creates conditions' for school readiness and 'holistic development of the child's personality' according to article 28 (1) of Ordinance#5 for Pre-school Education that sets the respective SES.

192 EU Education and Training Monitor 2019 Bulgaria

193 EU Education and Training Monitor 2019 Bulgaria

children, whereas in each of them there are municipalities that experience problems with availability (Tvarditsa in Sliven and Bansko and Strumyani in Blagoevgrad). Out of the two Blagoevgrad's municipalities, in one of them (Strumyani) the shortage of paces was rather technical than infrastructural issue: the registered shortage was 3 places. In the other municipality, Bansko, the shortage was 94 places - almost identical with the shortage of places in Tvarditsa (province Sliven): 99. It is difficult to explain the opposing positions of Blagoevgrad and Sliven with affordability reasons either. The average annual gross salary in the reference year (2018) in both Blagoevgrad and Sliven provinces was below the national average but the salaries in the Sliven exceeded the ones in Blagoevgrad with about 10%.[194] Thus, the province with lower average salary outperformed the richer province with more than 24 percentage points of pre-school participation.

Figure 18 Gross enrollment rate for children aged 3-6 and relative proportion of the poor with respect to the poverty line



Sources: EU (2019)
NSI: https://www.nsi.bg/bg/content/8262/индикатори-за-бедност-и-социално-включване-по-области

In the same reference year, the 'relative proportion of the poor with respect to the poverty line' was twice as high in Sliven as it was in Blagoevgrad. The respective proportions were 30.1% in the former vs. 16.5%[195] in the latter, making Sliven the region with the highest proportion of poor people in the country and Blagoevgrad – the region with the lowest. This indicates that the socio-economic equity might be more important factor for the chances of a child to be enrolled in a kindergarten than the average level of income in her region. Recognizing that the inequity originates in other social domains and project themselves into pre-school education allows to formulate adequate responses. Other developmental aspects might be contributing, too, to the differences such as the observed ones between Sliven and Blagoevgrad. Specifics of socio-cultural contexts need to be accounted for and previous interventions and evaluations have done so[196] paying attention to parental awareness and family and community attitudes towards pre-school education and ECEC provisions in general.

The combination of delivery management, supply profile and unprioritized social equity needs in Bulgaria is transforming access to pre-school and to other ECEC to social-justice issues as the same categories of children and their families are being sustainably excluded. While the infrastructural challenges in the big cities are addressed in an accelerating tempo, the policy responses to the needs of the children who still live in *small and remote locations* without pre-school provisions not necessarily fulfil *the right of all of them to equitable learning opportunities*, most of all – of the youngest among them (the 3- and 4-year-old ones). The envisaged financial compensation stipulated in art. 283 (12) is a righteous

194 The national average was BGN 13755, the regional for Sliven – BGN 10005, and the one for Blagoevgrad BGN - 9024. Source: NSI. Retrieved from:
https://www.nsi.bg/bg/content/3958/национално-ниво-икономически-дейности-форма-на-собственост-пол
and from: https://www.nsi.bg/bg/content/3960/статистически-райони-област
195 https://www.nsi.bg/bg/content/8262/индикатори-за-бедност-и-социално-включване-по-области
196 World Bank. 2017. Supporting Disadvantaged Children to Enter Kindergarten: Experimental Evidence from Bulgaria.

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equity remedy but in the particular case of these locations this measure cannot serve its ECD-focused purpose for children who otherwise might have been enrolled in the first KG group. It is difficult to reconcile the compulsory daily transportation of 4-year-old-children to pre-school facilities outside their town or village with the concept of '*evolving capacities*.'[197] Further, there is no yet a sustained and coherent national response to the financial hindrance that the kindergarten fees constitute for vulnerable groups. The recently stated intention by MES to secure 'significant additional funds' in the state budget for 2021 in order to facilitate the coverage for each child from the age of four[198] and the State Budget Act 2021 still allow substantial local variations. In the end it will be up to the municipalities whether to relieve all parents from paying fees, to relieve only some parents or to relieve some parents and decrease the fees for others.[199] Some 50 municipalities have already foregone the KG taxes,[200] some of them long before the September 2020 amendments to PSEA.

Further research should help to map comprehensively the factors that obstruct equal access to ECEC in general and to pre-school education in particular. Identifying and addressing existing gaps in data collection and ensuring its coherence is a required prerequisite. The demand for nursery places or the information on LE for preparatory groups in school are just two of the examples noted or reiterated in this section. What (other) social and socio-economic factors than unaffordability might contribute to inequality of access to pre-school education or how to guarantee effectively the right to equitable learning opportunities for all pre-school aged children are examples of identified questions that need both further data collection and analytical effort. Addressing any of the listed here data and research issues should have direct effect on the MES ability to comply with its mandate to safeguard equal access to pre-school education for all children in Bulgaria.

ECEC Outcomes: Child Development and School Readiness

Key findings:

- *With 12% of children unable to read at grade 4, one of the key tasks should be targeted toward eliminating learning poverty.*
- *The impact of ECEC investment on the developmental chances of children in Bulgaria is not well documented, not systematically followed and analyzed fragmented amongst public sectors and it is inconsistently addressed. In pre-school there is no systematic approach to measure it although there are standards on pre-school education that sets certain learning goals.*
- *The system needs to address more proactively policy tasks addressing child development and school readiness and to enlarge this scope to other non-education sectors responsible to ECEC.*
- *Programs informed by evidence are needed to allow flexible implementation and reaction to policy development and context.*

Bulgaria is still not measuring child development aspects and school readiness to guide policy developments across the ECEC scope. The country is still behind EU and OECD countries where ECEC is focusing child development monitoring and investments as key investments to inform and guide human

197 Article 5, UNCRC.

198 Krassimir Valchev, Minister of Education and Science Interview for the Bulgarian National Radio (BNR, 05.10.2020): '[t]here will be significant additional funds for the system of pre-school education, for each child who is covered at the age of four, regardless of whether it is additional or already covered, the municipalities will receive nearly BGN 300 per year, which will be for maintenance and nutrition. With these funds, they will be able to reduce the fees, maybe there will be additional BGN 25 million to reduce the fees for all pre-school children from 3 to 6. I expect at least 70-80 million to be added for the pre-school system beyond the increase in the salaries of kindergarten teachers.'

199 Amalipe (2020b) The Parliament amended PSEA. Published in Bulgarian, Retrieved from: https://amalipe.bg/zpuo-2/?fbclid=IwAR1l2gL9j5KQMfj1VEKvzkzeIN_zZ8nrEwSCM5LlfhKh2dGxx9q0d_2rpG8

200 Ibid.

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capital and related policies[201]. In Bulgaria the only systematically collected data are addressing pre-school and nursery enrollment where also the majority of policy efforts have been focused (see the analysis of the ECEC policy mix).

- MES system does not employ any unified approach for assessment of pre-school outcomes at regular child level. With the development of the priority inclusive education agenda, and mainly using donor and EU-funding, MES has initiated processes of mainstreaming methodologies and tools for screening of learning delays and risk but those instruments are covering a very specific and minor group of children,[202] guided by the inclusive agenda, for which the system is developing a very specific expertise and associated structures. The general pre-school processes and their outcomes at child specific level are still not a subject of policy efforts and system knowledge. The capacity of the system to administer and use such instruments to guide classroom level work and to inform policy developments is not fostered;
- Nurseries are not following any standardized protocol that clearly coordinates with pre-schools curricula and the existing "programs" and are not introducing instruments for systematized data collection on child development and early learning areas; apart from coverage, MH, as main responsible body, is not in charge of developing such practices but also is not participating in any coordination-level efforts transferring the content subjects to workforce and related universities;
- All other forms of ECEC formal provision addressing mainly limited social services are not utilizing unified approach toward monitoring the aspects of child development;
- With the support of UNICEF Standards for early childhood development have been drafted and the respective Ordinance (to be adopted jointly by MES and MH) has been presented for public consultation already in 2017. As mentioned, it has not been adopted yet.
- Finally, the county is still not using and developing formal universal parenting support policies[203] (rather fragmented activities gravitating around risk groups or separate policy topics[204]) and is not using the capacity of the existing minimum ECEC mix of services across sectors to popularize and promote child development monitoring amongst stakeholders and parents.

While the State educational standard[205] on pre-school education sets specific learning and lifelong learning goals for pre-school policy, no systemic evaluation instruments have been introduced to assess child development and school readiness.[206] Although the positive effects of pre-school education are often used to justify investments there is no evaluation system which measures *regularly and in standardized manner* the *impact of the Bulgarian pre-school education*. The goals of the education standard are**:** (i) an overall development of the child's personality and (ii) acquisition of a set of competences knowledge, skills and attitudes required for the successful transition of the child (from pre-school) to school education. There are key policy level questions and approaches that MES has to prioritize in order to evidence, understand and manage policy developments:

201 WB 2019, Parenting Support: Key Transformational Instrument of Child and Human Development Policies. Trends in EU countries and discussion on parenting policies in Bulgaria

202 The MES's efforts to develop instruments and mainstream expertise with respect to screening for learning difficulties, delays and risks have been among the most consistent and significant. Their scope and importance are reviewed below (see for example the section on BG05M2OP001-3.005 and specifically - the 'system level' part). The focus of the present section requires to note that although the screening might potentially involve all children entering pre-school education, the benefits from this intervention remains limited to the category of children challenged by learning obstacles. Without underestimating the benefits for this specific group, the essential necessity to introduce a standardized approach **to assess the learning and child-development outcomes for all children** (not just the ones facing the mentioned learning challenges) in pre-school education in Bulgaria needs to be clearly recognized.

203 WB 2019, Parenting Support: Key Transformational Instrument of Child and Human Development Policies. Trends in EU countries and discussion on parenting policies in Bulgaria

204 NPDE 2020 We Succeed Together

205 Ordinance №5 of 03.06.2016 on pre-school education, Article 28

206 Kuznetsova, Lazarov, Competence-based learning in the Bulgarian Education System, 2020

- Following few fragmented attempts to initiate *pre-school stage child development* data collection/assessment, addressing primarily school readiness, overall MES is still struggling between uncoordinated and in some cases outdated concepts for outcome measurement in pre-school education, national instruments that haven't been systematically applied and improved in time, and the lack of policy initiative to facilitate a process that needs to consolidate experts' views and concepts in order to launch an outcome-oriented approach;
- the *concept on school readiness and key competences concepts* needs also further conjunction and prioritization. In pre-school education key-competences (competence-based learning) is introduced and applied mainly with respect to age-appropriate cognitive development and socialization, without introducing key competences as a required pre-school stage outcome. No evaluation instruments or guidelines have been provided for either key competences or the subject related competences in pre-school education allowing for uncoordinated approaches and concept implementation at classroom level;
- Systematic classroom observation practices targeted at collecting and analyzing data to inform the implementation of the new curricula are the exception rather than the rule[207]. The system seems to lack space and capacity to employ the potential of similar instruments to not only "observe" but also support the development of modern and innovative teaching practice. Adapting and piloting the use of existing instruments for classroom observation could inform MES and Regional Departments of Education (RDEs) efforts to identify and address teachers training needs at both ITE and CPD levels;
- The institutional capacity for supporting learning and addressing the non-satisfactory learning/child development outcomes is still insufficient. The support function of the RDEs was introduced recently[208], in 2017, without changing/ limiting the scope of RDE current responsibilities or increasing the number of RDE experts. The experts should receive the "space and time" they need to provide better quality support and work closely with struggling (and not only) pedagogical specialists. A broader support of the RDE experts is needed, including training opportunities on supporting and mentoring teachers which will improve the effectiveness of the process. A balance should be achieved between administrative work, control and inspecting schools, and providing mentoring/support.

Low performing schools have a large proportion of students whose parents have a low education level. Learning outcomes, informed by national learning assessments in lower secondary, could only hint for the needs addressing early leaning and child development at pre-school stage. Lower secondary outcomes reveal large variations between regions and types of schools and indicate needs for special programs targeting learning at the lower education sates. Estimation of lower secondary school outcomes in Bulgaria controlled for socio-economic data for children by using School Value Added Measurement (SVAM 2017[209]) demonstrate that learning differences associated to parental education level are larger for Bulgarian language than for mathematics. Overall, the results show that Bulgarian schools with low performance (SVAM scores) have a large proportion of students whose parents have a low education level. This is indicative of a need for a combination of 'social' approach (based on extensive social assistance-targeted programs to schools [pre-schools] and communities with disadvantaged students, including parental education programmes) and pedagogical support at school level.

207 2020, Bulgaria Teaching Workforce Policy Note and Recommendations. Analytical report assessing teacher workforce policy outcomes and providing recommendations for improving education workforce policy and planning processes efficiency

208 RDEs' experts point out they were supporting teachers in various way even prior 2017, but with the new regulation this happens much more often and the term support is more used than "inspections" when thinking about and planning the interactions with schools.

209 Gortazar et al. 2014.

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Figure 19 Bulgarian language and mathematics outcomes for grades 5–7: SVAM scores by region for 2015

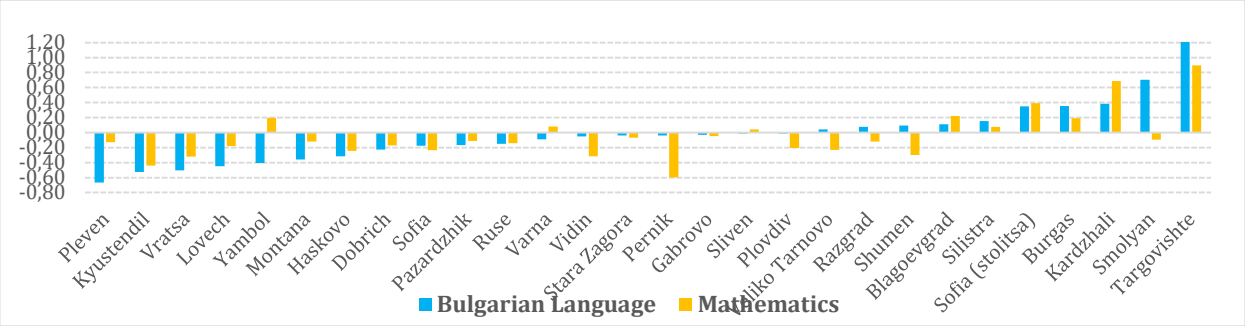
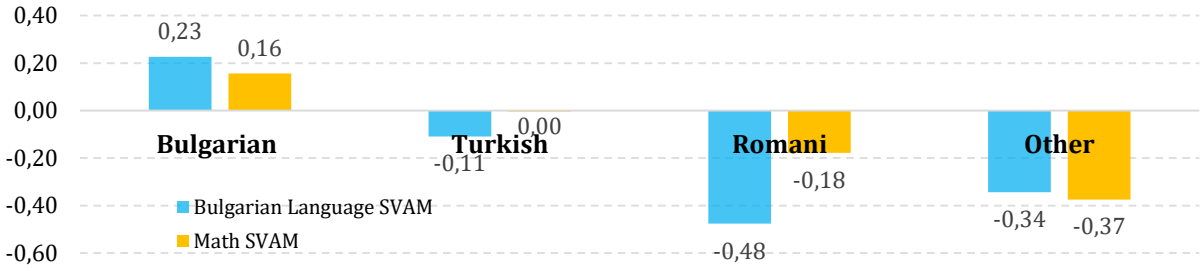


Figure 20 Bulgarian language and mathematics outcomes for grades 4–7: SVAM scores by primary language of use at home for 2017, national level



Source: World Bank, based on MES external evaluation in grades 5 and 7.
Note: The SVAM scores have a mean of 0 and standard deviation of 1. Differences in the SVAM scores across groups are statistically significant. Model 1 was used.

Bulgaria seems to underprioritize early learning when policy measures addressing ECEC and more specifically pre-school are compared with learning outcomes. In the context of lack of specific national data to inform directly pre-school and ECEC developments evidence is primarily stemming from international assessments demonstrating key areas for policy attention and needs. Data from PISA, TIMMS and PIRLS are signaling for education stage policy outcomes and processes interrelated with pre-school participation:

Learning poverty - being unable to read and understand a short, age-appropriate text by age 10.[210] **The level of learning poverty in Bulgaria is 12 percent,** which is almost double the average for the EU (6 percent) and four points higher than the average for OECD countries (8 percent)[211]. As in most countries, learning poverty is higher for boys than for girls. Boys are less likely to achieve minimum proficiency at the end of primary school (6 percent) than girls (4.4 percent) in Bulgaria. After 2016, MES introduced a variety of programs and initiatives addressing mainly schools to address those challenges: support for children from families where Bulgarian language is not spoken at home, tracking dropout students, fostering pre-school participation, and most recently, introducing targeted programs for socially vulnerable children ensuring free access to pre-school and legislative amendments for a gradual transition

210 Learning poverty means being unable to read and understand a short, age-appropriate text by age 10. The Human Capital Project focuses on reading because (a) reading proficiency is an easily understood measure of learning; (b) reading is a student's gateway to learning in every other area; and (c) reading proficiency can serve as a proxy for foundational learning in other subjects, in the same way that the absence of child stunting is a marker of healthy early childhood development.

211 Bulgaria is 1.6 percentage points better than the average for the Europe and Central Asia region and 17.3 percentage points better than the average for upper-middle-income countries.

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to compulsory preprimary education for 4-year-olds (see policy mix analysis). Most of the programs do not assess learning outcomes and direct contribution to policy problems addressed. One of the key tasks of Bulgaria learning policies should be targeted toward eliminating the learning poverty.

PIRLS 2016:212 **Bulgaria lags slightly in indicators predicting school readiness and reinforce the need for dedicated programs for parental support before and during formal pre-school education**[213]. About 8 percent of grade 4 students in Bulgaria had not engaged in any early literacy activities[214] with their parents compared to only 1 percent in the comparator countries.[215] (see below). Similarly, 87 percent of grade 4 students in Bulgaria had attended preprimary education for at least two years compared to more than 90 percent in the comparator countries. After 2016, MES has initiated special programs addressing parental involvement, especially at the pre-school level. This positive trend in the scope of program development that respond to existing challenges needs to be strengthened (please refer to the policy mix review) and paired with specific support programs addressing learning at the institutional level.

Figure 21 PIRLS 2016: Percentage of students engaged in early literacy activities with parents

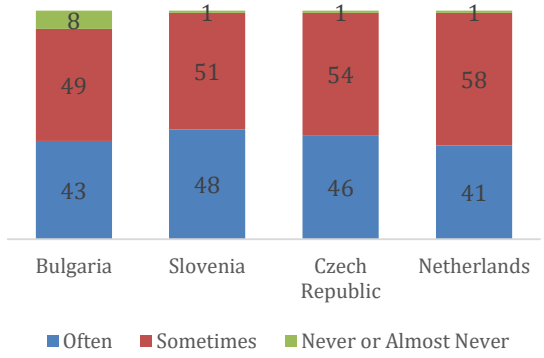
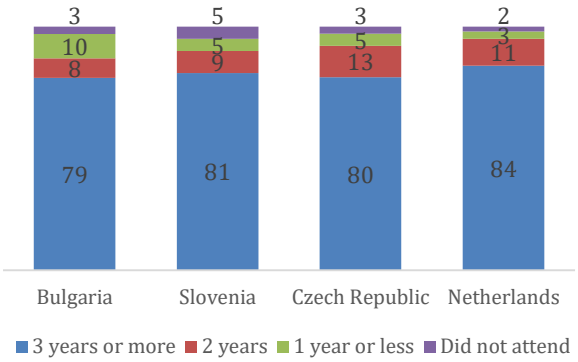


Figure 22. PIRLS 2016: Percentage of students attending pre-primary education



PIRLS 2016 primary schools outcomes signal for the needs socio-economic differences to be addressed early in education and PISA 2012 demonstrated that participation in at least two years of pre-school education before entering school increases the mathematical results in PISA by an average of 7 points, the effect reaches 10 points for children with lower socio-economic status and 19 points for children who speak another language at home.'[216] Bulgaria has embraced the position that enrolling into pre-school education leads to improved learning outcomes at a later stage and is investing in pre-school education without prioritizing close monitoring of learning effects. Despite high outcomes in reading with 83 percent of grade 4 students reaching proficiency level in reading (PIRLS)

212 PIRLS 2016 is incorporating questionnaire for school principals that provides insights addressing pre-school stage

213 World Bank 2020, Analytical report assessing teacher workforce policy outcomes and providing recommendations for improving education workforce policy and planning processes efficiency

214 PIRLS includes an early-literacy activities scale in each assessment with results consistently showing a strong relationship with achievement. The scale has been developed on the basis of the question whether parents engaged in a list of nine early literacy activities with their children before they entered primary/elementary school.

215 Estonia did not participate in PIRLS 2016.

216 Analysis of the Socio-Economic Development of Bulgaria Defining the National Priorities for the Period 2021-2027 Adopted by Decision of Council of Ministers (# 196/11.4.19).

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Bulgaria face challenges in addressing low performance[217]. About 17 percent of 10-year-olds are below intermediate proficiency level (Level 2) in reading. This result remained constant between 2001 and 2016, indicating the significant challenges faced by the education system to address learning vulnerabilities. Out of these, 5 percent perform below minimum proficiency level (Level 1).

Looking at the variation of learning outcomes across schools and students in PIRLS, an outstanding difference of 43 percent in primary education **lies between schools**, with the majority of this variation being attributed to students' average socio-economic status[218]. The between-school variation of 43 percent means that 43 percent of the differences in education outcomes across schools are explained by differences across schools, primarily by the average socio-economic status of students in the school. Other factors that can differ across schools and explain differences in learning outcomes are availability of educational materials in schools, availability of qualified teachers, and other. There is a segregation of students in schools according to their socio-economic status. Students from the poorest socioeconomic quintile overwhelmingly (66 percent) attend schools with peers from the lowest socioeconomic background.

Figure 23 Within- and between[219]-school variation of learning outcomes in PIRLS (2016)

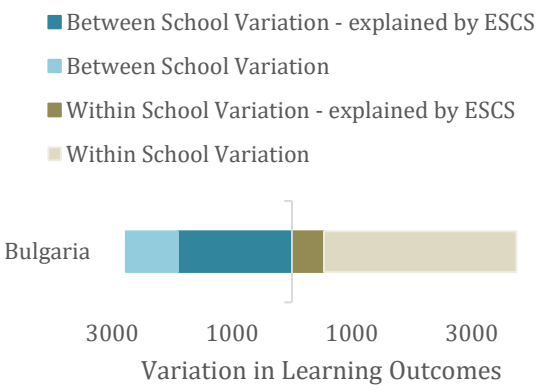
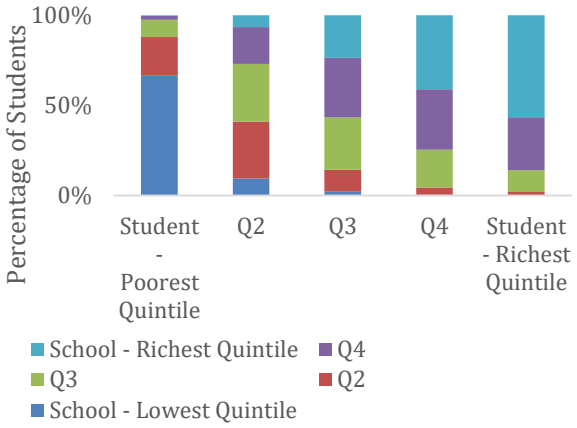


Figure 24 Distribution of students in schools by students' socioeconomic status



PIRLS 2016: also signals that according to school principals, school readiness in Bulgaria requires further attention and improvement. School directors identified in 2016 that at least 28 percent of children were enrolled in schools without participation in pre-school programs and most of those kids started school without minimum readiness (preparation).

PISA 's proportion of 'functionally literate' 15-year-old Bulgarian students has been consistently lower than the proportion of children who did not attend pre-schools in the years when the 15-year-old were in pre-school age indicating for systemic process of learning loss throughout format education.[220] Based on Eurostat data on pre-school participation (that covers the pre-school age of at least the 2015-

217 World Bank 2020, Analytical report assessing teacher workforce policy outcomes and providing recommendations for improving education workforce policy and planning processes efficiency.

218 The socioeconomic status (ESCS218) in PIRLS is derived using information on parental education, occupation, and household possessions including books available at home.

219 Within-school variation implies differences in education outcomes that are explained by differences within the school, for-example, differences in availability of educational materials across students within a school and differences in student-teacher interaction between students within a school.

220 The respective years are 2015 and 2018 for PISA and the period between 2003 and 2010 for pre-school participation. Eurostat does not provide data for the yours when the 2012 Pisa participants were in pre-school age.

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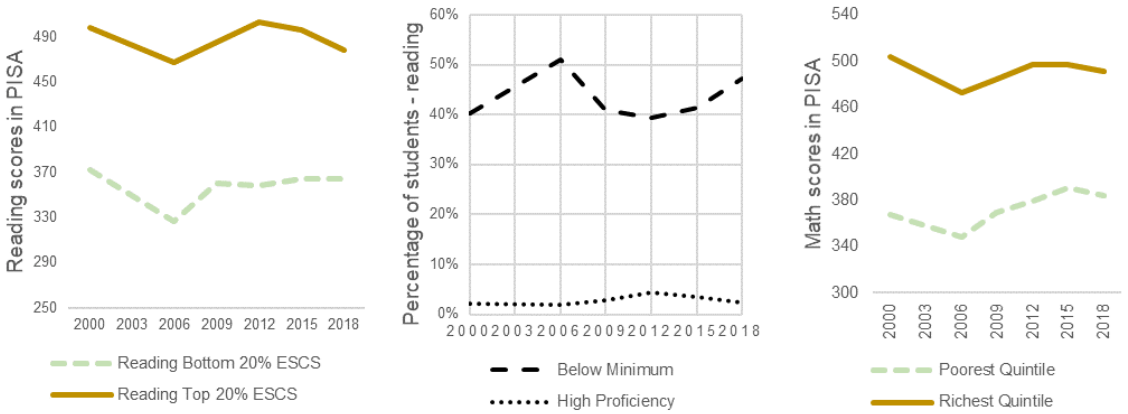
and 2018) consistent difference are suggesting the need to focus on the content and classroom application of pre-school policies. Pre-school participation between 2003 and 2010 (when the 15-year-old participants in 2015 and 2018 PISA were in pre-school age) ranged between 80.5% in 2006 and 85.3% in 2010.[221] At the same time the proportion of the students who scored under the second level in mathematics was 42% in 2015 and 44% 2018 (the respective scores in Language are: 41.5% in 2015 and 47.1% in 2018 and in science: 37.8% in 2015 and 47% in 2018).

PISA 2018 demonstrates also that until 2018 Bulgaria was not able to narrow the gap between high-performing students and the underperformers. While the share of good performers is below EU average and is not stable in time, the gap between good performers and low achievers has not been addressed and remains constant.

Figure 25 High performers in reading: PISA (2000–2018)



The latest Bulgaria's TIMSS results are concerning: the performance in both mathematics and science worsened in 2019 in comparison with 2015. The decline has been registered across the board, for girls as well as for boys. TIMSS 2015 Government report[222] also indicates inconsistent performance[223] between children who attended two years of pre-school education and those who attended only one year or less in both mathematics and science, without the same trend being registered in the 2019 outcomes. In addition, both TIMSS and PIRLS samples are deviating from both national and international data on participation in pre-school. TIMSS 2015 reports[224] only 5% of the [participating] pupils haven't attended at all pre-school education and PIRLS 2016 reports[225] – 3%. The pre-school participation rates in Bulgaria between 2008 and 2011 when both

221 Source: Eurostat, retrieved from: https://ec.europa.eu/eurostat/tgm/table.do?tab=table&plugin=1&language=en&pcode=sdg_04_30

222 Резултати от участието на България в Международното изследване на уменията по математика и природни науки TIMSS 2015 на учениците от 4. Клас,64

223 The difference in mathematics between the two groups is 10 points gains for lower participation and 2 points gains for those who attended two years with respect to those who did not attend pre-school education at all. Also, in science, the children who attended pre-school only one year scored higher than their peers enrolled two years in pre-school.

224 CAPSE (2018) RESULTS OF BULGARIA'S PARTICIPATION IN INTERNATIONAL SKILLS SURVEY IN MATHEMATICS AND SCIENCES TIMSS 2015 OF STUDENTS FROM 4TH GRADE MATHEMATICS AND SCIENCES IN ELEMENTARY SCHOOL Sofia: CAPSE. Published in Bulgarian: ЦОПУО (2018) Математиката и природните науки в начален етап Резултати от участието на България в Международното изследване на уменията по математика и природни науки TIMSS 2015 на учениците от 4. Клас Математиката и природните науки в начален етап София: ЦОПУО Retrieved from: https://www.iea.nl/sites/default/files/2019-04/TIMSS%202015%20Report_Final_Bulgaria.pdf

225 CAPSE (2019) RESULTS OF BULGARIA'S PARTICIPATION IN THE INTERNATIONAL STUDY OF READING SKILLS PIRLS 2016 OF 4TH GRADE STUDENTS Literacy in reading in elementary school, Sofia: CAPSE. Published in Bulgarian: ЦОПУО (2019) РЕЗУЛТАТИ ОТ

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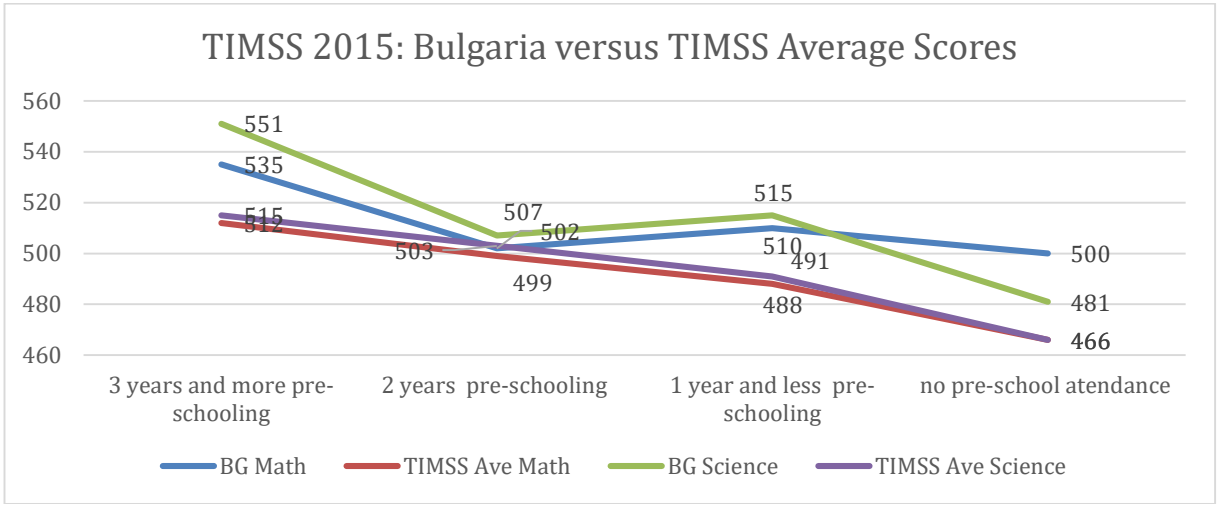
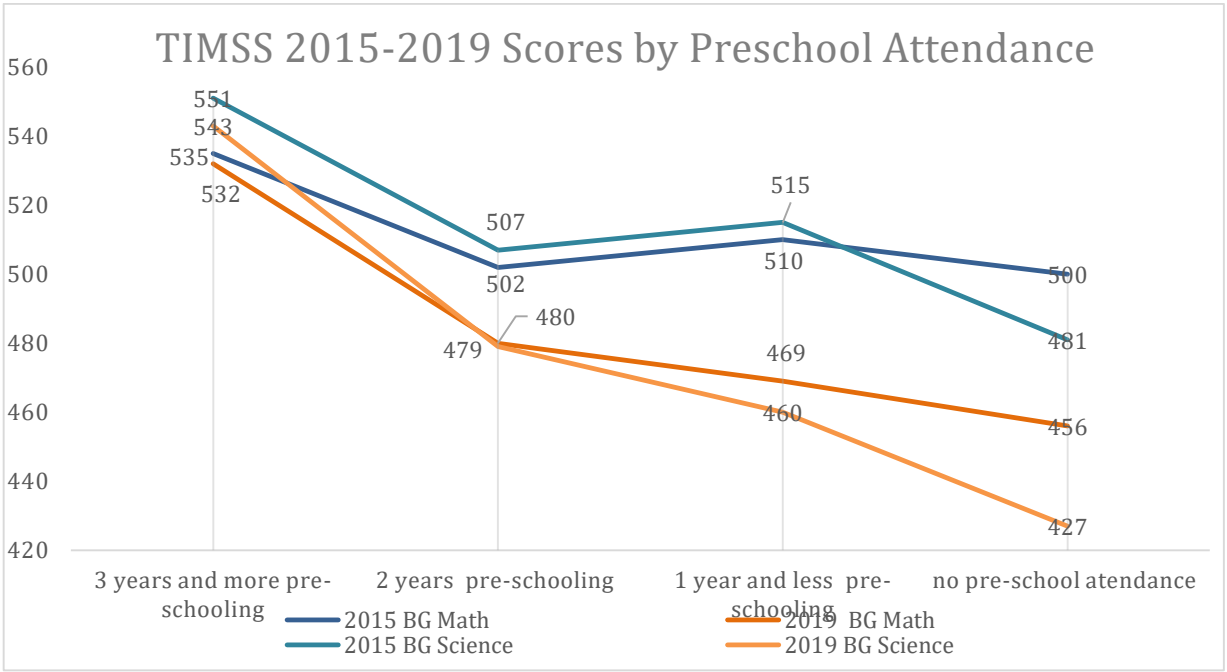
TIMSS and PIRLS participants were pre-school-aged children ranged between 84.2% (2009) and 86.6% (2011).

Figure 26 Bulgaria's TIMSS results: 2019 and 2015





Legend: TIMSS 2015 results of children who (from left to right) attended pre-school education 3 y., 2 y. 1 year and less, did not attended at all; left graph: math; right: science; blue/green: BG, grey: TIMSS average; Source: CAPSE (2018) p. 64.

УЧАСТИЕТО НА БЪЛГАРИЯ В МЕЖДУНАРОДНОТО ИЗСЛЕДВАНЕ НА УМЕНИЯТА ПО ЧЕТЕНЕ PIRLS 2016 НА УЧЕНИЦИТЕ ОТ 4. КЛАС Грамотността при четене в началния етап на образование Retrieved from: https://www.iea.nl/sites/default/files/2019-04/PIRLS%20Report_Final_Bulgaria.pdf

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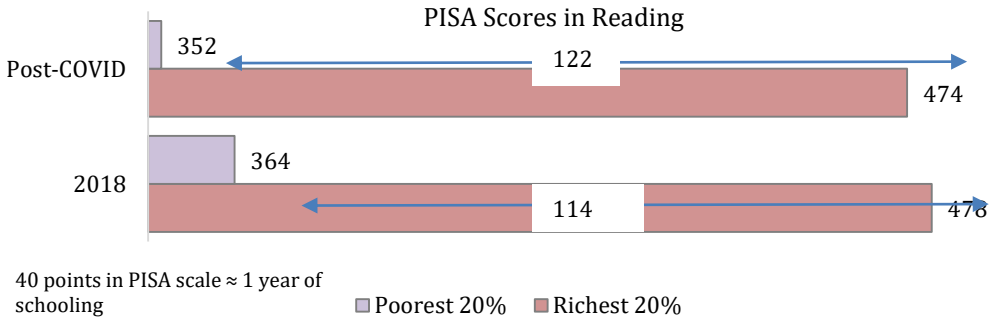
Learning loss: COVID-19 pandemic generates learning losses and pushes more school students into functional illiteracy. [226] Estimations for Bulgaria imply that the percentage of students (15 years old) performing below functional literacy may increase by up to 7 percentage points from 47 percent to 54 percent. The estimation tool is available online and allows for scenario tests based on national performance data. While pre-school education is less impacted by closures, impacts might be expected on (i) enrollment from the one hand, due to the social effect of the crisis and the requirement for pre-school fees across the spectrum of pre-school clients, and (ii) on curriculum control and innovation side depending on the focus of responses of pre-school system.

Figure 27 Estimated impact of COVID-19 on the socioeconomic achievement gap



The only national level assessment that specifically addressed pre-school education focused the attention to policy needs and developments addressing marginalized communities and signaled that pre-school education needs time to become efficient for the most vulnerable in Bulgaria. The "Springboard for school readiness" impact evaluations (2015,2017) expressed concerns about the 'one-year impact of kindergarten participation on cognitive and non-cognitive development of minority children's and found strong relationship between longer stay in preprimary programs and school readiness for the most vulnerable children. The analysis also pointed on the needs the system to observe and address impacts on the average child'.[227] As data and continuous monitoring of child level results is a rare practice in Bulgaria MES should use this cohort of children to continue monitoring education outcomes and in school stage. A recommendation for longitudinal study on learning and lifelong learning outcomes has been extended.

The warning that pre-school education and in broader context - the ECEC provisions – should not always and unreservedly be given the axioma status of benefactor to the further development of young children refers not just to Bulgaria. It has global validity and has been raised more long ago, also in Innocenti's Report Card 8:[228] The trend towards early childhood education and care has enormous potential for good – for giving children the best possible start in life, for limiting the early establishment of disadvantage, for advancing progress towards equality for women, for boosting educational

226 The World Bank has estimated the effects of COVID-19 related school closures on learning outcomes for 157 countries. Simulations use data on learning outcomes and years of schooling to estimate the potential effects of school closures in general and across socio-economic groups. For more information on World Bank's work on COVID-19 visit https://www.worldbank.org/en/data/interactive/2020/03/24/world-bank-education-and-covid-19.

227 World Bank. 2017. Supporting Disadvantaged Children to Enter Kindergarten: Experimental Evidence from Bulgaria. The only large-scale assessment of school readiness was implemented by the World Bank under the Springboard for School Readiness Project. The project was implemented by the Trust for Social Achievement (TSA) in 2015 and 2017 and addressed vulnerable population to inform pre-school barriers to access and learning outcomes (see below). In 2015 and 2017, a cohort of approximately 5,000 children from vulnerable communities were covered by experimental analysis to observe participation and recommend policy responses to fostering pre-school participation for children from vulnerable families (World Bank and TSA).

228 UNICEF 2008, The child care transition, Innocenti Report Card 8, UNICEF Innocenti Research Centre, Florence

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achievement, and for investing in citizenship. Poor quality care, on the other hand, has the potential for both immediate and long-term harm.

Bulgarian and international evidence acknowledge the need for development of stronger and matured system for pre-school-outcomes knowledge based on systematic data collection and analysis. This has to be done in systematic, coherent and sustainable way. The current status of documentation and analysis with respect to pre-school-education learning outcomes is not convincingly conclusive, to say the least. The pre-school education in Bulgaria needs a robust system to (self-) monitor its performance in terms of learning outcomes both on individual as well as on systemic level. Improving policy coherence between learning standards, learning assessment, performance, and accountability is needed across education levels with specific targets and approaches to teaching and teacher policies[229]:

- In preprimary education, the immediate goals need to equip teacher teams with instruments to monitor progress; competence-focused teaching needs to be integrated.
- In school education, the state exams need to reflect and integrate the competence concepts beyond assessing subject knowledge; competence-focused teaching needs to be integrated.
- In preprimary and school education, the accountability of schools and institutions needs to reflect competence goals where a mix of support oriented to learning outcomes should be developed as a priority policy approach.

ECEC Concepts and Learning Standards / Curriculum

Key findings:

- *The normatively defined function of the pre-school education as a basis for lifelong learning is not reflected in the standard regulating pre-school education' content. The latter is narrowly focused on (subject-related) preparation for primary school.*
- *The flagship policy role of pre-school is to contribute to prevention of school dropout and to better academic performance. The current overemphasizing the link to formal, school-based education does not leave much space for synergies with ECEC-related sectors such as health and social welfare and for fostering mechanisms to benefit systemically from informal learning. Contributions to LLL seems formal.*
- *In the last couple of years, the transition between pre-school and primary education and within the different stages of ECEC -towards pre-school- has been addressed in a broader framework aiming at smoothening the transition and equipping the system with instruments and practice.*

Yong children learn from their environment and in non-structured settings[230] including their families, exposure to everyday life, playgroups and playgrounds, formal ECEC provisions, etc. Family and community contexts are essential for the first years of learning of individuals. In these contexts, children make their first and fundamental steps in acquiring key competence for life – language and social competences. Ensuring families' financial and emotional stability, supporting parenting and providing adequate spaces and services that favor and motivate early learning is essential for children's development. In a lifelong learning approach to education these factors should not be overlooked.

While pre-school has been recognized as essential component of lifelong learning policies and addressed by some LLL policy goals, the broader ECEC area has not been associated with this process and is focused to sector specific agendas. In addition to the lack of coordinated policy and implementation approach behind parenting policies[231], the concept, policy goals, implementation

229 World Bank 2020, Analytical report assessing teacher workforce policy outcomes and providing recommendations for improving education workforce policy and planning processes efficiency
230 WB Background paper. Lifelong Learning in Bulgaria. Situation Analysis and Policy Direction Recommendations
231 Iossifov, I., Banova, V., et al. (2018) Early Childhood Development in Bulgaria;
https://www.mariasworld.org/bg/programi/350-programa-za-podkrepa-na-semeistvoto.html
https://www.az.government.bg/pages/roditeli-v-zaetost/

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approach and standards of nursery provision, that has a long history in Bulgaria, are not well outlining shared ECEC vision across formal and informal ECEC and require developments. First, the provision of nursery services in KGs still needs to adhere to the normatively established requirements as the joint MES and MH regulation required by PSEA[232] has not been introduced. The sector agencies have not been successful so far to agree on the scope and develop 'ECD standards' required.'[233]. In addition, the overall concept guaranteeing linkages between nurseries, pre-school, broader ECEC policy scope and parenting has not been discussed or planned. In addition, as three sectoral ministries regulate policy domains affecting the provision of nursery services it is difficult to outline the current policy intention towards the nursery institutions. The acknowledged role of MRDPW to set the infrastructural and environmental standards (see Introduction and the next section on Access) does not exceed a necessary but very sector-specific contribution to the regulatory framework. Second, in a parallel development, MLSP has led a specialized program for the provision of *care* services for children between 0 and 12 from as a component to the labour market and 'better reconciliation of professional and personal life' stimulus.[234] The *Project Parents in Employment* (ESF funded BGN 50 million intervention)[235] that specifically targets young children is 'provision of care for children 0 to 5 including children not enrolled in nurseries, [other] services and pre-school groups.'[236] It is not clear how the project contributing to promotion of '*cognitive, linguistic or socio-emotional development of the children and their physical wellbeing and growth'*[237] or enhances the parenting capacity. The project's result- indicators refer traditional measurement of coverage (the number of supported unemployed people and parents) while the effects and policy approached and standards needed to address (young) children are not addressed. As much as they exist, attempts to initiate services alternative to the standardized provisions are sporadic and overall, the topic is underdeveloped and underassessed. Targeted and coherent, let alone coordinated between the sectors approach affecting the nursery and other ECEC services for the youngest children is difficult to be registered.

232 Art. 24 (4) PSEA

233 Ibid.

234 MLSP, Executive Agency Employment. Project Parents in Employment. Source: https://www.az.government.bg/pages/roditeli-v-zaetost/

235 85% of the funding is provided by the ESF.

236 Ibid.

237 *The Context for Early Childhood Development: Factors of Influence and Relation to Outcomes* in WB (2013) What Matters Most for Early childhood Development: A framework Paper. Retrieved from: https://openknowledge.worldbank.org/bitstream/handle/10986/20174/901830NWP0no5000Box385307B00PUBLIC0.pdf?sequence=1&isAllowed=y; see also Introduction.

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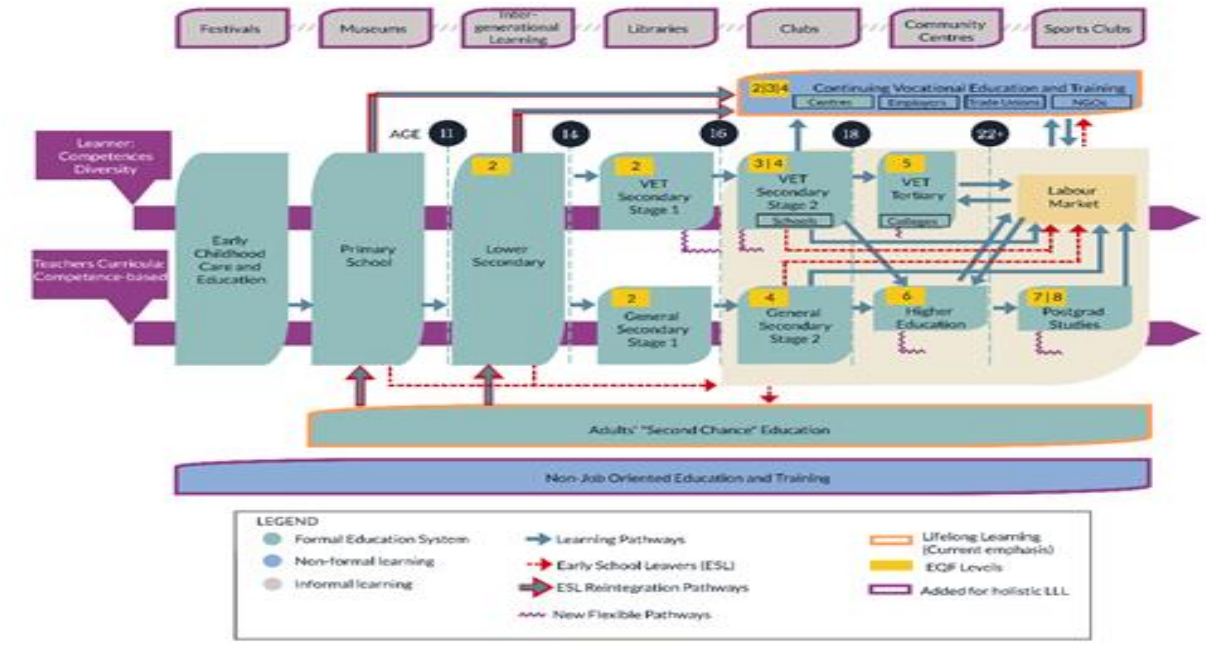
Figure 28 ECEC and its role to lifelong learning policy



While accepted as key element of the LLL and contributor to essential competence for life, pre-school education limits its contribution to key competences, inspired by *European Reference Framework of Key Competences for Lifelong Learning,* through traditional subject specific scope[238]. Following the developments of PSEA led reforms and MES policy actions focused to competence based learning[239] the new pre-school and school educational curricula are the main system instruments for strengthening learning focused to promote key competences'[240]. The legislation detailly addresses pre-school curricula and emphasizes their role for 'creating conditions for acquisition of competences' and explicitly states that the pre-school education 'lays the grounds for lifelong learning'[241]. Although this wording hints to the *competences* spelled out in the *European Reference Framework of Key Competences for Lifelong Learning*' there are no further references to them in the norms that define the pre-school education's content in Bulgaria. Instead, seven 'competences [that are] defined as expected results … according to educational domains'[242], which in practice cover the traditional for the system educational subjects (e.g. Bulgarian language, mathematics etc.) and are in the focus of the efforts for the successful transition of the child into the school education'.[243]

The prominence given to the curricula at legislative and executive level is not paired with practical instruments to inform whether and how acquisition of competences takes place. In addition to the lack of basic standard evaluation package (see ECEC learning outcomes) to observe school readiness and curriculum implementation the existing approaches in the system are not targeting assessment of progress towards key competences but simply the subject related competences that bring additional

238 Lazarov, St., Kuznetsova, D., (2020) FINAL BACKGROUND REPORT Competence-Based Learning in the Bulgarian Education System
239 Lazarov, St., Kuznetsova, D., (2020) FINAL BACKGROUND REPORT Competence-Based Learning in the Bulgarian Education System
240 Lazarov, St., Kuznetsova, D., (2020) FINAL BACKGROUND REPORT Competence-Based Learning in the Bulgarian Education System
241 Art. 27
242 The Bulgarian original reads "по образователни направления"
243 Art. 28 (1) 2. In addition, according to art. 28 (1) 2. '[t]he pre-school education creates conditions for … [h]olistic personal development of the child'.

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unclarity about its scope and difference to key competence in pre-school education.'[244] It is unfeasible to identify whether the employment of the pre-school curricula poses any challenges. By itself this deficiency is the main challenge, and it has to be address without delay.

In general, the preventive potential of the pre-school education with respect to early-school leaving and its ability to enhance (future) academic performance is dominating the policy focus and shapes its linkages to general school education in Bulgaria. This rationale is reflected in a number of strategic documents[245] and plays an important role in the plans for policy developments[246] as seen from the draft PE 2021-2027 application: '[t]he longer the child has visited pre-primary education, the better their educational outcomes are at school'. The policy framework relevant to pre-school education is focusing almost exclusively on the preparatory function of pre-school education with light reference to 'care in early childhood age' and '[p]olicies towards young children' in the National Strategy to Stimulate and Increase Literacy (2014 - 2020). In general, any form of intersectoral cooperation is envisaged while no specific intersectoral policy intentions or approaches are being formulated.

While ensuring smooth transition between pre-school and school education is of special focus[247], there is no common practice to promote close-to-school environment in pre-schools. School transition has been identified as a challenge for a number of children and parents in Bulgaria. To address existing needs, MES introduced in 2019 specific NPDE (*Caring Together for the Pupil)* which specifically supports the transition pre-primary – primary education aligned with a similar effort between the elementary and pre-gymnasium stage. It also supports building up partnerships between pre-schools and schools and networks of pre-school and schools. Pre-school settings are following the tradition pre-school daily organization and are not focused on promoting daily routines similar to school life. While pre-school children exposed to school-based pre-primary groups have access to close-to-school environment, the majority of children enrolled in the classical KG setting do not. In Finland, the direct learning environment and daily routine of pre-primary groups are designed to be closed to school routines.

One of the challenges that might stem from this focused operational target to contribute to school educational system is that the pre-school role in the ECEC-mix (education-health-social welfare) might be easily downplayed. Undoubtedly there is very important connection between the pre-school education and rest of the education system. Yet, pre-school education is by default also part of the ECEC, which, again, by definition covers all provisions *from birth to compulsory school age*. MES needs to keep this balance and guarantee that pre-school policies are developed to address the needs of both school and early years stages where the mentioned fragmentation of approaches and lack of sustained practices to support parenting are contributing to the need for Bulgaria to identify a strong system leader promoting ECEC, standards, approaches, and early-learning as essential components of child development.

A related and probably much underestimated challenge is the overconcentration on the pre-school education's contribution to school readiness. The risk is that it might turn out to be the (only) way

244 Lazarov, St., Kuznetsova, D., (2020) FINAL BACKGROUND REPORT Competence-Based Learning in the Bulgarian Education System

245 The pre-school educations preventive role with regard to early school leaving and enhancing potential vis-à-vis academic performance is clearly referred to present in most of the national strategies relevant to pre-school education. For details: see the section Review of National Strategic Goals 2014-2020.

246 Although this rationale is widely accepted, it has to be admitted that in the case of Bulgaria the *numbers are not adding up nicely,* at least for the time being. By the time the PSEA entered into force the pre-school participation rates were already on decline and this decline continued throughout the whole period PSEA has been enforced. Combating school drop-out has been MES's policy priority under the current administration and despite the reported successes it remains a challenge. And then the issues related to learning outcomes (see the respective section) remain unaddressed. Given all these, it is not clear if the amendment to extend the compulsory pre-school education with 50 % is based on specific data/evaluation that the educational administration has its disposal on the impact of the two-year compulsory pre-primary education.

247 Associated with general school targeted pre-school policy.

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that the normative stipulation[248] placing the pre-school education at the fundament of the LLL is operationalized. While the pre-school education is considered predominantly a basis for (long-term) educational process, the potential of ECEC services covering younger children (babies, toddlers, 0-3) to properly set the stage for life-long learning still remains untapped. This is an area where much more could be achieved especially in coordination and cooperation between education and other sectors. The challenge could be seen also in terms of balancing the overreliance on formal learning (school education) and the omission of the informal learning which remains 'the mainstay of early childhood learning'.[249]

The draft Strategic Framework Education Bulgaria 2030 envisages 'modernization of didactic tools in kindergartens' and this might be considered as hinted policy intention to sustain and possibly extend the NP Provision of Modern Educational Environment or to rely on the upcoming OPSE. A clear vision on the role of pre-school education as a starting point for LLL in Bulgaria, as well as on the learning goals that any 'didactic tool' or other support materials should serve predefines the effectiveness of the operationalizations of such policy intentions.

Workforce Policies Addressing Pre-school Education

Key findings:

- *Pre-school was able to balance workforce age composition and seems less vulnerable to expected workforce outflows than school education.*
- *The shortage of pre-school teachers is poorly informed and not associated with specific policy targets related to learning and curriculum, similar to general education approach.*
- *Continuous efforts have been put into place with respect to the upkeeping and bettering the qualification of the teachers but effects to direct classroom practice and contribution to learning goals remain unclear and not subject of specific measurement.*

While the shortage of teachers and the ageing education workforce are among the priority challenges characterizing[250, 251] the education system, the specific needs in pre-school education are not well informed. The roots of this low policy focused domain are linked to the delegated provision approach leaving pre-school human resource task to local labor market specifics. This governance approach lifted the focus of MES on the pre-school HR needs. In the last years MES have not promoted and developed focused policies to influence a comprehensive teacher workforce planning system[252] in school education. MES initiated a series of activities, rather non-coordinated, to address the raising shortage for specific teacher expertise in school education. Still MES need to specify its approach on pre-school education. According to the EC monitoring report on education (2019)[253], the shortage is emerging in particular with respect to teachers in kindergartens and primary teachers. MES is developing a workforce monitoring tool that targets primarily the need to facilitate the exchange of information between stakeholders and facilitate labor market rather than to estimate needs based on workforce profiles and trends.

The structural nature of ageing workforce and the danger of its aggravation over time have been addressed by general increase of teacher salaries that represent a major policy priority for GoB. This is one of the most known and consistent policy responses following the introduction of PSEA. The policy intention is to retain and attract teachers in education through doubling the renumeration of the

248 Ordinance#5/03.06.2016 on Pre-school Education, art. 27; see also above.
249 EC (2000) A Memorandum on Lifelong Learning.
250 See for example the draft of the OPSE 2021 – 2017 application
251 EU Education and Training Monitor 2019 Bulgaria. It has to be mentioned though, that the data presented in the EU report on Teachers' age by level of education (Fig. 2, p. 4) comes from 2017 data-source.
252 WB (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations
253 EU Education and Training Monitor 2019 Bulgaria.

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Bulgarian teachers within four years and bring it and keep it above the average salary in the country. The starting teacher's salary in 2017 was BGN 660 and in the beginning of 2021 it will reach BGN 1260. The respective amounts for a school's or a KG's principal are BGN 825 in 2017 and 1535 as per January 2021.[254] This policy response has been unified across pre-school and school education allowing for systematic approach addressing school and pre-school professionals.

Overall, the policy actions addressing workforce remain fragmented[255] and need further consolidation and fostered focus on specific outcomes[256]. The specifics of pre-school education seem to be integrated into general steam of actions developed to address workforce needs: (i) qualification aspects by focusing on both initial teacher training and raising the profile of students in pedagogy ITE (where pre-school majors have not been included)257 and continuous qualification (CPD) of teachers in the system; (ii) career development linked to introduction of workforce standards integrating requirements for CPD and performance appraisal for workforce, and (iii) initial accountability policies focused mainly to external evaluation by National Inspectorate for education and launching of a process for institutional self-assessment. Most of those processes are new to the system, designed to target equally pre-schools and schools, and are under development. Overall, the developments are paired with focus on regulatory aspects and low attention to learning outcome effects and outcomes that contribute to system goals (ITE outcomes, CPD outcomes and direct effects on learning). An extensive list and review of teacher policies development after the adoption of the PSEA are presented in Bulgaria Teaching Workforce Policy Note and Recommendations.

In comparison to school education pre-school workforce is much balanced as age profile, younger and less experienced in the education system[258]. In pre-school, the teacher workforce has progressively become younger in the last years, with the share of teachers ages 45 or younger increasing from 28 percent to 43 percent between 2005 and 2018, especially after 2011 with the proportion of professionals aged below 35 in particular increasing from 13.9 percent to 18.9 percent. Pre-school workforce experience decreased from 21 years to 18 years (with no data available for 2012 and 2013). On the one hand, this may be related to the fact that the teacher population has become younger. Limitations posed by available data do not allow for observation of workforce dynamics, for example, trends in employment tenure by age groups, to understand the characteristics and causes for the observed variations and inform the needs related to professional experience. As the decline is specifically observed in pre-schools with low student teacher ratio, this is a clear signal that small communities and provisions tend to work with younger professionals and this needs to be addressed by CPD programs. ITE for pre-school teachers has also experienced an upgrade in levels of education achieved. In particular, the share of teachers with a bachelor's or master's degree increased remarkably from 60 percent in 2005 to 83 percent in 2018.

Pre-school still can't sustain young teachers as a national target.[259] Few regions have done better than expected: out of the 28 regions young teachers (under 30) are between 12 and 18 percentage - Lovech

254 Mediapool Teachers' salaries raised with 15-16% from January. 17.08.2020, published only in Bulgarian, original title: Mediapool Заплатите на учителите се вдигат с 15-16% от януари. (17.08.2020) Retrieved from: https://www.mediapool.bg/zaplatite-na-uchitelite-se-vdigat-s-15-16-ot-yanuari-news311116.html

255 WB (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations

256 stimuli already before potential teachers join the workforce, thus already when they are students. This approach is not unknown to MES and indeed also this year additional scholarships were provided for certain academic majors including pedagogical ones but *Pre-school and Elementary-school Pedagogy* was not among them

257 stimuli for potential teachers to join the workforce; scholarships were provided for certain academic majors including pedagogical ones but *Pre-school and Elementary-school Pedagogy* was not among them

258 WB (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations

259 WB (2020a) Bulgaria Teaching Workforce Policy Note and Recommendations

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(18%), Sofia (17%), Plovdiv (13%), Ruse (13%) and Sliven (13%) and Sofia City (12%) and Stara Zagora (12%). On the other end are Vidin (6%), Kyustendil (6%) Targovishte (5%).[260]

The need for continuous update and upgrade of the qualification of the (pre-school) educators has been recognized and acted upon too but much more is needed as scope, thematic relevance and targeting[261]. According to workforce standards a pre-school teacher qualification requires a bachelor's degree in *Pre-school and Elementary-school Pedagogy* allowing to teach in pre-schools and the first four grades of the primary school. CPD is a compulsory element stimulating professional development. CPD has been targeted by numerous annual NPDE and a specific investment through ESF (Qualification of Pedagogical Specialists BG05M2OP001-2.010) operational since 2018. Both instruments address the introduced policy targets for CPD but are broadly focused and do not prioritize the specific needs of workforce groups or education institutions. In addition, thematically the investments are overarching that demonstrates the minor effect from the limited NPDEs and the need for a stronger and much bigger investment to be placed to address CPD needs. Both NPDEs and OPSESG investments are not developing specific actions targeting pre-school teachers. This is a specific need and a task for the system that addresses both administration and needs assessment approach and targeting of workforce groups.

Figure 29 Evolution of teacher age in pre-school

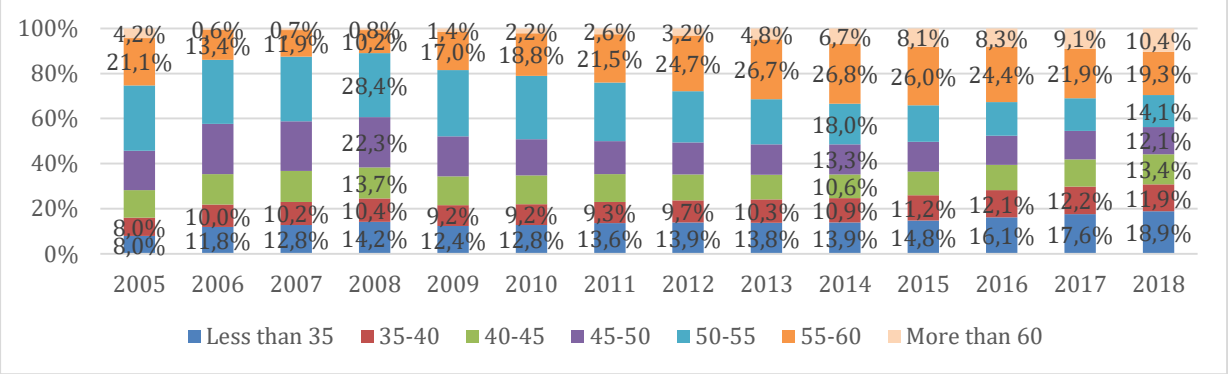
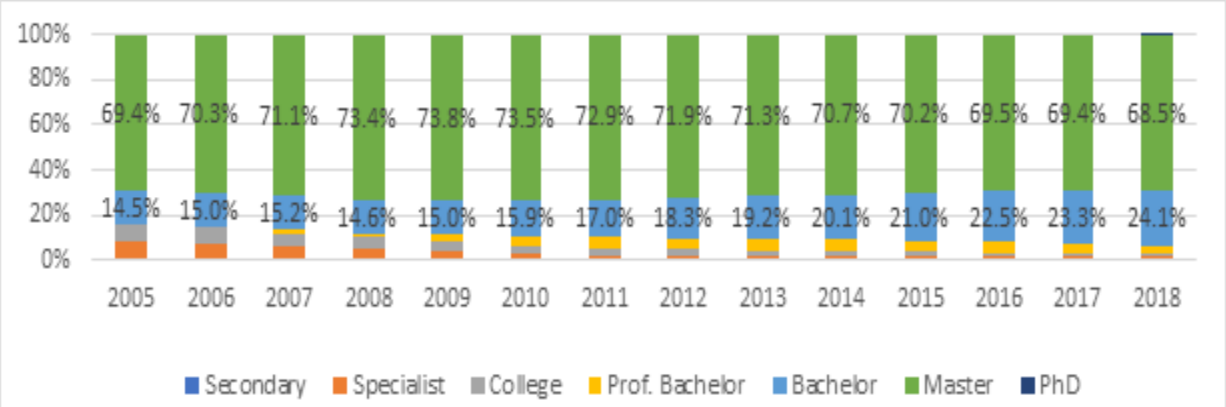


Figure 30 Evolution of initial teacher education in pre-school



260 Source: The World Bank, Table 'Number of teachers by age groups in kindergartens and schools, by regions, 2018' reproduced below:

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Table 5 Pre-school and school teachers by age group and region, 2018

(full set of figures provided under Bulgaria Teaching Workforce Policy Note and Recommendations)

Teachers by age group in kindergartens and schools, by region (2018)

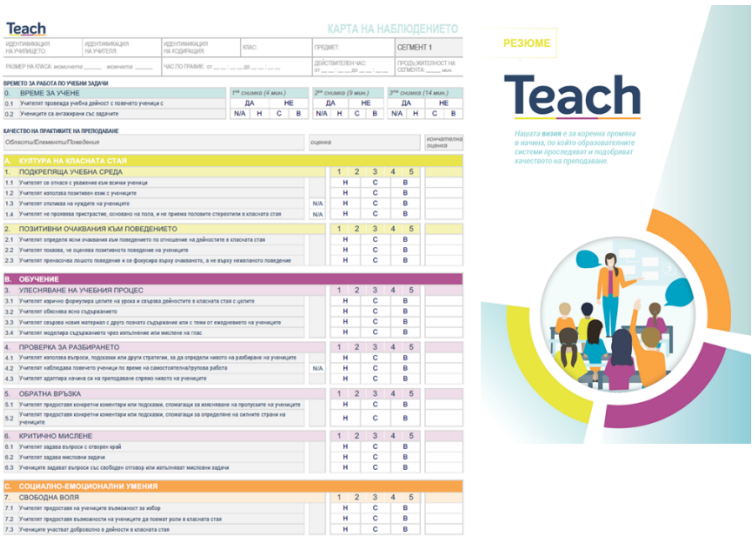
	Kindergarten								School							
	under 30	31-35	36-40	41-45	46-50	51-55	56-60	above 60	under 30	31-35	36-40	41-45	46-50	51-55	56-60	above 60
Blagoevgrad	108	107	108	132	111	130	222	40	288	239	330	664	652	589	601	157
	11.3%	11.2%	11.3%	13.8%	11.6%	13.6%	23.2%	4.2%	8.2%	6.8%	9.4%	18.9%	18.5%	16.7%	17.1%	4.5%
Burgas	102	114	170	165	156	144	181	90	255	254	429	697	713	709	777	410
	9.1%	10.2%	15.2%	14.7%	13.9%	12.8%	16.1%	8.0%	6.0%	6.0%	10.1%	16.4%	16.8%	16.7%	18.3%	9.7%
Dobrich	44	42	68	70	65	73	110	41	93	89	135	215	301	294	385	167
	8.6%	8.2%	13.3%	13.6%	12.7%	14.2%	21.4%	8.0%	5.5%	5.3%	8.0%	12.8%	17.9%	17.5%	22.9%	9.9%
Gabrovo	25	11	22	18	24	60	91	29	49	41	69	106	167	208	237	96
	8.9%	3.9%	7.9%	6.4%	8.6%	21.4%	32.5%	10.4%	5.0%	4.2%	7.1%	10.9%	17.2%	21.4%	24.4%	9.9%
Haskovo	56	43	80	75	75	104	113	31	120	130	191	346	441	433	379	151
	9.7%	7.5%	13.9%	13.0%	13.0%	18.0%	19.6%	5.4%	5.5%	5.9%	8.7%	15.8%	20.1%	19.8%	17.3%	6.9%
Kardzhali	33	23	80	67	58	67	83	28	84	108	185	246	256	281	288	164
	7.5%	5.2%	18.2%	15.3%	13.2%	15.3%	18.9%	6.4%	5.2%	6.7%	11.5%	15.3%	15.9%	17.4%	17.9%	10.2%
Kyustendil	16	25	31	36	43	48	55	13	39	54	86	215	207	228	235	75
	6.0%	9.4%	11.6%	13.5%	16.1%	18.0%	20.6%	4.9%	3.4%	4.7%	7.6%	18.9%	18.2%	20.0%	20.6%	6.6%
Lovech	57	19	27	44	33	52	66	26	114	62	106	168	245	305	267	121
	17.6%	5.9%	8.3%	13.6%	10.2%	16.0%	20.4%	8.0%	8.2%	4.5%	7.6%	12.1%	17.7%	22.0%	19.2%	8.7%
Montana	26	14	31	56	48	48	66	35	74	83	112	197	226	228	298	136
	8.0%	4.3%	9.6%	17.3%	14.8%	14.8%	20.4%	10.8%	5.5%	6.1%	8.3%	14.5%	16.7%	16.8%	22.0%	10.0%
Pazardzhik	40	46	74	73	78	88	149	53	189	163	306	408	449	450	536	262
	6.7%	7.7%	12.3%	12.1%	13.0%	14.6%	24.8%	8.8%	6.8%	5.9%	11.1%	14.8%	16.3%	16.3%	19.4%	9.5%
Pernik	30	48	21	45	27	42	58	28	92	80	117	145	178	183	200	125
	10.0%	16.1%	7.0%	15.1%	9.0%	14.0%	19.4%	9.4%	8.2%	7.1%	10.4%	12.9%	15.9%	16.3%	17.9%	11.2%
Pleven	71	60	78	97	73	88	102	64	184	121	178	391	520	516	558	223
	11.2%	9.5%	12.3%	15.3%	11.5%	13.9%	16.1%	10.1%	6.8%	4.5%	6.6%	14.5%	19.3%	19.2%	20.7%	8.3%
Plovdiv	230	137	207	299	214	255	317	168	679	503	651	1,089	1,153	995	1,047	590
	12.6%	7.5%	11.3%	16.4%	11.7%	14.0%	17.4%	9.2%	10.1%	7.5%	9.7%	16.2%	17.2%	14.8%	15.6%	8.8%
Razgrad	39	35	45	29	43	53	102	27	80	81	128	204	216	221	236	95
	10.5%	9.4%	12.1%	7.8%	11.5%	14.2%	27.3%	7.2%	6.3%	6.4%	10.2%	16.2%	17.1%	17.5%	18.7%	7.5%
Ruse	68	46	57	78	93	67	82	52	128	130	173	305	412	368	369	204
	12.5%	8.5%	10.5%	14.4%	17.1%	12.3%	15.1%	9.6%	6.1%	6.2%	8.3%	14.6%	19.7%	17.6%	17.7%	9.8%
Shumen	46	33	58	74	94	98	103	17	101	134	201	362	284	281	346	118
	8.8%	6.3%	11.1%	14.1%	18.0%	18.7%	19.7%	3.3%	5.5%	7.3%	11.0%	19.8%	15.5%	15.4%	18.9%	6.5%
Silistra	32	25	38	24	30	52	68	28	69	76	87	168	227	225	215	103
	10.8%	8.4%	12.8%	8.1%	10.1%	17.5%	22.9%	9.4%	5.9%	6.5%	7.4%	14.4%	19.4%	19.2%	18.4%	8.8%
Sliven	55	36	52	48	52	82	71	41	172	130	189	245	331	377	386	174
	12.6%	8.2%	11.9%	11.0%	11.9%	18.8%	16.2%	9.4%	8.6%	6.5%	9.4%	12.2%	16.5%	18.8%	19.3%	8.7%
Smolyan	27	29	50	39	26	59	71	15	77	93	112	183	235	230	275	103
	8.5%	9.2%	15.8%	12.3%	8.2%	18.7%	22.5%	4.7%	5.9%	7.1%	8.6%	14.0%	18.0%	17.6%	21.0%	7.9%
Sofia	103	62	62	61	53	99	108	74	231	148	182	292	357	481	506	263
	16.6%	10.0%	10.0%	9.8%	8.5%	15.9%	17.4%	11.9%	9.4%	6.0%	7.4%	11.9%	14.5%	19.6%	20.6%	10.7%
Sofia City	434	296	427	446	333	405	706	701	1,314	795	970	1,591	1,667	2,086	2,329	2,042
	11.6%	7.9%	11.4%	11.9%	8.9%	10.8%	18.8%	18.7%	10.3%	6.2%	7.6%	12.4%	13.0%	16.3%	18.2%	16.0%
Stara Zagora	97	58	98	117	90	111	143	98	262	185	264	459	639	634	606	308
	11.9%	7.1%	12.1%	14.4%	11.1%	13.7%	17.6%	12.1%	7.8%	5.5%	7.9%	13.7%	19.0%	18.9%	18.1%	9.2%
Targovishte	16	15	29	32	52	66	83	10	52	53	101	173	217	246	245	85
	5.3%	5.0%	9.6%	10.6%	17.2%	21.8%	27.4%	3.3%	4.4%	4.5%	8.6%	14.8%	18.5%	21.0%	20.9%	7.3%
Varna	106	135	156	189	187	179	210	119	282	276	421	663	800	769	871	544
	8.3%	10.5%	12.2%	14.8%	14.6%	14.0%	16.4%	9.3%	6.1%	6.0%	9.1%	14.3%	17.3%	16.6%	18.8%	11.8%
Veliko Tarno..	68	45	71	63	81	100	125	39	232	149	171	348	471	436	358	167
	11.5%	7.6%	12.0%	10.6%	13.7%	16.9%	21.1%	6.6%	9.9%	6.4%	7.3%	14.9%	20.2%	18.7%	15.4%	7.2%
Vidin	13	12	24	32	31	32	45	25	37	28	56	95	156	169	212	69
	6.1%	5.6%	11.2%	15.0%	14.5%	15.0%	21.0%	11.7%	4.5%	3.4%	6.8%	11.6%	19.0%	20.6%	25.8%	8.4%
Vratsa	49	27	61	94	95	61	93	28	119	87	177	275	361	343	316	120
	9.6%	5.3%	12.0%	18.5%	18.7%	12.0%	18.3%	5.5%	6.6%	4.8%	9.8%	15.3%	20.1%	19.1%	17.6%	6.7%
Yambol	35	32	35	41	40	28	45	51	42	41	86	159	229	223	280	169
	11.4%	10.4%	11.4%	13.4%	13.0%	9.1%	14.7%	16.6%	3.4%	3.3%	7.0%	12.9%	18.6%	18.1%	22.8%	13.8%

3.3% 32.5%

Focus on direct effect of all qualification investments is needed as currently both ITE and CPD are provision-oriented accounting for coverage of teachers and deprioritizing the need to look after application and policy affects from CPD investments. As discussed, the lack of standardized observation of school readiness of children or pre-schools accountability, in combination with a flat trend of low-performing students in primary education, signals the need to establish specific policy monitoring to inform early learning and needs addressing workforce. In the context of low accountability for qualification investments the programming and system approach seems too liberal (no post support, no post monitoring, no tracking of learning outcomes effects) towards workforce expectations. Across the

education system, classroom observation practices targeted at collecting and analyzing both qualitative and quantitative data regarding the implementation of the new curricula are the exception rather than the rule262. The system seems to lack the capacity to understand the potential of similar instruments to not only observe but also support the development of modern and innovative teaching practice. Adapting and piloting the use of existing instruments for classroom observation could inform MES and RDEs efforts to identify and address teachers training needs at both ITE and CPD levels. MES has at its disposal263 a standardized classroom observation platform (Teach), adapted for pre-schools as of 2020, providing an integrated digital solution for data collection and analysis. Teach could be used as a quick start background platform for developing and testing classroom observation aimed at informing ITE (inception of new teachers in the system) and CPD policy efforts, especially after introducing new approaches, content, and learning goals.

Figure 31 Teach: A classroom observation instrument to inform teaching standards and teacher needs



The retainment of the professionals from the other sectors related to ECEC remains a unprioritized and challenging task. ECEC workforce do not share basic standards and qualification requirements and are following the same fragmentation as ECEC sectoral approaches. The professional achievements of the pre-school educators depend also on contributions by the other professionals in the ECEC subsector.[264] Given that the measures and financial stimuli of the last three years to increase the attractiveness of the teacher's profession are not mirrored in the other sectors (health, social welfare) it is clear that staffing the other, not-educational, provisions in the ECEC subsector is least as challenging as in pre-school education.

The proportion between the medical and the non-medical nursery staff got inverted within the programming period 2014-2020. In the beginning of the period there were more medical staff than non-medical ones working in nursery institutions. By 2017 the balance has already been reversed and by the end of 2019 for every 100 medical specialists in the nurseries there are 111 non-medical staff. Still official statistics (NSI) does not provide information on the qualification of the non-medical staff nor how many of them have pedagogical background. Information or specific analysis to follow this trend is not present. The change in the profile of the nursery staff certainly cannot be attributed to the regulatory framework.

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263 The full school package of the school instrument was translated in Bulgarian and provided to MES in 2019.

264 The section on management pays specific attention to the coordination and collaboration among the ECEC professionals from the sectors of education, public health and social welfare.

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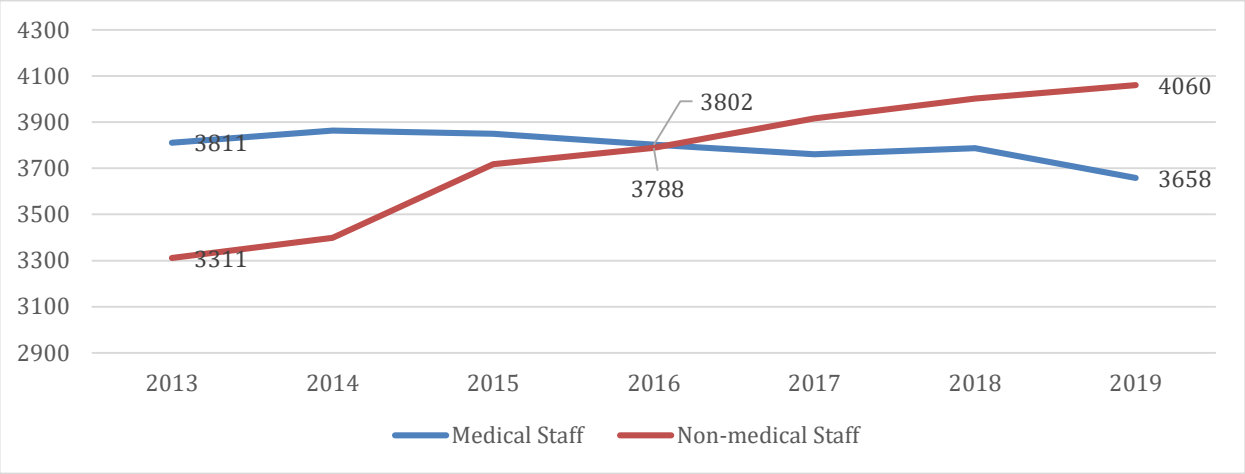
The ordinance that governs the establishment and functioning of the nurseries[265] was enforced in 2008 and amended for the last time in 2011. Throughout the period MH remained the primary responsible governmental agency for the normative framework and administratively and financially the nurseries have been municipal or private. This regulation does not facilitate the identification of a coherent national approach with respect to expansion plans or strategies nor does it the insufficient information about the needs of nursery provisions throughout the country.

Figure 32 Professional background of nursery staff



Source: NSI (2020) Children in Nurseries

Finally, workforce information in Bulgaria is based primarily on administrative data. Bulgaria is not administering any workforce survey to consult policies and directly steer with the network of professionals. Similarly, to learning outcomes evidence MES is dependent on external analysis as TALIS. As pre-school teachers were not covered by TALIS ('researches teachers from all level of the school education, the main target group being the ones teaching in grades V-VII of the primary school') information on pre-school workforce and trends is limited. MES need to put in place a systemic instrument to substantiate policy addressing pre-school education.

265 Ordinance # 26/18.11.2008 regulating the structure and functioning of nurseries and kinder kitchens and the health requirements applicable to them. Published in Bulgarian, original title: НАРЕДБА № 26 ОТ 18 НОЕМВРИ 2008 Г. ЗА УСТРОЙСТВОТО И ДЕЙНОСТТА НА ДЕТСКИТЕ ЯСЛИ И ДЕТСКИТЕ КУХНИ И ЗДРАВНИТЕ ИЗИСКВАНИЯ КЪМ ТЯХ

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Governance[266] and Policy Mix Management

Governance

A life-cycle-minded analytical approach employed to review the ECEC subsector in Bulgaria delivers the benefit of clear outline of the sectoral responsibilities. Naturally, the table below that visualizes the ECEC governance framework starts with the actors in the sector of public health since this sector has the leading responsibility for the younger children (0-2). Next to the demarcating the roles and positions of the sectoral actors the analysis requires clarification of the roles and positions alongside the axis national administration – local authorities. The categorization of the roles and positions of the actors involved in interaction and decision-making *in the entire ECEC subsector* allows to place the pre-school education in a broader context and to abstain from further paying attention to the social- and medical-care provisions (typical for the younger ECEC-aged children). In turn, this permits to completely shift the focus to the governance of the pre-school education. Specifically, some structural and functional features that typify the way pre-school education is governed are pointed out.

Table 6 ECEC Governance in Bulgaria

Governance Framework of the ECEC Subsector in Bulgaria

Sector	Actor	Role	Position	Remark
Public Health	MH[267]	Primary responsibility for the mainstream provisions for younger children (up to 3). Sets the respective regulatory framework.		
	RHIs[268]	Methodological guidance to nurseries and CKs[269]	MH's regional structures. Implement the state's public health policies in the respective region.	
	RIMSCCs[270]	Providers of ***medico****-social services* for children *up to 3* with specific indications[271]	Directly under the MH	
	Nurseries	Provides of ***care*** for children between 3 months and 3 years *staffed by medical and other specialists*	Under the RHIs: supervision, methodological guidance, professional standards. Under municipalities: organization and functioning of the nurseries (incl. the principal is appointed by the mayor).	

266 Hufty M. 2011. Investigating policy processes: The Governance Analytical Framework (GAF). In: Wiesmann U, Hurni H, editors; with an international group of co-editors. Research for Sustainable Development: Foundations, Experiences, and Perspectives. Perspectives of the Swiss National Centre of Competence in Research (NCCR) North-South, University of Bern, Vol. 6. Bern, Switzerland: Geographica Bernensia, pp 403–424. According to Hufty's definition g*overnance* 'refers to a category of social facts, namely the processes of interaction and decision-making among the actors involved in a collective problem that lead to the creation, reinforcement, or reproduction of social norms and institutions.

267 Ministry of Health.

268 Regional Health Inspectorates.

269 Children's Kitchens.

270 Residence Institutions Medical and Social Care for Children. According to NSI Residence Institutions Medical and Social Care for Children (RIMSCC) "are registered in accordance with the Health Institutions Act within the category "other health institutions" where medical and other staff conduct long-term medical supervision and specific care for children up to 3 years who suffer from chronical conditions and medico-social problems" [translation mine: II]. Retrieved from: https://www.nsi.bg/bg/content/3339/метаданни/домове-за-медико-социални-грижи-за-деца

271 As of 31.12.2019 there were only *454 children institutionalized in 13 institutions* with total *capacity of 809* children; NB: out the 454 children *170 actually 3-year-old and older*.

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	CKs	Providers of food for children 10-month to 3-year-old	Ibid.	
Social Welfare	MLSP[272]	Shared responsibility in the field of ECEC with focus on children in need of social-welfare services and child-protection measures and on parental participation into the labor market.		
	EASA[273]	Executive Agency under the MLSP responsible for the provision of social-welfare services and child-protection measures including for ECEC-aged children (0-7).		
	DSAs/ CPDs[274]	DSAs are the regional structures of EASA, responsible for the social assistance on the territory of the respective region. CPDs are DSAs' units explicitly focused on child protection and welfare, including for ECEC-aged children. They direct and supervise the *social service providers* (SSPs).		
	SSPs	The actual providers of services (directly supporting with children and their families)	Separate (independent) legal entities (mostly NGOs) to whom the provision of services is outsourced periodically (a form of public-private partnership).	
	Employment Agency[275]	Runs a project under OP HRD on reconciliation of family and professional life; provided support for hiring au-pairs		
Child Protection	SACP[276]	Control and methodological guidance *to all institutions and providers of care, education and treatment for all children*, including ECEC-aged ones (0-7)	*State Agency* under the *Council of Ministers* (CM). Can't regulate. Supposed to develop and monitor implementation of all the policies regarding children.	
Pre-school Education	CM	Normatively prescribed (but still nominally): "*The state policy in the field of pre-school and school education shall be carried out by the Council of Ministers*"		Art.251(1) PSEA
	MES	Primary responsibility for the provision of the pre-school education. Sets the policy and regulatory framework. Through the CM: might initiate legislative changes.		
	RDEs[277]	Control and methodological support to the KGs, schools (incl. with preparatory pre-school groups) and PDSCs[278]	MES's regional structures. Legal entities but they manage only their own budgets.	*Leading norm: Art. 252 (1) PSEA;* NB: A single reference in Ordinance # 5 on Pre-school Education.
	KGs	Primary providers of the pre-school education in the country. Serve 3-6-year-old children.	Double subordination: under the RDEs and the municipalities.	
	Preparatory Groups in Schools	Provide pre-school education within schools' premises to children in compulsory pre-school age (5-6)[279]	Structurally, financially and otherwise dependent units within some (primary) schools.	
	PDSCs[280]	Organize activities to support the inclusion, instruction and upbringing of children and pupils, as well as activities to develop their interests and capabilities.	Supportive functions and thus secondary position vis-à-vis the KGs and the preparatory groups.	Leading norm: art. 26, 49 PSEA
	SAUs[281]	Support the educators to provide the best possible education	Ibid. SAUs are always state bodies.	Leading norm: Art. 27, 50 PSEA

272 Ministry of Labor and Social Policy.
273 Executive Agency for Social Assistance.
274 Directorates for Social Assistance and Child Protection Departments.
275 An Executive Agency under MLSP
276 State Agency for Child Protection.
277 Regional Divisions of Education, Sic: PSEA, § 23.
278 Personality Development Support Centers.
279 According to the latest amendment of PSEA (Sept. 2020) they might provide pre-school education to four-year old children only in places with no KGs.
280 Specifically listed as pre-school institution, PSEA art. 2 (3).
281 Specialized Auxiliary Units, specifically listed as pre-school institution, PSEA art. 2 (3).

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Reginal and local governance	Regional Governor	Very limited role: coordinates the development and approves the regional personality development support strategy for children and pupils.	Represents the state in the respective region and serves as a liaison between the central and local authorities. Appointed by the CM.	Art. 196 PSEA. NB: No reference in Ord 5 on pre-school education
	Municipalities	Regulate the *rules* on *organization and procedures* applicable to nurseries and KGs on their territory. Primary *budgetary authority*[282] with respects to municipal ECEC providers. Proprietor of the municipal KGs' and nurseries' buildings. The mayor appoints and dismisses the municipal KGs' principals and the directors of the PDSCs and the nurseries.		

The governance of the pre-school education, even when the ECEC context is completely put aside, is marked by complexity. The *policy and regulatory frameworks* are responsibilities of the MES: 'the Minister of Education and Science […] guide[s] and coordinate[s] the implementation of the state policy in the field of pre-school […] education.'[283] Some of the by-laws and policy documents including such concerning pre-school education are adopted by the Council of Ministers.

The control and methodological guidance to the pre-school providers is entrusted to the Ministry's regional departments, the RDEs but these functions are not substantiated by administrative prerogatives.[284] Only a small minority of the principals of institutions with pre-school-education functions – the schools with preparatory groups - are appointed by the RDEs. The principals of the most widely spread providers of pre-school education, the municipal KGs, are appointed by the mayors of the municipalities.[285]

The physical infrastructure and capital investments are governed by the municipalities. Both the kindergarten and school premises (including these for the preparatory pre-school groups), except for a limited number of state and private institutions, are owned by the municipalities. The municipalities are primary budget authorities: the financing is provided by the state and streamed through the municipalities.[286] The role of the municipalities in allocating resources to the pre-school institutions, though, is pretty limited: the financing received by the pre-schools is defined by comprehensive formulas in the same State Educational Standard[287] (SES) that applies for the schools. One thing that the municipalities can do, though, is to waive KG fees paid by the parents and a number of municipalities have done so.

An implication of the way the governance of the system of pre-school education is organized is that a two-tier system of subordination is imposed. This in turn requires extensive collaboration and coordination in addition to already presented need to cooperate on intersectoral level. The regional educational administrations have to coordinate its functioning also with the local authorities. As an illustration here could serve the disbalance between the control function of the RDEs and the authority of the local administrations to sanction. So, for example, if a compulsory guidance of a RDE to a principal of a municipal kindergarten is not implemented correctly, or not implemented at all, the RDE has to ask the mayor to impose a sanction.

282 In Bulgarian: „първостепенни разпоредители с бюджет", the term in English as used in the Public Finance Act published by the Ministry of Finance.

283 PSEA, art 251 (3).

284 PSEA and Ordinance 5 list a number of other situations when RDE's is expected to play a role with regard to pre-school education, but these are relatively minor interventions (e.g. giving consent for self-standing pre-school education, Ordinance # 5, art 18(2).

285 PSEA, art. 217 (3).

286 If private pre-school institutions receive financing from the state budget, it is also allocated through the respective municipality.

287 *Ordinance for Financing the Institutions in the Pre-school and School Education System*, adopted by Decree of the Council of Ministers # 219/05.10.2017.

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Finally, when the governance of the pre-school education is reviewed the parents have to be considered too since they are incontestably actors involved in pre-school-education interactions. This is recognized also normatively. Both PSEA and *Ordinance #5 on Pre-school Education* explicitly point out that the parents are *participants* in the (pre-school) education process. The Ordinance goes a step further to define the parents as *participants and partners* (art. 37 (1)) and to emphasize that *pre-school education involves interaction and cooperation with the parents* (art. 37 (2)). To this end, to foster the engagement of the parents into the education process, PSEA introduced the institute of the *Public Council*, where at least three of the members have to be parents[288]. So far, the Public Councils did not prove undeniable success[289] in the schools and there is no indication that it was otherwise vis-à-vis the kindergartens. Although detailly regulated, the institutionalized participation of the parents in the pre-school educational process remains a challenge for the system.

The coordination and collaboration among the relevant sectors continue to be the main challenge for the management of the ECEC subsector (encompassing all children from birth to compulsory school age). The uneasy cooperation and interaction in the triangle education-social services-health were outlined in several studies[290] assessing the ECEC subsector. Sectoral approaches often dominate at the expense of multisectoral collaboration. The professionals employed in the ECEC institutions with different academic backgrounds and formal qualifications (educators, health specialist, social workers, etc.) are often clustered in institutions run by their own sector. Their professional conduct is regulated by the legislative and regulatory frameworks of the respective sectors. The publications also pointed out that although the ECEC professionals mastered their own professional fields, quite often they were unaware of the factual and formal (regulatory) limitations faced by their colleagues from other sectors[291]: '[e]ach of the three systems turns out to be closed on its own. …. There is a mutual lack of knowledge for the regulations in the other sectors, which cannot possibly be beneficial for intersectoral interaction.'

The sectoral demarcation is structurally reinforced also on regional level. Organizationally and financially the Regional Divisions of Education, the Regional Health Inspectorates, the Directorates for Social Assistance, respectively the Child Protection Departments are subordinated to different ministries

288 PSEA, art. 266 (1).

289 World Bank. 2013. Bulgaria Early Childhood Development: SABER Country Report 2013. Systems Approach for Better Education Results (SABER) country report; 2013. Washington, DC. © World Bank. https://openknowledge.worldbank.org/handle/10986/20146 License: CC BY 3.0 IGO;

Iossifov, I., Mihaylov, N., et al. (2019) Initial mapping of the school climate and the interaction between schools and parents. Study commissioned by the Ministry of Education and Science. Sofia: MES Published in Bulgarian, original title: Йосифов, Й., Михайлов, Н., и др. (2019) Първоначално картографиране на социалната среда в училище и на взаимоотношенията между училище и родители. Доклад в резултат на изследователско задание на Министерството на образованието и науката. София: МОН; Available online, in Bulgarian: https://roditeli.org/img/Report-initial-mapping-of-the-social-environment-at-school-and-of-school-parent-relationships.pdf

290 See for example: Iossifov, I., Banova, V., et al. (2018) Early Childhood Development in Bulgaria: Study of the Systems, Supporting Early Childhood Development, the Interrelations and Interactions between Them and with the Parents: Sofia: FZND (leading co-author, head of the research team). Published in Bulgarian: Йосифов, Й., Банова, В. и др. (2018) РАННОТО ДЕТСКО РАЗВИТИЕ В БЪЛГАРИЯ Изследване на системите подкрепящи ранното детско развитие, взаимовръзките и взаимодействието между тях и с родителите София: ФЗНД.Available online, in Bulgarian: https://www.detebg.org/wp-content/uploads/2018/03/Ранното-детско-развитие-в-България-Изследователски-доклад.pdf

and: Iossifov, I., Marinova, A., et al. (2017) Challenges Faced by the Professionals in the Field of Early Childhood Education and Care, Sofia: FZND. Published in Bulgarian, original title: (2017) Предизвикателства пред професионалистите в образованието и грижите за деца в ранна възраст. София: ФЗНД. Retrieved from: https://www.detebg.org/wp-content/uploads/2018/04/Предизвикателства-пред-професионалистите-в-образованието-и-грижите-за-деца-в-ранна-възраст.pdf

291 Iossifov, I., Banova, V., et al. (2018) EARLY CHILDHOOD DEVELOPMENT IN BULGARIA: Study of the Systems, Supporting Early Childhood Development, the Interrelations and Interactions between Them and with the Parents. SUMMARY. Sofia: FZND (leading co-author, head of the research team). Published in Bulgarian: Йосифов, Й., Банова, В. и др. (2018) РАННОТО ДЕТСКО РАЗВИТИЕ В БЪЛГАРИЯ Изследване на системите подкрепящи ранното детско развитие, взаимовръзките и взаимодействието между тях и с родителите. РЕЗЮМЕ. София: ФЗНД. Available online, in Bulgarian: https://www.detebg.org/wp-content/uploads/2018/03/Ранното-детско-развитие-в-България-резюме.pdf

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and their functioning and performance are subject to supervision, evaluation and sanction within the respective sectoral regulations. The only administration which formally is outside this sectoral triangle is the State Agency for Child Protection. It is entitled to control and provide methodological guidance to all matters related to children but practically has no capacity at all to coordinate the management of ECEC provisions.

There is no working institutionalized mechanism for coordination[292] **between the sectors relevant to ECEC**:

> *The most accurate idea of the coordination of early-childhood-development services or the collaboration between the different sectors was given by one of the interviewed experts: "The parent is expected to be the natural coordinator of care." It was reported by the respondents that many professionals tend to expect that the parent should carry out the interaction between the sectors and be the coordinating unit between them, and not that they themselves should have direct contact.*[293]

Further, ECEC professionals have reported that they often rely on informal coordination based on personal contacts when dealing with professional challenges concerning other than their own sector.[294] Unsurprisingly, this proves to be much easier in smaller towns and villages than in bigger cities.

Building intersectoral ECEC capacity is a primary necessity vis-à-vis the management of the subsector in Bulgaria. A key recommendation in *ECD in Bulgaria. Study of the Systems Supporting ECD*[295] is to provide joint training and capacity-building activities for ECEC professionals from the three sectors, to increase their intersectoral knowledge and to stimulate the cooperation among them. This recommendation, which can be traced also in other analytical publications on ECD in Bulgaria,[296] is still to be realized in a comprehensive and meaningful way. Building working and institutionally backed procedures for coordination and collaboration among education-, health- and social-welfare-professionals remains another priority to be addressed.

Review of National Strategic Goals 2014-2020

A comprehensive policy document that provides guidance to the ECEC subsector might have helped to reach the much-needed better levels of coordination and cooperation between the sectors of public health, social welfare and education. An effort to develop such a strategy has been made in the

292 There is a coordinating body, chaired by the chairperson of the State Agency for Child Protection: National Council for Child Protection which is under. Officially it has consultative and coordinating functions but it is difficult to establish the real coordinating potential of this body. See also: World Bank. 2013. Bulgaria Early Childhood Development: SABER Country Report 2013. Systems Approach for Better Education Results (SABER) country report; 2013. Washington, DC. © World Bank. https://openknowledge.worldbank.org/handle/10986/20146 License: CC BY 3.0 IGO;

293 Ibid.

294 Ibid.

295 : (2018) Early Childhood Development in Bulgaria: Study of the Systems, Supporting Early Childhood Development, the Interrelations and Interactions between Them and with the Parents: Sofia: FZND. Published in Bulgarian, original title: (2018) РАННОТО ДЕТСКО РАЗВИТИЕ В БЪЛГАРИЯ Изследване на системите подкрепящи ранното детско развитие, взаимовръзките и взаимодействието между тях и с родителите София: ФЗНД. Retrieved from: https://www.detebg.org/wp-content/uploads/2018/03/Ранното-детско-развитие-в-България-Изследователски-доклад.pdf

296 World Bank. 2013. Bulgaria Early Childhood Development: SABER Country Report 2013. Systems Approach for Better Education Results (SABER) country report; 2013. Washington, DC. © World Bank. https://openknowledge.worldbank.org/handle/10986/20146 License: CC BY 3.0 IGO; see also:

Iossifov, I., Marinova, A., et al. (2017) Challenges Faced by the Professionals in the Field of Early Childhood Education and Care, Sofia: FZND. Published in Bulgarian, original title: (2017) Предизвикателства пред професионалистите в образованието и грижите за деца в ранна възраст. София: ФЗНД. Retrieved from: https://www.detebg.org/wp-content/uploads/2018/04/Предизвикателства-пред-професионалистите-в-образованието-и-грижите-за-деца-в-ранна-възраст.pdf

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period 2018-2020. A working group chaired by a Deputy Minister of Education and Science was established in 2018 to draft a National Strategy for Early Childhood Development. However, the likelihood of initiating a public discussion on a draft of such strategy, let alone of adopting it, seems minimal at this point of time, after the unsuccessful experience with another draft strategy - the National Strategy for the Child 2019-2030. The adoption of the latter, which is normatively stipulated by the Child Protection Act,[297] has been first postponed and later withdrawn due to controversial public reactions, some of them even objecting the need of such a strategy.

Further, this section reviews the strategic documents in the field of education that have relevance to pre-school education.

Amongst the list of strategic documents addressing education in 2014-2020 programming period, six are addressing pre-school education. Overall, the approach of the strategic documents in education is following the LLL approach to education with the LLL strategy as overarching document and specific strategic planning on key challenging areas across education. The strategies are providing a simplified monitoring and evaluation system giving priority to input indicators that register coverage and participation and limiting specific measurement of outcomes, directly linked to policy goals. The period is characterized in addition with lack of consistency in the publication of the interim reports on the strategies' implementation. There is not always coherence between the interim reports of the different strategies.

By default, the implementations of the strategies are accounted for by reporting activities, measures and modules realized within the national programs and the system level projects within OPSESG. It is difficult, if possible at all, to reconstruct with respect to pre-school education a comprehensive and reliable account for the implementation of the strategies based on their (publicly) available reports.

National Strategy for Lifelong Learning for the Period 2014-2020

The National Strategy for Lifelong Learning for the Period 2014-2020 (NS LLL) 'defines the strategic framework of the state's policy vis-à-vis education and training, aiming at reaching the European objective of intelligent sustainable and inclusive growth'.[298] The opening sentence of the document establishes its primacy in the policy framework that guides the sector of education in Bulgaria. This strategy claims relevance beyond the field of education and training, since it should '*answer all emerged challenges with respect to social inclusion and economic growth*'. **Pre-school education has a noticeable presence in the NS LLL. Although not stated explicitly, the strategy treats the pre-school education**[299] **as a starting point of the LLL in Bulgaria**. Respectively, the kindergartens are listed as *providers of training*. The document, adopted at the moment when the country had reached its highest levels of participation in pre-school education, as recorded by the official statistics, reflects certain optimism about Bulgaria's catching up with the better performing EUMS in terms of participation in pre-school education. Namely, **the first (out of eight) strategic objective is related to enrollment: to increase the pre-school participation level of the children between 4 and compulsory school age**. As a 'progress indicator' [sic] has been set 90% participation by 2020.

The emphasizing of the preparatory function of pre-school education with respect to school education has been outlined repeatedly in this strategy[300]. References to pre-school education are

297 Child Protection Act, art. 1(3)

298 All quotations in this section, this one included, unless specified otherwise are from the National Strategy for Lifelong Learning for the Period 2014-2020.

299 Being adopted by Decision of the Council of Ministers (# 12 of 10 Jan. 2014) while still the Public Education Act was enforced the Strategy follows its terminology, namely, the term '*pre-school preparation and upbringing*' instead of *pre-school education* which was introduced in the legislation by PSEA.

300 This understanding of the auxiliary (preparatory) function of the pre-school education has been present before but not as clearly formulated as in this 2014-2020 Strategy. Its predecessor, the NS LLL 2008 – 2013 mentioned pre-school preparation only twice in

present throughout the document, not only when the pre-school area of impact is addressed. They can be summarized in the following content-specific points.

- **The appreciation for the pre-school education's preparatory and preventive potential is emphasized**. Within the situational analysis of the *area of impact* '*improving the educational achievements and reducing the early school leaving*', the two-year compulsory education is clearly recognized as a '*positive step*'. The '[d]*evelopment of supportive environment in the system of pre-school upbringing and preparation*' is considered as a further measure in this *area of impact*. The preventive and preparatory function of the pre-school education is specifically targeted at children at risk of not being ready for primary education due to poor command of the language of instruction. The cluster of activities '[e]xpanding the opportunities for additional Bulgarian language training for children' in the '*reducing the early school leaving*' *area of impact* is a logical continuation of the cluster '[*p*]*rovision of training in Bulgarian language for children whose mother tongue is another one*' in the *pre-school area of impact*.
- **Another linkage between pre-school-related and other interventions that can be inferred is the need to '[c]oordinate the interaction of the interested stakeholders** in order to realize the LLL policy'. It is recognized that the necessary interactions are *intersectoral* in nature and '*the necessity to improve the coordination*' is admitted. The '*administrative capacity to plan, monitor and evaluate*', as well as '*the national, regional and local levels*' are specifically mentioned. The intrinsic nature of pre-school education of being part simultaneously of the educational sector and the ECEC-mix requires that the *need of coordination* is interpreted broadly.[301]
- ***'Provision of conditions for extending the participation and improving the quality of pre-school upbringing and preparation'* has been formulated as a specific area of impact in order to *reach the strategy's objective.*** The review of the status quo of this area, at the moment of adoption of the strategy, recognizes the positive effect of the '*affirmation of the two-year compulsory pre-school preparation… from 2012'*,[302] acknowledges the challenges lying ahead and formulates three goals to be reached within this area of impact:
  - *'improving the quality of pre-school preparation and upbringing as a* [NB:] ***solid basis for further learning*** *and full social inclusion*';
  - *'improving the* ***conditions for access*** *to pre-school preparation and upbringing', and*
  - *'ensuring a* ***smooth transition*** *from pre-school to school education'.*

The only specific to pre-school education performance indicator for reaching the strategy's objectives refers to participation, thus focusing on the second goal within the *pre-school area of impact*. The goals within the pre-school area of impact are formulated after four specified difficulties to pre-school education are identified and, in turn, nine clusters of activities have been envisaged to serve the three objectives. Some of the activity clusters, as for example '[*p*]*rovision of training in Bulgarian language for children whose mother tongue is another one*' can easily be linked on one hand to the goals and to the strategy's only relevant to pre-school education indicator and on the other - to multi-year policy interventions that followed in years after the adoption of the strategy. As examples here could serve NP *Development of pre-school education* and SLP *BG05M2OP001-3.005*. But the only strategy's pre-school-education focused indicator cannot reflect the progress with respect to all three goals or the effectiveness all nine activity clusters.

very general terms, once as an activity aimed at 'creating conditions for inclusion of all children in the educational process already at pre-school age' and once as progress indicator: 'participation in pre-school preparation' but NB without giving value of the indicator.

301 The intersectoral nature of the ECEC as well as its dependence on the interaction between national, regional and local stakeholders are reviewed in detail in the section on Governance **and** .

302 As stipulated by § 9 of Transitional and Final Provisions of the Amendment Act (enforced on 05. Oct. 2010) to the Public Education Act in connection with art. 20 of the Public Education Act.

For some of the activity clusters, the progress that has been booked so far is either minimal or unclear, often - both. An illustrative example is the reporting with respect to the activity cluster '[*e*]*nsuring physical activity of pre-school children aiming at harmonious personal development*'. According to information made public by MES, the relevant to this cluster activities were reported only in 2014 and 2016. The activities covered 4712 children in 123 KGs in 2014[303] (corresponding to 1.91% of the children in KGs 2014-2015 school year) and 5000 children (corresponding to 2.1% of the children in KGs in the 2016-2017 school year) in unspecified number of KGs in 2016.[304] The activities in 2016 were conducted within the program '*Sport for Children in Kindergartens*' and took place in 60 kindergartens. A report for the same program, but for 2017 has been published by the Ministry of Youth and Sport, again for 60 kindergartens and again for the same budget (BGN 200000).[305] On the basis of this overlap it is safe to assume that activities within the same cluster that took place in 2017 reached again 5000 children in KGs. Altogether for the three years, for which public information is available, (cumulatively) 14712[306] children took part in these activities, which corresponds to 2.04% of the cumulative number of children in KGs in 14-15, 16-17 and 17-18 school years.

Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)

***Strategy for Educational Integration of Children and Students from Ethnic Minorities* 2015-2020 reflects the continuous concerns related to educational disadvantages accumulated among ethnic minority children and students, most of all, among the largest minority group in Bulgaria – the Roma**. The *Strategy for Educational Integration of Children and Students from Ethnic Minorities* (SEICSEM) for the period 2015-2020 is the second strategy with the same title. It is much more elaborated document than the first one, adopted in 2004 and updated in 2010. Soon after the adoption of the first SEICSEM, the Council of Ministers established a *Center for Educational Integration of Children and Students from Ethnic Minorities*.[307]

The presence of pre-school education in SEICSEM is less prominent than in the NS LLL, although chronologically the former follows the latter and addresses specifically a target group already identified in need of special support as early as at the stage of pre-school education. SEICSEM evaluates positively the introduction of compulsory pre-school education and conveys the message that the pre-school education is a natural entry point to the educational system. At the same it recognizes that the participation of the children from 'vulnerable minority communities and groups'[308] is still considerably lower than the average. Against the background of such analysis there only two prescribed clusters of

303 Reported in: *Basic Parameters of the Implementation of the Envisaged Activities and Tasks by Areas of Impact in the Action Plan for 2014 for the Implementation of the National Lifelong Learning Strategy for the Period 2014-2020* Published only in Bulgarian, original title*:* ОСНОВНИ ПАРАМЕТРИ на изпълнението на предвидените дейности и задачи по области на въздействие ПЛАН ЗА ДЕЙСТВИЕ ЗА 2014 ГОДИНА В ИЗПЪЛНЕНИЕ НА НАЦИОНАЛНАТА СТРАТЕГИЯ ЗА УЧЕНЕ ПРЕЗ ЦЕЛИЯ ЖИВОТ ЗА ПЕРИОДА 2014-2020 ГОДИНА Retrieved from: https://www.mon.bg/bg/143

304 Reported in: *Basic Parameters of the Implementation of the Envisaged Activities and Tasks by Areas of Impact in the Action Plan for 2016 for the Implementation of the National Lifelong Learning Strategy for the Period 2014-2020* Published only in Bulgarian, original title*:* ОСНОВНИ ПАРАМЕТРИ на изпълнението на предвидените дейности и задачи по области на въздействие ПЛАН ЗА ДЕЙСТВИЕ ЗА 2016 ГОДИНА В ИЗПЪЛНЕНИЕ НА НАЦИОНАЛНАТА СТРАТЕГИЯ ЗА УЧЕНЕ ПРЕЗ ЦЕЛИЯ ЖИВОТ ЗА ПЕРИОДА 2014-2020 ГОДИНА
Retrieved from: https://www.mon.bg/bg/143

305 Order of the Minister of Sport and Youth RD-09-82/03.02.2017Retrieved from:
http://mpes.government.bg/Documents/Programs/2017/SDDG2017/Odobr_Pr_SDDG_2017.PDF

306 Since there is overlap between 2016 and 2017 also with respect to the financed activities and participating KGs, it is reasonable to assume that part of the participating children also overlapped, which, in turn, means that these activities reached fewer unique children.

307 Decree#4 of the CM 11.01.2005.

308 All quotations in this section, this one included, unless specified otherwise are from SEICSEM.

activities related to pre-school education: 1) '[t]he development of appropriate for the different regions of the country mechanisms for maximum coverage of children in compulsory pre-school and school age' and 2) '[a]*ppointment of … assistant educators by the kindergarten principals, where there is a need for additional educational activities with children … from ethnic minorities*'. These clusters should contribute to achieving of the strategic goal of '[s]*afeguarding equal access to quality education for children and students of ethnic minorities*.' There are two performance-indicators and two result-indicators relevant to pre-school education but unfortunately neither their wording is very precise[309] nor is there value attached to any of them.

A key important contribution of SEICSEM is the focused attention paid on the need of desegregation, also at pre-school level. With respect to (educational) integration the segregation is recognized as a fundamental issue that hinders the overall development of the education in Bulgaria. SEICSEM admits that the process of desegregation has not been unfolding sustainably and outlines the reasons:

> *Due to the legislative deficiencies, lack of long-term targeted funding and consistent institutional and public support, the process of closing down segregated kindergartens and schools stopped, and its positive results were significantly minimized by the subsequent secondary segregation at many places*.

Only one of the strategy's 16 expected results can be clearly associated with desegregation at pre-school level: '[s]*uccessfully integrated children … in a multicultural educational environment in … kindergartens … outside the Roma neighborhoods.'* Also, just one (result-)indicator is clearly related to desegregation and at the same time has relevance to pre-school education. It refers to: '*number of closed kindergartens … situated in the separate housing areas* [sic] *inhabited by Roma or self-identifying as others by ethnicity sign, but living in a situation similar to the Roma's*'. As it is with all other *indictors* in this document, this one is unspecified in terms of value. Specifying indicators through which the performance and the results of the strategy might be measured could have provided some guidance about the effectiveness of the implementation approaches serving the strategy.

With respect to desegregation approaches at pre-school level a lack of coherence is observed between relevant strategic documents, namely: SEICSEM and the *National Strategy for Integration of the Roma (2012 - 2020)*. SEICSEM sets as objectives simultaneously a desegregation through closing down of kindergartens dominated by Roma children and an increased participation of minority, most of all Roma, children in kindergartens. Meeting these two objectives at once is a difficult challenge and requires exceptional commitment and focus. The combined analysis of SEICSEM and the section on education in the *National Strategy for Integration of the Roma (2012 - 2020)*, however, does not lead to a conclusion for clear focus and coherence, nor for a targeted effort to desegregate by reducing the number of segregated kindergartens. The objective of '[i]*mproving the quality of education in the separate kindergartens and schools in the large Roma neighborhoods and in the rural areas where there are mostly Roma children*' in the *National Strategy for Integration of the Roma (2012 - 2020)*, indicates a different approach towards pre-school education integration of Roma children than *the SEICSEM's. A* possibly feasible approach, at least at policy intention level, is suggested by another strategic document: '[t]*he regional policies for development of the network of kindergartens and schools* [that] *guarantee the equal access to education to all children and students in compulsory pre-school and school age*.' The quotation is from *Strategy for Reducing the Proportion of Early Leavers from the Education System*, SRPELES, (2013-2020).

Strategy for Reducing the Proportion of Early Leavers from the Education System (2013 - 2020)

309 For example, the listed result indicators read: '*proportion of children aged 3 to 6/7* ***attending*** *kindergartens*' and '*proportion of children in compulsory pre-school age* ***enrolled*** *in kindergartens*'.

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There is certain level of overlap between SEICSEM and SRPELES which reflects the recognized fact that the children from *vulnerable minority groups* constitute the largest group of early school leavers, respectively – the largest group of unparticipating in (compulsory) pre-school education. SRPELES, too, emphasizes that the participation of '*children from vulnerable ethnic communities and groups*'[310] in pre-school education is disproportionally low. This substantiated by research statement from the analytical part of the strategy finds its logical continuation in the prescribed *key measure* that the '*kindergarten … should continue to implement lasting measures for the educational integration of children … and the preservation and development of their identity*'.

In more general terms and not only when focusing on children from vulnerable minorities, SRPELES pays considerable attention to pre-school education. Pre-school education is specifically addressed throughout this strategy from the analysis of the reasons for early-school leaving, to the strategic goal, to the key measures and the result indicators. Within its analytical part SRPELES points to issues that, although they certainly deserve attention, were not often mentioned in other policy documents. A worthy example is the identifying of the '*interactions within the kindergarten and the school …among the important education-related reasons for early school leaving*'. Encouragingly, this concern is reflected in a prescribed key measure of creating '*a positive educational environment in every kindergarten* … [as] *particularly important for the prevention of early school leaving*'. Less encouragingly, no indicator that can provide information on its execution and delivered result is defined.

There is no specific explanation why but within the same measure of creating positive educational environment' is included also the '***development of an early warning system in every kindergarten***'. According to the latest interim report on the SLP *Active inclusion in the pre-school education system* (See: BG05M2OP001-3.005)[311] a number of pre-school teachers have been trained corresponding to almost 90% of the number of kindergartens. Theoretically, there should already be enough professional capacity to introduce an early warning system in every kindergarten in the country.

Two very important points made by SRPELES[312] have been realized. It pleaded for two major legislative and policy changes and doubtlessly both of them were needed. The first identified necessity (at that time) was to adopt of new comprehensive and modern legislation on 'pre-school upbringing and preparation and school education'. Three years later PSEA was enforced and a whole new normative infrastructure of by-laws followed. Further, SRPELES made a strong argument for adopting a Coordination Mechanism, to engage and direct the efforts of sectors having to do with providing support to identifying and re-integrating and retaining children and students in the pre-school and school education. Such mechanism was piloted in 2017 and mainstreamed in 2018.[313]

The strategy pays considerable attention to the need of effective control over the implementation of the legislation establishing that part of pre-school (and school) education is compulsory. Here two categories of stakeholders are explicitly named: the local administrations (with respect to their control functions) and the parents (in the context of increasing their responsibilities and their active cooperation to secure their children's presence in the (pre-)schools). The way the parents are viewed by SRPELES is two-fold. First, their cooperation and engagement are deemed *conditio sine qua non*. Second, their responsibilities and possible position of addressees of sanctions in case of no compliance with the obligation to guarantee their children's participation in (pre-)school education is explicitly and repeatedly stated.

The underlying approach towards pre-school education also in this strategy is to instrumentalize its powerful potential to prevent early school leaving. The analytical part points out that 'insufficient enrolment of children in kindergartens increases the risks related to their adaptation to school' and that

310 All quotations in this section, this one included, unless specified otherwise are from SRPELES

311 See the section: BG05M2OP001-3.005 in Impacts of System Level Projects within Operational Program Science and Education for *Smart Growth*

312 SRPELES was adopted by the Council of Ministers on 30. 10. 2013 by Protocol # 44.

313 See the section on Participation.

children '*at increased risk of early school leaving … are those who are not included in the system of pre-school upbringing and preparation*'. Prevention is a key policy intention with respect to early school leavers and *prevention should start already at pre-school age*. Most notably, there is a clear reference to pre-school education in SRPELES's strategic goal. Here the pre-school education, is considered a prerequisite for the further development of the child, this time together with the school education: with respect to equal social inclusion and full personal realization. Naturally, one of the strategy's result indicators is the '[p]*roportion of 4-5- and 6-yearold children included in pre-school upbringing and preparation*'

National Strategy to Stimulate and Increase Literacy (2014 - 2020)

The role of pre-school education as contributor to the school readiness and respectively literacy and academic achievement outlined in the National Strategy to Stimulate and Increase Literacy (2014 - 2020) naturally mirrors the preventive function assigned to it by SRPELES. 'The basis is laid down in the kindergarten'[314] states this strategy already in its introductory section 'analysis of the status quo' and this line of reasoning and justifying pre-school-education based interventions is repeated many times throughout the strategy. References to pre-school education related measures are present in all three operational goals of the strategy. The last one '[i]ncreasing of the participation and inclusion' even suggests extending the operational field downwards towards 'care in early childhood age' and this reference to care proceeding pre-school education is a notable exception in the documents that shape the policy framework relevant to pre-school education. One of the strategy's only two result indicators related to pre-school education refers to 90 % pre-school participation rate of the children from the age of four.

From all the strategic documents with relevance to pre-school education it is the National Strategy to Stimulate and Increase Literacy (NSSIL) **that pays attention to care for younger children, the ECEC component that precede the pre-school education, but there is no reference to intersectoral collaboration or specific intersectoral policy intentions and approaches.** Within its section '[p]olicies to stimulate and develop literacy' the strategy mentions '[p]olicies towards young children'. The section recognizes the need to involve the parents as the primary educators of the children, makes references to relevant EU policy documents and emphasizes the benefits of high-quality ECEC. *But it does not mention any collaboration with nurseries or other ECEC institutions*. Neither does the section actually formulate any specific policy intentions or approaches. The attention it pays on the parents is reflected in one of the measures under the operational goal 'creation of supportive environment', namely measure 2 '[s]upport to the parents to improve their skills to stimulate their children to read and develop language skills'. Annex 1 to the strategy lists five clusters of activities to serve the realization of this measure and in four of them kindergartens' participation is expected. However, none of the result indicators can even remotely be related to this measure (or the listed clusters of activities) and therefore its effectiveness cannot be evaluated.

The section on 'policies towards young children' specifically recognizes the need to support the professional development of the pre-school education staff, outlining as challenges the work with parents and the capacity to conduct screening for school readiness. The corresponding measure 'qualification of the teachers' serving the operational objective 'increasing the literacy level', explicitly mentions that it refers to pre-school teachers too but neither the listed in the annex clusters of activities nor the result indicators make any further specific references to pre-school education.

Finally, the section on 'policies towards young children' admits that 'one of the weaknesses in the system of pre-school preparation and upbringing' is the lack of '*a mechanism to measuring children's performance … not just the cognitive but also the non-cognitive skills, to determine children's readiness for school*'. Correspondingly '[a]ssessment of effectiveness of attending of pre-

314 All quotations in this section, this one included, unless specified otherwise are from NSSIL.

school preparation' is listed as a key activity for implementation of the strategy (Annex 1). The given deadline is 2017 and the responsible institution is the Center for Control and Assessment of the Quality of the School Education, nowadays operating under the name Center for Assessment in the Pre-school and School Education (CAPSE).[315] This key activity directly relates to the measurements needed for the second result indicator relevant to pre-school education: '80 % of the children at the end of the compulsory pre-school preparation to reach school readiness'.

Other Strategies

There are two more strategies that incidentally mention pre-school education but in neither of them is there any specific reference to pre-school education in its goals, measures or indicators. These are the *National Strategy for Pedagogical Staff* (*2014-2020*) and the *Strategy for Effective Implementation of the ICT in the Education and Science in Republic of Bulgaria* (*2014-2020*). In the latter there is no reference to pre-school education also in the analytical part, whereas the former mentions that in the period 2007-2012 the 'average relative proportion … of the staff of the [system of] pre-school education and preparation' was 9.8% - the highest among professionals from the different stages of the pre-school and school education.

Policy Mix Addressing Pre-school in the Context of ECEC

Scope and Trends

System level projects (SLPs) funded within the Operational Program Science and Education for Smart Growth (OPSESG), NPDE and separate targeted investments from national budget are the key policy implementation instruments[316] **addressing school and pre-school education during programming period 2014 – 2020**. Through those three clusters of instruments MES steer resources and focus efforts towards envisaged changes in the whole education system **including in the subsector of pre-school education**. The 2014-2020 period is specific with the reforms introduced by PSEA and the setting up a completely new framework of by-laws addressing the overall education structure and standards. With respect to the pre-school education, however, key components of the policy trend reinforced by PSEA could be seen in the already submitted at that time OPSESG.

MES employs diversity of short and long-term programs to address policy tasks (reviewed in detail below) in pre-school education during 2014-2020. The core of program interventions consisted of 3 multi-year projects under OPSESG (system level interventions) and 12 annual NPDEs relevant to pre-school education that took place after 2016. The duration and the financial power of the OPSESG's SLP made them by default more solid and less flexible instruments. Primarily designed as one-year interventions, dynamics in scope and topics of the NPDE is seen. Some programs have been implemented every year after the enforcement of PSEA, other of them were revised and transformed or just replaced by new thematic programs. Altogether 36 one-year NP-interventions have been taking place in the period 2016-2020 under these 12 different NPDEs.

315 The need of assessment of the effectiveness of the pre-school education in Bulgaria has been specifically addressed in the section ECEC Outcomes: Child Development and School Readiness.

316 The analysis of the policy implementation approach with respect to pre-school education is run with respect to the key policy areas, the employed instruments and the stated strategic goals. The employed normative instruments and policy interventions is addressed since their scope allows to sketch thematically the key policy areas. Although the programing period runs from 2014 to 2020 the focus of analysis is on the time after the adoption of PSEA since it set a new legislative framework in the field of (pre-)school education.

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In addition, specific national funding addressing pre-school are adding to the 2020 policy mix. Whereas the OPs and the NPDEs (both reviewed in detail below) are sustainable instruments permanently employed for policy implementation in the field of pre-school education, incidental instruments have been employed too. Introduced in October 2020, the *State Budget Capital Program*[317] is a three-year program (2020-2022) for investment in ECEC- and school-infrastructure. The program addresses an issue identified as a major challenge faced by the pre-school education system: the availability of pre-school facilities.[318] In terms of financial power, it is a major instrument with its BGN 35 million annually allocated only to ECEC facilities it surpasses with almost 1/3 the 2020's cumulative budgets of all NPs with baring to pre-school education. Further, the sustainable development of *education mediators* also needs to be considered within an analysis of the pre-school education policy mix. The mediators have been instrumental in implementing the state's policies with respect to coverage by and inclusion in the pre-schools of Roma children; indirectly they have contributed also to other policy areas such as desegregation and learning. Previously, an annual program, titled 'Sport in Kindergartens', has been run and reported by the Ministry of Youth and Sport (2016, 2017).

As of 2020 seven EU funded interventions can be referred to ECEC policy. The three projects implemented under OPSESG (*Active Inclusion in Pre-school Education System*[319], *Qualification of Pedagogical Specialists*[320] and *Support for inclusive education* are reviewed below. The remaining projects, listed below, have contributions the ECEC domain, do not target pre-school and it is not possible to assess comprehensively the effects of all these interventions on the pre-school education in particular:

- OP HRD Project Parents in Employment. This project run by the MLSP's Agency for Employment allocates considerable financial resource to supporting parents to hire babysitters/au pairs. Aiming to foster reconciliation between family and professional life, its impacts on the children's developmental prospects (there is no indication that the au pair services need to cover any particular ECEC standards or to contribute to the holistic development of the child or her school readiness)[321] and ECEC coverage are not reported.
- OP HRD SLP BG05M9OP001-2.012 Continuing support for deinstitutionalization of children and youth.
- OP HRD SLP (BG05M9OP001-2.093) Continuing support for deinstitutionalization of children and youth – Stage 2 – provision of social and integrated health-social services for children and families.

The latter two aim at finalizing the process of deinstitutionalization of residential care for children and youth. The former is under the MLSP, the later under the MH which still (as of April 2020) runs 13 residential care institutions for children 0-3. Both projects have shall contribute to the social inclusion of ECEC children and indirectly to inclusive pre-school education.

- One of project is an integrated procedure that channels resources from both OPHRD and OPSESGSLP SLP (BG05M9OP001-2.018) Socio-economic integration of vulnerable groups, Integrated measures for improving the access to education - Component 1 was open for a preliminary selected list of municipalities.[322] This novel procedure aims at synergizing between different instruments while keeping the focus of each of them on its target by internal demarcation for financing activities in line with the respective OP's priorities.
- In addition, a number of interventions aiming at improving the physical infrastructure have been realized under *OP Regions in Growth 2014-2020 Priority Axis 2. Support for Energy Efficiency in Key Centers in Peripheral Regions*. Within regional programs for energy efficiency of public buildings

317 Program developed by virtue of § 20 of Final Provisions of the State Budget Act for 2020. Source: Програма за изграждане, пристрояване, надстрояване и реконструкция на детски ясли, детски градини и училища 2020 – 2022 (mon.bg)

318 See above the section on Access and Equity.

319 BG05M2OP001-3.005

320 BG05M2OP001-2.010

321 Requirements set by the SES on Pre-school Education (Ordinance #5 on Pre-school Education, art. 28(1)) to the pre-school education institutions.

322 A continuation of the project (Component 2) shall start in 2021.

KGs and school have been renovated. Since these programs are regional, there was not a unified national approach towards employing this instrument.

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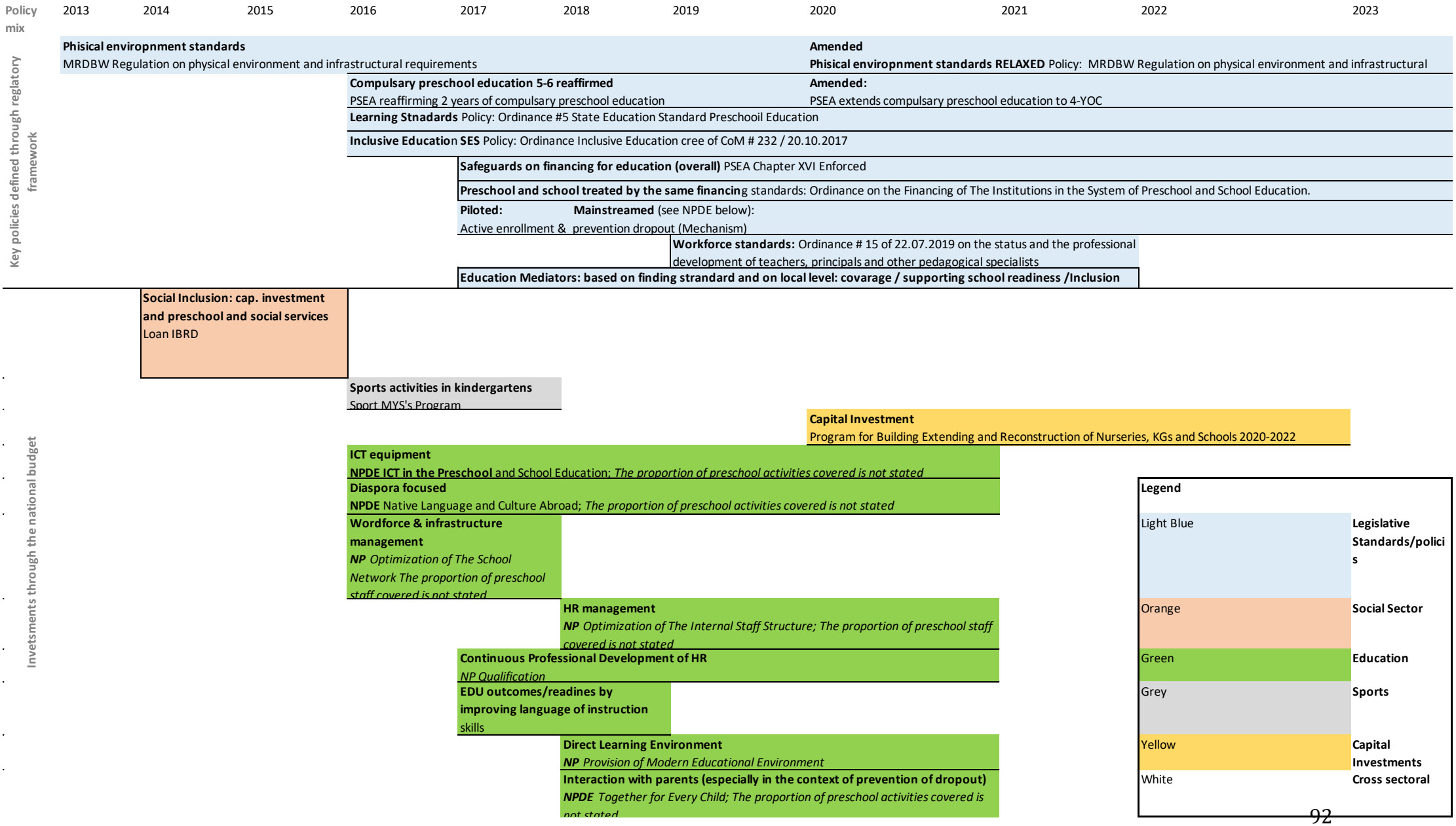
Preschool policy mix 2015-2023 (as implemented and planned by 2020) and relevant ECEC actions



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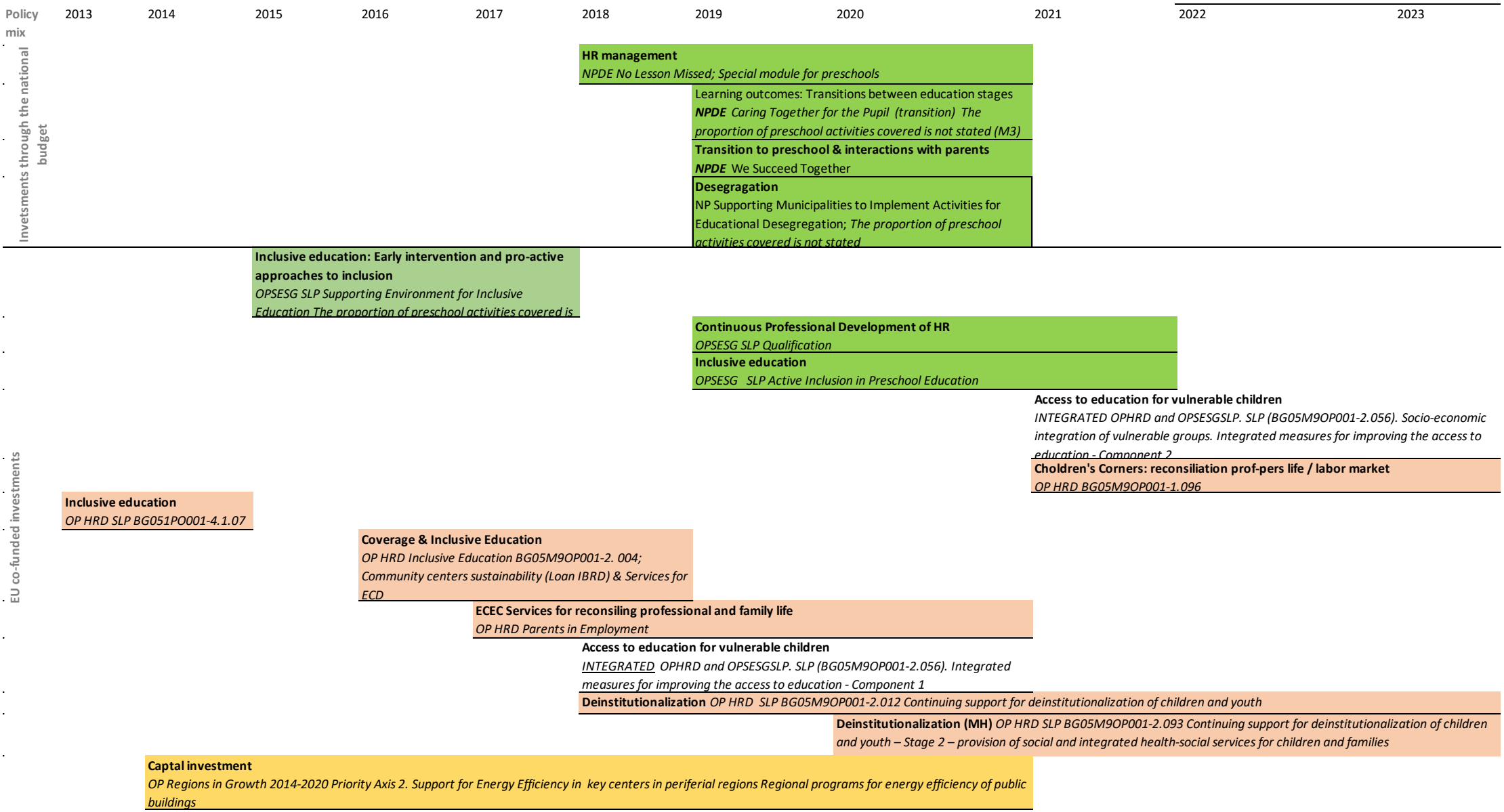
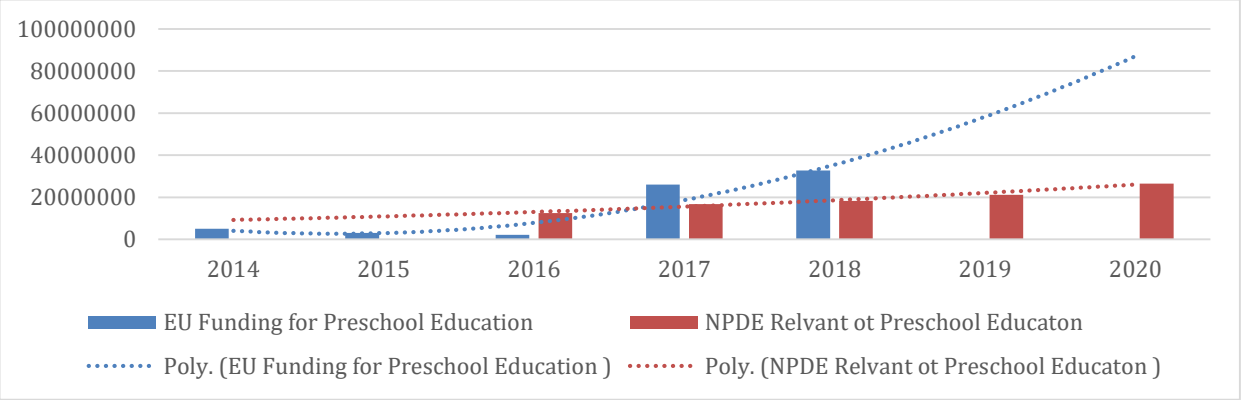

Policy mix
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
Invetsments through the national budget
HR management
NPDE No Lesson Missed; Special module for preschools
Learning outcomes: Transitions between education stages
NPDE Caring Together for the Pupil (transition) The proportion of preschool activities covered is not stated (M3)
Transition to preschool & interactions with parents
NPDE We Succeed Together
Desegragation
NP Supporting Municipalities to Implement Activities for Educational Desegregation; The proportion of preschool activities covered is not stated
Inclusive education: Early intervention and pro-active approaches to inclusion
OPSESG SLP Supporting Environment for Inclusive Education The proportion of preschool activities covered is
Continuous Professional Development of HR
OPSESG SLP Qualification
Inclusive education
OPSESG SLP Active Inclusion in Preschool Education
Access to education for vulnerable children
INTEGRATED OPHRD and OPSESGSLP. SLP (BG05M9OP001-2.056). Socio-economic integration of vulnerable groups. Integrated measures for improving the access to education - Component 2
Choldren's Corners: reconsiliation prof-pers life / labor market
OP HRD BG05M9OP001-1.096
EU co-funded investments
Inclusive education
OP HRD SLP BG051PO001-4.1.07
Coverage & Inclusive Education
OP HRD Inclusive Education BG05M9OP001-2. 004; Community centers sustainability (Loan IBRD) & Services for ECD
ECEC Services for reconsiling professional and family life
OP HRD Parents in Employment
Access to education for vulnerable children
INTEGRATED OPHRD and OPSESGSLP. SLP (BG05M9OP001-2.056). Integrated measures for improving the access to education - Component 1
Deinstitutionalization OP HRD SLP BG05M9OP001-2.012 Continuing support for deinstitutionalization of children and youth
Deinstitutionalization (MH) OP HRD SLP BG05M9OP001-2.093 Continuing support for deinstitutionalization of children and youth – Stage 2 – provision of social and integrated health-social services for children and families
Captal investment
OP Regions in Growth 2014-2020 Priority Axis 2. Support for Energy Efficiency in key centers in periferial regions Regional programs for energy efficiency of public buildings

As targeting, approach, design and funding scope the EU funded OPSESG's and OPHRD's interventions are the most significant and influential operational policy instruments. In the period after 2016 the NPDE have expanded in terms of thematic and financial scope. In the same period, the OPSESG's SLPs relevant to pre-school education remained limited their individual financial powers have dominated policy funding. The EU funding addressing policy developments to pre-school education has sharply increased since 2016 and currently notably exceeds the non-incidental national allocations to the pre-school policy mix through the NPDE. Figure 33, based on data extracted from state budget reports, reflects the EU funding until 2018 relevant to pre-school education only hence the largest, entirely pre-school-focused project, OPSESG's SLP Active Inclusion in Pre-school Education is not reflected (it started in 2019, total budget BGN 82.5 million). But even without it, the EU contribution to the pre-school policy mix surpasses the national one that has been directed through the recurrent annual NPDE. The provisional parity seen on **Error! Reference source not found.** is achieved only thanks to the incidental *State Budget Capital Program*.

Figure 33 EU and NPDE funding to pre-school education

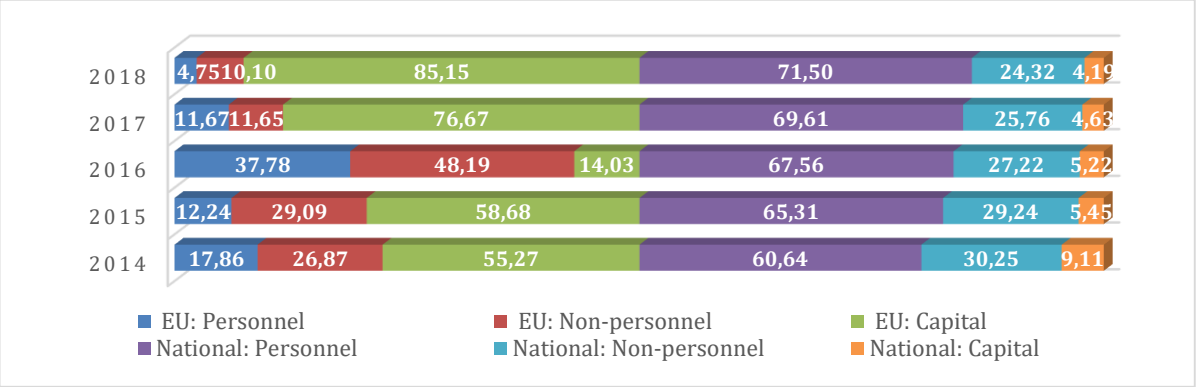


Source: WB, BOOST database and calculations based on available information on the NPDE (adjusted. when possible or estimated to reflect the scopes of the budgets relevant to pre-school education)

The EU funds have been directed mostly to capital expenses while national funding is primarily focused to human capital expenditures. The structure of the EU funding, as seen from Figure 34, has been different from the general structure of public expenditures for pre-school education in outgoing programming period. In none of the reported years the personnel costs were the leading EU expenditure item and their relative increase in 2016 can be explained with the fact that the EU funding reached a bottom that year. In the period 2014-2018 the EU funding has been utilized mainly for capital expenditures. The implementation of OPSESG's SLP Active Inclusion in Pre-school Education System[323] certainly shifts the balance of expenditures towards non-personnel costs in 2019 and 2020 whereas the relevance of OPSESG's SLP Qualification of Pedagogical Specialists[324] to the system of pre-school education contributes to raising the proportion of the EU personnel expenditures in the last two years of the programming period.

323 BG05M2OP001-3.005
324 BG05M2OP001-2.010

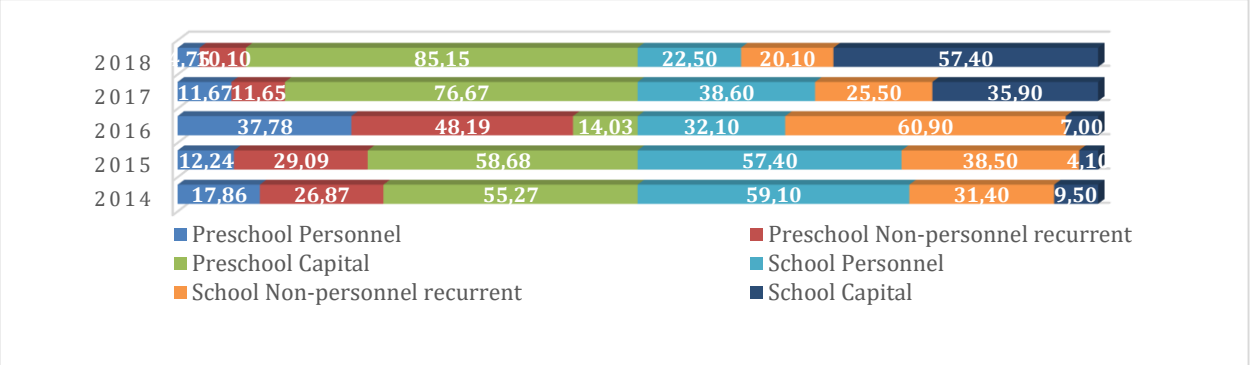
Figure 34 Distribution of EU and national funding by type of expenditure (in %)



Source: WB, BOOST database

The expenditure structure of the EU contributions to the pre-school and school education systems differed in the beginning of the period but paralleled developments might be observed by 2018. Unlike the allocations to pre-school education, the structure of the EU financial support to the school education resembled, in the beginning of the programming period, closer the pattern of the national, respectively the overall public expenditure on education with much larger proportion directed to workforce costs. A clear trend towards decreasing the EU contributions to personnel expenses in the school education system has been observed, though, between 2016 and 2018 and at the end of this period (2018) the largest EU expenditure item with respect to both pre-school and school education was capital investment.

Figure 35 Expenditure structures of the EU contributions towards pre-school and school education



Source: WB, BOOST database

Too personnel-cost centered and disproportionally large NPDEs dominated financially the pre-school-relevant NPDE in the reviewed period and this way approximated the expenditure profile of the policy mix for the entire programming period to the structure of the overall public expenses on pre-school education. Reviewing the structure of the policy mix by type of expenditure requires to note the focus and size of the largest NPDEs. The second one, NP Optimization of The Internal Staff Structure, (2018 – 2020) is a de facto continuation of the personnel-focused module of the first one, NP Optimization of The School Network, operational in 2016 and 2017. The budgets of these programs ranged from BGN 24.86 million in 2016 to BGN 69.68 million for 2020, thus easily overshadowing the combined budgets of all other preschool relevant NPDE in the respective years.

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Bulgaria's ECEC policy investments (EU, NDPE) are primarily focused on workforce, infrastructure and actions addressing participation in pre-school. While the 2020 ECEC policy mix is maintaining the trend for sector separated activities, the equity domain is addressed by cross-sectoral investments to support inclusive education (*ESF BG05M9OP001-2.056 Socio-economic integration of vulnerable groups. Integrated measures for improving the access to education - Component 2*).[325] Equity and pre-school curriculum are amongst priority topics addressed but from investment perspective are less prioritized than the three topics listed above. The OPHRD-funded ECEC-relevant interventions have supported reconciliation between family and professional life and, most of all, social inclusion of vulnerable groups. The latter has been an area of interventions where alongside the traditional sectoral approach[326] a new integrated approach between two sectors, respectively between two OPs: OPSESG and OPHRD, has been tried out.[327]

The notion of competence-based approach within the Bulgarian pre-school education during 2014-2020 remains centered on schooling (attendance) and this is projected also within the policy mix. More is needed with respect to learning outcomes and lifelog learning. However, when comparing and contrasting the thematic scope of the policy mix with the needs identified in the analysis of the pre-school education, there are some apparent gaps. Most of all, the policy mix does not contribute to answering the question how learning outcomes are being addressed beyond the interventions targeting children whose mother tongue is not Bulgarian and some other specific activities centered on vulnerable children. Also, it is difficult to establish clear link between the policy implementation approaches and LLL beyond the specific dimension of school readiness.

Most of the program instruments addressing pre-school are not designed to observe separately the specific pre-school effects and outcomes and are mixed with general education investments. Except for only one OPSESG's SLP and the two[328] NPDEs entirely focused on pre-school education, the pre-school education effects and outcomes are not coherently outlined either on the level of design or at the level of reporting. Overall, this limits MES ability to monitor and evidence developments in pre-school stage and in combination with lacking outcome-oriented instruments (see ECEC outcomes) it reduces the potential for policy implementation that is based on aspirations stemming from knowledge.

Overall pre-school policies need to improve their contribution to the balance of policy efforts between coverage and early-learning/child development outcomes addressing competence-based policy goals. Following the system reforms introduced in 2016 (PSEA) and the mainstreamed approach pre-school to be better aligned as standards and institutional requirements to school education and broader LLL concept, the pre-school education is expected to address successfully both the challenges associated with coverage and to contribute to competence-based learning – the key approach of MES to promote frontline human capital development policies through education. The pre-school policy mix covers five key topics – workforce, infrastructure, enrollment/coverage, desegregation and curriculum related investments. While, following the trends in school education priorities workforce expenditures and infrastructure attract most of the funds, triggered by key policy developments (workforce compensation and compulsory enrollment of 4 years old) the balance between policy measures focused to raise participation and the ones focused on curriculum and learning needs to be specifically addressed.

325 This is the same joint intervention initiated in 2018 with the objective to support socio-economic integration through 'integrated measures improving access to education'. See the previous footnote.

326 e.g. the interventions aiming to finalize the process of deinstitutionalization of residential care, one run by MLSP: OP HRD SLP BG05M9OP001-2.012 Continuing support for deinstitutionalization of children and youth and respectively the other run MH: OPHRD's SLP BG05M9OP001-2.093 Continuing support for deinstitutionalization of children and youth – Stage 2 – provision of social and integrated health-social services for children and families

327 Integrated OPHRD's and OPSESG's SLP (BG05M9OP001-2.018). Socio-economic integration of vulnerable groups. Integrated measures for improving the access to education - Component 1 has been running in the period 2018-2020. It will be followed by Integrated OPHRD's and OPSESG's SLP (BG05M9OP001-2.056). Socio-economic integration of vulnerable groups. Integrated measures for improving the access to education - Component 2

328 Of which only one, *NP We Succeed Together,* has been operational as per 2020.

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In practice, MES has started to design programs with complex scope of activities bringing together schooling and learning as both NPDE and OPSESG investments are demonstrating (NP We succeed together; OPSESG SLP Active inclusion in pre-school education) but overall, the focused investment in curriculum and related specific competence-based learning needs to be strengthened and clearly positioned to promote and contribute to child development targets and school readiness goals.

Pre-school policy mix is addressing at lower extend alignment with ECEC policies mirroring the fragmented approach in ECEC domain and needs to develop models to address both nurseries and broader provision. MES has ran a NPDE addressing the transition from family environment to pre-school focusing on the role of this transition period to readiness to education and learning and schooling. At the moment no comparable intervention exists that links ECEC provisions for younger children to pre-school education. There is, though, a sign that the alongside the transition from pre-school, *the transition to it* has found a (modes) place in the policy mix. A module in the NP We Succeed Together is designed to facilitate the transition between family and pre-school the children-first comers.

Inclusive education and parenting are adding to the pre-school thematic scope but overall, both are addressed in the context of the need to reach universal coverage of the pre-school education. Inclusive education's presence in the design of the program instruments (and in their reporting) shows an approach relying on it to reach out to the least represented, and vulnerable, groups of the pre-school-aged children. This rationale is reflected in the activities, and even in the name, of the largest, specific to pre-school intervention: SLP *Active Inclusion in Pre-school Education*. Other interventions place inclusive education in the broader context of social inclusion and particularly within the framework of actively targeting children at risk of exclusion also education exclusion. Such interventions have been in the domain of MLSP (SLP *Continuing support for deinstitutionalization of children and youth – Stage 2*) or divided between it and MES (SLP *Socio-economic integration of vulnerable groups, Integrated measures for improving the access to education - Component* 1). Parenting too has been addressed in the context of increasing pre-school participation. On a much modest scale modules have been incorporated in NPDEs that encourage parental involvement in the broader context of enrollment, retention, smoother transition to pre-school and stimulating school readiness (NP We Succeed Together, NP Together for Every Child, NP Development of pre-school education)

The identified priority pre-school domains were addressed by a variety of instruments but not necessarily the approach was coordinated or monitored consistently to evidence specific and common policy effects outcomes. The institute of education mediators are an example for an approach that served both coverage and desegregation; an example of an intervention instrument that addressed the same key policy areas is OPSESG's SLP Active Inclusion in Pre-school Education. Having both: i) multiple policy approaches that address the same area and ii) the same approaches that address more than one area attest for flexibility in design but also requires substantial capacity for coordination and safeguarding efficiency. The existing reporting and monitoring instruments do allow the conclusion that MES needs to target better its NDPE and OPSESG instruments as well as to account for more specific outcomes. Qualification within the workforce key topic might serve as an example here. Activities to uphold and upgrade the professional qualification of the teachers take place under one NP, one SLP and within a number of other interventions – on specific topics (e.g., SLP Active Inclusion in Pre-school Education: on teaching Bulgarian to children whose mother tongue is another one) but it is difficult to follow how many pre-school teachers have upgraded their qualification in a given year and most importantly – how this upgrade resulted in better learning in the pre-schools. A lesson learnt here is that proper data management with respect to an intervention requires setting clear indicators not just on the level of activities within the system as it is now (e.g. the number of trained teachers, without segregation per education) but rather indicators on the change that resulted from the respective intervention (e.g. the number of children who improved their command in Bulgarian if the example of SLP Active Inclusion in Pre-school Education is utilized once again here).

For the first time OPSESG, primarily through a SLP *Active Inclusion in Pre-school Education* invested in wide system-level agenda. SLP *Active Inclusion in Pre-school Education* overarches issues such a coverage, inclusive education and contribution to learning environment. This approach opened possibilities for designing other measures allowing cross-topical, infra-sectoral innovative approaches. The example supporting such an expectation, although still quite humble one at least in terms of financial scope, is the 2020's NP *We Succeed Together*. At the same time core objectives set by PSEA such as learning, including LLL remained under-addressed by the policy mix relevant to pre-school education.

Pre-school Policy Mix Instruments and Lessons Learned

Impacts of National Programs for Development of Education

While there is a growing focus to preschool education, most of the NPDE that address pre-school are blended with activities that address school education and few are specifically focused to preschool. Between 2016 and 2020 NDPE addressing pre-school grew[329] as separate programs and financial power (refer to policy mix funding review) to reach 12 thematic programs by 2020. *36 one-year interventions/modules addressing pre-school education were funded by MES under 12 NPDE of which 4 were entirely focused on pre-school education while the remaining offered combined programming with school education*. Two of the NPDE were implemented throughout the whole period (*NP Native Language and Culture Abroad* and *NP ICT in the Pre-school and School Education*) and but none of them was not specifically focused on pre-school education. In 2017 MES introduced the first entirely focused on pre-school education NPDE (*NP Development of pre-school education*) and after two years of operation (17, 18), it was replaced by another NP devoted to pre-school education: *NP We Succeed Together* (19, 20).

In 2017, the first program entirely devoted to pre-school education, NP *Development of pre-school education* piloted activities that later have been developed further in an OP SESG SLP addressing preschool. The program targeted children considered at risk of learning difficulties and focused on supporting them to reach school readiness by providing additional training in small groups of four to eight children. An important change in the design of the intervention was introduced after the first year: in the one (2018) *the participation of the parents became a compulsory condition*. With respect to execution, both in 2017 and in 2018 the program overperformed. Despite that an over-reach was already realized in the first implementation year, 2017 (2680 children in 228 KGs against planned 1600 children in 130 KGs) the performance indicators and the budget (BGN 400 000) for 2018 remained the same. The participating children and KGs in the 2018 exceeded the ones in 2017 and respectively the budget was overshot with more than 30%. The program served a clear and present need. In 2019 it was replaced by another program entirely focused on pre-school education (see below) but meanwhile it paved the way for activities adapted within SLP Active Inclusion in Pre-school Education.

The NP We Succeed Together (2019) is potentially the most empowering (NPDE) intervention in the field of pre-school education to the date. NP Development of pre-school education seized to exist in 2018 and in 2019 *NP We Succeed Together* started. Although in terms of budget and PIs it began more modestly, in terms of design it was a more ambitious one. In its first year the program aimed at *children who attendant pre-school education for the first time, focusing on smooth transition from family to pre-school environment* and on engagement of the parents. The administration, apparently, considered the pilot year a success since the program's budget doubled in the following year, 2020. The initial objective was re-operationalized as the program's leading module received 50% more funds than the money allocated to the whole program in the first year. Two other modules were added, again with modest financing but even more daring qua design. These two modules allowed the pre-school education institutions to experiment with innovative initiatives and external collaborations. The envisaged activities pre-suppose openness

329 From 3 out of 9 NPs in 2016 to 10 out of 21 in 2020.

and engaging expertise not available so far within the pre-schools which is certainly an encouraging message. However, this stimulus is somewhat counterbalanced by the level of detail in which requirements are described, thus expecting the innovations to fit within a given matrix.

The majority of the remaining NPDEs relevant to pre-school education lack of specific focus to pre-school education. Only within three other NPDEs modules, activities and resources specifically allocated to pre-school education could be identified with certain confidence. These programs (*NP No Lesson Missed*, *NP Provision of Modern Educational Environment*, *NP ICT in the Pre-school and School Education*) are characterized by their auxiliary nature: they safeguard the provision of financial resources or material infrastructure for the pre-schools to upkeep (pay replacement teachers, have learning materials) or upgrade (acquire ICT hardware and skills to use it) its functioning. Within one of the other programs (*NP Qualification*) there were three activities specifically envisaged to serve pre-school educators; the other activities or modules within NP Qualification could be relevant for pre-school as well as for school pedagogical staff. As for the remaining seven programs - even within the modules where pre-school education was explicitly mentioned - it remained unclear what would be pre-school's part of the scope of the whole program.

The cumulative impact of the NPDE on pre-school education cannot be assessed in detail, due to oversimplified approach for program reporting and assessment and lack of financial benchmarks for preschool investments:

1. Not only with respect to program design but also with respect to their reporting the proportions of NPDE funding focused on pre-school education remined unspecified in many cases. It is understandable that the design of some of the programs do not allow in all cases to separate interventions aimed at pre-school education from other interventions. There are examples of NPDEs (e.g., NP Optimization of The School Network) where in a given year such segregation is provided and in the next it is not, meaning that over time the reporting, respectively information provision and data management has worsened. Improving the specificity of the reporting vis-à-vis pre-school education is clearly identified necessity that will contribute to analyzing the impact of each program as well as of all the NPDEs in general.

2. lack of specificity related to the performance indicators *(PI):* Within the *NP Provision of Modern Educational Environment* neither for 2018 nor for 2019 a value has been attributed with respect to the relevant to pre-school PI. Another illustration is related to *the lack of reporting on PIs* and comes from the program *NP ICT in the Pre-school and School Education*. In neither of the available reports (2016, 2017, 2018-2019) there was any account given with respect to the *number of trained pre-school pedagogical specialists*.

3. Sudden notable changes in the funding or in the design: One of the modules clearly devoted to pre-school education is *No Lesson Missed in the Kindergarten*. Although the program existed before, it became relevant to pre-school education in 2018 with the introduction on the mentioned module. There were no changes in the PIs between 2018 and 2019 although the report for 2018 showed that by far they were not met and the changes in the budget reflected the reported spending for 2018. The changes both in the indicators and in the funding between 2019 and 2020 were significant: the budget of the module almost doubled,[330] the number of participating KGs more than halved[331] and the number of the replacement hours was decreased 10-fold.[332] The key factor for that development is associated with the high administrative burden associated with the program according to MES. The introduced changes were not able to address the number of beneficiaries but positively affected the beneficiaries included. Such significant changes in the budgets and PIs of the activities demonstrate the need for systemic monitoring of the implementation approach to inform programming and to document and apply practices based on the lessons learned. A

330 From BGN 135000 to BGN 250000.
331 From 250 to 100.
332 From 30000 to 3000.

system for ongoing assessment would support the introduction of corrections to support the implementation and its optimum outcomes.

4. NP Caring Together for the Pupil might allow drawing useful lesson(s). The budget decrease within the program between 2019 and 2020 reflects the revision of the PIs. The program, which otherwise addressed the quite important issues of transitions including the transition between pre-school and primary school education, was remarkably downsized (in 2020 both the budget's and the PIs' numbers constituted only about a third of the 2019's).

Recommendations: there is need to improve NDPE information provision and data management approach. A common characteristic among the reviewed programs has been the deficiency of information and lack of its specificity (vis-à-vis pre-school education) with respect to both design and implementation. Insufficient information provision has been present as a systematic problem in all reviewed areas of the pre-school education system and its presence is clearly identified with respect to the NPDE too. Some of the deficiencies are difficult to explain since they represent worsening with respect to earlier information availability.

While blended interventions with education are good instrument to promote coherent approach in preschool and primary school stages, MES should guarantee and target funding and program scope that address, foster and influence preschool participation and specific policy outcomes.

NPDE design could better reflect the strategic goals set in the policy intention documents and focus its contributions to learning gap existing and associated policy goals.

Impacts of System Level Projects within Operational Program Science and Education for Smart Growth

OP SESG investments boosted funding flows to preschools through SLP by replicating the NPDE approach to focus policy investments primarily to school education and to lower extend preschool education. During 2014-2020, three[333] SLPs addressed pre-school education and one of them has been entirely focused on it. The other two interventions aimed simultaneously at pre-school as well as at school education where the project design is not allowing to specifically to trach effects to preschool policy. The majority (twelve) of the SLPs had no linkage to pre-school education.

The policy mix domains are broadly addressing 2014-2020 strategic goals. There is no an explicit overlap between the policy areas and the strategic goals stated in the national strategies and other strategic documents relevant to pre-school education but when the correspondences are interpreted broadly the strategic goals overarch the investments. On the basis of the analysis of the strategic documents relevant to pre-school education the following three strategic priority areas have been identified:

- Maximalization of participation and equal access
- Educational institutions and provisions safeguarding supportive and stimulating environment
- Active educational integration that guarantees social inclusion of children from vulnerable group

The review of the policy intentions relevant to pre-school education stated in OP SESG (

Table 7) concurs generally with the findings of the analysis of the strategic documents. Broad interpretations of the strategic objectives allow placing pre-school policy areas under them without having complete overlap. Still for some areas it is difficult to position them within the strategic-goal framework for the outgoing period. For example, learning, for which it is logical to expect to be in the

[333] Four, if *BG05M2OP001-3.018-0001* (formally) counted

center of each education system, cannot be positioned with confidence under any of the strategic priority areas. It is also not convincingly clear positioned with the priorities of OPSESG.

Table 7 OPSESG Investment Priorities, Strategic Objectives and Expected Results

Investment Priority[334]	*Specific Objective* (*SO*)	*Results to Be Achieved with EU Support*
***Reducing and preventing early school leaving and promoting equal access to high-quality pre-school**, primary and secondary education, including (formal, non-formal and informal) ways of learning for re-inclusion in the education and training system*	*SO1: Improvement of the children's and pupils' achievements in mastering of key competences* *SO2: Reducing the number of early school leavers and sustainable retention of students in the education system*	*...compulsory **school education preceded by high-quality and economically affordable education and ECEC.*** *The expected results are related to the **improvement of the quality of pre-school education** as a solid basis for further education and contribution to prevention of school dropout and for increase of the benefits of completing the next educational degree and acquiring new skills.*
***Active inclusion**, including promoting equal opportunities and active participation, and better employability*	*Increasing the number of **educational institutions** that have provided a **supportive environment for inclusive education***	
*Socio-economic **integration of marginalized communities**, as for example the **Roma***	***Increasing the number of successfully integrated through the educational system children** and students from marginalized communities, including Roma*	***early integration in to the educational system*** *raising the **qualification** of the staff to work in a **multicultural environment*** *creating an **appropriate** socio-psychological **climate in society*** *.. the interventions under this SO ... to **reduce the number of ethnically segregated kindergartens** and schools, to **increase the number of integrated students for whom Bulgarian is not their mother tongue** and at the same time to provide them with an environment oriented to **preserving their cultural identity***

As seen from the

Table 7 *learning* is not present as a separate investment priority and on this level its presence can be assumed only if very broad interpretation of ***high-quality pre-school*** Is applied. The first Specific Objective gives confidence that such assumption is correct but also it places learning as a sub-goal within priority dominated by coverage.

334 *All the texts in Italics in* Table 7 *are quotations, translated from Bulgarian text of the OPSESG.*

BG05M2OP001-4.001-0008 "Provision of information and publicity activities of the Operational Programme Science and Education for Smart Growth, evaluations and studies of Operational Programme Science and Education for Smart Growth and preparation for the next programming period" under priority axis 4 "Technical Assistance" of the Operational Programme Science and Education for Smart Growth"

Active Inclusion in the Pre-school Education System[335] (BG05M2OP001-3.005), **focuses specifically to pre-school education, promotes learning policy goals, bears potential to contribute to early learning outcomes of a significant proportion of the preschoolers, explicitly recognizes the importance of educational inclusion and is the first preschool project addressing widely the preschool system**. The scope of the project demonstrates a strong focus on system level. This SLP should include: a) 50 000 children of disadvantaged background (including Roma) to participate in activities for active inclusion in pre-school education; b) 1500 KGs to secure environment for active inclusion in the system of pre-school education (*including early prevention of learning difficulties*); c) 40000 children from ethnic minorities (including Roma) to be included in the pre-school education system. The project covers all the priorities of OPSESG relevant to pre-school education. It aims simultaneously at improving children's *achievements in mastering of key competences* (in this case – building foundation for literacy), *active inclusion* and *integration of vulnerable communities, with special focus on Roma*.

A core objective of this SLP is contributing to Bulgarian language proficiency for children from vulnerable groups. '*Advances in becoming skilled at Bulgarian language for 85% of the children from vulnerable groups as result of their participation in the project*' is defined as an indicator for achieved result. Respectively, additional Bulgarian language training for children from vulnerable groups is a key activity. Working in small groups and individual approach to each child should contribute to it. Mastering Bulgarian language has been marked as necessary component for achieving the objectives within all three priorities. The project is focused**:**

- at child level: preschool enrollment gaps by enhancing the participation of children with disadvantaged background in pre-school education. Under the activity as aimed to '*support of children from vulnerable groups including providing funds to waive fees at kindergartens with increased concentration of children from vulnerable groups, providing additional pedagogical and non-pedagogical staff, providing teaching and resource materials.'* references to different policy needs and priorities can be traced: *economically affordable education, supportive environment for inclusive education, raising the qualification of the staff to work in a multicultural environment,* to name a few.

- at child level: providing support to the Bulgarian language skills of children with different linguistic background. According to the latest available report '*11378 children who do not speak/ do not speak Bulgarian well* [were] *included in additional training in Bulgarian*'. The reported proportion constitutes 22.75% of the 50000 children whose active inclusion the SLP had to contribute to and given the duration of the project, the target should be reached.

- at system level: capacity development of teachers to screen learning difficulties planned has high potential impact on the pre-school education system. The accumulated to the moment of this analysis reporting result of the third activity was that '***1630 teachers*** *from all over the country* [were] *involved* ***in screening training***'. This corresponds to **8.2%** from the teaching staff in the kindergartens.[336] Together with the previously developed instruments, piloted activities and trained pre-school teachers and other educators,[337] this SLP has allowed the pre-school education system to reach a point where on

335 'Duration: 16 May 2019 – 16 November 2021[.] Total budget: BGN 82 500 000' Source: https://www.opnoir.bg/?go=projects&p=detail&projectsId=67&lang=en

336 Again, for the 2018-2019 school year, according to NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia

337 According to information provided by MES (written feedback 2021), within OPHRD SLP 'Inclusive education' and OPSESG SLP 'Support for equal access and personal development' altogether 298 psychologists and 112 speech therapists have been trained in administrating screening of children aged 36-to-42-months. In 2016/2017 school year within the UNICEF's initiative 'Together from the Kindergarten' screening test activities have been administrated in 35 KGs. After PSEA has been enforced (2016) and with financing provided by MES, more than 1500 kindergarten teachers have been trained in screening.

average two pre-school teacher per kindergarten should be able to screen the children for risk of learning difficulties. This constitutes a contribution to a system-level change.

- at stakeholder level: support for parents of children from vulnerable groups and building positive public attitudes towards pre-school education are planned under the activity.

The project is expected to set a basic standard for measuring early learning/school readiness outcomes in preschool education (through Bulgarian level proficiency) due to both system level impact and school readiness goals set. While the progress report is focused to demonstrate the intensity of coverage and participation in activities, the preschool system, that lack specific and unified instrument for school readiness monitoring, could be impacted by introducing systemic approach for monitoring/assessment of language proficiency of the children covered As most of the activities will be evidenced by indicators addressing participation (number of staff, number of children and others) the specific goal targeting language proficiency is an adequate and strong response to both preschool system and beneficiaries challenges and needs. MES should foster and strengthen that approach to address learning centered policy goals.

BG05M2OP001-3.003 (2015-2018) and BG05M2OP001-3.018-0001 (2020/21-2022)

Providing Conditions and Resources for Creation and Development of Supporting Environment for Inclusive Education in kindergartens and Schools– Phase 1[338] has blended activities addressing pre-school and school educational institutions. Although only 34 kindergartens (out of 2002 KGs in 2015-2016 school year) have been targeted by the project, the intervention piloted a specific instrument for screening and trained pedagogical teams to apply a model developed within OPHRD SLP Inclusive Education (BG051PO001-4.1.07, 2012-2014), sustaining developed instruments and continuing work with pre-school institutions and slightly extending their number. Screening for learning difficulties of children in pre-school age has been furthered within the following SLP Active Inclusion in the Pre-school Education System (see above, the section on BG05M2OP001-3.005). Accompanying such type of piloting interventions with continuous support for the pedagogical specialists (coaching, monitoring, peer reviewing) should become a norm and MES shall benefit from in-depth analysis of the impact and replicability and should base its further interventions accounting for the effects on i) children, ii) educators, iii) educational institutions capacity to implement, foster and promote inclusive practices based on sound child focused approaches. The upcoming PE should secure links and dissemination of practices to broader multisectoral ECEC provision and the next stages might be a good opportunity to test this approach. Based on the need to adapt and improve initial teacher training focus on child level screening approaches and instruments and competences, the next stages could pilot such integrations blended with specific classroom level practices and blended to education observations.
On March 2021 a new SLP *BG05M2OP001-3.018-0001 Support for Inclusive education* has been initiated. Building upon and BG05M2OP001-3.003 approach, once again it targets both pre-schools and schools, focusing this time not only on children and students with special educational needs but also on children (and pupils/students) with chronical health problems. The intended pre-school specific outreach of this SLP exceeds the BG05M2OP001-3.003's as *220 supported kindergartens* is formulated as one of the specific performance indicators.[339]

[338] The official name of the project is 'Support for equal access and personal development', 'Providing Conditions and Resources for Creation and Development of Supporting Environment for Inclusive Education in kindergartens and Schools– Phase 1' is the official name of the OPSESG procedure.
339 Ibid.

Qualification of Pedagogical Specialists[340] (BG05M2OP001-2.010) is not specific in promoting and addressing preschool through planning and goal setting and on implementation level the program provides limited information focused to preschool. This SLP contributes to all stated priorities of the OPSESG related to pre-school education - better qualified teachers contribute to better quality of education, more effective inclusion and integration of vulnerable children and students. The project is focused on improving the qualification of the pedagogical specialists in the country through trainings. Neither at the stage of planning, nor at reporting, is there clarity what the proportion of pre-school teachers taking part in these activities might be. It is difficult to estimate and evaluate the potential impact of the project on the pre-school education system (respectively on the school education system). The training activities differ from each other with respect to the scope of the training and respectively the awarded certificates. The first activity leads to '*awarding of one to three qualification credits*', whereas the second activity '*support[s] pedagogical specialists to acquire professional qualification degrees [PQD], including conducting preparatory courses for acquiring fifth and fourth professional qualification degrees.*'

Still, the project is the first wide system level effort to address education professionals with specific trainings. Based on progress reports '*5 347 pedagogical specialists aged up to 34 [were] included in programs for raising their qualifications under this program; 24 563 pedagogical specialists aged between 35 and 54 [were] included in programs for raising their qualifications; 4 895 pedagogical specialists [were] included in trainings for application of modern assessment methods.*' The first two groups (up to 34 and 34-54) corresponds to 38% of the total number of Bulgarian teachers in pre-school and school education systems in the 2018-2019 school year.[341] The program allow access to different trainings by education specialists facilitated by a special information system where provision and demand are matched. While this is a positive step on system level to ensure information flows, MES needs to focus efforts to align planning instruments of CPD/qualification with monitoring and reporting on qualifications. This has not only implication to information systems design and coordination but requires careful analysis and management of qualification outcomes for specific groups of teachers/professionals and requires attemps to test measuring effects on classroom and learning level.

The planned investment in enhancing organization and management of continuous professional development should allow an improvement in data collection and analysis of the qualification needs stated by the pre-school teachers. The investment has to result in '*an information system for pedagogical specialists to register [their] training needs; selection of topics for training of pedagogical specialists; planning of training; selection of trainings and training programs; opportunities for online training and tests; preparation of reports and others*.' Optimally, a successful realization of this activity will not only digitalize the information on pedagogical-staff qualifications in the country but will also allow better management of the qualification-training supply to reflect the needs and wants stated by the teachers themselves. The project implementation and MES system plans will be informed by an '*assessment of the quality of the performed qualification activities under the operation*'. The direct objective is to assess the core project activities. This activity, optimally, might provide a comprehensive snapshot of the qualification level of a representative proportion of Bulgarian teachers, also pre-school ones. The assessments have been postponed due to COVID19 crisis and is planned for 2021.

Recommendations: The focused to learning gaps and infra-sectoral approach of the SLP Active Inclusion in Pre-school Education System has to be sustained and expanded. Although, formally considered, also other interventions such as NP Optimization of the Internal Staff Structure or NP ICT in

340 'Duration: 4 October 2018 – 4 October 2021[.] Total budget: BGN 19 911 123,00[. …] The project activities are implemented within three school years- from 2018/2019 to 2020/2021.' Source: https://opnoir.bg/?go=projects&p=detail&projectsId=60&lang=en

341 According to NSI there were altogether 78841 teachers in this school year: 19799 in kindergartens, 20668 – in elementary stage 17417 -pro gymnasium stage, 11209 in general secondary and 9748 in professional education. Source: NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia

the Pre-school and School Education might have a systemic outreach, the SLP Active Inclusion in Pre-school Education is the only one with potential to bring changes to the system at once. It is also polythematic and thus creating potential synergies within its locations of intervention. Its potential to bring innovative attitudes with respect to the management of the system needs to be considered too.

There's a clear need to improve the design and the reporting. Setting and reporting on activity indicators might give an idea about outreach with respect to the system but what it is really needed are indicators that generate data about the change that resulted from the respective intervention, thus ones that indicate impact. A positive sign that this need might have been understood and appreciated appears in the SLP Active Inclusion in Pre-school Education System. As a *specific indicator for result* there has been set 'the relative proportion of the children from vulnerable group with progress [resulting] from their participation in the intervention'. Measuring the impact of an intervention should allow drawing the pertinent lessons from it and help the system to self-reflect on its performance.

Accessibility of National Programs and System Level Projects

The accessibly of a program intervention to the actors responsible for its implementation is a necessary condition for the effectiveness[342] **of the intervention**. A comprehensive assessment of the accessibility should be based on analysis of data collected through qualitative[343] and qualitative methods. Although the current analysis recognizes its limitations stemming from deficiency of comprehensive data provision, it provides an indication on the accessibility of the program interventions after 2016 on the basis of information available at the moment of writing. It reviews reports of the relevant to pre-school education SLPs and NPDEs and as its 'research question' serves the following: 'Would a KG principal be inclined to apply for a NPDE or a OPSESG's SLP on the basis of their accessibility?'

The NPDEs that provided financing for pre-school institutions or professionals in the period 2016-2020 cannot be characterized as particularly accessible to the kindergartens. **An analysis taking into account aspects such as the openness of the NPDEs to the KGs, their competitiveness, the conditions and requirements, the attractiveness and intensity of the efforts needed to apply, leads to a conclusion that there is scope to increase the accessibility of the NPDEs.** To establish the level of their accessibility the NPDEs programs with relevance to pre-school education have been reviewed with the help of an ad-hoc constructed instrument. First, it examines which NPDEs are open at all for the KGs (thus: who might be the applicant) and then it goes over their competitiveness (how many projects might be funded in total), specificity, requirements for contributions (co-financing), requirements for collaboration or other conditions creating situation of dependency (e.g. if external permission is needed), efficiency (maximum amount that might be granted vs. the efforts to apply) and (financial) attractiveness (what might be the maximal amount per application).

From all the 12 NPDEs, in reality there have been only five for which a KG principal can make a discretionary decision to apply for funding. The analysis shows that out of the 12 programs 3 were not open to KGs at all and 1 has been opened only in 2020. Out of the 9 NPDEs open for applications by KGs, 1 (*NP ICT in the Pre-school and School Education*) has been (re-)announced without described application procedure and 2 (*NP Optimization of the School Network* and *NP Optimization of the Internal Staff Structure*) had quite technical nature, serving to provide compensations anyway regulated by the labor law and the latter succeeded the former in 2018. Another program (*NP No Lesson Missed*) also aimed at providing renumerations paid according to the regulatory framework and applying for it was an administrative necessity rather than a matter of managerial decision. This leaves 5 programs where any KG principal in the country might possibly decide to apply to, namely: *NP We Succeed Together, NP*

342 The effectiveness of the NPs as policy implementation instruments depends on not only on the accessibility of the instrument but also on other factors such as their relevance to the main challenges experienced by the pre-school education institutions, the environment in which the pre-school institutions operate, the internal capacity etc. The accessibility is by far not the only condition but is one sine qua non.

343 E.g., focus group discussions, key informant interviews, etc.

Development of pre-school education, *NP Together for Every Child*, *NP Caring Together for The Pupil* and *NP Provision of Modern Educational Environment*. The last one was open for application by pre-schools only in 2020.

The NPDE funding approach of applying competitive procedures for kindergartens to access low budgets needs reconsideration. MES could introduce block grants o preschools that pack the policy priorities and address preschools based on specific needs or by competitive block grants for innovative practices. The financing which a KG would receive if its project application for one of these five NPs has been approved was limited. The amounts awarded for approved project application varied between BGN 860 and BGN 3500, the latter sum being lower than three monthly principal's salaries (2020). Most of the maximum amounts that might be granted were closer to 3500 rather than to 860, thus bringing the average to BGN 2360.5,[344] less than two monthly principal's salaries.

Administrative burden associated with NPDE should be addressed. Only one of the application procedures for the five listed NPDEs might be characterized as really easy, the other four being intensive rather than easy to apply for. When the size of the awarded grants is taken into account it is to be expected that a KG principal shall definitely ask herself, in her role as a manager, if applying for a NPDE is the most efficient way to allocate the time and resources at their disposal.

The competitiveness, or rather the theoretical chance for success if applying, increased notably throughout the period. If all five programs would have taken place in the same year and every application within the five listed projects were submitted for the maximum amount, the number of the successful applications would be 997. On the basis of the maximum acceptable amounts per application and the allocated sums, there might have been between 60 and 385 successful applications per NPDE (average: 199) or between 20 and 285 per module (average: 125). This way potentially 1000 KGs would have had a chance to receive financing from a NPDE, and if for convenience the number of KGs is rounded at 2000, each KGs would have had a 50% chance[345] of success, if it applied. In reality in 2017 there was only 1 NPDE (*NP Development of pre-school education was operational*), in 2018: 3 NPDEs (*NP Development of pre-school education, NP Provision of Modern Educational Environment, NP Together for Every Child*) and in 2019 and 2020: 4 NPDEs (*NP We Succeed Together, NP Caring Together for The Pupil, NP Together for Every Child, NP Provision of Modern Educational Environment*) simultaneously open for application.

The modules of the five NPDEs are characterized with relatively high degree of specificity. Of all eight relevant modules in the five programs only one can be defined as general rather than specific; all the others are either specific or very specific. The specificity might refer to the target groups (e.g., children and their families whose first language is not Bulgarian; children new-comers to KG etc.), to the mode of implementation (e.g. two defined activities have to take place within the same module), etc. On one hand, this high level of specificity directs the process of application and hopefully makes the drafting process more efficient. On the other hand, however, it restricts the possibilities to address the issues pertinent to the applicants; also, *if a policy intervention aims to encourage the innovation in a given sector it is counterintuitive to introduce very specific requirements on how the innovations should take place*.

Three out of five programs put serious additional conditions that potentially decrease the accessibility of the NPDEs. One of the programs requires co-financing of 20% and in other two cases external contributions or collaboration are needed. Stimulating KGs and pre-schools educators in general to foster collaborations is needed and brings a lot of potential added value but putting it as a condition sine qua non for allowing access to a policy intervention instrument might itself become a serious obstacle to utilize the instrument. Securing such external support, moreover in advance, when applying, might be considered as an obstacle for either the application or the implementation.

344 The calculation is based on the maximum amounts awarded within the eight modules open for KGs within the five listed NPs.
345 See Figure 14: 2002 in 2015-2016 school year, 1834 in 18-19 school year.

The accessibility to the relevant SLP within OPSESG was not a challenge to the pre-school education institutions and professionals. In comparison to the NPDEs, the access to the three SLP should be characterized as a question of formality. The access varied from administrative pre-selection to prioritizing the initiative of the professionals to effort to achieve a truly systemic coverage.

The access to the completed *Providing conditions and resources for creation and development of supporting environment for inclusive education in kindergartens and schools– Phase 1* (BG05M2OP001-3.003) **has been predefined**. It was not a managerial decision of the KG's principal if to apply; as the technical report stated the 34 KGs that took place were 'selected'. The selection of the 34 KGs was based on the 25 KGs that had participated in a preceding project '*Inclusive education'*; nine more KGs were added to complete the list of the KGs participating in BG05M2OP001-3.003.

The accessibility to the only entirely devoted to pre-school education SLP *Active inclusion in the pre-school education system* (BG05M2OP001-3.005) **has been maximized**. Having as a performance indicator the participation of 1500 KGs (out of 1834)[346] means conscious effort to reach more than 80% of the KGs in the country. The application form is quite simple and apparently the application procedure has been decentralized through the RDE, as evident form their websites. The application process was quite easy according to informal KG principals' feedback.

The other ongoing SLP *Qualification of Pedagogical Specialists* (BG05M2OP001-2.010) has been aiming at thoroughgoing accessibility too. The focus and rationale of the SLP suggests that the educators themselves should be pro-active in pursuing the improvement of their qualification and therefore such possibility should be given to all of them. The performance indicators for the two qualification-focused activities are respectively 43 810 teachers (in activity 1) and 48 015 (in activity 2), which altogether exceeds with one sixth the total number of the teachers in Bulgaria (78841)[347] in 2018-2019 school year. Moreover, within the first activity KGs (as well as schools and RDEs) can commission training courses for their staff, that allows flexibility with respect to their execution.

346 Interesting detail is that on the MES's website (https://www.mon.bg/bg/100788) this indicator is presented as 'minimum 1500 of all 1894' KGs. As a publication date is given: 23.01.2020. According to NSI there were 1894 KGs in the 2016-2017 school year. In 2017-2018 and in 2018-2019 there were 1834 KGs according to NSI. See NSI (2019, 2018, 2017)

347 NSI (2019) EDUCATION IN THE REPUBLIC OF BULGARIA. NSI: Sofia

Steps Forward: Strategy 2030 and Programming for Education 2021-2027

To foster preschool education contribution to the children's and country's developmental prospects MES needs to find a balance between responses to currently demanding problems and truly visionary goals for pre-school education. There are several key policy intervention areas and trends, pertaining to both critical system demands and visionary directions, that MES is expected to address: learning loss and early learning outcomes, the inclusion of the Roma and other specific vulnerable groups, the digital agenda, ageing workforce pressure, decreasing student population, continuous encouragement of parental participation, climate change effects to education and green agenda, global trends and effects as pandemics, migration outflows and economy and labor market pressure. In short-term, dealing with the effects and aftermaths of the Covid19 needs to be addressed too. Based on the analysis of the policy mix in the outgoing period, recognizing the importance of the Education Strategy 2021-2030[348] and the Program Education (PE) 2021-2027 and accounting for the need to balance between addressing ongoing challenges and acting in a visionary manner, several key areas for education in Bulgaria have been identified as components of the critical strategic mix for 2021-2027. The climate change/*green and the Digital Agendas* share characteristics of forward-looking and externally-induced stimuli for advanced development reflecting also a threat of being left behind. The learning loss, additionally strengthened by COVID, *early learning outcomes* and *effective inclusion of the Roma children in pre-school education* are challenges inherited from the past, shared only accidentally with few EUMS and issues that the Bulgarian educational system needs to deal with before the end of the upcoming programming period in order to preserve its chances to reverse the trend of lagging behind within the EU. *Covid19*, external to the domain of education and damaging phenomenon has long-term and vast potential to harm the educational developmental prospects of everyone in education, including in pre-school education. The efforts to encourage the participation of parents in the educational process are noticeable and encouraging on the level of design and indicators but how these are translated into implementation and what the effects and the lessons learnt are remain an ongoing issue still to be addressed coherently. Other key policy intervention areas that deserve attention include the approach to *stimulating creativity, innovations*, entrepreneurship in education, the *management of the pre-school workforce*, the *synergy between ECEC and LLL* and the need of *effective, coherent and sustainable pre-school-specific monitoring and evaluation*. The overlaps among the listed challenges refer both to their potential to reinforce each other's impacts and although reviewed separately, their interlocking effects have been taken into consideration.

Both the draft Education Strategy 2030 and the draft PE step back from the expected commitment to close access to education gap – a critical step expected from Bulgaria's education policy. Despite the continuous attention on Roma inclusion, at the preschool education level there is no explicitly set goal addressing the need to close the gap of Roma participation and inclusion in education. Bulgaria should aim to completely resolve the issues related to the coverage of Roma children in pre-school education in the upcoming period. Roma inclusion in the education system, also at pre-school level, has been a central point of the coverage strategies and measures in the outgoing period and preserves its priority status for the upcoming one. The Education Strategy 2021-2030 and PE 2021-2027 do not provide specificity about the scope of the envisaged change in the upcoming period with respect to inclusion of Roma children in the pre-school education. PE, Priority 1 explicitly mentions Roma on the level of indicators (IC V and especially IC VIII) but without clarity on the envisaged change with respect to pre-school education. Though Education Strategy 2021-2030 contains a number of indirect references to goals and measures contributing towards inclusion of Roma children into the pre-school education, also

348 Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)

this document does not explicate Roma-specific pre-school coverage goal. Further delays in solving the challenge of Roma coverage in preschool education increases the risks of maintaining and widening the gaps in education performance between Bulgaria and overwhelming majority of the EUMS.

While leaning loss is expected to grow due to a combination of COVID19 related interruptions of classical education process and pertinent system challenges associated with teaching and learning, still safeguarding measurable and specific early learning outcomes for each and every child in pre-school education, identified as a main challenge for the preschool education in the outgoing period, is not recognizable as an explicit priority for the upcoming one. The Education Strategy 2021-2030 makes specific references to clusters of measures/activities with potential to contribute to improving the early learning outcomes and healthy child development such as: '[d]development and implementation of indicators for monitoring of the quality of education and care in early childhood' and: '[d]evelopment and implementation of National Framework for the quality of education and care in early childhood'.[349] These and other measures that can be interpreted as contributing towards safeguarding *better early learning outcomes across the board* are assigned to 'Priority Area 3 Efficient and Sustainable Inclusion' and not linked to an objective related to improving the learning outcomes and developmental prospects *of all pre-school aged children*. This approach mirrors the employed incorporation of clusters of measures/activities targeting *specific vulnerable groups* of children where the measures that contribute to better learning outcomes are considered only in the context of the axis *access-inclusion-equity*. There are no references to guaranteeing learning outcomes for all children in pre-school age in Priority 2 - Modernization and Quality of Education of PE 2021-2027 either. Measures within 'planned operations of strategic importance' titled 'General and additional support for personal development in pre-school education' contain the potential to enhance early learning outcomes across the board.[350] However, these components are considered only in the context of access and equality and are envisaged within Priority 1 - Inclusive Education and Educational Integration.[351] As the ECEC situational analysis and especially the section on 'ECEC Outcomes: Child Development and School Readiness' (see above) demonstrated, so far there has not been an universal and coherent system of measuring the impact of pre-school investment on the early learning outcomes and developmental chances of the children *in Bulgaria*. The investments in pre-school education are justified by measurements and studies taking places years after the children graduated from the pre-schools in the absence of a coherent and systematic measurement at the exit point of this educational level. The pre-school education system in Bulgaria has to make a transition from approaches centered on access to prioritizations based on eliminating learning poverty and safeguarding the normatively set learning goals for every child in pre-school age. *Therefore, the priority axis access-inclusion-equity needs to be extended to include also the component of 'safeguarded early learning outcomes for every child'*. These learning outcomes have to be recorded, analyzed and when needed – acted upon and this refers to all children, not only the ones that might be considered vulnerable. Without addressing this challenge in the upcoming programming period Bulgaria risks educational performance at later educational levels legging behind the other EUMS's in a long term.

Both Strategy 2030 and PE 2021-2027 routinely address climate change and green agenda, highlighted by EU as a flagship agenda. Specifically, this is relevant to pre-school education specific plans for funding so far, and constitutes a risk of losing opportunities to foster and promote intensively culture, competences, and society response expected during the programing period. The most ambitious

349 The document does not specify how these two measures relate to each other and why the former is not incorporated into the latter.

350 Examples include: [e]nhancing the capacity, qualification and skills of pedagogical and non-pedagogical professionals, including for shaping and implementing policies to increase the scope in pre-school education and to increase the quality of pre-school education', 'to implement general and additional support for personal development in kindergartens and in pre-school education groups at school', '[e]nhanced monitoring of the progress of the learning process in kindergartens and in pre-school education groups'. All listed examples are qualified in the text of the PE to be applied in a more limited contexts, mostly serving vulnerable groups and narrowly aiming at access, inclusion and equity.

351 For more detailed analysis of PE's Priority 1 and Priority 2 in the context of pre-school education: see below.

transformation plan ever announced, the EU Green Deal, concerns the sector of education at least two-fold. Achieving the three goals of 'i) there are no net emissions of greenhouse gases by 2050 ii) economic growth is decoupled from resource use [and] iii) no person and no place is left behind'[352] necessitates active involvement of the educational sector including at pre-school level both as a recipient and a contributor. At the receiving end, the pre-school institutions shall benefit from the resources allocated to adjust their premises and make their functioning more energy-efficient and environmentally-friendly. As contributors, the pre-schools are in the forefront of upbringing, socializing and training the children in ways that contribute to the Green Deal's objectives. Against this background the references in both the draft Education Strategy 2021-2030[353] and the draft of PE 2021-2027 are scarce. A specific reference to raising environmental awareness that might, with a level of confidence, be referred *also* to pre-school education is '[b]uilding environmental culture and habits for separate waste collection'.[354] Although the Strategy considers prioritizing 'policies … including related to the transition towards green economy'[355] as one of the strong sides of the Bulgarian education and one of the recognized opportunities for development, this is not translated into specific measures concerning pre-school education.[356] The PE 2021-2027 makes a single reference to a project under Next Generation EU Recovery and Sustainability Facility 2021-2024 that supports 'sustainable resource management in kindergartens and schools, energy efficiency, recycling and waste reduction'.[357] No specific attention is paid to the role the pre-schools in upbringing and training the children who have to realize the EU objective of 'economic growth decoupled from resource use'. Numerous measures envisaged in both documents, including such clustering investments in pre-school and school education, allow contextualizing the green agenda into their scope, but these opportunities remain unutilized.[358]

COVID 19 crisis is putting the system into huge stress due to the critical stage of post legislative and process reform period in education and the legacy of underperforming teaching and learning process resulting in learning loss and provision instability. Still the last calendar year proposed unique opportunity for (i) quickly introduce and respond to processes that would take much longer period under normal epidemiologic conditions and (ii) train the system to respond to unplanned events that disrupt normal system processes. In addition to intensive switch to digital training and education process, in the context of climate change effects expected to be significant for Bulgaria (based on climate change simulation analysis) and the lack of specific adaptation strategy for education, the COVID 19 crisis could be accepted as a complex preparation period for the system to prepare, assess and test quick response measures. In addition to essential responses that the system is developing (access to digital devices, connectivity, digital content, competences for digital teaching and learning, public health aspects) both strategic planning and programming should guarantee focus to climate change associated needs and system readiness.

There are numerous references to digital policy goals and steps in the Education Strategy 2021-2030 and PE drafts, but with respect to pre-school education neither of the documents offers a coherent vision how digitalization contributes to safeguarding preschoolers' early learning

352 EC (2020) A European Green Deal. Striving to be the first climate-neutral continent. Source: https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

353 Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)

354 Ibid.

355 Ibid.

356 Further references in the strategy to the link between education and green economy are made only in the section for VET and green classrooms are mentioned only in relations to the schools.

357 Draft PE 2021-2027.

358 For example, both documents devote considerable attention to supporting teachers' professional development but not references to synergizing teachers' training and the green agenda are made.

outcomes and healthy development. Overall Bulgaria invested in digital equipment in pre-school over the past decade, but the underlying concept and targets have not been formulated and measured. The references to digitalization relevant to pre-school education in both documents are scattered and mostly present in intervention areas where pre-school and school education are clustered together, such as teachers' training and 'introducing/modernizing of security systems and control of the access to the kindergartens and schools'.[359] No specific references to utilization of the digitalization in the educational process in the pre-schools are made and potentially the most relevant to pre-schooling (clustered) measures/activities are "[b]alanced use of digital educational solutions and traditional learning accounting for the children's age'.[360] Neither of the documents explicitly addresses *the need to support pre-school aged children to develop healthy attitudes and suitable habits towards digital devices and contents* from the very first moment of their 'digital life'. A question still to be faced by Bulgarian (pre-school) education system is *how to balance the access and the use digital content by preschoolers in a way serving their best interest.*[361] The employment of digital solutions also in auxiliary functions, as for example in the context of the mentioned 'security systems and control of the access to the kindergartens and schools', needs a cautious and consensual and rights-based approach. Although further research is needed, there are already studies that raise concerns about the effects of (video-) surveillance technologies on the emerging behavioral patterns and developmental prospects of (young) children.[362] Additional considerations include the sensitivities of a large number of parents and the relevant constitutional norms.[363] Related, but still on its own right, is the matter of addressing digital contents, platforms and technologies in the context of pre-school education not only from learning but also from upbringing and socialization perspective, which remains open issue too.

Overall, the proposed approach to innovation is rather administrative and limits the opportunities to foster a true process of ideas creation, exchange, experiments and crowdsourcing that are critically needed for fostering innovation. The prominent place of innovation in the strategic and implementation planning for the upcoming period lacks specificity on pre-school education. Investment across the board, instead of relying on competitiveness and openness, might require reconsidering. Innovation is prominently present in the Education Strategy 2021-2030 but the strategy does not shape a coherent vision on the role and impact of innovation on the pre-school education in the upcoming period. The occasional references of pre-school institutions and provisions in the context of innovation are as a rule coupled to school education. The same approach is mirrored in PE 2021-2027, though with higher level of specificity. PE 2021-2027 envisages investments in innovation on system level suggesting massively and directly encouraging pre-school and school institutions to develop educational innovations. Not much space for competitiveness as well as for external influences and ideas is left which in turn creates risks for missing out-of-the-system breakthroughs. Crowdsourcing of ideas, involving local communities and relying on parents, (local) businesses and other stakeholders might prove to create a more encouraging environment for (pre-school) educational innovation, also in Bulgaria. The centralized allocation of resources for innovation contains also a risk of formalizing the process and putting too many conditions, as a lesson learnt from policy mix review demonstrates.[364] MES is advised to reconsider this approach and instead of centering the process on education institutions , to realign them with other

359 Under Goal 3.7 in ES 2030.

360 Under the Goal (4.4) '[d]evelopment of the education in digital environment and through digital resources' in ES 2030.

361 A key principle of UNCRC (A rt. 3/1) stipulates that '*In all actions concerning children,* whether undertaken by public or private social welfare institutions, courts of law, *administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration.*'

362 Office of Private Commissioner of Canada (2012) Surveillance Technologies and Children. Report prepared by the Research Group of the Office of the Privacy Commissioner of Canada, October 2012. Retrievable from: https://www.priv.gc.ca/en/opc-actions-and-decisions/research/explore-privacy-research/2012/opc_201210/

363 See, for example, Art. 32 (2) Constitution of Republic of Bulgaria.

364 Sees above the review of the design of NPDE We Succeed Together for 2020 (Policy Mix, NPDE).

stakeholders starting from children and students, parents, local communities, business, innovation hubs, university and other research and development units and wider public. The finding should better blend system level actions with competitive calls for all beneficiaries including education institutions.

The need of emancipation of the pre-school education from the school in the area workforce policy needs competence-oriented investments in the 2021-2027 period. Both Education Strategy 2021-2030 and PE 2021-2027 do not distinguish between pre-school and school regarding workforce targets while MES has evidence for different dynamics between the two stages; nether on level of strategizing nor on level of intervention planning and reporting under priority one and two of OP. The chosen cumulative approach misses important nuances, as positive trends[365] and challenges related to finetuning policy responses. The policy mix analysis clearly identified as one of the pitfalls in the area of professional development and qualification is the need for specific evidence-based policy responses, hence: data, analysis and policy adjustment with respect to pre-school workforce. The approach of merging activities and funds between preschool and school education limit also a more specific efforts for cost-effectiveness assessments of the program procedures in preschool. Overall based on the reports it is obvious that the coverage is growing in nominal numbers and this is a big first success for the system but the next steps would require much more specific planning of both resources and activities that will allow for detailed assessment and monitoring of efficiency.

Improving the informing of the pre-school policy evaluation and formulation and finetuning ongoing implementation and interventions shall require establishing a comprehensive and sustainable information collection, allowing for more specific monitoring and evaluation in the upcoming period. The monitoring and evaluation approaches and procedures are numerous, scattered, often created on project-basis and at the same time not able to provide specific, segregated information that informs policy formulation and implementation designs, at least: not with respect to pre-school education. The paragraph on the workforce (see above) illustrates the case. Specifically, the monitoring and evaluation of the qualification investments exemplifies the need of systematic approach. The Education Strategy 2021-2030 and PE 2021-2027 can benefit from incorporating these lessons from previous programing periods, as seen also from the analysis of the policy mix. At present the drafts of both documents only occasionally address the need of monitoring and evaluation and with respect to pre-school education this is done incidentally.[366] Developing and employing a coherent and sustainable accountability (monitoring and evaluation) system with respect to pre-school education shall improve the ability to MES to follow its policy intervention and swiftly adjust/fine-tune it when needed.

MES has planned to monitor and address territorial disparities through investments but still there's a need to develop a coordinated approach to report and analyze this information. Based on the information provided it is not possible to observe and assess the effects of the investments from point of view territorial dimensions across NPDE and OPSESG projects. To analyze and manage impact MES will need to systematically collect and merge territorial data across interventions. The basic data set developed for this analysis could serve as a starting base to upgrade and develop this practice. In addition MES will have to introduce a standard policy for access to data for analytical needs that guarantees that this aspect will be guaranteed.

The lessons learned in the outgoing period necessitates that LLL makes a transition from a normative concept into a key policy area of intensive interventions in the domain of pre-school

365 An example here is the rejuvenating of the pre-school teachers' corpus, a process which is not equally mirrored in the school workforce. See the section on Workforce Policies Addressing Pre-school Education.

366 There is a single specific to pre-school education reference in PE 2021-2027 to pre-school education monitoring system '[e]nhanced monitoring of the learning process in kindergartens and in pre-school education groups in order to early warn [sic] of early departure from the system'.

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education. The recognized importance of the lifelong learning in the outgoing programing period is echoed in the draft documents shaping strategic objectives and policy implementation approaches in the upcoming one. Both Education Strategy 2021-2030 and PE 2021-2027 pay explicit attention to LLL but its link with ECEC and the normatively defined role of pre-school education as LLL's fundament[367] is only accidentally mentioned in descriptive texts.[368] No reference to specific measures/activities, interventions and (strategic) goals, neither indicators that enhance the role of pre-school education as key component of a lifelong learning trajectory can be identified in the available drafts. Embedding resourceful pre-school-centered and LLL-minded interventions and other policy implementation approaches into the planning for the upcoming period is well justified by lessons learned in outgoing period (see ECEC Concepts and Learning Standards / Curriculum) and bears the potential to provide fertile ground for other policy intervention areas addressed above such as development of healthy attitude towards digital content and technologies and environmentally friendly attitudes.

367 Art. 27 Ordinance #5 on Pre-school Education

368 Actually, the only clear text specifically recognizing the importance of 'early childhood learning' for LLL is the following in the PE 2021-2027: 'The growing need to tackle problems such as social exclusion, discrimination and low levels of educational attainment shows that work must continue to ensure equal access to quality early childhood learning and care, with the most important basis for successful lifelong learning'.

Recommendations on Preschool and Horizontal Aspects

Pre-school Policy Implementation and Policy Mix

Pre-school education needs to prioritize investments in cross-thematic interventions that span across key policy areas of needs and target measurable systematic impact. The vast majority of the policy mix interventions funded by the national budget have been single-topic focused and with insufficient instruments to evidence or measure the impacts on both system or specific intervention level.[369] OPSESG system level project *Active Inclusion in Pre-school Education* pioneered pre-school-centred measures bearing developmental potential to the whole system by overarching issues such a coverage, inclusive education, educational desegregation and contribution to learning outcomes, thus creating environment for across-the-system developments. MES should use this approach and expand it to stronger national funded and EU co-funded initiatives to address directly pre-school and broadly ECEC activities.

Setting specific indicators for result, defined in a way that measure outcome from investments has to become the norm for MES pre-school education interventions. Such properly designed indicators need to replace the currently used input and activity-level indicators that function as substitutes for result indictors. MES needs not just to mainstream, but to turn the proper result indicators into the norm since the system has to be in a state to measure the impact of its own interventions in terms of behavioural or competence change. This requires a notable departure from the previous/ongoing and widely established practice to formulate input or activity-level indicators (e.g., such that measure the number of participants in an intervention: teachers trained, children participated, parents involved etc.) instead of result indicators that address the specific policy goals for the system.

Pre-school investment programs needs to directly address and measure child development and early learning outcomes.[370] The pre-schools' contribution to (future) learning outcomes is not well documented, analysed and utilized[371] which in turn does not allow to design and implement learning and developmental focused interventions. Still the learning and developmental outcomes on system level are not measured; on intervention level such indicators are limited and project-specific;[372] instead, measurement data from later educational stages (PIRLS, TIMSS, PISA) are used as proxy and justifications for interventions. In parallel, and at least as equally important: the narrow interpretation of the school readiness as raison d'être for the pre-school education has to be outgrown. As much as pre-schools are part of the education system they are also places where child development -beyond education- needs to be fostered.

With 12% of children unable to read at grade 4 and in line with the latest negative declines in TIMSS 2019, a compulsory task for MES should be targeted toward eliminating learning poverty. The analysis has collected variation of evidences demonstrating that across primary education outcomes there are clear signals for the need pre-school to be specifically tasked and targeted to support the skills, attitudes and early-ages knowledge needed to lay nurturing environment for later academic achievements.

[369] E.g., NP No Lesson Missed, NP ICT in the Pre-school and School Education, NP Qualification etc.

[370] As defined by State Educational Standard on Pre-school Education, see also above the section on ECEC Outcomes: Child Development and School Readiness

[371] This is extensively addressed in the section on ECEC Outcomes: Child Development and School Readiness.

[372] There examples from both, NPDE and OPSESG, e.g., both NP Development of Pre-school Education and SLP Active Inclusion in Pre-school Education focus on contribution to supporting learning capacities of specific vulnerable groups.

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The policy mix has to serve the normatively defined function of the pre-school education as a basis for lifelong learning in a way that guarantees spill-over effect to the routine functioning of the pre-school education. Formal pre-schooling needs to go hand-in-hand with informal and non-formal learning. This requires adopting a broader conceptualization of the pre-school education beyond viewing it as a preparatory stage that readies children for schooling. Informal and nonformal learning in the pre-schools, now unnoticeable on system level, have to be encouraged and to compliment the standardized pre-school curriculum. Inputs from outside the pre-school educational sector have to be fostered. The initial project investments (e.g., NP *We Succeed Together* and NP *Caring Together for the Pupil* stimulating collaboration between pre-schools and schools) once again underline the link between the pre-school and school education. Against this backdrop, the absence of an intervention triggering collaboration between nurseries and pre-schools that stimulates lifelong learning cannot remain unnoticed.

System level discrepancies need to be identified, monitored, tracked and addressed through both education and cross-sector responses.[373] Disbalances within the system are early indicators, that there might be unrecognized opportunities for more efficient functioning as well as that challenges that project-based investments into the domain of pre-school education not always can be solved by the instruments and with the capacity of the pre-school education system. The *Mechanism*[374] is an example for an intervention that addressed the disbalances with coverage of children, that engaged other public sectors (social services, health, interior, local authorities) in addressing a problem that manifested severely itself in the domain of education but has its origins in other areas. Every time when discrepancies appear, they have to be paid attention to with the same vigour and treated as symptoms of necessity to re-examine the management and the policy needs of the system. The following disbalances have been identified by the pre-school review and recommended to guide policy development planning and reform/policy strengthening steps:

(i) coverage: national overcapacity vs. unmet local demand;
(ii) financing: notable discrepancy in the availability of NDPE to school and pre-school education – actions and funding;
(iii) workforce: the different pace of attracting young teachers to the system;
(iv) learning loss: TIMSS 2019 results showed decreasing learning outcomes; discrepancies between the TIMMS 2015 outcomes of children who attended one year and those who attended two years of pre-school education;
(v) coverage, financing and learning outcomes: while the financing per child in the pre-school system increased the coverage decreased and the latest proxy on learning outcome (TIMSS 2019) shows worsening of the (future) learning outcomes;
vii) access and financing: the concept of universal pre-school access does not fit to the existing financial co-payments approach that impact affordability of pre-school for specific social groups depending on vulnerability factors;
viii) continuous professional development: the priority investments in workforce's continuous professional development are not in line with the lack of result-oriented modules that focus on expected classroom level change;
ix) data collection and management: statistical data (national and international) on outcomes and the notion of MES administration on better outcomes that that statistics do not correctly picture (specially on coverage);
x) early learning outcomes: the policy goal for competence-based learning conflicts with the lack of specific tools and common concept for measuring pre-school outcomes (there is a discrepancy also with the policy goal for wider coverage);
xi) coverage, access and equity: specific profile of settlements with lack of pre-school (and ECEC) places and the lack of sustainable investments in alternative provisions/services does not line with the effort to achieve universal coverage;

[373] Especially in the cases when the discrepancy has its root causes outside the domain of education.

[374] *Mechanism for inclusion and retention of children and pupils, see the section on* Pre-school Coverage and ECEC Aspects

xii) governance and management: call for modernization of institutions and the lack of system level result-based monitoring and accountability policies (different from external evaluation);
xiii) vision: the policy goals on digitalization across education does not fit with unclear scope of policy plans and concept for ECEC stages in their relevance to early learning, health and civil aspects of digitalization and ethics;
xiv) vision and environment: the green agenda cannot be realized with obsolete infrastructure design models applied, reinforcing inefficient and non-energy resourced approaches on space design and lacking updates addressing the need to integrate education concepts in d needs into spec end capital investment designs.

MES should introduce a specific impact measurement of the considerable efforts and investments to continuous professional development as a matter of urgency. There have been at least four considerable qualification instruments addressing pre-schools, (NP Qualification (2017-2020), ESF funded SLP Qualification of Pedagogical Specialists (2019-2021); ESF funded training component, Activity 3, within SLP Active Inclusion in Pre-school Education System (2019-2021) and the direct national funding for pre-schools that guarantees professional development of teachers). Effects from those investments as improved classroom practices, new approaches, methods introduced, impact on early/school learning outcomes, child development or any impact the system of pre-school education have not been tracked. It is not possible to segregate the potential effect of each of the interventions (apart from formal ones, such as acquiring professional qualification degrees – a policy that is not integrating post-certification monitoring and support). At the end, while data on the number of teachers is present, MES is not disaggregating this by education stage, professionals' specialty, years of experience or any other system relevant criteria. The parallel operating of different interventions does not necessarily lead to overlaps but MES need to further develop synergies of instruments for monitor and manage the training/qualification flows, needs and associated planning. A coherent systemic design of the cluster of interventions relevant to the continuous professional development for pre-school education is not only a question of efficient allocation of resources but also of effectiveness of the system and of contribution to its normatively stated objectives. Finally, classroom level observations tools are needed for the system to track and learn from the qualification investments. Examples and experiences from other countries could be adapted to address specific pre-school needs.

Pre-school challenges tackled in the outgoing period still constitute critical policy areas to be carried over to the new period. Together with them there are other key policy domains that have not been (sustainably) addressed and cannot be ignored further. The list of the former consists at least of i) coverage; ii) inclusion, iii) desegregation, iv) continuous professional development, v) early intervention and support for children with learning difficulties; vii) transitions; vi) engaging parents. To the latter belong: i) early learning outcomes and child development *for all children*; ii) lifelong learning, beyond readying for formal schooling; iii) healthy attitudes towards and proper introduction to digital devices and channels (see above); iv) fostering environmental awareness (see above).

Horizontal Aspects: Pre-school Education in the Broader Context of ECEC and General Social, Economic and Developmental Targets

The objective to solve the issues related to access both in terms of availability (overcoming infrastructural obstacles) and affordability (making pre-school education affordable to every Bulgarian family) has to be met in a rapid tempo. The system has to prioritize tackling issues related to inequal access to a guaranteed standard of pre-school education as a key goal associated with access. Once again, here recognizing and addressing causes also outside the domain of education might be required. Next to steps that have already been put in place, such as the just mentioned M*echanism*, the State Budget Program on Capital Investment, etc. close monitoring of the internal migration trends and proactively reacting to demand including with adapting the modalities of pre-school provisions might

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prove useful. The last will be critically need for the areas where demand for pre-school is critically decreasing or increasing due to factors not directly related to education. International examples in this direction might be adapted to both ECEC/early pre-school stages and preparatory school stages.

In the context of financial and epidemiological crisis the financing of the pre-school education has to remain on equal priority with the funding for schools:

- Pre-school policy needs access to a guaranteed share of education budget to secure not only the operational needs but also the necessary resources for the reform and development policy mix.
- ESF funding will play a critical role during the first years following the COVID19 stress and need to guarantee funds for upgrades, ideas and reforms in pre-school education.
- Unclarity about the allocation of resources between pre-school and school education within most of the interventions that address both should be avoided and funding plans revised to secure levels for pre-schools;
- Even in times when the funding from the national sources might be directed predominantly on keeping the system running, funding should be secured not just for catching up with the best performing EUMS.

Improved information provision and better data management are compulsory for generating up-to-date-able knowledge that in turn allows reliable self-evaluation and self-reflection. As broad as this recommendation might seem, it is one of the most pertinent and often encountered with respect to the education system in Bulgaria. Across the analysis - from financing, to the review of the policy instruments – evidence for data needs, lack of data evidenced interventions and poor monitoring approaches are provided. MES needs to adopt a general strategy for data driven interventions that stimulate the system to focus on an organizational development as a learning organization.

The pre-school education system has to recognize its role and responsibility in forming healthy attitudes and laying the foundations for acquiring adequate digital skills. With respect to pre-school education, the draft Education Strategy 2021-2030[375] refers to technology and digital competences mostly in the context of provision of support and facilitation to the management, bettering teachers' qualification, interaction with parents. The document statements that '[d]igital skills and competencies are a priority for the entire educational spectrum' and that 'key competencies will be formed in children…along digital citizenship competencies' remain unspecified. The abstinence to envisage or plan specific exposure to [digital] technologies at early age is addressing probably the general public's potential sensitivity to the topic but at the same time it has to be recognized that regardless of the common concerns the vast majority of children at pre-school age have already been regularly exposed to digital devices and technologies through family and other environment. A well-thought through and carefully implemented introduction to the digital technologies as an educational medium alongside with nurturing a temperate, healthy, age-appropriate attitude towards digital devices and technologies might prove a better and well-balanced welcoming of the pre-school-aged children of the third decade of the XXI century to (their) digital world.

The pre-school vision as standards and organizational aspects need to be in the forefront of forming green attitudes of the generation that will shape its behavioural patterns and values in an epoch when not only from the economy but also the society will be required to become greener. The analysis showed that the references to the green agenda in the Education Strategy and PE for the upcoming period are at best scarce. This could hardly be enough given that the pre-school-aged children whose behavioural patterns and values will be formed between 2021 and 2030 will be the same young people who will become active citizen and economic agents at the time when the effects of the biggest policy package in human history might have already started shaping their lives. MES might consider to:

- Strengthen and update the green agenda in pre-school learning standards;
- Introduce green organizational policies for pre-schools that require a minimum transformation of the functioning and organization of the daily routine of pre-schools;

[375] Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)

- Set minimum green framework for all new infrastructural investments;
- Update and amend the physical environment standards to address low carbon and energy saving standards including through redesign of the non-energy efficient design of pre-schools that follow the legacy from the socialist period. The WB has developed as specific note on the topic delivered to both MES and the Ministry of Environment and Waters.

MES needs to formulate and adopt a modern concept for direct learning environments in pre-school and depart from the legacy of teacher centric space design to more interactive and child driven interactions and space planning. Direct pre-school environment concepts are lacking holistic concept and are dominated by formal physical environment requirements. As stated in a forthcoming WB analysis on learning environments,[376] pre-schools need overall reformulation of concept, approach, design of funds and standards across direct learning environments and targeted support to teachers and principals on how to manage that change.

The pre-school education system's focus on inclusion and on the related but separate priority of children with special education needs, has to be sustained and reaffirmed. There is a strong legacy of pre-school policy interventions with respect to inclusion and specifically to children with special education needs. It can be traced back before the beginning of the OPSESG to a system level intervention titled *Inclusive Education*[377] and this legacy has been reflected also in strategic goals relevant to pre-school education in the strategic documents for the period 2014-2020. It also has been taken over in the SLP *Active Inclusion in Pre-school Education System*, thus tracing a path from addressing particular challenges related to special education needs, to inclusion, to (universal) coverage. Outside pre-school-specific universal coverage, the contemporary dimensions of the inclusion domain need attention in at least two (unorthodox) aspects. First, the significance of the inclusion needs to be further endorsed in a way that allows to be appreciated by all Bulgarian children and families including these that have never considered themselves excluded; their internalizing of the intrinsic added value of the inclusive (pre-school) education for the whole society, also for themselves, shall safeguard its sustainability. Second, inclusion is a natural link between the education and the other ECEC related sector (social welfare, health) and this relation starts manifesting itself in also in the newly-introduced integrated EU-finding procedures.[378]

Strategic Investments Planning and Specific Recommendations to PE 2021-2027

MES needs to improve the current approach for planning for pre-school reforms and to specifically plan a mix of goals for pre-school-education policy for the 2021-2027 period that guarantee a relevant vision and development goals throughout the policy period. The policy implementation mix focused on pre-school during 2014-2020 period is difficult to be linked to the set of strategic objectives from 2014. Some of the policy mix instruments cannot be traced back to the strategic objectives set in the beginning of the period and neither, be linked to the newly emerging or pertinent needs of system as the latter have been revealed by the analysis.[379] Adding pre-school module or activities to other school-level interventions or broadening school programs scope to open them also for the pre-school education[380] seems a key approach in the outgoing period. Bulgaria pre-school policy goals and system developmental stage requires planning and implementation approaches that span across critical needs and a vision for

376 WB (2020b) Learning Environments in Bulgaria. Assessment and Recommendations on the Learning Environments in Pre-school, General Schools and Vocational Schools in Bulgaria. Forthcoming

377 OPHRD SLP BG051PO001-4.1.07 *Inclusive Education*

378 INTEGRATED OPHRD and OPSESGSLP SLP Socio-economic integration of vulnerable groups. Integrated measures for improving the access to education - Component 1 and Component 2 -(BG05M9OP001-2.018 and BG05M9OP001-2.056)

379 See Pre-school Policy Mix Instruments and Lessons Learned.

380 Please refer to the review of the SLP and most of all – the NPDE.

development and achievements. Education Strategy 2030 draft could be supplemented with specific planning on the approach for change and selection of key policy targets and processes that will provide the basis for system change and development as stated by the strategy.

The Education Strategy 2021-2030[381] and relevant implementation programs including the draft -PE 2021-2027[382], have to find a fine balance between proposing responses to currently demanding problems and truly visionary goals for pre-school education. As important as they are, the priorities carried on from previous periods on strategic and operational level (such as dealing with the obstacles to universal coverage, adopting the stipulated in PSEA joint MES-MH ECD standards, etc.) have to be addressed in a way and with a speed that they do not dominate the strategic goal-setting for the whole period. Recognizing them as urgent tasks left over from previous periods should also help to focus on, as well as, distinguish between two major sets of objectives: i) the ongoing needs, identified also by the analysis, that has to be addressed with specific timeline and goals in the upcoming period[383] and ii) interventions, approaches and stimuli bringing closer the moment when vision of 'functionally literate, innovative, socially responsible and active citizens, motivated to upgrade their competencies through lifelong learning'[384] becomes reality.
PE 2021—2027 might (i)strengthen and address more specifically pre-school longer-term objectives that contribute to policy goals (under Priority 2) and developmental/LLL approach (under Priority 1) and (ii) plan stronger requirements to the system on ongoing challenges as preschool coverage and early competences. Already introduced instruments focused on *retention* and prevention of early school leaving that showed encouraging potential on the level of design and scope need to be evaluated in terms of sustainability of impact, especially with respect to *retention*. Adjusting the instruments to safeguard durable effects, though, has to be considered as an inevitable (technical) challenge, not a reason for not deploy further the respective instruments.[385] However, even if such interventions are supported in the upcoming period by ESF funding, structurally they belong to the standard toolkit of MES safeguarding the routine functioning of the (pre-school) education system. Admitting the link between retention and inclusion requires to recognise the role of early learning outcomes and fostering competences. The practice to synergise pre-school educational inclusion (also) though early learning outcomes needs to be sustained.[386] Newly emerging needs, developments and opportunities, such as the *green* and the *digital agendas* have to find *specific place in the ESF programming*, to stimulate Bulgarian preschool education to develop and access adaptation measures on par with other stakeholders.

PE 2021—2027 planned broad-spectrum '*operation of strategic importance*'[387] focused on pre-school education needs to address explicitly the need to measure effects on system and institution level and thoroughly to monitor and address early learning outcomes and COVID influenced learning loss for all pre-school children. The envisaged SLP, addressing 'General and additional support for personal development in pre-school education',[388] with an intention to build upon and upgrade the

381 Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)
382 Draft Program Education (2021-2027)
383 As an example here, also in relation with dealing with past re-appearing past challenges, might serve an upgrade of the 'target' (3.1) of '[o]vercoming regional, socio-economic and other barriers to access to education' to 'safeguarding universal and equal access to pre-school education that safeguards enhancing the potential of the children to advance their holistic development and early learning outcomes'. Source: Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)
384 Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)
385 Such, as for example, the Mechanism.
386 See for example the very first recommendation in the section Pre-school Policy Implementation and Policy Mix.
387 Draft Operational Program Education Priority 1 — Inclusive Education and Educational Integration
388 Ibid.

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activities of the ongoing SLP *Active Inclusion in the Pre-school Education System* and provisional allocation of more than BGN 125 million has to be ensured in its entirety. With the envisaged broad spectrum of challenges to be addressed a well-designed intervention should seek a sustainable systemic approach and related impact encompassing the key pre-school policy areas. While safeguarding the provisionally planned activities at least one more intervention area needs to be added. The clearly identified by the analysis necessity to measure the effects of pre-school education *on all children* especially regarding *early learning outcomes* has to be addressed with priority. The pre-school education needs to launch and maintain, in accordance with the ambitions stated in Strategy 2030, and throughout all investments and policy steps, ongoing coherent measuring on its impact and respectively adapting interventions not just for vulnerable groups but for all children in order to fulfil meaningfully the norms of SES on Pre-school Education that define its functions.[389] PE could specify more the strategic impact on preschool education. In addition, the PE draft could be much more specific on the strategic operations on both Priority 1 and 2 to specify the key operations that will seek for policy development. While under Priority 1 (SO v) the program is repeating the present legislative scope of general and additional support, it is important to specify the approach and key value added of ESF investments on those policy instruments.

The upcoming PE 2021-2027 could propose more specific to the pre-school interventions within the 'introduction of innovative forms of governance, training and learning environment, the use of innovative teaching methods, the development of innovative learning content, curricula and educational plans'.[390] The program is replicating the 2014-2020 trend of packing pre-school education with school education. The program could be more specific and it is recommendable more separate, pre-school explicit interventions to be planned.

Institutional capacity development and accountability of both pre-school and school institutions has been introduced, but the system needs to establish strong systemic plan on institutional level support, management and accountability policies. MES learning accountability policies seems to be underdeveloped and relying on the external evaluation introduced by PSEA (external Inspectorate on Education). At the same time, with respect to accountability and institutional developments the system needs to improve its focus on and efforts to contribute to competence-based learning ambitions. With respect to pre-school education, further capacity building is needed in i) enabling the pre-schools to address set policy goals; ii) accountability; iii) fostering leadership; iv) acquiring and managing additional funding (also through competitive procedures).

Preschool institution capacity to develop, manage, plan and implement project-based activities needs to be supported and addressed through funding opportunities that stimulate whole institutional development. Both NPDE and OPSESG investment programs, demonstrated the need to strengthen the overall capacity of the pre-schools and specifically their ability to implement complex investment projects that address policy tasks. Overall pre-schools need both:

- Easy access to new type of block of national funds (instead to fragmented and small NDPE), that address a complex of pertinent needs steaming from systemic issues, that are easy to access and not fragmented to the level of actions and bureaucracy as currently the NDPE are offering;
- Implementation and design support for more complex investments that will allow to follow the ESF standards and develop investments that contribute the policy visions and development needs.
- Competitive procedures aiming specifically to foster testing and piloting front-leading concepts in preschool blended with the essentially needed system level projects that stimulate system level policy advancements.

389 To remind according to Ordinance #5 on Pre-school Education the system of pre-school education has to contribute to the early learning outcomes and the holistic development of the child.
390 Draft PE, Priority 2 – Modernization and Quality of Education

Overall, the PE and NPDE approach to innovations needs to be better aligned with the Strategy 2030 calls for wide stakeholder-participation approach and needs to promote open approach to ideas funding. This topic could blend competitive and systemic funding to foster interest to front-lead education innovations. In addition, the PE should open beneficiary scope to more actors outside the educational system including reinventing and adapting approaches created outside the domain of education.

PE and NPDE should launch a wider beneficiary scope to all pre-school policy specific interventions that accommodate and stimulate nursery and ECEC-agent participation and guarantee access to funding and policy development opportunities. While the policy gaps, the low links to ECEC as demonstrated in the report are calling for such investments, and the Strategy 2030 recognized the needs and calls for actions, PE is not clearly fostering investments in this direction.

Managing the enrolment capacity of the pre-school education system has to be addressed not only with respect to access (availability, affordability) but also accounting for external to the education system developments (such as generally declining but simultaneously mobile demand) that might require utilizing softer approaches. Maintaining preschool coverage efficiently should turn itself from an urgent policy objective into a routine managerial function of the pre-school education system. In an environment characterized by strong influence of external factors (such as demographic trends, including internal migration, overwhelming certain location while 'emptying' others), addressing externally generated disbalances might need to be addressed by re-examining and re-designing existing measures. Here on one hand, it might be needed to coordinate key pre-school policy areas (e.g., universal coverage, equality of access, holistic development and early learning outcomes, safeguarding rights of the child) while at the same time a complex policy approach spanning over several regulatory and intervention approaches might be required (normative amendments, adaptation of the interventions, collaboration with other sectors and stakeholders).

Specific targets to PE 2021-2027 investments addressing preschool coverage need to be reconsidered and justified to guarantee that relevant strategic goals are set. Based on the current proposal it seems that Bulgaria tends to prolong solving major issues related to coverage for yet another programming period. This system level problem needs to be systematically approached and solved within the strategic period with a primarily goal to minimize coverage gap. The current target indicator is stepping back from 2014-2020 goals and is signalling for the need to draw a clear requirement for the system to develop adequate answers to pre-school coverage specifics.

The attention paid on the transition between pre-school and school education in the Education Strategy 2021-2030 has to be continuously translated into policy interventions and extended to cover the transition from ECEC setting preceding pre-school education. The necessity to manage transitions within to education system, including between pre-school and school education, as well as from family environment towards pre-schools is duly noted in the Education Strategy 2021-2030. The way the transitions within the education system and from the family environment to pre-schools are referred to in the strategy allows to assume with high degree of the confidence that the respective modules in the now existing NP Caring Together for The Pupil and NP We Succeed Together will be preserved and most probably extended. Optimally within the upcoming decade they might be mainstreamed and embedded to the extend to become part of the routine functioning of the pre-school education system. The strategy indirectly addresses the transition from nurseries to pre-schools and although at the moment it concerns less than one fifth of the Bulgarian children, it is expected that the relative proportion of these children will grow significantly and quickly if Bulgaria is to meet the respective EU objectives.

PE and NPDE workforce investments need to foster targeted approach to pre-school workforce with specific thematic, coverage and knowledge application goals. For this the PE could introduce

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(i)a specific approach addressing the choice that workforce qualification activities that span across workforce training interventions; (ii) pilot a specific monitoring tool that is focused to provide information and support to workforce and the system to measure classroom application of specific prioritized trainings and based on this to develop a basic trials and approaches on assessing and managing impacts on child development and early learning outcomes; (iii) expand beneficiaries to ECEC professionals (nurseries and other relevant ECEC professionals) that needs to be addressed equally with qualification activities focused to ECEC continuous professional development needs. Preschool needs to apply a fostered attention and instrument to address the opportunity of younger, and probably more open to novelties workforce. Data are demonstrating that pre-school was able to attract and maintain much balanced age profile of teachers.

Data collection and specific system and institution level projects are needed to address Green agenda during 2021-2030. Both national funding and OPE 2021-2027 are not presenting specific policy approaches in this direction to revel what will differentiate from the fragmented approach until now. Preschool needs specific efforts starting from diligent data analysis, institution level stimulus, infrastructure investments, direct learning environment reconsideration, funding for experiments and collection of ideas. Informing dimensional policy aspects will be a priority need. MES could refer to World Bank recommendations on climate change adaptation strategies for education (2018) that address system, content and institutional level measures to address adaptation strategies and related green policy steps. Strategy 2030 approach needs to be consolidated and focused to ensure a stable base for green and sustainable development policies in education that overpass investment in infrastructure and influence broadly and proactively education process and environment.

It is recommendable MES to develop a specific concept for direct learning environments (DLE) in ECEC and pre-school and to integrate it into pre-school education policy programs. DLE lack a specific concept targeting learning and has been overfocused on investment in furniture rather than on developing learning environment conducive to preschool goals. The WB mapping of DLE provided to MES in 2020 indicate the need to monitor and foster conceptual investments in DLE, foster experimental work, systematically collect information on basic DLE elements and integrate education concepts in pure infrastructure investments. The World Bank team proposed a classification of all education institutions, based on DLE profile to be integrated in PE 2021-2027 approach and allow for access to specific packages of funds, that stimulate institutions to develop DLE conceptually in respond to their education policy investments. ESF regulations on DLE investment could positively support that process as the limitation to focused funding that directly contributes to activities could act as a focused stimulus for education institutions in Bulgaria to address direct learning environments through conceptual education needs and targets. The data set and group analysis are provided to MES with the Direct learning Environment Mapping report.

Both Education Strategy 2030 and PE 2021-2027 need to develop, in addition to basic indicators addressing EU and international comparative measurement, a set of Bulgarian policy specific indicators that will allow targeted monitoring of a list of education components to inform policy management in short-, mid- and long-term developments. Reach and sustainable data maintenance is an obligatory requirement for OECD membership that Bulgaria is aiming for. The lack of sustainable country specific data that are focused to the whole spectrum of education outcomes and processes and the fragmented approach for data collection and management is complicating and negatively affecting Bulgaria efforts for accessing OECD. Special and targeted efforts should be developed at both national policy and OP level to complement the narrow approach to evidencing outcomes. The system of preschool education needs a coherent and sustainable system of monitoring and evaluation to compliment and gradually replace the numerous but scattered and uncoordinated monitoring procedures and approaches. Such intervention requires system level investment and logically needs to be planned under SLP. In addition, to address the Strategy call for priority topics as competences, green agenda,

digitalization, ECEC bridges to education/preschool and other MES could enlarge and enrich the indicators to target specifically developments across the key priority system topics.

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GENERAL EDUCATION IN BULGARIA

The review of the general education policies is aiming to provide support to MES (in consultation with the Executive Agency Operational Programme Science and Education for Smart Growth (EAOPSESG) in their progress towards the preparation of the implementation of Education Strategy 2030, fulfilling the enabling conditions for the EU programming period 2021-2027 in the field of education and to support their planning for the OP for Education 2021-2027. A snapshot of Bulgarian general education's current situation and key recommendations in the context of the 2021-2030 sector strategy and operational programs are provided. The review follows the general education developments and efforts towards providing high-quality education to all students, school optimization progress and is addressing the important agenda in the context of poor performance as evidenced by the 47 percent of 15-year-old students functionally innumerate and illiterate as measured by the OECD PISA 2018, possibly aggravated by the COVID-19 pandemic and generating further learning losses and affecting the human capital in the long run.

The analysis focuses on (i) access, especially early school leaving challenges and the gap between big urban- cities, small urban-towns and suburbs, and rural areas, (ii) quality, mainly flagging curriculum implementation challenges, learning outcomes and teachers' competencies; (iii) equity and inclusion, discussing vulnerable students, schools and the Government efforts to support them; (iv) relevance of skills for productivity, including the importance of incentives to motivate both teachers and students for a rapid response translated into longer-term learning outcomes connected to the labour market and economy, and finally (v) governance and management, highlighting an increased financing level in education but also monitoring and evaluation challenges and the need for informed decision making.

Key recommendations are provided based on findings related to the increased achievement gap and the current pandemic's shock, expected to cause an increase in the rate of school dropouts in the medium term, particularly for disadvantaged students. Such recommendations are provided for two levels. Firstly, for the strategic level, recommendations are focusing on the need to (i) invest more and smarter in building human capital, (ii) to improve teaching, increase learning outcomes and teacher competencies, to increase the efficiency and effectiveness of spending through equitable budget allocation, (iii) the linkage between policy intent and policy implementation through programs, better human resource management, and school autonomy, as well as through digitalization and bringing innovative teaching practices into reality. Second, the recommendations target the program level with a medium-term approach, especially for programs focusing on vulnerable learners and vulnerable schools to support students, preventing early school leaving and dropout and increasing performance and learning outcomes in order to address both the COVID19 effects and negative legacy of the education system.

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Guiding policies, vision, and priorities

Inclusion policies and the evidence-based approach to policy decisions addressing smartly and efficiently learning are the transversal elements of the Strategic Framework for the Development of Education, Training, and Learning in the Republic of Bulgaria (2021 - 2030) developed by the Ministry of Education and Science. The priority interventions are focusing on skills and talents, motivated and creative teachers, inclusion, digital transition, future jobs, lifelong learning, governance, management, and collaboration. Variety of stakeholders and funds are considered by the strategic approach for education amongst which state-budget, ESF, EEA Grants, Swiss Cooperation, Erasmus program and others. There are three actors relevant to teaching and learning: students, teachers, and learning environments.

Technical complexities and multiple simultaneous priorities constantly pull education systems out of alignment with learning[391]. Various parts of the system need to be aligned toward prioritizing learning among other sectors like health, jobs or social protection. The new curriculum, aimed at increasing emphasis on active learning and creative thinking, will depend on (i) teachers trained to use more active learning methods and care enough to change; all education actors need to join forces in the same direction. Pandemic worsens the situation as health and jobs are also priorities, and together with education, integrated investments in the three areas will have a high impact on the longer-term; (ii) clear commitments that bridge the growing divide between prospering and those who are left behind, and (iii) closing the access to education gap. Bulgaria has undertaken steps in this direction[392] but needs to keep the learning promise under the Strategic Framework and invest more and invest smartly in its future. The full realization of the education agenda requires sustained, innovative, and well-targeted financing and improved focus to efficiency of implementation arrangements for achieving quality learning for all students at all levels.

Key challenges and policy interventions

Student access and completion

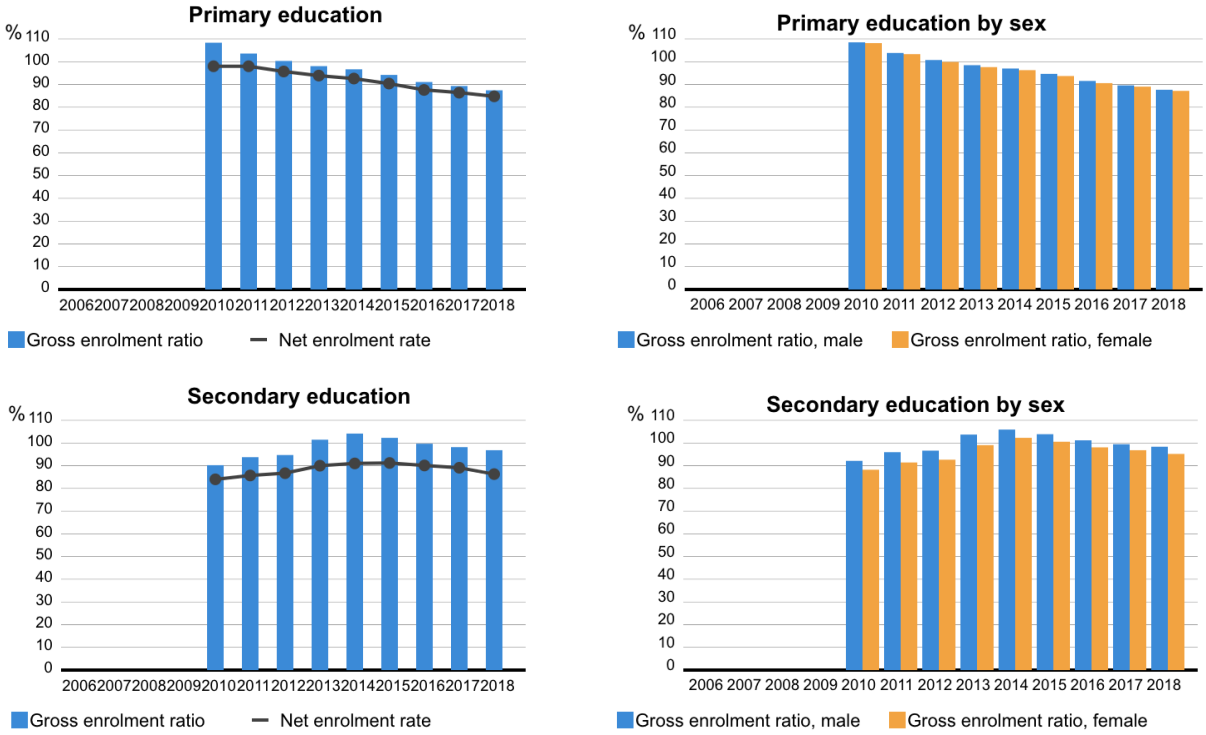
The Strategic Framework states that increasing enrolment and retention of children and students in compulsory pre-school and school education is a key priority. At the same time, reducing the proportion of school dropouts and early school leavers (ESL) are among the most important targets for recent education policies.

Participation in general education in Bulgaria has been declining in recent years. While net enrolment rates in primary education were nearly 100 percent in 2010, by 2018, that had decreased to fewer than 90 percent, and this decline has concerned both boys and girls (Figure 36). Enrolment in secondary education had been improving from 2010 until 2014, when it reached 91 percent. Yet, since then, it gradually declined, and in 2018 it was 86 percent. These figures do not consider the percentage of children who have been born in Bulgaria but live with their families abroad at present. Enrolments rates for female students in secondary education are lower than for males throughout the period.

391 The World Development Report 2018—LEARNING to Realize Education's Promise. https://www.worldbank.org/en/publication/wdr2018

392 General education is under significant reform at present following the Pre-school and School Education Law introduction in 2016. Among its key features, this Law reaffirms the committment for obligatory pre-school education, redefined secondary education structure in two stages: the first stage of upper secondary education up to 10th grade and the second stage of upper secondary education up to 12th grade. The law regulated quality management and set out the replacement of State Education Requirement with State Education Standards which are to be defined in learning outcomes terms and introduced a significant curricular reform to align them with competence-based learning.

Figure 36 Enrolment rates primary and secondary education in Bulgaria, total and by sex



Source: World Bank Staff calculation based on data extracted from Unesco Institute of Statistics (UIS) database http://data.uis.unesco.org/), 2020

In a post-2020 agenda, it can be observed that many EEA countries have not achieved ESL national targets set for 2020, including Bulgaria. This is the best argument for continuing the development of policies, programs, and actions to tackle ESL and achieve the target in the long term with two conditions: better targeting and integrated intervention. Reducing ESL is essential for achieving several key European and national objectives, including smart growth, by improving education and training levels, and inclusive growth, by focusing on ESL as a major risk factor for unemployment, poverty, and social exclusion. Even the goal of sustained growth emphasizes resource efficiency, environmental sustainability, and competitiveness, which is affected by ESL, compromising competitiveness. Upgrading the skills of its population and reducing ESL should continue as a key priority for Bulgaria.

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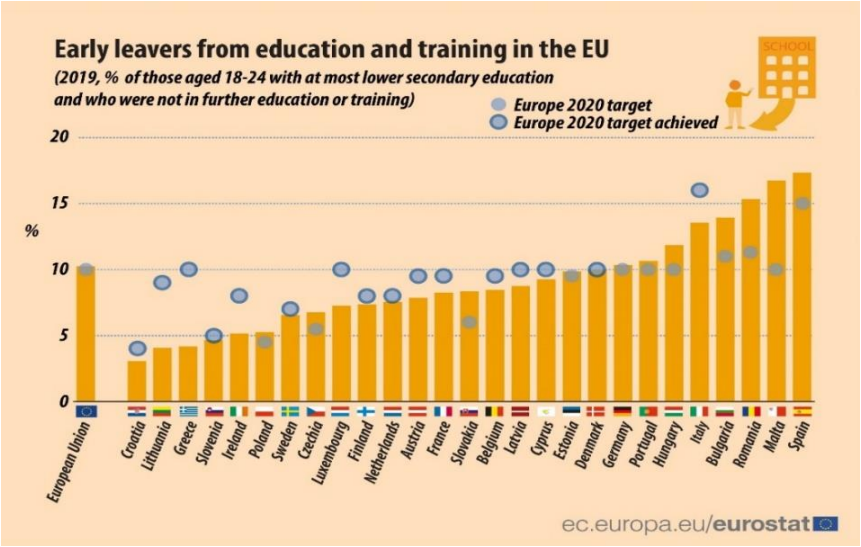
Figure 37 ESL rates and targets in Europe



Source: Eurostat 2020, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Early_leavers_2019-01.jpg

From 2013 to 2019, the ESL's evolution was discontinuous, increasing from 2013 (12.5%) to 13.9%, 2016). In 2017 this negative trend was interrupted, and the decline was reported by 1.1 percentage points, close to the value of 2013 (12.7%). In 2018, the percentage ratio was maintained, but in 2019 there is again an increase to 13.9%. In this period, the share of ESL on average for EU countries shows a steady and stable downward trend - from 11.9% in 2013 to 10.30% in 2019, approaching the target value - 10%.

The increase by 1.2 percentage points in 2019 is explained in the Ministry of Education's policy documents by several interruptions in the educational process during the year due to announced flu holidays. The migration of children and students of compulsory preschool and school-age with their parents working outside the country. One positive step is that as part of the mechanism for cooperation among institutions for inclusion in the educational system of children and students in pre-school and school-age data on children not in the education system because of going abroad was collected (see figure 38)

Implementing the mechanism for cooperation among institutions for inclusion in children and students' educational system in pre-school and school-age gave short-term positive results—the number of students not covered by the education system reduced in almost all cohorts. The chart below presents the reduction of those not enrolled or dropped out from 2018 to 2020.

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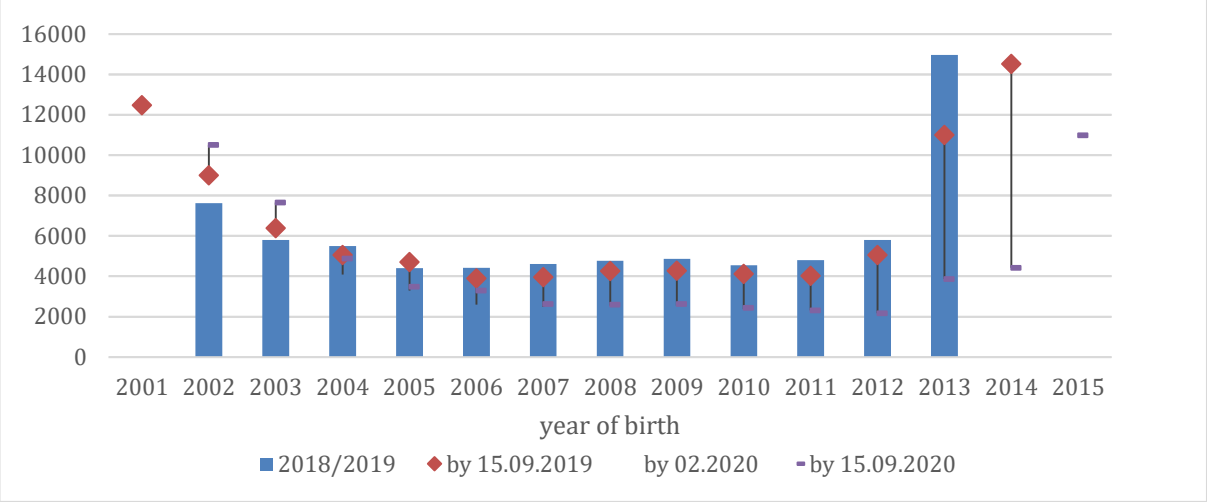
Figure 38 Not covered (not enrolled and dropped out) children and students by cohorts (year of birth)



Source: MES report on the mechanism for cooperation among institutions for inclusion in the educational system of children and students in pre-school and school-age

Comparable to Turkey, Romania, Spain, Bulgaria is better placed, not necessary with all other countries. Bulgaria students leave school early for various reasons, including personal, family, school, and social factors. The analysis of the drop-out factors in education, based on the information system of national mechanism for addressing drop-outs of MES, reveals that the cultural specifics (34-56 percent) are leading (associated with lack of interest, lack of support from family), followed by economic factors (10-14 percent[393] between the years) and specific education related reasons. International evidence on ESL indicates that there is typically more than one factor that has led a young person to decide to leave school early. In general, it is the outcome of a progressive and cumulative process of disengagement. On the demand side, ESL can be triggered by problems related to young people's personal, health, or emotional difficulties. It can be associated with the socioeconomic or family backgrounds of students. For some young people, the opportunity cost of remaining in school is too high, and they leave to pursue employment or other specific opportunities outside school. Supply-side factors also explain ESL as limited access to quality education or preferred choice of study, perhaps due to the rigid education structure, which may lead young people to drop out. Problems with the course of study or the school environment that should be conducive to learning, especially relationships with teachers and other students that should be enabled by a positive climate, are important as well.

ESL is often linked to parents trans frontier movements work that is hard to be recorded. The lack of data exchange among the Member States on the continuity of education in other schools makes children be considered dropout from a national system when they enroll in another country. It is difficult to assess data and also to record them as a non-resident population timely, and it correlates with data fluctuation mentioned above. This trend is very common for Bulgaria and other EEA countries.

The Eurostat definition of ESL is - Early Leaver from Education and Training, previously named early school leaver, refers to a person aged 18 to 24 who has completed at most lower secondary education and is not involved in further education or training. The indicator 'early leavers from education and training' is expressed as a percentage of the people aged 18 to 24 out of the total resident population aged 18 to 24. For Eurostat statistical purposes, an early leaver from education and training is operationally defined as a person aged 18 to 24 recorded in the Labour force survey (LFS):

[393] Based on MES information (June 2021)

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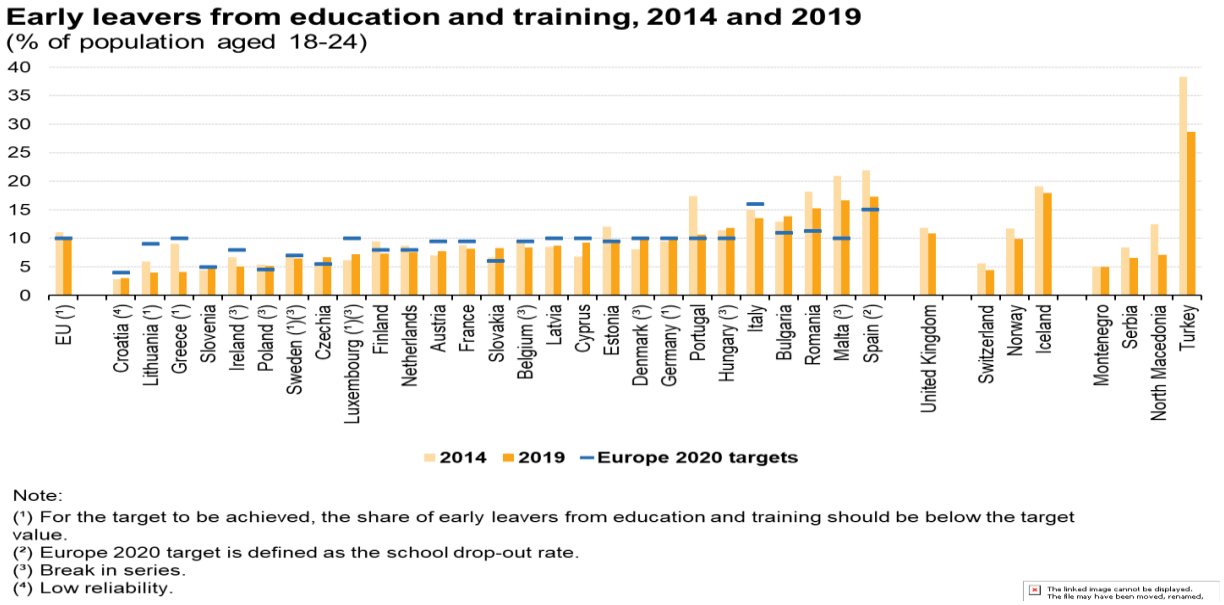
- whose highest level of education or training attained is at most the lower secondary education. At most lower secondary education refers to ISCED (International Standard Classification of Education) 2011 level 0-2 for data from 2014 onwards and ISCED 1997 level 0-3C short for data up to 2013;
- who received no education or training (neither formal nor non-formal) in the four weeks preceding the survey

The question asked in the LFS from 2017 to aggregate this indicator every three months is in the section on Education and Training, and those who have between 18 and 24 and respond that have no primary or only primary education are recorded as ESL (see Table 8 below)

72.	Which is the highest level of education that you have graduated from? - has no primary education....
	- primary
	- basic education (lower secondary)
	- vocational education after completion of Grades 6th or 7th /1st level vocational qualification
	- vocational education after completion of basic education/1st level vocational qualification
	- secondary general
	- secondary technical or vocational education/3rd or 2nd level vocational qualification
	- post-secondary non-tertiary education/4th level vocational qualification
	- higher - degree Professional bachelor /Specialist
	- higher - degree Bachelor
	- higher - degree Master
	- higher - degree Doctor

Figure 39 ESL per European country between 2014 and 2019



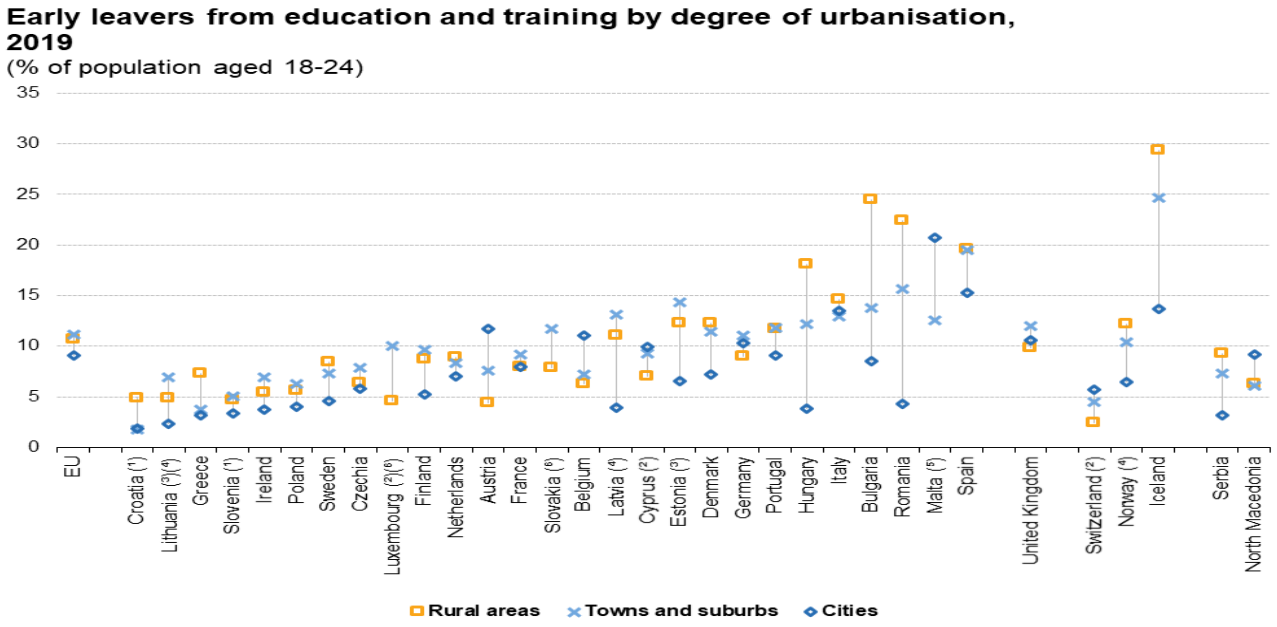
Note:
(1) For the target to be achieved, the share of early leavers from education and training should be below the target value.
(2) Europe 2020 target is defined as the school drop-out rate.
(3) Break in series.
(4) Low reliability.

Source: Eurostat, 2021 (online data code edat_lfse_14)

There is a consistent gap between big urban- cities, small urban-towns and suburbs, and rural areas. The big gap is comparable to the one in neighbouring countries but in opposition to the uniformity

found in many European countries. This inequality is persistent in the past five years compared with the European Union, where the situation is much more equitable, and the rates are quite close to one another, and the target is almost reached. It may be explained by the historical difference in the degree of development but also probably different access to quality education. This high rate of ESL at secondary education is likely the main problem related to losing good job opportunities for young people, which eventually negatively impacts the country's economic growth. The reasons for ESL are complex and combine different layers of personal, social, and economic factors; however, limited access to quality education likely plays a key role. There is further quality segregation between rural and urban schools, as schools in rural areas do not have the necessary funds or needed infrastructure to attract enough full-time qualified teachers.

Figure 40 Early leavers by rural areas, towns and suburbs, and cities



Note: ranked on overall share of early leavers. Montenegro and Turkey not available.
(1) Low reliability.
(2) Rural areas: low reliability.
(3) Towns and suburbs: low reliability.
(4) Cities: low reliability.
(5) Rural areas: not available due to a very low reliability.
(6) Cities: not available due to a very low reliability.
Source: Eurostat 2021 (online data code edat_lfse_30)

Looking in more depth at the trends between 2014 and 2019, we may find surprising findings. Bulgaria's most significant problem is illustrated in the figure below: the inequality between cities, towns, and rural areas. Some progress can be noted in the last years, and the gap between ESL rates in cities and rural areas decreased from 26 percent in 2014 to 16 in 2019. This trend is not based on a strong progress in rural areas, but rather on the negative evolution of the indicator in urban areas. With cities having a lack of progress, but not a negative trend (as in the case of small urban areas), the decrease by area of residence would have been much smaller. At the same time certain (although limited) progress can be observed in the rural areas - mainly due to the infusion of EU funds under education-related OPs.[394] The ESL rate in rural areas decreased by 4 percent, in small urban areas

[394] The MES system projects "Your Lesson", "Support for Success" reached rural schools and supported the decrease of drop-outs and ESLs.

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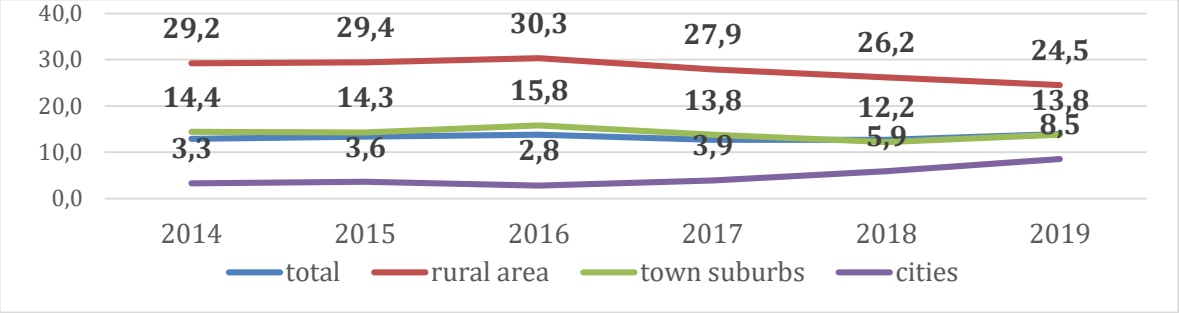
remained the same, and more than doubled in cities. The average ESL rate increased slightly between 2014 and 2019 at the national level, explained by the city's deterioration.

Figure 41 ESL rate per urbanization degree between 2014 and 2019 in Bulgaria

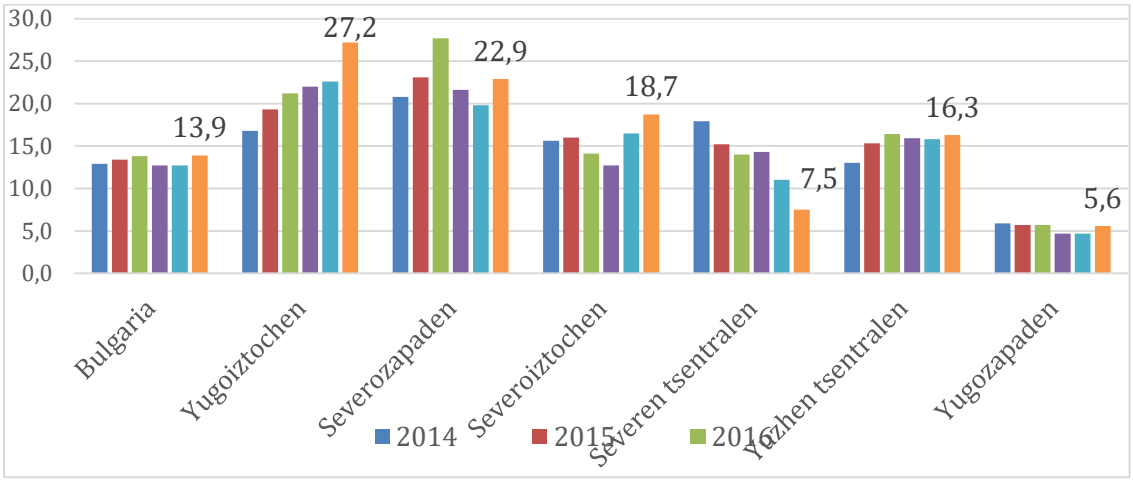


Source: World Bank staff calculation based on Eurostat 2020 (Early leavers from education and training by sex and degree of urbanisation [edat_lfse_30])

Looking at the regional level, there is a high variation and disparities among regions. The constant increase over the years in the Yugoiztochen area contrasts with a constant decrease in Severen Tsentralen, while Yuzhen Tsentralen and Yugozapaden remain unchanged. Remote (mountains) and rural areas are problem areas as they have low-density populations. Geographical isolation, poor transportation accessibility, remoteness from employers, and access to services create regional development disparities.

The second dimension that suppliments the geographical one is demographic decline triggered by migration, aging, and low birth rates. As a result, the economic activity is limited; living standards are low, depopulation makes the areas socially decline, and becomes unattractive to business. Existing regional disparities and needs for a skilled workforce should be addressed by supporting increased education and training system flexibility. Provision of Second Chance (SC) programs, work-based learning, and strong vocational schooling, in a flexible approach and permeable paths will stimulate investment and development in the region. More research should investigate how this environment may affect factors such as lack of grit (positive mindset) in the neighborhood population derived from low opportunities in the area and correlated with remoteness and other social layers that affect learning outcomes.

Figure 42 ESL rate per Bulgarian regions between 2014 and 2019



Source: NSI

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Examples of European projects targeting ESL reduction

Austria: Youth coaching program, *Jugendcoaching* started in 2012 as a pilot project in two Austrian provinces (Vienna and Styria) and was implemented nationwide in 2013. The program was developed by the Ministry of Social Affairs and the Ministry of Education to offer individual consultation and guidance on a free and voluntary basis, to reduce early school leaving and provide students with the support to choose their educational path and future career. It is funded by the Ministry of Social Affairs and receives financial support from the ESF. The program targets students in the age group 14 to 19 and youth with special educational needs till the age of 24. Teachers, or other appointed personnel, identify student-at-risk of dropout and coordinate with the youth coaching program. The coaching process has 3 stages: **Stage 1** First conversation - An informal initial consultation with a trained coach (social worker or psychologist) is set. The coach provides information and advice and assesses the need for further intervention. **Stage 2** Additional consultation - the program offers additional consultation sessions (up to 3 months) when further assistance/monitoring are required. **Stage 3** Case management - coach develops an individual plan with targets and support measures for students dealing with more complex problems. The coach closely monitors implementation of the plan and offers support.

Stop Dropout! Project. The project includes tools, to help teachers and counselors identify at risk individuals, evaluate their needs and provide them with flexible support. The project aims at reducing the dropout rates of young learners in vocational education and training. The project is co-financed by the European social fund. There are three components: (1) the **Risk Detector**, an interactive electronic tool designed to identify students at risk of failure or dropping out. Students learning and behavioral strengths and weaknesses are evaluated along with an assessment of the most appropriate support to be delivered; (2) the **Personal Profile**, is an interview process that implicates the learning in the definition of his/her own strengths and weaknesses and in defining their goals; (3) the **Flexible Prevention and Support System** no only helps prevent ESL but supports those who have already dropped out. It is a partnership between the professionals, communities and the individual student and it is highly individualized.

The Netherlands: *Medical advice for sick-reported students (MASS)*
The project is spread over 13 municipalities and it targets students in primary and secondary education. The aim is to address school absenteeism due to sickness reporting (medical absenteeism) through early identification of students with high absenteeism due to medical reasons. Students are provided, in coordination with their parents, with medical advice and follow up from the youth healthcare physicians. Since the introduction of MASS, the level of absenteeism due to reported sickness decreased from 8.5 days in 12 school weeks to 4.9 days within a period of 12 months.

Getting started: Getting started is a program introduced in 2012 targeting young people aged 15-23. The project aims at providing students at risk of early school leaving and those who have already left, to continue education and enter the job market.
The program consists of 4 stages:

- ✓ A comprehensive diagnosis during which the students' specific issues are assessed and program goals are set
- ✓ Internship or education program with the focus of reintegration in normal school routine
- ✓ Developing skills and making use of the skills learned

A follow up period during which coaching sessions are limited and students function independently

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Poland. Forum Theater against Early School Leaving *(FOTEL)* targets students aged 13 to 16 to prevent early school leaving through using drama techniques to help students gain a deeper understanding of diverse issues/problems and their possible solutions. The project aims at improving school climate, motivating students and resolving conflict.
The social action *School without violence* includes workshops for teachers, publication of examples of good practice, advice and support, 'day without violence' celebrations in schools, volunteer week and a photo competition

Portugal. The program for Priority Intervention Educational Areas (TEIP) was launched in 1996 and it targets schools located in socially and economically disadvantaged areas. A second version of the program was implemented from 2006 having as main objective ESL reduction and fostering educational success. In 2012, a third version started reinforcing the second version objectives and highlighting the quality of the learning outcomes. At present, the TEIP program includes 137 school clusters representing 17 percent of total school clusters. All schools develop specific improvement plans, based on an agreement, between the school and school authorities, on measures, targets, evaluation and additional resources. The specific improvement plan covers four different areas: (i) support t to improve learning; (ii) management and organization of school clusters' measures; (iii) prevention of ESL, absenteeism and behavior, and (iv) school/families/community relations.

The Mais Sucesso Escolar (MSE) and Percursos Curriculares Alternativos (Alternative Curricula Pathways) program are run by the Ministry of Education and Science and have nationwide coverage. The TEIP and MSE programs have recently been extended covering over 25 percent of pupils and schools in Portugal. The main focus is on providing extra support to pupils (academic, personal, social) inside and outside the classroom in the form of mentoring/tutoring, intercultural mediation, guidance and vocational experiences. These include in-service teacher training, as well as parent and community involvement.
Moreover, interventions at family and community levels are carried out by dedicated NGOs operating in education deploying specially trained mediators to work in schools and provide support to students outside classes. Based on a well-established methodology, mediators help selected at-risk pupils develop their non-cognitive skills that will enhance their beliefs, self-esteem, conscientiousness and openness to experience, which are essential for school success.
The Integrated Program of Education and Training is dedicated to supporting early school leavers over 15 years old to complete lower secondary education. Dedicated second chance classes may be organized in regular schools, NGO´s, communities' facilities and enterprises. Each group has a full-time tutor and a small group of teachers develop a tailored curriculum with a high degree of flexibility and strong vocational focus. Students may enroll and complete their studies at any time of the year, while the duration depends on their own pace.

Sweden. Multi-disciplinary teams and individual action plans. All school personnel, including teachers, school psychologists and counselors, social pedagogues, career guidance practitioners, social workers, youth workers, are compelled to report to the head teacher if they identify a student at risk.
The head teacher has the responsibility to investigate if a student needs specific support and to ensure that an individualized action plan/program is set to address the problem.
In addition to the support staff available within school premises, schools must resort to any relevant external resource such as youth workers, social educators, or special education teachers, depending on the problem and risk factors.
Ongoing monitoring. Once students have entered a support program, their progress is monitored on an ongoing basis. Remedial interventions for young people who have dropped out of school proved effective in bringing students back to education. Such interventions worked through close follow up and intense individualized measures such as coaching and guidance, motivational and study support, social and skills training.

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Fines/penalties. Benefit payments may be withdrawn, or penalties imposed when truancy is recurrent. This method aims at placing greater responsibility on parents and upper secondary students to attend school. However, it is often not implemented as this approach doesn't take into consideration the broader issues that the student may be facing and the hardship that the penalties may exasperate.
Digital platform. Plug Innovation (www.pluginnovation.se) is the national digital cluster for dropout prevention. The platform gathers information, compares and assesses dropout prevention methods used in different projects, in order to share successes and help users identify the most effective practices in ESL prevention.

Out-of-school children

According to UNESCO, the number of out-of-school children and adolescents has been growing significantly in Bulgaria in the past years. As shown in Figure 43, the most significant increase occurred among children of primary age education. While in 2010, only 450 of them were recorded out of school, in 2018, this figure went up to almost 40,000. In adolescents' case, a remarkable improvement was registered between 2010 and 2014, when the number decreased from nearly 24,000 to 5.000. In 2018 the number increased again to 34,398.

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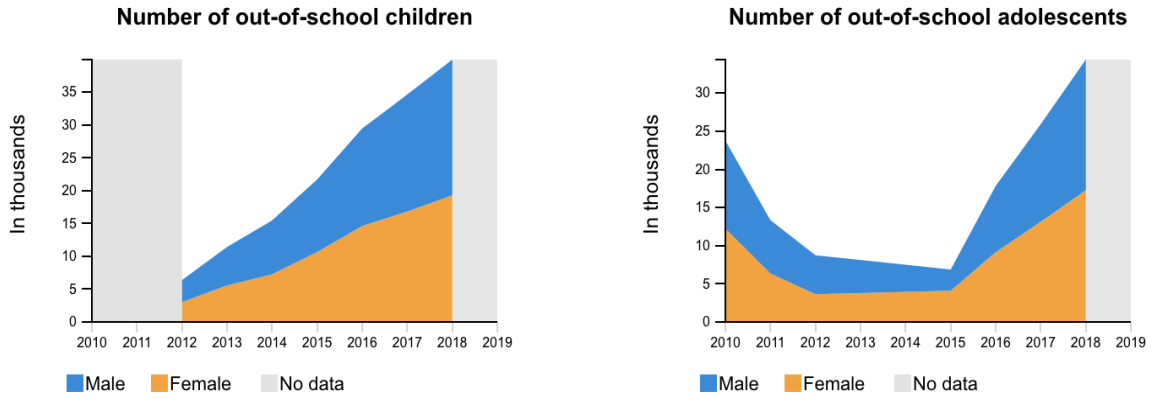
Figure 43 Out-of-school children and adolescents in Bulgaria



	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Out-of-school children										
Total	450	514	6,389	11,428	15,467	21,711	29,488	34,641	39,977	...
Female	...	...	3,047	5,547	7,251	10,662	14,626	16,813	19,315	...
Male	...	...	3,342	5,881	8,216	11,049	14,862	17,828	20,662	...
Out-of-school adolescents										
Total	23,796	13,367	8,731	582	539	6,885	17,827	25,925	34,398	...
Female	12,235	6,360	3,634	...	...	4,109	9,143	13,128	17,271	...
Male	11,561	7,007	5,097	...	...	2,776	8,684	12,797	17,127	...

Source: World Bank Staff calculation based on data extracted from Unesco Institute of Statistics (UIS) database http://data.uis.unesco.org/), 2020

The figures of out-of-school children and adolescents are higher, according to MES records. In September 2017, **MES** announced that 206,378 children and adolescents aged five to 18 are not enrolled in school. Furthermore, this figure does not include an additional 100,000 that are officially recorded abroad with their families.[395]

As a response, an inter-institutional program to address this issue was created and implemented. As part of this, 1,134 local teams were created[396] , and they carried out 216,904 home visits in identifying 197,659 out-of-school children. Around 23,898 children, 12 percent, have been enrolled back into school, but 2,124 dropped out again.[397] Nevertheless, the most significant success is regarding the children in the lowest age groups – 7,974 five-year-olds, 2,863 six-year-olds, who could be retained in school further and have better prospects of completing education. The number of reintegrated students who dropped out in previous years is significant – 7,741 – but their share is lower than estimated initially.

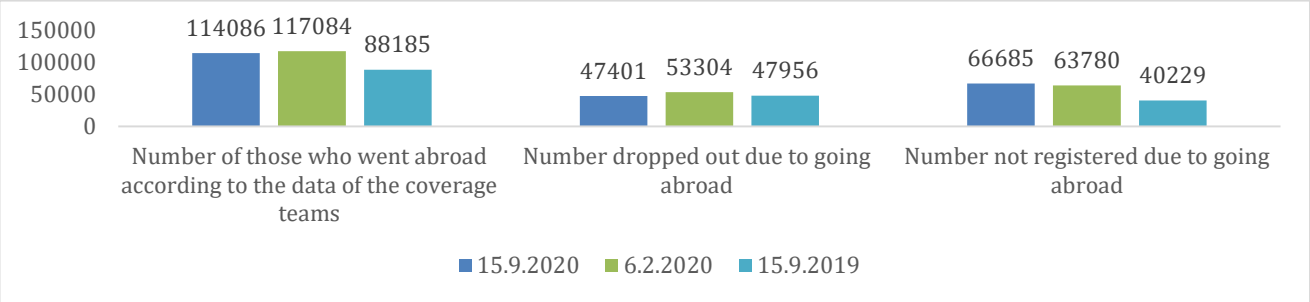
Data from the MES points out to even higher figures, and in July 2017, it announced that 206,378 children and adolescents aged 5 to 18 were not enrolled in school (including drop-outs). The MES-lead response of more than 1,300 local teams carried out home visits and enrolled for first time 52,104 school-aged children, out of which 2,386 dropped out again. Overall MES reports 26,732 children reintegrated in the system.

395 Data announced by the MES at the beginning of September 2017: see further information at https://www.mvr.bg/docs/librariesprovider70/%D0%B4%D0%BE%D0%BA%D1%83%D0%BC%D0%B5%D0%BD%D1%82%D0%B8-%D0%BE%D1%82-%D0%B4%D0%B5%D0%B9%D0%BD%D0%BE%D1%81%D1%82%D0%B8/mon-prevencia-deca.pdf?sfvrsn=2834cef4_0

396 Information from MES provided in June 2018

397 http://mon.bg/bg/news/3162

Figure 44 Students not in the education system because of going abroad



Source: MES report on the mechanism for cooperation among institutions for inclusion in the educational system of children and students in pre-school and school-age

The consecutive economic shock created by the current pandemic can increase the school dropout rate in the medium term, particularly for disadvantaged students. Students who fall behind in education will be demotivated and at a higher risk of dropping out of school. The loss in household incomes due to COVID-19 will also test households' ability to keep students in school, increasing out-of-school youth and early leavers, hindering tertiary education transition. Because of the pandemic outbreak, school closures and remote or online education are becoming an undeniable reality for education systems worldwide, creating tremendous challenges for ensuring all students can continue their daily lessons. Bulgaria has taken measures to continue education by assigned multi-sectoral teams to provide integrated support. In response to the pandemic MES introduced series of responses addressing the most vulnerable to distance learning[398]. Further improvements could be introduced to the engagement of parents and the local community in working with local teams, with focus on Roma, reconsider a compliance approach, introduce incentives and rewards, provide remedial support and strengthen the socio-emotional skills for these students. Inaccessibility to the Internet and digital devices may put disadvantaged students at a much higher risk of losing education opportunities. The ESL and dropout rates are likely to surge if the GoB takes no decisive intentional actions in responding to this crisis.

Although various interventions addressing drop-outs have been in place for many years, the drop of school and ESLs continue to be a serious challenge. Providing access and supporting learning of all children of compulsory school age has become a key political priority of the new GoB (since 2016). The need for support, in particular for categories at high risk of exclusion (children with a social and economic disadvantaged background, children with special education needs, Roma minority children), continues to be significant. The situation with the most vulnerable should be followed with priority especially in the context of the alarming PISA outcomes in 2018. The policy effects on Roma students, that are the regular representatives of vulnerable to education, needs more efforts. "The Situation of Roma in 11 Member States" survey by FRA and UNDP, undertaken in 2011, showed that only 68% of Roma children of obligatory school age in Bulgaria are enrolled.[399] In 2016, the EU-MIDIS-2 survey showed an improvement, but Roma enrolment is still below the national rate of 91%.[400] The survey also registered 67% of Roma as early school leavers (aged 18-24 years old with at most a lower secondary education and no further

[398] Free access to technical devices; free access to electronic content through establishment of free Wi-Fi connection for families with low socio-economic status; amendment in the regulation for school funding allowing the school budget to cover expenses for internet access to students; engaging the social workers and mediators in support activities to students that do not have access to electronic learning through distribution of teaching materials and maintaining communication between the school and the family.

[399] FRA 2014, Education: the situation of Roma in 11 Member States, p.18.

[400] FRA 2016, EU-MIDIS II, p.27.

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education or training) with significant gender differences: 57% of young Roma men vs. 77% of young Roma women.

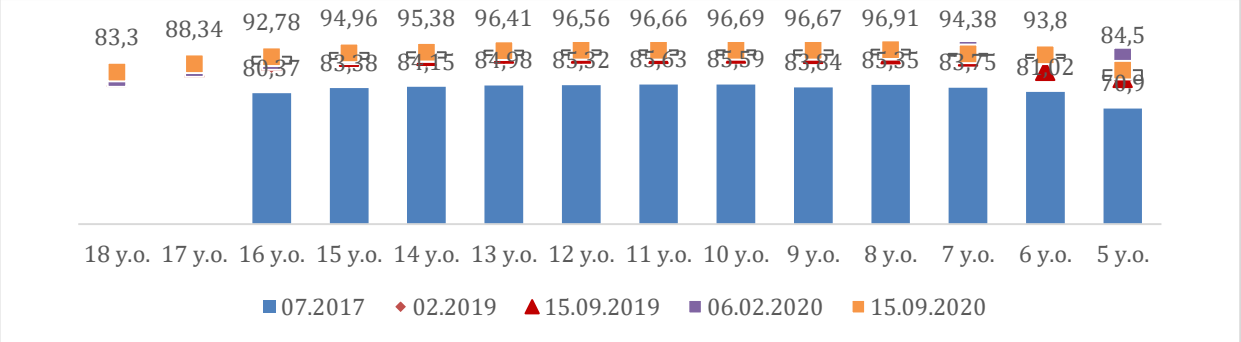
With Decision 373/5.7.2017 and later with Decree 100/8.6.2018, the Council of Ministers set up a multi-institutional framework for full enrolment. It contains a Mechanism, a Coordination Unit, and local, multi-institutional teams. The Mechanism[401] includes the key institutions delivering public social services for children and their families (educational, social care and health care, police, municipal authorities, etc.). Under the Mechanism, all the participant institutions formally cooperate to ensure every child attends school.[402] The Coordination Unit is set up at a high level, chaired by the deputy PM, and includes ministers of education, social policy, healthcare, interior, etc. Its principal function is to coordinate the Mechanism application at the central level and monitor the implementation of related measures. Since the central institutions have decentralized structures at the regional level, the Unit can provide horizontal coordination at the district and local levels.

The multi-institutional local teams are deployed at the catchment area level for a school or kindergarten. They include representatives from all local institutions with roles and responsibilities for children (including the police). The teams are expected to carry out activities to identify children who reside in the area and do not attend school, enrol them, and compensate for dropout or early school leaving already produced.

The setup of a multi-institutional framework with a Coordination Unit and local teams to be accountable for increased enrolment and at the same time to look at all facets of the issue, that can fall in different but interconnected areas such health and nutrition, social protection, or police, is an important element of the approach. Engaging a broad range of institutions (not only education) is a sign of cooperation, commitment, and political will to mobilize all institutional resources in the same direction. The deputy PM's envisaged high political engagement, Minister of education, and other ministers is a precondition for fulfilling the expected tasks, and it has the highest level of authority. Setting up multi-sectoral integrated local teams was key to implement the assignment.

The measures taken by the GoB gave good results, and the enrolment rate increased in all age groups, including 5-year-old children.

Figure 45 . Enrollment rate by age groups



Source: MES report on the mechanism for cooperation among institutions for inclusion in the educational system of children and students in pre-school and school-age

[401] Its full name is Mechanism for cooperation among institutions for inclusion in the educational system of children and students in pre-school and school age

[402] Decree 100/08.06.2018, Art. 3

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At the same time, the framework has some limitations that can be addressed in the immediate future to improve the function of the mechanism through a revised institutional arrangement and community approach. The limitations observed are:

- Stronger role could be provided to the local communities. Only optional engagement of parents and the local community representatives, such as mediators or local NGOs, is envisaged in working with the local teams. No engagement or consultations at the central level with parents or other civil society actors that represent the interest of the vulnerable target groups is provisioned. At the same time, it is widely recognized that parents' participation is mandatory to make full enrolment possible. The inclusion of parents in the mechanism at local and national level has the potential to strengthen it.
- The key challenge of the mechanism is that while touching upon serious social inclusion problems it has measures only in education without proposing a more relevant social package to families addressed. Overall, this is a missed big opportunity that was not developed at the latest stages of the mechanism. At present it stresses on specific measures that could have immediate effects but are problematic from a child- and family- wellbeing point of view: for example[403], it replaced family welfare benefits with cash to buy clothing and shoes and it strengthened administrative punishments for offenses related to attendance. Alternatives such as rewarding performance at school could be considered instead.
- The effectiveness and needs related to the current teaching and managerial practices in schools that enroll out-of-school children needs a focused review and support to fully reintegrating these children in their new educational path. The schools promote at large-scale individualized learning strategies[404]. All these measures are key for a successful enrollment, retainment, completion and transition to upper levels of education. Relevant CPD packages targeting specific support for teachers working with the most of need needs to be planned and provided.

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[403] (2) (Изм. - ДВ, бр. 82 от 2019 г.) Екипите за обхват по чл. 1, ал. 3, т. 1 координирано с директорите на съответните образователни институции предлагат на компетентните институции да предприемат допълнителни мерки с оглед на прилагане на комплексен подход, включващ и налагането на наказания от компетентните органи за неспазването на задълженията на родителите, настойниците/попечителите или лицата, които полагат грижи за детето и не осигуряват ежедневното присъствие на децата и учениците, по Закона за закрила на детето, по Закона за предучилищното и училищното образование и по Закона за борба с противообществените прояви на малолетни и непълнолетни, както и предоставянето на помощи в натура по реда на Закона за семейни помощи за деца и Правилника за прилагане на Закона за социално подпомагане (ДВ, бр. 133 от 1998 г.);

[404] Чл. 3а. (Нов - ДВ, бр. 82 от 2019 г.) За предотвратяване на отпадането от образователната система на деца и ученици в задължителна предучилищна и училищна възраст, които отсъстват по неуважителни причини от детска градина или училище, директорите на образователните институции организират участниците в екипите за обхват по чл. 3, ал. 11 и други лица за:

1. своевременно установяване на причините и прилагане на мерки за предотвратяване отсъствието на децата и учениците;
2. своевременно извършване на посещения по домовете на децата и учениците в риск от отпадане, за които се установи, че отсъстват от детската градина или училището без уважителни причини;
3. системно взаимодействие с родителите с цел мотивирането им за осигуряване на трайното присъствие на детето или ученика в образователната институция;
4. предлагане на мерки за обща и допълнителна подкрепа на децата и учениците в риск от отпадане по чл. 1, ал. 2 в съответствие с държавния образователен стандарт за приобщаващо образование;
5. предлагане на мерки за ангажиране на застрашените от отпадане ученици в училищния живот;
6. прилагане на целенасочени мерки за превенция на отпадането на учениците на прехода между VII и VIII клас;
7. проследяване на изпълнението и на резултатите от предприетите мерки за преодоляване отсъствието на децата и учениците по неуважителни причини и отразяването им в ИСРМ.

- Other barriers like financial ones (fees for kindergartens[405]) and local/abroad migration need to be part of the integrated package of support services to be delivered.
- It is essential to supplement the current assessments performed with tools that use learning measurement results and other socio-economic factors to spotlight hidden exclusions, make choices, and evaluate progress. One of the examples recommended by EC is SUCCESS AT SCHOOL ASSESSMENT TOOL (SASAT), a questionnaire about student perception on the school and learning process that can be applied twice per year[406].
- The Covid pandemic put into menace the main achievements of the mechanism. Most of the students reintegrated remain digitally excluded, having no proper access to devices or internet connection. According to expert assessment, the motivation of the vulnerable children and the family support needed for education are jeopardized and remote learning is estimated not to be efficient and will cause new dropout.

Existing challenges related to enrolment in pre-school education affect retention and completion in general education. Despite many efforts over the past decade, Bulgaria's general participation rate for children between age 4 and compulsory school age remains significantly below the EU average. as already indicated in the ECEC section of the report. The last amendment in the Preschool and School Education Law (from September 2020) came as a response to one of the key preschool attendance barriers and proposed important steps for abolishing the fees for preschool education. Overall, the investment in general education is low, in particular in relation to pre-primary and primary education. Higher education levels, particularly tertiary level expenditures, continue to have the main share in total education expenditures. While the spending on this level of education is close to the EU average, according to EUROSTAT data, the pre-school level equalled 0.7% of Bulgaria's GDP, less than half the 1.5% average across the EU. Fees and indirect/hidden costs remain a significant attendance barrier across all levels of education.

Transitions

All key EU recommendations highlight the importance of monitoring and adopting a clear strategy for transitions from one education level to another, key moments for continuing studies and prevention of dropout. Available data from the MES on the number of fourth-grade students at the beginning of the second term of the 2019/2020 school year and the number of students who have continued their studies during the 2020/2021 school year and are enrolled in fifth grade is presented in the table below.

Table 9. Transition rates primary to lower secondary (2019/2020)

№	Area	Number of students in daily form in 4th grade during the 2019/2020 school year	Number of students in day form in 4th grade during the 2019/2020 school year and continued their studies in 5th grade in daily form
	1	**2**	**3**
1	Blagoevgrad	3129	3092
2	Burgas	4438	4360

[405] Refer to ECEC section

[406] A recommendation of EC as good practice developed by Jasińska-Maciążek, A. & Tomaszewska-Pękała, H. (2017). Reducing early school leaving: toolkit for schools. How to identify and monitor students and schools in need of additional care and support. Warsaw: Faculty of Education, University of Warsaw.

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3	Varna	4715	4649
4	Veliko Tarnovo	1849	1829
5	Vidin	671	662
6	Vratsa	1552	1535
7	Gabrovo	827	822
8	Dobrich	1452	1425
9	Kardzhali	1311	1299
10	Kyustendil	1004	995
11	Lovech	1148	1104
12	Montana	1155	1119
13	Pazardzhik	2376	2312
14	Pernik	1096	1084
15	Pleven	2154	2110
16	Plovdiv	6454	6368
17	Razgrad	1063	1045
18	Ruse	1744	1724
19	Silistra	919	898
20	Sliven	2158	2089
21	Smolyan	901	898
22	Sofia city	12661	12507
23	Sofia Region	2228	2200
24	Stara Zagora	3149	3061
25	Targovishte	929	913
26	Haskovo	2118	2083
27	Shumen	1489	1474
28	Yambol	1145	1122
29	Others	29	26
	Total:	**65864**	**64805**

Source: World Bank staff calculation based on Ministry of Education and Science data, 2020

The regions with lower transitions rates in 5th grade are only few according to the map below.

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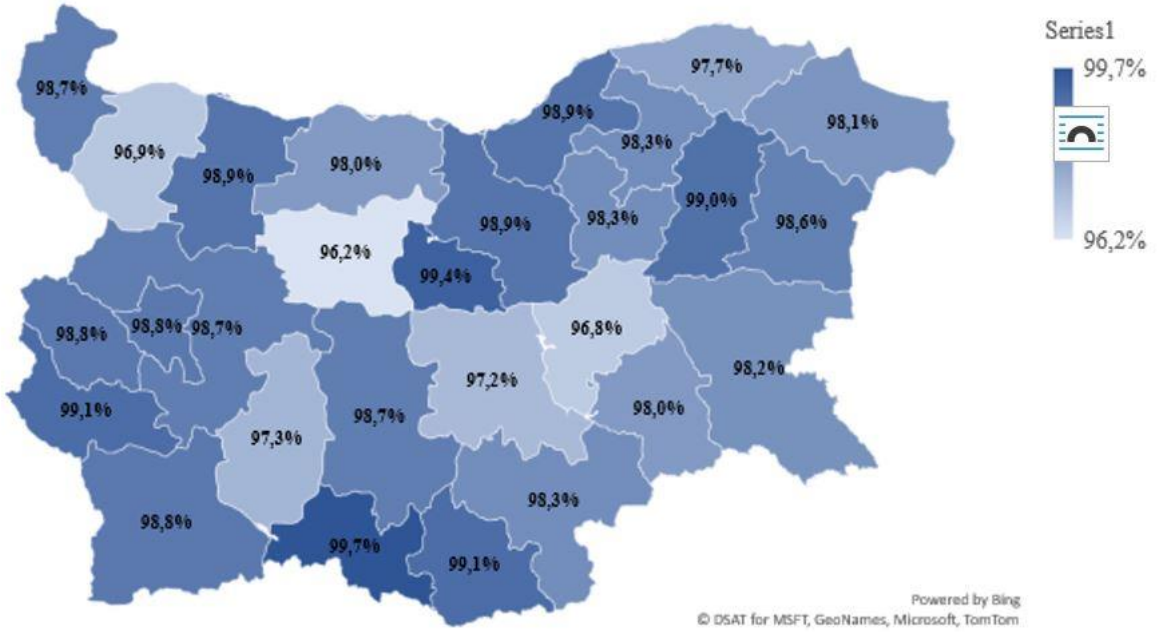

Source: World Bank staff calculation based on Ministry of Education and Science data, 2020.

The most important loss in the transition to an upper level of education occurs in the secondary education level. According to Ministry of Education data (2020), around 10% of students finishing the lower secondary education in a cohort do not continue their upper secondary studies (2019/2020). The loss in transition from primary to lower secondary is less significant (under 2%). An analysis by grades of the dropout rates also indicates higher values of the indicator in the first year of studies after the transition to the next education level. Consequently, the support measures need to target at the same time primary-lower secondary and lower secondary-upper secondary levels. Specific support measures entail close cooperation of school actors from both education levels.

Table 10. Transition rates from lower to upper secondary (2019/2020)

№	Area	Number of students in daily form in 7th grade in the 2017/2018 school year	Number of students enrolled in daily form in 7th grade in 2017/18 school year and continued their studies in 8th grade in daily form or dual during the 2018/19 school year
	1	2	3
1	Blagoevgrad	2832	2754
2	Burgas	3625	3321
3	Varna	3826	3573
4	Veliko Tarnovo	1753	1640
5	Vidin	749	707
6	Vratsa	1560	1492
7	Gabrovo	848	806
8	Dobrich	1391	1216
9	Kardzhali	1282	1229

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10	Kyustendil	1002	938
11	Lovech	1184	1079
12	Montana	1102	1001
13	Pazardzhik	2271	1970
14	Pernik	874	849
15	Pleven	2168	2002
16	Plovdiv	5444	4939
17	Razgrad	1050	977
18	Ruse	1667	1569
19	Silistra	898	805
20	Sliven	1861	1415
21	Smolyan	792	777
22	Sofia city	9747	9382
23	Sofia Region	1988	1803
24	Stara Zagora	2901	2469
25	Targovishte	992	892
26	Haskovo	1867	1689
27	Shumen	1513	1428
28	Yambol	1149	989
29	Others	29	22
	Total	**58365**	**53733**

Source: Ministry of Education and Science data, 2020

By geographical areas, the regions that are mostly affected by the lower transition rates are presented in the table below and the map, with Sliven having the highest number of students that leave early the education system:

Table 11. Regions with lowest transition rates in upper secondary education level

Pazardzhik	2238	2051	91,64433
Razgrad	962	893	92,82744
Silistra	830	767	92,40964
Sliven	1903	1543	81,0825
Stara Zagora	3035	2736	90,14827
Yambol	1145	1002	87,51092

Source: Ministry of Education and Science data, 2020

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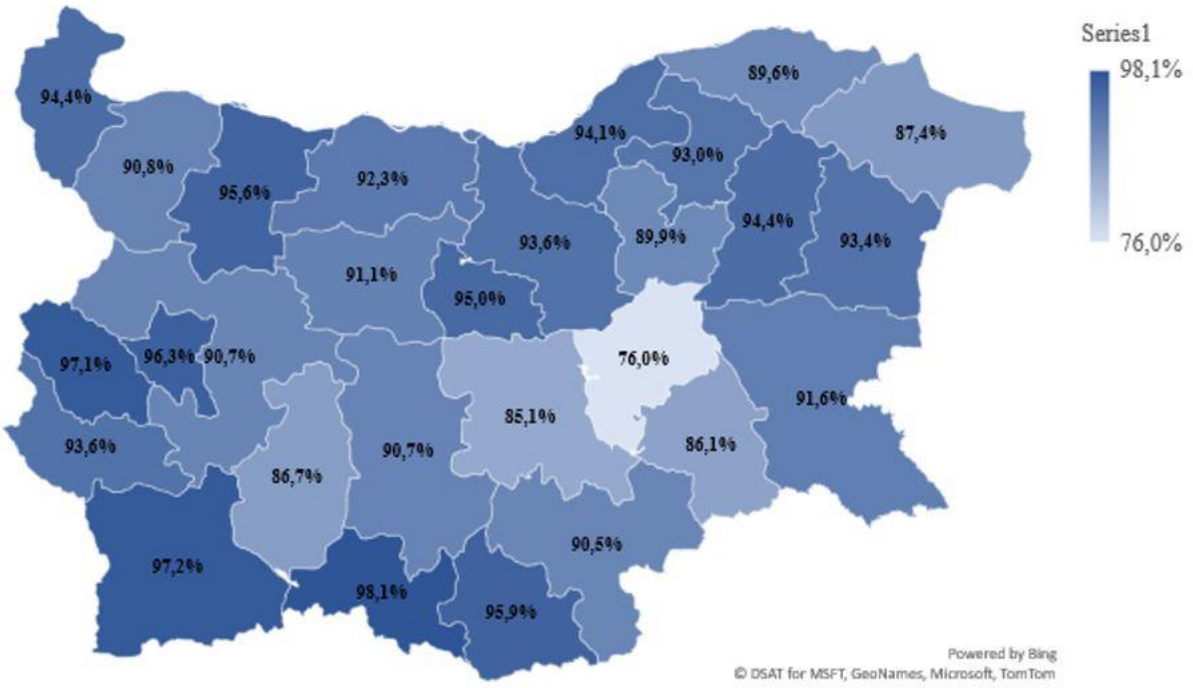

Source: WB staff calculation based on Ministry of Education and Science data, 2020

Both qualitative and quantitative studies/tracking could offer insights on the set of causes leading to this gap and inform about promising practices that some regions implement successfully. Further thematic studies need to be conducted at national and regional level to document the trends and the impact of different initiatives on these indicators.

Student – learning outcomes

Curriculum and learning outcomes - resilient challenges

Schooling is not the same as learning. In many education systems worldwide, millions of students lack basic literary and numeracy skills even after several years in school. This amplifies inequality, especially for the disadvantaged who are most in need of the boost that a quality education can offer. The Harmonized Learning Outcomes indicator calculated by the World Bank (combining PIRLS and PISA outcomes) shows that Bulgaria performs above the expected, given its income level. This is because of the strong learning outcomes at the primary level in comparison to countries with similar income, as evidenced by PIRLS and TIMSS.

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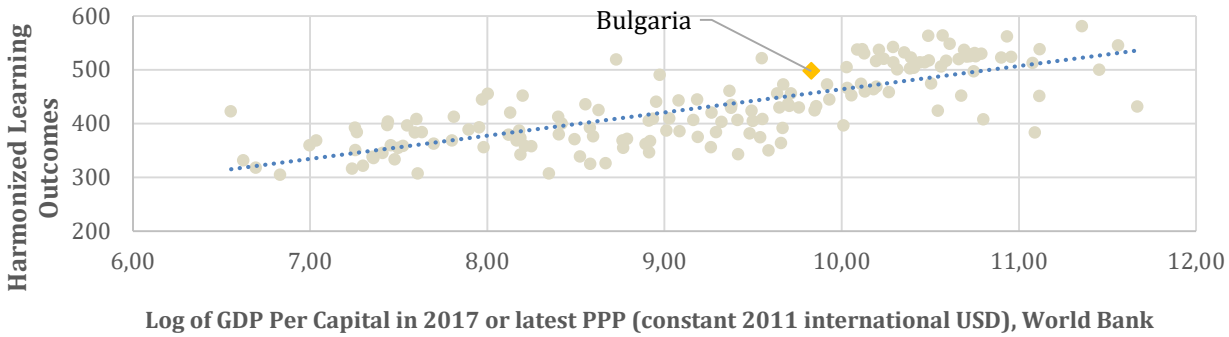
Figure 46 HLO per countries



Source. WB staff calculation based on WB database.

However, the results of international assessments are still worrying. 2018 PISA results demonstrate high shares of underachievers, 47% in reading, 44% in natural science, 47% in mathematics, and 32% of low achievers in all three subjects[407]. , far from the strategic target set at the national level: the share of students whose achievements are below the critical second level in the area of reading and natural sciences should be less than 30% and less than 35% in mathematics. Compared to the OECD countries, Bulgaria students performed 67 points lower (roughly more than one and a half years of schooling) in reading. Similar achievement gaps exist in mathematics and science.

Low PISA/PIRSL/TIMSS results demonstrate that the Bulgarian education system is still transitioning from a subject knowledge curriculum, specific to a traditional educational system, to a competency-based framework. This approach is currently only partly reflected in the curriculum and classroom practice and need to invest in developing stronger learning activities that offer (i)active learning opportunities and (ii)learning contexts that create students' opportunities for skills development and values/attitudes acquisition. Moreover, the low achievement for PISA results is obtained with more education spending. It demonstrates that Bulgaria has a lower investment return than its peer countries such as Serbia, Ukraine, Romania, Montenegro, or Moldova.

[407] PISA 2018 Results, Combined executive summaries, p.17

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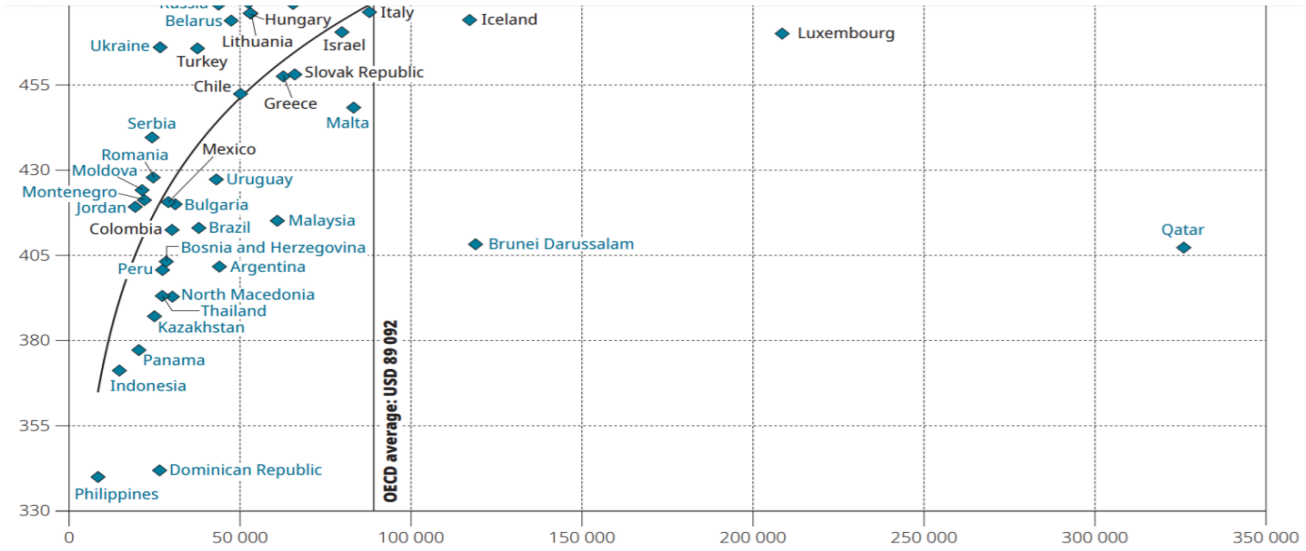
Figure 47 Reading performance in PISA and cumulative expenditure per student over the theoretical duration of studies in US dollars



Source: OECD, 2020

T**he policy response needs to document and address all the factors leading to this situation.** Indeed, one of the curricula[408] and the implementation of the new syllabi in primary and secondary education, starting with the school year 2016/2017, could positively impact students' key competencies. However, the results can be observed in the next PISA evaluation 2021, which is postponed for 2022 due to the pandemics COVID 2019). This is also a consequence of the implementation schedule for the new curriculum in preschool, primary and secondary levels that are to be completed only in the school year 2022/2023 – see table below:

Table 12. The implementation calendar of new preschool and school curriculum[409]:

Curricula/program of study	**Year**
School Curricula	2015
Pre-school Curricula	2016
Programs of Study 1st and 5th grade	2016/2017 school year
Programs of Study 2nd, 6th and 8th grade	2017/2018 school year
Programs of Study 3rd, 7th, 9th grade	2018/2019 school year
Programs of Study 4th and 10th grade	2019/2020 school year

[408] The formal curriculum (framework and different syllabi) represents the written curriculum, while in the classroom we have the implemented/taught curriculum.

[409] A new curricula was approved after the adoption of the Preschool and School Education Act. As a result, textbooks and study sets for subjects from general education from 1st to 11th grade were approved (a set for the 12th grade is to be approved in 2021), textbooks for subjects from specialized training and for subjects from vocational training. Textbooks and study sets in foreign language subjects were also approved following the levels of the Common European Framework of Reference for Languages. In addition, textbooks in mother tongue - Turkish and in religion - Christianity, Islam and non-denominational education were approved, as well as textbooks to support education organized abroad in Bulgarian language and Literature, History and Civilizations, and Geography and Economics.

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Programs of Study 11th grade	2020/2021 school year
Programs of Study 12th grade	2022/2023 school year

The learning outcomes have been stagnant in the last 12 years, and that there are high expectations for the implementation of the new curriculum. However, other systemic responses, in addition to curriculum changes, need to be addressed to resolve learning challenges. Such interventions may be: the provision of additional educational support for children and students provided as part of the education package, the increased value of National Programs for Development in Education, EU-supported projects that target specifically vulnerable schools and students. The changes in curriculum alone will not suffice to achieve better learning outcomes.

Another possible indicator for the learning outcomes (and underperforming students) is related to the repetition rate. As indicated in the table below, the total number of students that had to repeat the year accounts for less than 1% of the total student population, and it is on a descending trend. However, this indicator reflects only partly the percentage of underperforming students, because Bulgarian educational system is liberal to the repetition rate - from first to fourth grade repetition is not allowed by law, while in the next grades the school funding system does not encourage reporting the real underperforming students and they do not repeat the grade. Repetition data needs to be correlated with other student characteristics to (i) inform school performance and (ii) to better target support measures: educational (including if the case remedial education), psychological, social-assistance, health, etc. The focus on students with a *minimum of two years above* the theoretical age of a specific cohort (strongly correlated with late enrolment and repetition) is another important tracking tool.

Table 13. School year repetition rates (2016/2020)

School year	Total number of students	Number of students marked as re-enrolled	%
2016/2017	744218	7313	0,98
2017/2018	735368	6424	0,88
2018/2019	719979	6222	0,86
2019/2020	711381	6134	0,86
2020/2021	709028	3417	0,48

Source: Data provided by the Ministry of Education and Science

The results of students' regular assessments (at classroom level) in primary and secondary levels are another key source of data for analysis of the students' existing level of competencies, including key competencies. In one hand the existing assessments are not designed and tested to inform the progress on the competences. Secondly, the development of new syllabi considers all 8 EU key competence descriptors, and each subject contributes, therefore, to their acquisition. However, the taught curriculum (practice in the classroom) needs to be monitored in practice, as specific guidelines on assessment, based on specific descriptors and tools are not widely used in the classroom. Teachers need to be more supported through training, mentoring, and coaching programs to understand how to create and manage learning contexts that can develop and adequately assess the specific competencies indicated in subject syllabi, in a systemic program financed under the next operational program.

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Other challenges in the transition to a competency-based teaching and promotion of key competencies in the curriculum are the insufficient recognition of the teachers' needs to have these competencies developed at a functional level (see the section on teachers) and assign key indicators for their assessment. Two of the key indicators proposed in the strategic documents for OP 2014-2020 aim to measure competency-based learning's successful implementation: PISA students' scores and students' national examination results. However, the two indicators are not sufficient to assess the overall process and address challenges faced in implementing key competencies in the classroom, curriculum management, teachers' training etc.

The curriculum area changes focused on mainstream students, with less attention to curriculum adaptation to students' needs at-risk: the curriculum framework, the syllabi, the teacher training programs (both initial and continuous), learning resources.

In line with inclusion priorities, MES implements a long-term financial policy for providing free access to learning materials. For each student from 1st to 7th grade a textbook set for the respective school year is provided. In addition, learning sets, printed in Braille are provided for each student with visual disabilities from 1st to 12th grade and free sets are provided for each student with sensory disabilities from 1st to 12th grade. This applies to children and students in state, municipal and private kindergartens and schools. Textbooks are also provided for free use for students enrolled in the Bulgarian schools abroad. This policy is not combined with a focused impact evaluation and is not linked to the existing form of student evaluation and efficiency of the teaching methods addressing the specific groups of vulnerable children, to inform back policy efforts and implementation. In addition to the print edition, students, teachers and even their parents have access to electronically readable textbooks (the electronic version of printed editions) and electronic versions of textbooks that use various media formats, audio files, videos, interactive animations, 3D visualizations and other modern digital approaches. These textbooks and training kits bring the latest trends in education.[410] They are free from 1st to 7th grade.

Students skills and values

Creating strong basic skills to lay the foundation for the skills of 21st century based on early detection of student abilities and talents, shifting from reproduction, memorizing to critical thinking, problem-solving and the practical applicability of knowledge acquired. Development of key competencies by looking at students' talents, updating competence-based curriculum, assessment and textbooks, and focusing on scientific, financial, digital media literacy and improving the ability to solve daily tasks represent a strategic intervention area

Constructing better behavior by building core values is another priority of intervention. There is a difference between behaviour and values and between school values as students' organizational and personal values. Organizational school values reflect the norms and standards of behavior that teachers, students and parents are expected to follow. Personal values reflect the norms and standards of behavior that individuals set for themselves. These are greatly influenced by self-interest. Organizational values guide people to do what is considered by school principals and school boards as best for the organization. Personal values guide individual students to do what they think is best for them. Personal values are often not identical to organizational values. The core values that are expected to be supported by the SF and determine the future behavior of participants in the education process are:

- Classroom climate conducive to creating social and civic skills;
- Bulgarian national identity through Bulgarian language, traditions, and culture;
- Encourage collaboration, respect, and express informed opinions;
- European and universal values;
- fighting extremism, discrimination, spreading fake news and hatred in society;

[410] Information provided by MES

- detection and prevention of human trafficking, drug addiction;
- Create critical thinking;
- Develop value-oriented behavior on human dignity and rights, freedom, democracy, equality;
- intercultural dialogue.

School values are set by principals and teachers. It is their job to communicate these values and promote them, among others by personal example, as without that, students are certain to behave, by default, in line with their own personal values. For an organization's culture to take hold, its members need to accept the underlying beliefs espoused by managers and secondly, commit to these beliefs. When the underlying beliefs are widely accepted, and there is a commitment to these beliefs, as seen in practices on the ground, the values are embraced; some other require change and the build-up of commitment. A set of values represent what people value, what they think is important in life; they can be, but are not necessarily, a product of broader systems of beliefs, such as national education culture. They are usually taken for granted by members of the organization. Values are not behaviors, but they define and shape behavior. The school climate is defined as the shared perception of the way things are done in school. In addition to the values to be promoted, we strongly recommend a positive climate in schools and classrooms. The teacher creates a culture that is conducive to learning. The focus is not on the teacher correcting students' negative behaviors but rather on how the teacher creates a supportive learning environment and sets positive behavioral expectations. A supportive learning environment is created by teachers who treat all students respectfully, consistently using positive language, responding to students' needs, and both challenging gender, ethnic stereotypes and not exhibiting bias in the classroom. At the same time, the positive behavior is expected by setting clear behavioral expectations, acknowledging positive student behavior, and effectively redirecting misbehavior. Encouraging the positive climate and behavior in schools helps most vulnerable and poor students perform better while positively encouraged by teachers and parents and prevent further dropout.

Acquiring the right basic skills in compulsory education

A school or a system organization that develops the right incentive framework to motivate both teachers and students may have a rapid response translated into longer-term learning outcomes connected to the labour market and economy. The education and training systems are sometimes plagued by weak management, support, and incentives that make them unreliable or ineffective. Weak incentives and support systems in place can restrain public organizational development and the capacity to adapt and change.

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In Britain, Mexico, and Malaysia, longitudinal surveys of organizations have established a causal link between investing in training and organization productivity. Moreover, the organizations, schools, and training providers, investing in job skills, as presented in Box 2, have more chances to enhance their productivity and achieve performance primarily when investing in new technology and new work methods, as might be the case after the pandemic crisis. When teaching a child connected to life experience, technology and information must be relevant and must bring a job. Mathematics can increase problem-solving skills, but any other discipline can be thought of as toward problem-solving, like any science or even geography or history. Communication through foreign languages and ICT use, learning, personal and social skills are important to be part of the teaching method and improved classroom practice.

Box 2. What job skills are relevant to enhance productivity?

Job-relevant skills refer to a set of competencies valued by employers that include skills relevant to the specific job or to enhance productivity such as:

Problem-solving skills or the capacity to think critically and analyze.

Learning skills or the ability to acquire new knowledge, distill lessons learned, and apply them.

Communication skills, including reading and writing, collecting and using information to communicate with others, and using a foreign language and information and communication technologies (ICTs) as communication tools.

Personal skills for self-management, making sound judgments, and managing risks.

Social skills to collabourate with and motivate others in a team, manage client relations, exercise leadership, resolve conflicts, and develop networks.

Adaptation of Box I, page 14, from the World Bank - Stepping Up Skills report, June 2010.

Teacher workforce[411]

Variety of data sources indicate that MES polici**e**s are expected to address workforce outflows due to ageing and shortages in specific subjects or regions linked to labor force demand and dynamics**.** The average age of teachers in Bulgaria is above 50 years, and yearly, more than 4000 teachers (4-5% of all teachers) reach retirement age[412] . Concerns about the quality of instruction (both initial teacher training and continuous professional development) and student support provided in schools and kindergartens are present due to the fragmentation in teacher training and stagnant education outcomes. Detailed analysis on workforce policy trends is provided in a separate report[413] by the World Bank under the EU DG Reform program.

In general education the teacher workforce's demographic composition reveals that the percentage of teachers above 55 years old doubled in 2018/2019 compared with 2007/2008: from 15% to 32%. Bulgaria is in fourth place in Europe at the share of + 55 old teachers and the bottom at the share of teachers under 35 years old.

[411] A separate report has been produced and shared with the Ministry and Executive Agency on this topic as deliverable 1 per the RAS legal agreement.

[412] Hristova N., "11 000 out of 90 000 teachers are under 35 years old", dnes.bg, 12.09.2019, https://www.dnes.bg/obshtestvo/2019/09/12/11-000-ot-obshto-90-000-uchiteli-sa-do-35-godishni.422547

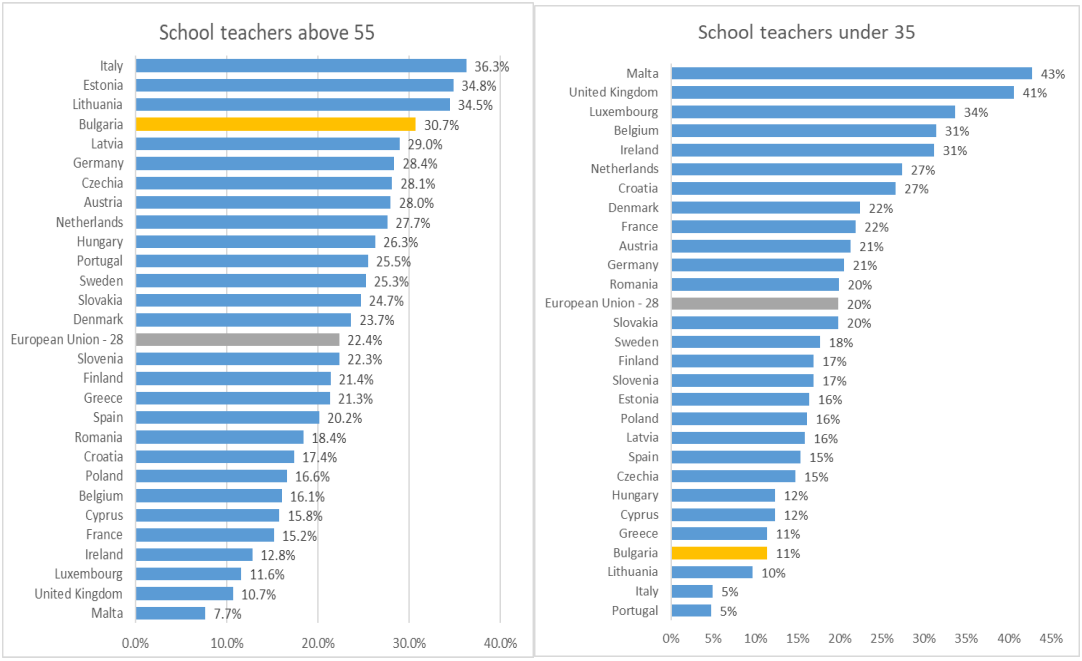
[413] WB (2020) Bulgaria Teaching Workforce Policy Note and Recommendations

Table 14. The demographic composition of the teacher workforce in general education

	2007/2008	2011/2012	2015/2016	2018/2019
Teaching staff in general, special and vocational schools (school education)	73 299	60 241	58 270	64 689
Of which female staff	59 541	49 519	47 936	53 744
Percentage of female staff	81%	82%	82%	83%
Of which teachers under 35 y.o.	11 971	5 789	4 929	7 426
Percentage of teachers under 35 y.o.	16%	10%	8%	11%
Of which teachers 55+ y.o.	10 961	13 568	17 834	20 811
Percentage of teachers 55+ y.o.	15%	23%	31%	32%

Source: National Statistics Institute

Figure 48 Teachers 55 above 55 and teachers under 35 in EU countries



Source: Eurostat 2020 (online database)

Teacher salaries and regional differences

According to data from the National Statistical Institute, in December 2019, the minimum wage nationally was 560 BGN, and the average wage was 1349 BGN. There are large differences in the average salary levels in different regions of the country, which affects the standard of living and purchasing power of teachers' salaries. Comparatively, the lowest average salary of 869 BGN was in the Vidin district (the most disadvantaged of the five districts in the North West planning region with the lowest socio-economic performance in the country) while the highest average salary of 1874 BGN was in the Sofia-city district. With the new education law from 2016, these salary differences by regions need to be adequately

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addressed, balancing the trend for higher autonomy and decentralization of governance[414] with quality and equity issues

Teacher career

Existing incentives for recruiting the best candidates for a teaching career are key for successful human resources development in education but still in Bulgaria the profile of the candidates is below the average GPA and is not packed with motivation-based selection. As indicated in Table 15, students aiming to become teachers, enrolling in a pedagogy program have a lower GPA than the average GPA of all general/specialized pedagogy tracks. The only exception is the education management field, where the GPA is slightly higher than two of the main benchmarks (Math and IT), even if lower than the highest benchmark (Medicine).

Table 15. Average GPA of students entering pedagogy programs

Professional track	2019	2018	2017	2016	2015	2014	2013
Pedagogy	4,89	4,84	4,83	4,88	4,91	4,9	4,88
Pedagogy of …	4,78	4,71	4,68	4,69	4,71	4,66	4,57
Theory and management of education	5,32	5,12	5,11	4,95	4,98	5,03	5,18
AVERAGE GPA all tracks	5	4,97	4,95	4,96	4,97	4,98	5,02
Medicine (Top scores across all years)	5,63	5,63	5,57	5,55	5,55	5,55	5,55
Math	5,28	5,29	5,22	5,29	5,22	5,25	5,17
IT	5,27	5,17	5,12	5,18	5,13	5,07	5,12

Source: Rating system of higher education institutions in Bulgaria - https://rsvu.mon.bg/rsvu4/#/

Support for in-service teacher training (professional qualification development)

Following PSEA (2016) in-service training was developed to balance between school needs and national priorities. Still the systems are fragmented and weak approaches to plan and evaluate in-service training investments are in place. Professional qualification degree was positioned as a key requirement for career development and starting 2018-2019 school year MES invested ESF funds to stimulate acquirement of PQCs. The project Qualification for Professional Development of Pedagogical Specialists (OP SESG) provided for first time partial tuition fees for teachers[415] (the reimbursement limits are universal regardless of the actual costs incurred by teachers) that were disbursed after submitting all required documentation, including the payment bill and the Certificate for the already acquired respective PQD. The inclusion of all universities as PQD course providers eased the geographic access and together with the tuition grants and the active campaign of the RDE addressing principals and teachers an increase of the number of pedagogical specialists who acquired PQDs is present for the past four years: from 29.000 to 49.000 teachers, meaning from 36% to 54% of total pre-school and school teachers.

Teachers competences

Existing thematic studies and surveys indicate several support areas needed for the teachers, as they represent the key element to provide quality inclusive education services. Representative research on the burnout causes among teachers[416] shows that most of them are skeptical about introducing innovations

[414] This trend is strong, especially after the introduction of delegated school budget.

[415] 1st QD - 73 BGN; 2nd PQD - 96 BGN; 3rd PQD - 50 BGN; 4th PQD - 91 BGN; 5th PQD - 102 BGN; participation in the preparatory course for 5th or 4th PQD - 70 BGN.

[416] Yanakiev Y., "Diagnosis of Burnout Syndrome in Pedagogical Specialists - Strategies for Managing Chronic Stress in the Workplace", (Plovdiv, Plovdiv University)

and changes in the current activity: six out of ten teachers have a conservative attitude to innovations that show their inertia and skepticism towards modern educational tools and methods. Furthermore, the study reveals that one of the stress factors very often mentioned by teachers (along with students' bad/aggressive behavior and lack of motivation) is linked to the frequent changes in the curriculum mentioned by 67.7 % of participants as a serious source of work stress. In addition, some teachers do not use systemic methodological guidance (i.e., additional/ supporting tools). Still, some teachers are not fully aware of the changes the new syllabi are entailing/promoting. Textbooks continue to be the main teaching resource; however, the recent changes in textbook use in the classroom also indicate difficulties in selecting the right textbook from the perspective of the students' needs.[417] Moreover, not all teachers plan their lessons or fully understand how the process works. Some teachers plan their lessons by giving students an active role, using limited additional resources for contextualized learning activities.

Some teachers still show some scepticism and increased stress levels when implementing new teaching approaches/ practices, even if the curriculum changes started more than four years ago. Furthermore, the level of efficiency of the support offered in other forms of professional development or practical guidelines (self-directed learning) is poorly monitored. For example, the recent MES e-platform: https://e-learn.mon.bg/ - National e-library for teachers already has over 3,000 materials available online designed, shared, and used by teachers. However, these resources were insufficiently used in the classroom, and therefore the importance of focusing more on guidance and support for teachers. It is important to create new incentives for introducing new teaching practices, based on new educational resources (including open education resources). ***Further efforts should focus on teachers' interests and how the e-materials help them introduce new teaching practices.***

The introduction of competency-based tests will be a strong call for changing the classroom goals and educational process and could have a long-term impact on students' learning outcomes. The tests are currently the main instrument for assessing the learning outcomes; key stakeholders, students, parents, and teachers focus their attention on the national examinations scores as an end goal of education. Consequently, this underestimates the value of key skills acquired as they are not being measured. At the same time, thematic studies indicate that the focus on Bulgarian language, literature, mathematics, and foreign languages leaves many core subjects out of focus. Therefore STEA(M) subjects and other subjects that are not part of the state exams are often neglected. The new SF needs to rebalance the STEAM subjects with literature and mathematics and revise the number of learning hours in the curricula to revisit teachers' availability and the right skill set. There is a need for more pre-service teacher preparation in practical domains, but also continuous professional development to train teachers to foster complex, higher-order skills to make sure students, including the most marginalized and vulnerable, acquire the knowledge, attitudes, and skills they need for their lives and livelihoods.

The initial teacher training system needs to address the demand for new entry teachers in the system, giving universities a key role in shaping the future learning landscape. However, a clear assessment mechanism for the graduates of pedagogical tracks has to successfully measure the key competencies acquired and required to start their teaching career. There are promising competency development programs for teachers with a low participation outreach for students and teachers, despite their national coverage in their titles. They have the potential to be applied on a broader scale, for example, the introduction of a program similar to the "IT business teaches" in other industries, or implementing the most effective components of the "Qualification" Program on the regional/national level, based on specific

[417] We should mention that the teachers have the right to choose freely the textbooks they would like to use in a given class. For every class and grade they have the opportunity to select among a number of different textbooks approved by MES according to the needs of the students.

learning needs of teachers. Scaling up the programs needs deeper analysis of outcomes; teachers need assessment, as currently, only performance indicators are available.

Teach for Bulgaria programs provide valuable lessons on how quality teachers can positively affect vulnerable students outcomes and decrease the effects of the inequality access gap. In Bulgaria the program is successful and appreciated, and the NGO that manages it is a valuable partner for MES on the teachers' policies.

Box 3. Lessons learned from Teach for Bulgaria program (2010-2020)

The experience of the *Teach for Bulgaria* program, documented in several impact studies (Zahariev and Yordanov, 2019; Kerschner, Smidt and Angelova, 2019) is meaningful and could inspire existing policies in various areas:

- **Teacher's recruitment.** The program's research indicates that closing the learning gap for students with poor socio-economic backgrounds strongly correlates with the teachers' quality of working in the schools from disadvantaged communities. Teachers of disciplines such as mathematics, computer science, and foreign languages are in short supply in these communities. How this program attracts and retains teachers in these schools is very relevant. Despite its overall attractiveness, the teaching profession continues in Bulgaria to be negatively affected by the challenging context in which a school operates.
- **Teacher training and personal development**. Often general training in pedagogy is not effective if aspiring teachers have limited working practice experience with students at-risk of exclusion and have insufficiently developed curriculum adaptation competencies. The program demonstrates that teacher training has higher effectiveness if it includes applied/hands-on competence development in a specific subject, in transversal pedagogical areas, as well as in the personal development field (including social and emotional skills, motivation).
- **Identify specific subjects to focus on initial teacher training and the effect on the school size.** The program recommends reviewing the process of recruitment and training in the social sciences and Bulgarian language. At the same time, the program documented positive effects are stronger in small schools with up to 420 students.
- **Assessment of performance/added value of the teacher's activity in fields related to the subject taught.** The program has a strong methodological framework and know-how in assessing the teacher's impact on students' performance, having as reference the standardized test scores at state examinations (4th, 7th, and 12th grade) and comparison groups based on propensity scores. Using this know-how, specific policies need to increase the effectiveness and efficiency of human resources in education, including strategies for creating new incentives for teachers (i.e., merit-based remuneration policies).

Equity and Inclusion

Significant steps were taken forward by the national authorities to address the needs and challenges of at-risk categories of children and youth in the education and training services. In line with the inclusion policy scope following the 2016 legislation, presented in the ECEC analysis above, the school education policies are targeting diverse group of vulnerable children and students, including a special focus on the

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Roma population[418]. In addition, based on the law, children with special gifts are also covered by the policy. Intensive package and provision targeting vulnerable to education students is provided under the general and additional support activities (services) guaranteed by the law.

The General Comment 4 on Article 24 of the Convention on the Rights of Persons with Disabilities defines these settings as follows (United Nations, 2016, p. 4): **Inclusion/Integration/Segregation/ Exclusion.** When defining inclusive learning settings these four explanations are important to follow:

- ***Exclusion*** *occurs when students are directly or indirectly prevented from or denied access to education in any form.*
- ***Segregation*** *occurs when the education of students with disabilities is provided in separate environments designed or used to respond to particular or various impairments, in isolation from students without disabilities.*
- ***Integration*** *is a process of placing persons with disabilities in existing mainstream educational institutions, as long as the former can adjust to the standardized requirements of such institutions.*

Inclusion *involves a process of systemic reform embodying changes and modifications in content, teaching methods, approaches, structures and strategies in education to overcome barriers with a vision serving to provide all students of the relevant age range with an equitable and participatory learning experience and environment that best corresponds to their requirements and preferences.*

MES has focused its efforts to develop the instruments and tools needed for the system to operationalize the inclusive education policy and agenda. ESF funding was a critical investment in that respects and addressed one of the key challenges Bulgaria education has – the lack of systematized, validated and piloted intruments that are well places in the practice to support classroom practices. The Project "Support for Inclusive Education" financed by the OPSESG (2020) covers 220 kindergartens and 430 schools to support 4,100 children with special educational needs, as well as 7,700 children with chronic diseases, at-risk or gifted. The students have been supported through general support for personal development. and families are part of the inclusive education provision in schools. Parents become full partners in assuring a good balance and a positive climate as an important player in school life. Tools and models for cross-sectoral teams for inclusive education are being developed. Assessment is done through the interaction between health (diseases, disorders and disorders) and environmental (context) factors in accordance with the World Health Organisation's International Classification of Human Functioning, Disability and Health (ICF) and taking into account the International Classification of Diseases. Development of a unified functional assessment card will provide an opportunity to identify and support the child/student's strengths and introduce a cross-sectoral approach in its implementation and in defining measures for comprehensive additional support – in the areas of education, social services and health. The tool developed will be used in the training of specialists from the Regional Centres for Supporting the Inclusive Education Process (RCMP), Regional Health Inspections (RPI) and the Social Assistance Directorates (NGA) that will implement the ICF-CY functional assessment map (International Classification of Functioning, Disability and Health: Children and Youth Version: ICF-CY). At the next stage,

[418] The exact number of Roma is difficult to determine, as many of them prefer to declare themselves as Turks, Bulgarians or Vlachs at the census. According to the 2001 census, 370,908 people declared Roma ethnicity, while at the 2011 census, 325,343 persons Roma were recorded, representing 4.9% of the country's population. Simultaneously, reputational international and Bulgarian researchers estimate Roma's real number in Bulgaria at around 800,000 (accounting for more than 10% of the population). A similar figure is given in the EU Framework for National Strategies for Roma Integration. This makes Bulgaria the country with the highest percentage of the Roma population.

the ICF-CY functional assessment card will be implemented in 28 areas by the trained specialists from the RCMP, the RPI and the NGA.

Roma are a special focus of the programs throughout human development. Roma's educational attainment is significantly lower than the Bulgarian majority and the other large minority - the Turks.[419] School attendance or Roma children and adolescents remains insufficient, but some improvements can be seen in the past decade. As table 17 shows, participation increased from 79 percent to 93 percent from 2011 to 2019 across all age groups. Those aged 11-15 still are those with the highest level of participation at around 90 percent. Those aged 15 to 18 even participate the least despite increasing from 40 percent to 63 percent in that period. Yet, attendance remains irregular and higher for the younger children, aged 7 to 10 years old.[420]

Table 17: School attendance Roma children and adolescents by age groups 2019 vs. 2011

		Age			Total
		7-10 years	11-14 years	15-18 years	Col %
2019 (Global Metrics/TSA)					
Does he/ she currently go to school?	Yes	95.3%	91.6%	63.0%	84.1%
	No	4.70%	8.40%	37.10%	15.90%
How often does he/ she go to school?	Every day	93.0%	90.8%	90.2%	91.5%
	He/ she is absent one day per week	4.3%	6.5%	6.9%	5.7%
	He/ she is absent more than 4 days per month	2.7%	2.7%	2.9%	2.7%
2011 (UNDP)					
Does he/ she currently go to school?	Yes	78.6%	90.3%	43.9%	71.6%
	No	21.4%	9.7%	56.1%	28.4%
How often does he/ she go to school?	Every day	89.4%	92.0%	91.6%	90.8%
	He/ she is absent one day per week	7.8%	4.0%	4.8%	5.7%
	He/ she is absent more than 4 days per month	2.8%	4.0%	3.6%	3.4%

Source: Global Metrics (2021) "Roma Communities in Bulgaria 2011 - 2019

Attitudes towards education among adults in the Roma communities are critical in supporting their children and adolescents to participate in education and training. Alongside the importance of school environments, including teachers and curricula preparation and attitude and peer values and behaviour, the role of models and expectations in the community can play a significant role in encouraging learning. Recent data shows that expectations among Roma adults regarding the level of education desirable for their children have moved higher, both for their girls and boys. While completion of secondary school remains the predominant expectation (66 percent and 61 percent say this is sufficient for their boy and girls respectively, and this was 63 and 60 percent in 2011), significantly fewer adults regard primary

[419] The National Strategy for Roma Integration notes, "There has been a slow improvement in the Roma community's educational status in the last 20 years…In the three groups - Bulgarians, Turks, and Roma, there is an increase in education level, but the weakest is this change in the Roma community."National strategy of the Republic of Bulgaria for Roma integration, p.8, available at https://ec.europa.eu/info/sites/info/files/roma_bulgaria_strategy_en.pdf

[420] Global metrics (2021). *Roma Communities in Bulgaria 2011 – 2019.* Sofia, January 2021

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education as sufficient. Furthermore, expectations of higher education increased by 10 percentage points from 2011 to 2019 and stand at very similar levels for both boys and girls (26 and 25 percent, respectively)

To address the overall strategic framework in education and the specific policy goals set in the National Strategy for Roma Integration MES implemented a mix of policy actions under national and ESF budget.

In 2006 the MES has established a Center for Educational Integration of Children and Students from Ethnic Minorities. The center is funded annually, with about one million BGN, that are distributed through a competition to schools, kindergartens, municipalities, and others. Funds complement this limited financing resource from Investment Priority 3.2 - Socio-economic integration of marginalized communities such as the Roma, part of the current OP for Science and Education for Smart Growth. This makes the OP one of the key factors contributing to the implementation of integration policies.

In the last two years, MES has been financing a national program for desegregation. The National Program for Support of Municipalities for Implementation of Activities for Educational Desegregation is the first program[421] on the topic financed from the state budget signaling for a policy focus and support to the process of desegregation. It supports activities for intercity transport and for the provision of teaching aids. In 2019 the program achieved important results: a total of 356 children and students of Roma origin are covered, in addition to indirect participants - 1044 parents, of whom over 52% are of Roma origin; 4 educational mediators appointed; 14 pedagogical specialists are engaged to realize additional activities with the children and students of Roma origin. Despite the indisputable need for educational integration activities and desegregation in dozens of municipalities in 2019, only six municipalities applied under the National Program. In 2020, interest is low as well. Possible mitigation plan should incorporate proactive communication and involvement of the local communities, leaders and stakeholders (including NGOs), long-term policy strategy and plane, package of stimulation incentives for participating families and similarly to the mechanism options to promote relevant social policy packages. The effect of the requirement for 10 % municipal co-funding has not been assessed and also limits the possible municipal interest. Other possible steps that could be explored and assessed are mandatory desegregation plans for all relevant municipalities, requirement for transparent consultative process with local stakeholders and to develop a relevant communication package to all parties involved, including the preparation needed for local professionals and mediators.

2014-2020 OP Science and Education for Smart Growth is a key financial instrument to address inclusion and equity policies. During the current programming period, the ESF has co-financed three OPs in Bulgaria. One of the country's important achievements mentioned in EC and GoB reports is the inclusion of the Socio-Economic Integration of Marginalized Communities such as Roma as a targeted investment priority in the Human Resources Development OP (HRDOP) and Education Operational Programme. Under the current investment priority, two operations are considered good practices and supported from wide stakeholders to be sustained extended, or complemented with new measures:

(1)*Active Inclusion in Preschool Education* supports additional training in the Bulgarian language, pedagogical support for teachers, teacher training, hiring educational mediators, and parents' activities. The project pays extra individual amounts for disadvantaged children attending kindergarten. The project is a good example for transition of a national pilot program to system level implementation. This chain of activities become a catalyst for an important government decision to drop kindergarten fees for families below minimum income. The project supports three-quarters of the kindergartens in Bulgaria and applies the "*Explicit but Not Exclusive Targeting"* principle to support marginalized communities such as Roma together with a wide range of vulnerable groups.

[421] In 2019 and 2020, the program was funded with a BGN 1 million budget within the national programs of the Ministry of Education and Science.

(2) *Integrated interventions under Socio-Economic Integration of Marginalized Communities project (HRDOP and SESGOP)*. The main contributions of this operation are addressing (i)the main challenges at local level regarding employment, health care, social services and education and allow municipalities to receive a resource for the implementation of municipal plans for Roma integration. At present, nearly 200 municipalities have plans approved by municipal council decisions, but they lack resources to implement them.-; (ii) activities that enable local public strategies and stimulate community development, including activities to fight early marriages and other patriarchal practices; (iii) co-financing one operation with multiple OPs.

Vulnerable schools

In 2018, MES, for the very first time, allocated nearly 12 million EUR (24 million BGN) for schools and kindergartens to work with children and students from vulnerable groups.[422]. In 2018, funds were provided only for children in preschool and primary education while in 2019 secondary students were added. This new approach for the state budget financing is systemic and not project-based, after consultations with stakeholders (families, organizations, institutions that work with vulnerable students).[423] Parents' educational status determines vulnerability: if parents graduated less than secondary education, students are considered at risk and are part of vulnerable groups. Every school and kindergarten collects the parents' education status through the National Information System of Pre-school and School Education. Schools are divided into five groups, depending on the percentage of parents with lower education levels: primary or lower secondary. Category I & II have between 20% and 60% of children from vulnerable groups; institutions from groups III, IV, and V have between 60% and 100 % children from vulnerable groups. According to the Regulation, schools and kindergartens with a concentration of students from vulnerable groups receive an extra amount of between 20.45 and 102.24 EUR (40-200 BGN) per student for additional educational support for those at risk. The allocated funds are only for extra staff salaries and experts' fees, but they could also be used to appoint school mediators, as MES recommends.

Table 18. Vulnerable schools per category and education level.

Vulnerable schools	Preschools	Schools	VET Gymnasiums	Total
Total education institutions	**1840**	**1963**	**404**	**4207**
With concentration of vulnerable students	**483**	**930**	**150**	**1563**
Group I	110	140	29	279
Groups II	106	134	44	284
Group III	98	160	35	293
Group IV	90	226	31	347
Group V	79	270	11	360
No concentration of vulnerable students	**1254**	**893**	**254**	**2401**

Source: Amalipe (2021) *No segregation*[424]

[422] Standard for Financing, art. 52a

[423] Until now this happens mainly through Science and Education OP (co-financed by ESF) and the Centre for Educational Integration (financed by the state budget with around 500,000 EUR annually), which support is project-based.

[424] Amalipe (2021), *Nosegregation: Дейности в преодоляване на сегрегацията в училищеActivities for overcoming school segregation at local level*, available at https://amalipe.bg/wp-content/uploads/2021/03/D2.1_School-segregation-maps-in-Bulgaria_BGversion.pdf

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Identifying schools and kindergartens with a concentration of vulnerable groups based on parents' educational status creates a sound basis for targeted support and interventions in the most vulnerable schools. It is important to emphasize that the educational and ethnic side of the problem in most cases completely coincides. The schools with a concentration of children coming from low educated families in most cases, overlap with a concentration of Roma students. The MES provides additional support from the state budget for these schools and kindergartens to hire quality teachers and appoint educational mediators. The ESF + may further support and strengthen the application of this policy. The new Education program should also use the classification of educational institutions based on parents' educational status. As the state budget supports the teaching staff salaries or mediators, the Education Program can target new operations to implement activities leading to improved quality and inclusion of education.

To successfully address the inclusion and equity agenda MES is planning to use ESF resources during 2021-2027. This is a very positive sign that MES to building a sustainable approach inclusive policies, MES is expected to develop and manage projects at both local and system level to address equity challenges. Under Specific objective 8 MES envisages measures through community-led local development and Integrated territorial investments that are a strong platform for supporting local solutions. Based on the experience with the program of desegregation it is recommendable national level policies and actions to be in place.

Learning Environments[425]

A key finding of the World Bank assessment of learning environment is that the regional differences in Bulgaria are not influenced by the socio-economic characteristics of students. In Bulgaria, learning environment (LE) is not equally developed amongst schools (and preschools) and there are differences between regions but those the disparities between schools and regions are explained by policy developments and education sector-specific investment practices addressing LE. This finding is supported by the fact that the distribution of poor infrastructure is similar between learning outcomes groups where low achievers are exposed to comparative levels of poor LE as the students with high level education attainments.

The country is lagging OECD countries when compared to an infrastructure that is supportive to learning. There isn't a renewed conceptual approach to renovations applied that addresses interactive learning. This will negatively affect the need for new investment in infrastructure. Bulgaria is expected to develop a common base for direct LE concept that informs and addresses learning a minimum standard at the national level.

Teacher support and qualification programs are natural and successful instruments in incorporating and addressing LE through a concept approach focused on teaching and learning. The teacher is a key agent in developing and using the contemporary LE. In the context of Strategy 2030 and future ESF investments this approach could be considered to address LE in their mix of elements addressing learning – teacher practices, teaching materials and direct LE infrastructure elements. Following the requirement of new ESF+ regulation on creating equal access to all level of education, specifically for vulnerable groups and supporting learning mobility, it is important to include the learning environment as a part of the project design together with new curricula, learning courses, which are

[425] A separate report has been produced and shared with the Ministry and Executive Agency on this topic as deliverable 1 per the RAS legal agreement.

introduced across education - ECEC, general education and VET sectors. International studies show that pupils' satisfaction with school environment and better psychological climate with lower level of bullying might impact learning outcomes of the children, especially from lower socio-economic groups.[426] Therefore, soft measures on upgrade of learning environments could be included in the project design (participatory exercises to develop new learning environments layouts with the different groups of children, evaluation of the needs of users to create equal access to the learning environments and education process, upgrade of furniture and equipment in connection with the project objectives, introduction of teacher practices, which envisage change of learning environments).

The 2021-2027 OPs should clearly reflect the concept of addressing learning environment for and its structural elements subject for funding. Currently, the OP mentions different aspects of preschool/school learning environments without providing a specific identification of its scope and necessary components: for example, social environment (inclusion, prevention of bullying), specialized supportive educational environment (inclusion), digital environment, cloud environment (ICT), different learning environments for skills competence (VET), innovative learning environments (no connection with each education sector), real work environment (VET), multilingual environment (inclusion). The OP could specify the elements of these environments to be a subject of improvement or special sub-section on learning environments improvement (teacher's training, learning aids, LE upgrade) could be introduced for each priority area. The OP could also reflect the priority areas of National Education Strategy 2030 in terms of inclusion, teacher motivation, green learning environment. There is a section on innovative learning environments in OP, which might require more elaboration and alignment with National Education Strategy 2030 priorities and specific presentation on the approach chosen. The findings from this analysis could directly inform this topic and related decisions.

Development of a connection between the Green Deal policy and the concept of Green schools, introduced in the Education 2030 Strategy is recommended. The EU will finance significant rehabilitation of schools in the framework of Green Deal to ensure that physical learning environments (school buildings) are more energy efficient. In terms of the ESF+, the future projects might target soft measures of learning environments development: teacher trainings on development of green educational environments, development of curricula and assessment of existing learning environments by users. Additionally, the OECD teacher questionnaire on key elements of LE (light, temperature, comfort) might inform this thematic area and collect necessary data for OP.

Following the review of international and local data sets, ESF investment policies trends and national planning documents, a list of discussion questions, recommendation and specific proposals for next steps concerning LE is outlined in the analysis. Below a selected list of key policy advice is listed:

- Revising and optimizing the existing sanitary, construction and fire-protection standards, which regulate the creation and maintenance of educational facilities, in order to (i) address contemporary trends in education approaches, learning environment development, as well as construction and engineering technologies; (ii) address policy targets and more specifically the new policy goal to ensure equal access to quality learning spaces for all four-year old children. It will be important MES to stimulate and lead an inter-agency dialog on this topic to bridge ideas, needs, planning and fundraising approaches in order to build a continue of practices that build upon the existing decentralized approach for LE decision and management.

[426] Shmis, Tigran; Ustinova, Maria; Chugunov, Dmitry. 2020. Learning Environments and Learning Achievement in the Russian Federation: How School Infrastructure and Climate Affect Student Success. International Development in Focus. Washington, DC: World Bank. © World Bank. https://openknowledge.worldbank.org/handle/10986/32598

- Guided by policy targets addressed by Education Strategy 2030 (21st century skills, competence-based learning, green concepts, citizenship and participation) to develop and provide guidelines to a broad scope of stakeholders addressing learning environment - the national design and education professionals, policy officers, experts on construction and rehabilitation of educational buildings, investments agencies responsible for capital investments. To promote contemporary approaches and international best practice.
- A challenging task might be to create a task force to coordinate the efforts of different agencies in developing high-quality educational facilities. MES could start exploring subjects and activities that gain support and are of common interest for the variety of stakeholders addressing investments in learning environments.
- Major renovations 2021-2027 to be planned and implemented in line with pedagogical concepts and contemporary trends in designing LE.
- The current information on STEM-classrooms and digital equipment availability is not detailed enough to observe the conceptual aspects of investments. With flexible design addressing school life organization and available technologies, there will be opportunities to create less separate functional rooms for these purposes. The STEM/digital areas could be arranged everywhere in the preschool/school premises. Also, available data demonstrate existing expectations from preschools to participate in STEM creative processes and policy developments.

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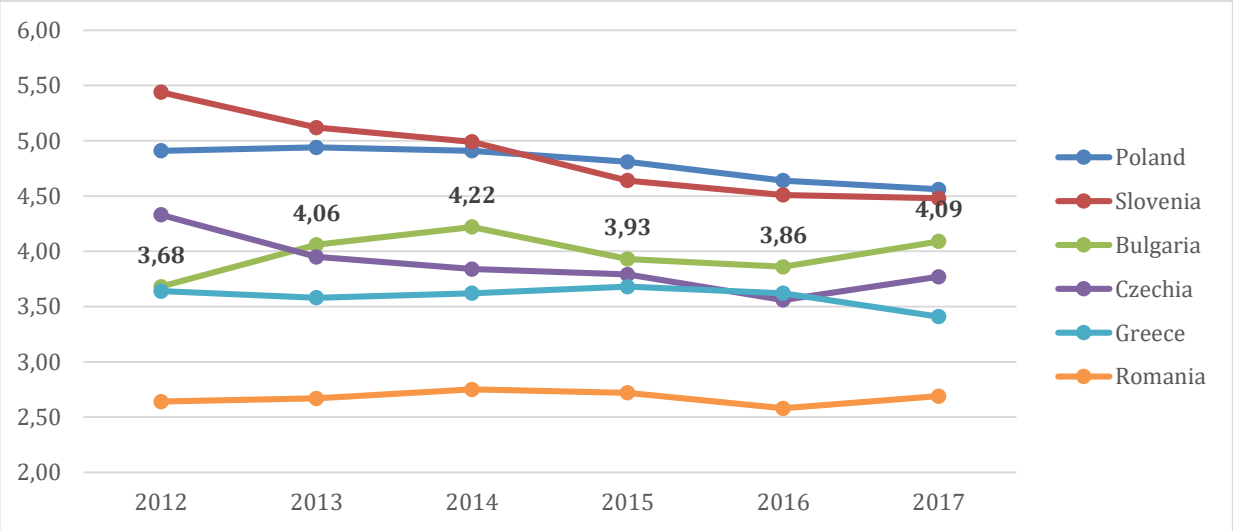
General Education Governance and Policy Mix

Governance and management

Introducing per capita financing and providing an adequate budget for education allowed Bulgaria in the last years to prevent further increases in the inequality learning gap. Compared with neighbouring east European countries, Bulgaria is investing around 4.1% of the GDP (Figure 49) in education, being at the upper level of the scale, spending more than Romania, Greece, or the Check Republic. The financing levels for education in Bulgaria are below the EU average of 4.7 percent but not far below, highlighting that the Government invests in schools and education continuously. With adequate funding, it becomes easier to address the equity and quality challenges the education sector faces, and the Government can overcome the potential public financial management weaknesses.

Figure 49 Public expenditure on general education, except preschool, as % of GDP



Source: Eurostat

The State Budget Act 2018[427] reforms the financing system in schools and kindergartens and adjust the per capita financing introduced in 2008. The delegated budgets in small schools, predominantly in rural, receive proportionally higher allocations than larger schools, providing opportunities for schools and kindergartens with smaller numbers of students to develop. The innovation introduced in the delegated budget system is using in addition to the number of students, the number per class, and school. Since 2018, the MES provides municipalities with funds for the unified funding standard per student, the new standard per class, and the institution standard. A regional component also provides additional financing through the coefficient to these standards for remote municipalities and regions.[428] The funds allocated to municipalities is assigned to mandatory and additional components in a ratio of 85%: 15%.

Monitoring and evaluation (M&E) system needs strengthening. Bulgaria has many of the components of a monitoring and evaluation system in place. The National Electronic System for Preschool and School Education (NESPSE-НЕИСПУО) is used for collecting on schools, kindergartens, and personal development support centers. The data include school data (name, location, contact, classroom (education level, profile), teachers (contact details, position, and full-time position, qualification, employment), additional support for students (pedagogical adviser, psychologist, speech therapist), curriculum and

[427] State Gazette 99/12.12.2017

[428] Amalipe, *New in schools' delegated budgets in 2018.* Available at: http://amalipe.com/index.php?nav=news&id=3171&lang=2

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teacher workload and student registry. The student-level data includes passing exams, transitioning to the next grade, completion, repetition, expel, and dropout. The students who travel, movement, scholarships, disabled students (visual, hearing and sensory impairments) are recorded too. For the class data from 1 to 7 grade is general or specialized, and for upper secondary, every class has a profile (foreign languages, humanities, social sciences, economic development, software, and hardware sciences, mathematics, natural sciences, fine arts, music, sports, entrepreneurial).

The system is improving the breadth and reliability of its statistical tools to capture educational data. MES is expected to start operating with a new integrated EMIS system with the 2021-2022 school year. The challenges and findings stated below are should be addressed by this system to allow for comprehensive use of the information for policy managements and decisions:

- Information on student learning outcomes has been collected through national and international assessments. Data collected by the system is comprehensive but would benefit from improved accuracy and reliability measures. What Bulgarian NESPSE lacks is a coherent and continued approach to evaluation that draws on this information in a consistent way to inform policy decisions and practices in schools for educational improvements. This reduces the system's capacity to provide fair and accurate, accountable information to the public on the education system's performance and to inform policymaking.
- Although the database cover data on students, more attributes are needed. The data gap is critical and should update the existing module on the attributes related to ethnicity/minority, especially Roma, student family income, disabled students in mainstream schools, education infrastructure status and characteristics, vulnerable schools, and vulnerable students. These new attributes are important in monitoring learning outcomes, in performing impact analysis that can show attribution of specific interventions and programs with specific results. They will also serve as tools that show progress in implementing specific priority areas related to inclusion, equity, and inequality gaps.
- The current system for collecting relevant education data is divided between the National Statistics Institute and the Ministry of Education. While in the first case, the number of indicators is rather limited. In the case of MES data, the main challenges concern the quality assurance mechanisms and the not sufficient staff to analyze the data in-depth. The specific departments within the Ministry/subordinated agencies receive insufficient support to perform this task, even though there is a critical need for an adequate collection of primary data, calculation of indicators, and interpretation of these indicators. Long-term support is needed, as these departments could also focus on monitoring and assessing different policy results/impact (i.e., Early School Leaving Strategy).

Data and information collected can be used more in decisions making. Despite comprehensive and quality data, the information remains closed, and it can be used more and timely. Although the establishment of NESPSE has improved data sharing, transparency, and access, to a certain degree, policymakers do not yet utilize data at the fullest for decision making. The data on teachers, infrastructure, and other datasets can be part of the same database placed in MES and with integrated modules. The MES provides data at request-based and can make them more accessible transparently for the use of schools, teachers, and parents.

Additional Aspects of the Policy Mix for General Education

EU funded policy investments

Your Class project, is one of the largest projects supported under Priority Axis 2 of the Operational Program and is defined as systemic. This means that it implements comprehensive policies for the entire

school education system required by the PSEA, namely the additional support for children with learning difficulties and interest activities that develop children's abilities. These two policies are different in themselves, and their combination was a problem in implementing the project.

After the project's end, the extracurricular activities for overcoming learning difficulties were continued through the new systematic project called "Support for success." It contains mainly activities for overcoming learning difficulties and is implemented in the schools with a concentration of vulnerable groups. Extracurricular activities for developing students' skills and interests are continued through state budget fund.

Many of the good practice projects financed under current OP for Science and Education for Smart Growth that tackled ESL could be classified as follows:

- develop mechanisms to identify students at-risk of ESL, record their attendance, and report progress;
- involve parents into school activities, including the provision of training, and schools into community life;
- support disadvantaged children with clothing, teaching aids, remedial classes, summer classes for recuperating learning or catch up, including specific teaching-learning support for minority children;
- provide socio-emotional skills development activities.

These activities are conducive to better learning outcomes and improve retention in schools. However, they need complementarity and integration with other activities that could be expanded for several years to support students throughout the completion of the lower secondary level. Such activities could complement other measures, such as improving the learning environment to facilitate access to quality education or improving teachers' skills to become even more talented, creative, and innovative.

Table 19. EU funded projects - Good practice to tackle ESL

Area	Municipality	school	Description
Burgas	Aytos	Svetlina Primary School	A "parental calendar" in which parents are involved in-class activities
Burgas	Burgas	Petko Rosen High School	systematic control to prevent absences by contacting a parent, psychological counseling and school work
Vratsa	Vratsa	Hristo Botev United School	"Every student can be an excellent student- project "Reducing the dropout of Roma children from school"
Vratsa	Borovan	Otets Paisiy Primary School	Support for children from socially disadvantaged families with clothes, shoes, teaching aids and aids
Vratsa	Kozloduy	Hristo Botev High School	1. Summer language school for children in preparatory grade. 2. "Fun Saturday" - use older students
Vratsa	Moesia	Municipality of Moesia	Develop a register, with student data, address, parents data, ESL signals, notifications to parents, social services, track administrative violations acts
Lovech	Ugyrchin	Hristo Botev Primary Sc.	Individual work with students who have difficulties in mastering the curriculum
Plovdiv	Plovdiv	Sugar Rooster Kinderg.	"Workshop for parents" and create summer groups for preschooler with foreign mother tongue
Plovdiv	Plovdiv	Panayot Volov Primary School	Additional training/remedial in subjects for primary and lower secondary stages; organizing activities of interest
Silistra	Tutrakan	Municipality of Tutrakan	Maintaining a database for children at risk of dropping out
Silistra	Silistra	Cyril and Methodius Primary School	1. Morning Sharing Initiative on topics and experiences that excite children, carried out jointly with parents and teachers 2. Conducting reading classes together with parents

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Sliven	Hard	Nikola Prokopiev Primary School	Involvement of newly appointed teachers in the specifics of school work with children from ethnic minorities with the help of teachers - mentors
Sofia Region	Botevgrad	Primary school St. Cyril and Methodius	Improving the quality of education by applying: shared care, learning through empathy, discussing current topics, trainings for the development of social skills
Stara Zagora	Kazanlak	Vasil Levski Primary School	Registration log for home visits of the class teacher- the date, the reason for the visit, signed by a parent and a class teacher
Targovishte	Targovishte	High school Nikola Marinov	Initiative "Summer Academy for first graders"
Targovishte	Omurtag	Daki Yordanov Primary School	1. Door-to-door mobile group for visits to children's families 2. Individual programs, ID cards and development reports for at-risk children
Haskovo	Haskovo	Sandor Petofi Primary School	1. Conducting talks on prevention of early marriages 2. Using interactive methods, such virtual classroom, parent meetings
Haskovo	Dimitrovgrad	Municipality of Dimitrovgrad	Development of a coordination mechanism, including preparation of a register, assign specific measures and persons, verification of absences, weekly meetings and reports
Haskovo	Svilengrad	Kindergarten "Clover"	Survey of the family environment in order to prevent the risk of non-inclusion or dropping out - visits to the address, check attitudes and motivate parents
Yambol	Yambol	Hadji Dimitar Primary School	Implementation of student attendance control, contact parents, home visits, social assistance, child protection, individual support for students with learning difficulties

Box 4. Your Class Project

"Your Class" started in September 2016 and continued for two school years until September 2018. It was financed with 140 million BGN (almost 72 million EUR) by the Science and Education for Smart Growth Operational Programme.

Within the programme, schools receive funding for two types of extracurricular activities: for overcoming learning difficulties and for developing students' skills and interests. The higher the concentration of students with learning difficulties, the bigger the funding was.

During the implementation of the project, innovative methods were tested, such as the provision of extracurricular activities by non-governmental organizations and other persons outside the school, the formation of public councils that choose extracurricular activities for students and many others. The performance passed with great interest and participation of the students.

National programs that contribute to increasing access, quality, inclusion, and relevance of general education

An overview of the main national programs directly contributing to increasing access, quality, inclusion, and general education relevance is presented in Table 14 below. These programs have a very different thematic approach and target group. Still, thefocus is on providing better learning contexts and more effective support for students' learning outcomes and well-being. Looking at the value of the national programs and targeted number of students, three programs are outstanding and considered a great priority:

- digitalization of education (see program 7)
- quality learning environments (see program 3)
- develop a STEM area (see program 21)

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Other national programs mentioned in table 14 are part of the policy mix that, together with EU funding, implement the education strategy, targeting the four pillars mentioned in this document. These programs to continue and produce results needs an evaluation for adjustment and for continuation or change. Without a proper assessment, it can't be justified a continuation of financing when results are not at the expectations level.

Table 20. National programs relevant to learning outcomes in primary and secondary education

Bulgarian National Programs	Objective	Allocation in 2020 (million BGN)	Estimated benefiting students
3. Providing a modern educational environment	Provide conditions for equal access to preschool and general education and improve the quality of the educational process. Encourage reading to achieve the intellectual, emotional, social, cultural, and personal development of the student. Provide traffic safety training.	6	4,700
7. ICT in the System of Preschool and School Education	Improve the quality and opportunities for e-learning in the system of preschool and school education, access to modern information and communication technologies, introduce innovative modern teaching methods, and create conditions for training of pedagogical specialists for their use.	12	960,000
12. Native language and culture abroad	Support learning of Bulgarian language and literature, history and civilization, geography and economics related to the history and geography of Bulgaria, organized abroad for preschool children and students from 1st to 12th grade.	1.21	13,500
13. Without no lessons	Create conditions for not missing school content and opportunities for sufficient study time by providing substitute teachers and other specialists in schools and kindergartens	2.7	4,000 (estimated 50 st per school)
17. Assistance to municipalities for educational desegregation	Implement activities in non-segregated, host educational institutions to provide an educational environment that encourages mutual communication between children in compulsory preschool education, students, parents and pedagogical specialists.	1	N/A
21. Building a school stem environment	Create a culture of innovation by developing an integrative and creative environment focused on STEM areas, including redesign spaces, adopt new technologies, and teaching methods, new cross-curricular learning content, with priority on enabling environment to address the SEN students' needs.	20	43,800 (estimated 300 st per school)

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Recommendations for General Education

The increased achievement gap and the current pandemic's income shock can cause an increase in the rate of school dropout in the medium term, particularly for disadvantaged students. Students who fall behind in education will be demotivated and at a higher risk of dropping out of school. The loss in household incomes due to COVID-19 will also test households' ability to keep students in school, increasing out-of-school youth, and hindering the transition to post-secondary education.

The effect of COVID-19 on education will have a decades-long impact on the economy unless authorities act to recover learning losses and protect affected cohorts' human capital. Learning losses and reduced schooling years for student cohorts affected by COVID-19 will reduce their expected earnings by an estimated 2.4%, which may amount to an overall economic loss of up to US$393 million (2011 PPP) every year. Bulgaria needs to protect education spending, ensure remediation to recover learning losses, prevent student dropouts, and invest in building a resilient education system for other crises in the future.

Invest more and smarter in building human capital. Human Capital Index developed by the World Bank draws attention to the fact that Bulgaria needs to prioritize investments in its children's health and education urgently. The Bulgarian Government should enhance their efforts to invest more and smarter in human capital, to accelerate progress towards a world in which all children and youth can expect to receive quality learning in the classroom or online, and can go to the labour market as healthy, skilled, and productive adults. The challenges unleashed by COVID-19, however, require an even stronger policy response, including greater use of technology to improve education services delivery to ensure that people receive a quality education, as the key driver of growth and development.

The recommendations made jointly by UNESCO, UNICEF, World Bank, World Food Program and the UN High Commissioner for Refugees in the context of a new framework for reopening schools in 2020[429], are grouped around six dimensions:

1. Reforming educational policies: introducing clear policies on opening and closing schools during public health emergencies, reforms needed to ensure equitable access for marginalized and out-of-school children, and to strengthen and standardize distance learning.
2. Financing: analysis of the impact of Covid-19 on education and provision of funds for investments in strengthening educational systems for recovery and resilience.
3. Safe education: ensuring conditions that reduce the transmission of disease, protect essential services and goods, and promote healthy behavior.
4. Compensating for learning: great emphasis on methods that compensate for lost training time, strengthen pedagogy and rely on hybrid learning models, integrating approaches in distance education. It must also include information on the transmission and prevention of disease.
5. Well-being and protection: focus on students' well-being and the protection of children by providing essential school services, including medical care and meals.
6. Supporting the most marginalized: adapting school opening policies to ensure access for marginalized groups, all out-of-school children, migrants and minority populations.

[429] https://www.unicef.org/documents/framework-reopening-schools

Recommendations to improve curriculum and increase learning outcomes

The education system has made progress in recent years in key areas such as curriculum, funding, recruitment and teacher training, and digital learning. However, the positive results did not have the expected pace of improving education quality and equity and reached unevenly different levels of education. Thus, the share of children at risk of exclusion who are underachievers, who are not attending or even dropping education continues to be a significant challenge in primary and secondary education. Especially children coming from socio-economically disadvantaged areas, Roma children and those with SEN have significantly lower chances of successfully completing compulsory education and accessing higher levels of education; this state of affairs has a substantial long-term effect, both individually and socially, affecting Bulgaria's economic development potential.

There is a need to ensure a greater balance in investments and support first levels of education, especially early education, and to capitalize on the progress made in developing a new curriculum in its effective application in the classroom. Focusing on students' competencies, not only on content, is the biggest challenge from a pedagogical perspective, to which both the initial and continuous training system must respond and in which it must be learned from the experiences of international assessments (PISA, TIMSS, PIRLS). Transitions to higher education levels, especially targeted support for low-opportunity categories, encouraging integrated interventions and promoting active early risk identification policies are directions that the education system has already experienced and needs to intensify. Bulgaria must also capitalize on current initiatives in digital education, as initiatives in this field prove their value/usefulness during the crisis caused by the COVID pandemic.

The effectiveness and efficiency of many policies, both at the school / local level and regional level has been negatively influenced by limited managerial capacity, this area being also a priority area for short and medium-term intervention; efficient management will also allow better use of resources, as well as a faster response to the various challenges faced by educational institutions

Another area of development with a great potential for return on investment is the more active involvement of non-governmental actors and those representing the business environment, as well as active partnerships with associations of students and parents, open and transparent governance predictability, and quality of public policies in education.

Finally, the education system must invest more in impact evaluations to analyze results, interventions, or policy deployment in education, both at general and tertiary education levels, leading to adjusted policies evidence-based. Equally, the institutional capacity to collect and analyze data at the system level must be built.

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Figure 50 Recommendations for improved curriculum, learning outcomes, and teacher competencies

Curriculum	Learning outcomes	Teacher compentences
• Embedding the key competences in the referrence framework • Syllabi with clear guidelines for teachers and focus on competences building • Promoting curriculum adaptation strategies for at risk categories of students	• Understanding why learning outcomes lower than expected • Documenting better the important gaps between regions/schools • Document suport needs for the main underachivers categories • Link the analysis of the learning outcomes with the returns of investment	• Systemic approach of the teacher needs related to new curriculum implementation, in particular adaptation to at risk categories of students • Digital education strategies, adapted to the conditions and resources offered by the school

Bulgaria needs to build on that strong position in primary education to influence the policy steps needed to address the EU and the OECD counterparts' gap. The short-term learning policy goals should aim to eliminate learning poverty and improve learning outcomes at lower and upper secondary education levels. The education system needs to introduce approaches that build on the current efforts to achieve sustainable enrolment of vulnerable children to meet the specific goals for learning outcomes and achievements for the most vulnerable to education that does not meet the standards.

It is necessary to embed the new vision of the European Reference Framework on Key Competencies (2018) in initial and continuous training programs, curriculum development, and learning resources creation, including open education resources. The acquisition of key competencies is a process that needs to go beyond the school education level, as key competencies are important aspects of higher education too. They are an important tool for ensuring the overall coherence. This is also reflected in the curricula and creates a gap between preschool and school education regarding key competencies.

Curriculum specialists should define descriptors of key competencies for each education level (i.e., literacy for primary level graduates) and specific tools to assess the level of acquisition for each key competence. The international evaluation PISA measures only proficiency in some areas: reading, mathematics, and natural sciences. The specialist should follow a coherent approach to describe each key competence's scope, defined for each level of education, and the mechanism adopted for the measurement process. Simultaneously, the education system needs a complete picture of the level of key competencies for graduates of primary, lower, and upper secondary and tertiary education. This is the pillar for revising specific curriculum development, financing, infrastructure, teacher training, and recruiting teachers' policies.

In-depth comparative analysis of the PISA 2018 data on returns of investment could lead to specific recommendations on needed interventions for the categories of students with the highest level of underachievement. The comparisons need to take into account the average scores and the specific conditions/support activities different categories of students receive (return of investment approach).

The methodological guidance on applying the subject syllabi need to provide clear definitions of the scope for key competencies, indications on the improved teaching methods, improved assessment tools at the classroom/school/system level focused on acquiring key competences. The methodology should be

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accompanied by assessing the effectiveness of curricula and attaining key competencies through representative samples for each education level (primary, lower, and upper secondary).

The curriculum developed should be continued and reflected in everyday classroom practice (taught curriculum) and students' learning outcomes (learned curriculum). Therefore, the education authorities need to create a framework for monitoring the new curriculum's implementation at the school-level, and all actors need to be trained in curriculum implementation and management area. Teachers need to be better helped to understand how to create and manage learning contexts that will develop the specific competencies indicated in subject syllabi. School principals need to have the right skills to support and initiate corrective actions when required (learning leadership).

The curriculum area changes need to continue, with a special focus on students with less opportunities. For example, one important intervention area for both curriculum and teacher training strategies concerns the curriculum adaptation to the needs and expectations of students at risk: the curriculum framework, the syllabi, the teacher training programs (both initial and continuous), learning resources etc. New methodological guidelines/pedagogical strategies need to be developed, focused on the necessary adaptations to specific categories of students at risk, including students with a disadvantaged social and economic background, Roma and students with disabilities and/or with special education needs.

Recommendations to improve teachers' policies

The positive quantitative outcomes of the national teacher training strategy need to be justified with impact evaluation of these programs on teacher's development of specific competencies, particularly in shifting to genuine competence-based learning. Specific support areas/need analysis data should be linked to the programs' added value, leading to new national/regional programs and teachers' methodological resources.

Another priority for the near future is related to a systemic approach of the teacher support needs related to new curriculum implementation, particularly adaptation to at-risk categories of students and online/digital environments and learning resources.

In the current context of reconsidering and transforming the assessment system, teachers will need support because the new test formats are currently skill-oriented; first models were already published on the MES webpage mid-2019 and were applied for grades 4, 7 and 10 at the end of the 2019/20 school year. These are the first graduates with a complete experience of using the new curriculum during the entire education level, and these tests should reflect overall the effectiveness of new curriculum implementation, including the crucial role of teachers.

As yearly more than 4000 teachers (4-5% of all teacher population) reach retirement age, a clear mechanism is needed to ensure that the graduates of pedagogical tracks acquired relevant skills to start their teaching career successfully.

In particular, digital education strategies, adapted to the school's conditions and resources, need to be enforced, assuring the necessary flexibility in delivering courses in a blended format and continuing a quality inclusive education even when the school moves online. Initial teacher education needs to offer more relevant learning experiences to future teachers using a learning platform, embedded in the teaching method, creating open education resources, participating in online collaborative learning platforms, and adapting online activities and resources to at-risk students. Continuous training needs to facilitate the development of every teacher's competencies in using its specific learning environment used by its school. At the policy level, a special school-based approach needs to be systematically implemented, offering each school the liberty and resources needed to create a digital environment to be used permanently, not only in emergency cases.

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Communities of practice proved to be highly effective during school closure. Peer learning, support groups, and participation in professional networks become an effective tool for many teachers to develop their digital skills. These groups could be facilitated by teachers, academics, and researchers with relevant experience, with a special role played by teachers' professional associations in specific fields.

The training curriculum for teacher professional development needs to emphasize more the specific elements of required digital competencies and related didactical skills and knowledge and create relevant assessment and monitoring tools. Even though teachers' digital competences are included in the specific curricula for initial training and for exams granting the right to teach and in the assessment for granting different teacher professional levels, there is an insufficient link with specific subject-curricula and the everyday teaching experiences in the classroom.

A key role should be played by the headteachers/managerial team of a school in regular monitoring. Part of the school-based curriculum management, headteachers, needs to regularly assess how confident and creative the teachers are in using digital technologies in their classes and how each subject contributes to the development of digital competence (as a key competence).

Recommendations for Inclusive Education programmes and projects to be financed

Do's	Don't	Why
Do support programs that provide **inclusive educational settings.**	Don't support initiatives that reinforce segregating students with disabilities in separate settings away from their same-age peers.	Unfortunately, segregated schools continue to be often supported with the rationale that "segregated schools are the only current model and it is better to support them versus abandoning those children in the schools without a better alternative in place."
Do establish **model or pilot schools** that include children with the full range of disability categories and level of support needs.	Don't create model or pilot schools that exclude children based on category of disability or severity.	Implement programs that exclude certain children can reinforce stereotypes and stigmas and further isolate and potentially harm children.
Do **recognize the unique communication needs of SEN students** who benefit from a multilingual environment which may not be their local school.	Don't place students who are deaf in inclusive education settings without providing support and an inclusive communication environment.	It is crucial that the educational setting for students who are deaf be based on a student's individual needs, reflect the educated choice of the family and child and promote full communication.

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Do engage students with disabilities, families of children with disabilities, government representatives, school officials and teachers, and community leaders in project preparation.	Don't support programs that only address few or none of these essential stakeholders. All programs benefit from actively engaging these actors.	To develop a participatory approach, include input from a diverse set of stakeholders. Do not assume that persons without disabilities or families of children without disabilities represent the disability community. Aligned with the principles of "nothing about us without us".
Do support access to the national curriculum that is adapted or modified as needed.	Don't support alternative curricula that are not individualized to the needs of the student or are pre-determined based on disability type	All children can learn; however, some students need adapted or modified curriculum to reach their full academic potential.
Do create education programs that are inclusive of the needs of students with disabilities from the beginning.	Don't rely on retrofitting programs to include the needs of students with disabilities.	When inclusion is not required from the beginning, there is often not funding available for later adding. When inclusion is an afterthought, it tends to be swept aside to address other priorities.
Do address community and society attitudes as part of inclusive education projects	Don't assume social, societal and other attitudinal barriers can be addressed at a later date.	Addressing community attitudes, including engaging and educating parents of children with and without disabilities, school management or parents teacher association on the benefits of inclusive education is key to sustainable programs.
Do support classroom-based screenings and evaluations that are strengths-based to determine eligibility for special education services.	Don't use tools not designed for educational use (such as census questions or medical assessments) to make educational decisions.	Culturally appropriate identification tools are developed and used for educational purposes.
Do focus on identifying children excluded from school and providing an impetus for their school achievement.	Don't ignore the fact that many students with disabilities (formally identified or not) are excluded from attending school with their peers and do not receive benefits.	Millions of children with disabilities are excluded from both inclusive and segregated schools. Within households surveys related to the educational needs of children, questions about reasons children are not attending school can serve as an initial screening.

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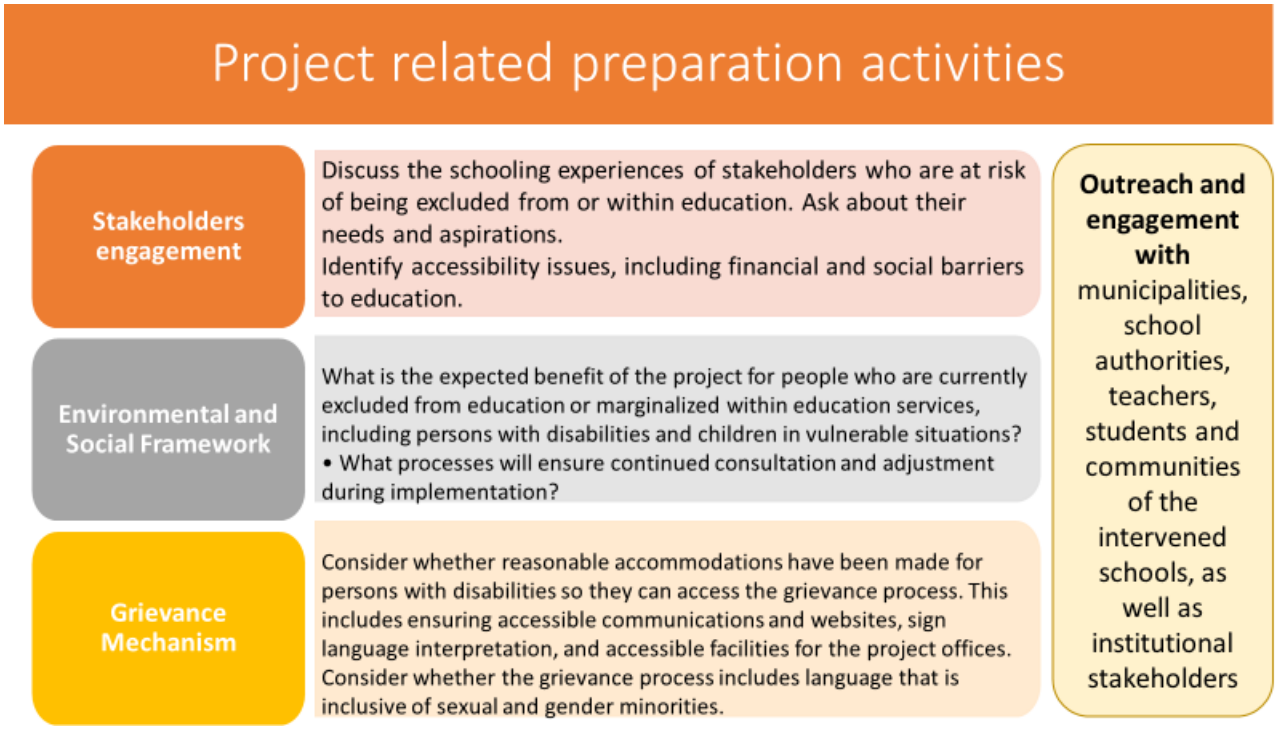

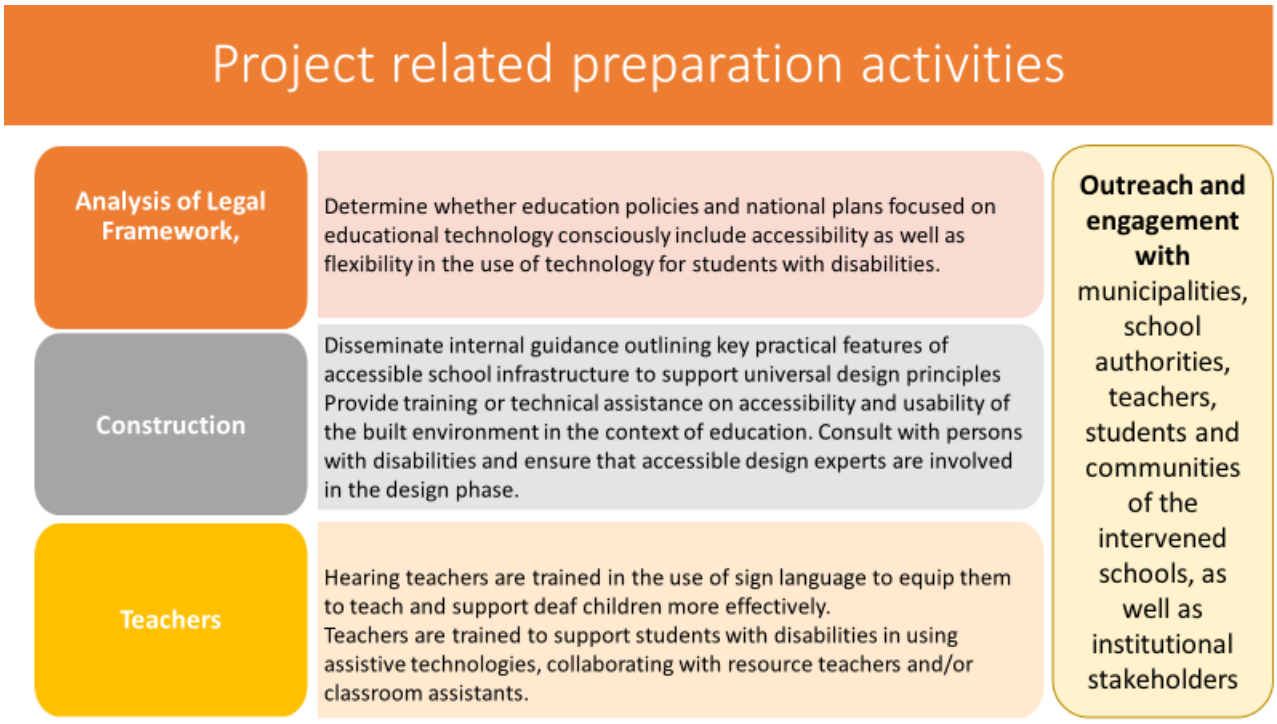

Recommendations on targeting vulnerable to education especially Roma

A combination of mainstreaming and targeting approach is recommended to enhance and support educational integration and social inclusion. Mainstreaming, in the context of education, is the practice of

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placing students with special(additional) education services in a general education classroom. The combination with targeting approach is to dedicate funds, program to these specific classrooms, schools, setting not necessary to specific individuals. The support of the Education Program for Roma educational integration follows the ten basic Roma inclusion principles, including the principles "Explicit but not exclusive targeting; Aiming at the mainstream". The European approach is to explicitly target the underserved people in a very straightforward way to be clear that programs and finance goes to these categories. At the same time the approach is to be explicit but not exclusive, the financing addresses the needs of other categories as well. Mainstreaming policies are expected to address access barriers due to (i)social status; Bulgaria has started also discussions for full abolishment of preschool fees similar to OECD countries; (ii) physical distance - ensuring free transportation for secondary education students Is a possible step to address access challenges; (iii) access to learning materials – Bulgaria might develop an universal program for accessing free textbooks for all students; (iv) access to electronic devices for distance learning for all students is another priority approach needed; (v) vulnerable children and students to participate in the mainstream projects: for example, through including funds for appointing educational mediators, work with parents and others within the system level projects that not necessarily target vulnerable. In addition system level instruments as the school budgets needs development in order to ensure equitable stimulus for workforce distribution, learning environment investments and standards and equity between schools (rural/urban).

Incorporate in the OP 2021-2027 activities addressing **specific objective 8 with appropriate types of activities and operations, target groups, implementation methods, indicators, and budget**. The experience of the current programming period shows the success of the inclusion of investment priority 3.2. It should be continued and further developed. Specific objective 8 should support activities and operations to increase vulnerable groups including Roma coverage in pre-school education, prevent school drop-out and early school leaving, improve the coverage of secondary and higher education, desegregation, and introduce intercultural education. These topics register severe deficits and disparities in the educational level of Roma compared to other groups. This has been recorded through a survey EU-MIDIS2 of the European Union Agency for Fundamental Rights and national census. Below them are the specific goals of the National Strategy for Roma Integration and the Strategy for Educational Integration of students from ethnic minorities.

Further planned **activities and operations should continuethe current operations and complement or add the missing links.** They should be in line with the current political measures that have been implemented during the last years. For example, it is good to plan an operation to support schools and kindergartens with the concentration of vulnerable groups, according to the Financing Order Article 52 a. This operation could help schools and kindergartens work with parents from vulnerable groups by building partnerships with NGOs and others. Another operation can support the activities of the inter-institutional scope teams established by Decree 100 of June 2018.

Implementing the operations should be following their specifics and a **combination of community-led local development, integrated territorial investments, and competitive selection of projects** at the national level is advisable. A mix of various implementation methods should be used to integrate Roma children looking at specific conditions throughout the country, including in urban and rural municipalities, municipalities with a political will for integration actions and municipalities without such political will. **Possible beneficiaries should be a wide range - schools, kindergartens, municipalities, NGOs.** The involvement of a wide range of stakeholders is a vital prerequisite for success in this new aspect is a process.

- Funding of operations under specific objective 8 should be at least at a level similar to the level of the current programming period (investment priority 3.2.)
- We recommend inclusion of the target group of "minorities / Roma" and of the respective indicator under special objectives VIII, V, VI, IV
- Undertaking targeted efforts to include a larger percentage of Roma as participants in operations under specific objectives V, VI, IV.

Recommendations at program level

For developing a resilient, fair, and quality education system, the recommended medium-term approach contains the following recommendations at education program level interventions:

- invest in modular mobile classrooms (trailers/containers) to provide education services that can be used temporarily in the yard of schools and later located in communities that have high natural growth and do not have schools to cover the number of potential students;
- give greater autonomy to the school principals to find solutions to comply with the sanitation and new learning standards;
- access to utilities and facilities that meets the basic requirements
- development of digital infrastructure so that each school provide continue learning support for students through the right equipment in the classroom and at home (interactive boards, laptops, tablets, mobile stations for intelligent charging, mobile stands, routers, multifunctional etc).
- increase the budget for education for adequate resources so that all schools benefit from sufficient, qualified, and trained teachers. Motivate and compensate teachers according to performance depending on the results and difficulties encountered in a school
- foster a positive school climate, a partnership with parents and the community, as well as greater transparency in both prioritizing the school budget and executing according to agreed goals.

Prepare and implement strategic, integrated and systematic national program focusing on vulnerable learners and vulnerable schools to support students, preventing early school leaving and dropout and increase performance and learning outcomes

- ***Improve equitable access to quality education for disadvantaged students***. This can be achieved through the allocation of (block) grant funds to lagging vulnerable schools funded by OP Education. The proposed financing mechanism would top up the regular school budget with a grant amount leaving the principal and the teachers the freedom to choose from a menu of relevant activities and making them accountable for results. Preventing dropout and increasing enrollment by developing and implementing a National Program to Reduce ESL should be a priority. Resources must be secured to ensure adequate systemic implementation of prevention, intervention, and compensation measures and attain greater enrollment of: (i) children at-risk of dropping out; (ii) children who have never been enrolled in school; (iii) early school leavers; (iv) Roma; and (v) migrant children. Such a National Program would provide grants to lagging schools to address ESL and decrease learning gaps, including by using the Simplified Cost Option (SCO) method promoted by the European Commission (EC) in support of a move towards a results-based management approach.
- **To improve learning, demand-side programs need to increase student's effort or capacity to learn**. To make up the lack of learning gaps of low-performing students, remedial classes, tutoring, counseling in school is the first relevant approach, organizing bridging summer courses and extracurricular are recommendable. The program should target schools with students from disadvantaged groups, including Roma students in terms of language proficiency for school, transportation to and from school, support learning materials and cash transfer to compensate for opportunity costs, etc.
- **At the school level, consideration should be given to introducing a student mentoring program to reduce early school leaving and develop skills**. This should include a system that provides schools with the ability to plan school-level improvements tailored to the teaching force and diverse needs of the socioemotional students they serve. Offer systematic support to school leaders and teachers to ensure that relevant training and guides are available to prepare school staff on methodologies that can engage students meaningfully, especially students from vulnerable

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groups and disadvantaged homes who endure multiple constraints. Recognize schools and groups of teachers who make substantive progress in improving student outcomes and student learning.

Collect, monitor and use data regularly in direct connection with the NESPE system. An important component will be regular monitoring, data collection, and use related to the groups at risk of ESL. A Data Collection Methodology would support interventions implementation and monitoring. It covers all data and information to be collected by schools to identify and track students at risk of ESL/dropout, early leavers, and out of school children using dedicated instruments, and a list of key performance indicators to measure progress towards reducing the ESL rate and improving student outcomes. With the basic data and information collected at the school and community level, the ESL data will be integrated with contextual data such as socio-economic information, census, new borne, etc. which provide an inclusive status quo for further actions to be taken.

Horizontal Aspects

Spending allocated budget for education should be more targeted, integrative, and coherent. Within an adequate budget for education, as Bulgaria has, it becomes essential to pay attention to the efficiency and effectiveness of spending through the following: equitable budget allocation, the linkage between policy intent and policy implementation through programs, better human resource management, and promote school autonomy.

- More resources through block grants should be allocated to vulnerable schools to increase equity in spending, to equalize fiscal imbalances among localities, and give proportionally more to poor and vulnerable students to improve their learning outcomes (participation, completion, and performance rates), as they are overaffected after pandemic;
- Education financial resources should target better school learning outcomes, better performance of their students (enrollment, completion, transition, performance) rather than inputs, like staff payroll, textbooks, meals, or outputs, like students' participation in workshops or teacher training.
- Create a better connection between policy intent and formulation with its actual implementation through programs and projects. The right mix of programs implemented in education that may cover all the measures promoted in the education strategy to be implemented will allow accountability for results distributed at different levels and no gap in financing areas that need resources.
- Better incentives for staff working and managing education units needs to be designed to encourage teachers' and principals' performance in vulnerable areas, like rural and marginalized, with vulnerable students to improve the quality of teaching and management but also to record better outcomes for vulnerable students and to tackle equity and quality issue at the same time. Monitoring attendance is one result that proved successful in the currently implemented project to initiate such a reform.
- More autonomy to schools offers efficient spending and better capacity to implement projects. In this context, autonomy refers to teachers' selection, hiring, and payment but also the allocation of funds per project or activities, including for education infrastructure or accelerating, recuperating learning.

Tackling the digital divide and bringing innovative teaching practice into reality. The number of digital devices used in classroom education (such as laptops, computers, video projectors, cameras, and smartboards) are still lagging other European Countries. On average, in all ISCED levels, schools have lower chances to be highly digitally equipped and connected than the European average (European Commission, DG CNECT, 2019). Specific investments of local Government helped some schools to be better equipped for using digital technologies in learning. At the same time, high-speed connectivity has a slightly higher share at all ISCED levels than the European average. However, there are high differences among

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schools, as most local governments do not have the means to support investment programs in education, and national programs are developing at a slow pace.

Therefore, innovative practices used for teaching result from rather specific initiatives of teachers or schools, rather than an outcome of specific national programs/policies. As in the case of student's views on various digital competences, the outcomes of the national report concerning schools with strong policies and strong support to use digital technologies in teaching and learning and promotion of professional development need to be considered with care (European Commission, DG CNECT, 2019).

Free digital tools are employed more and more by teachers, and various education usage ideas have started to be widespread on the Internet. Analyzing teachers' education situations through digital platforms, the most used tools are, by far, Kahoot, Padlet, and Voki. Among advantages (given the context) is that these can be embedded into practice with only a beamer and a laptop, sometimes requiring students' smartphones. On the other end, multitouch tables, VR headsets, and AR glasses were bought by a few IT labs in universities and in schools and used for demos, since the (educational) software is expensive or not yet available. Higher education institutions are using Moodle, Google Classroom, Claroline, Easyclass, or Edmodo to distribute education support materials to students and to gather learning portfolio pieces. While ICT in education is promoted and recognized as helping institutional development and the learning process, very few universities have specific policies. None of them has a single learning platform for all specializations.

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Legal and Policy Framework

United Nations Convention on the Rights of the Child

Constitution of Republic of Bulgaria

Child Protection Act

Pre-school and school Education Act

Public Finance Act

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Annex 1

ECEC: List of NPDE and Respective Modules Addressing Preschool Education

1	2	3	4	5	6	7
Title[430] (EN[431] and BG)	Level of Focus to Preschool Education Program key words / key (reporting) specifics / key description(s)	Year *Remark for the specific &/or (the following) year(s)*	**M**odule Relevant to Preschool and /or Performance Indicator (**PI**)[432]	Results per **M**odule or per **PI**	Financing **Allocated** (in BGN)[433] key financial reporting specifics & remarks	Financing Spent (in BGN)
NP We Succeed Together	Entirely focused *Transition from family to preschool; Supportive environment and parental involvement. Stimulating*	2019 Reported activities for both the calendar (19) and school (19/20) year.	**M:** *no modules specified for this program for 2019* **PI**: 100 KGs to realize activities under this program **PI**: 1500 children to be included in the activities	150 KGs participated[435] 4828 children[436]	200000	280977[434] The reported financial information refers to 19/20 school year

[430] If not specified otherwise the sources of the content of the table are the respective (yearly) reports for the (respective) NPs.

[431] The translation of the tittle in English is not official; it is done by the author of the text.

[432] When there are no separate modules: PI for the whole program (only these PI that are relevant to preschool education).

[433] When the amount is aligned to the left it is for the whole program, when aligned to the right – for the respective module.

[434] NPDE Year Report 2019.The reported (financial) information for NP We Succeed Together refers to 2019/2020 school year. Source: https://mon.bg/bg/100653

[435] Reported in: *Basic Parameters of the Implementation of the Envisaged Activities and Tasks by Areas of Impact in the Action Plan for 2019 for the Implementation of the National Lifelong Learning Strategy for the Period 2014-2020* Published only in Bulgarian, original title: ОСНОВНИ ПАРАМЕТРИ на изпълнението на предвидените дейности и задачи по области на въздействие ПЛАН ЗА ДЕЙСТВИЕ ЗА 2019 ГОДИНА В ИЗПЪЛНЕНИЕ НА НАЦИОНАЛНАТА СТРАТЕГИЯ ЗА УЧЕНЕ ПРЕЗ ЦЕЛИЯ ЖИВОТ ЗА ПЕРИОДА 2014-2020 ГОДИНА, published 25.09.2020, retrieved from: https://www.mon.bg/bg/143

[436] NPDE Year Report 2019.The reported information for NP We Succeed Together refers to 2019'2020 school year. Source: https://mon.bg/bg/100653

НП Успяваме заедно	*activities and interactions aimed at children-first comers*	2020 *Support to innovate and cooperate in and outside the pre-school institution*	**M1: It is nice in the kindergarten** Stimulating activities and interactions aimed at children-first comers and their parents. **M2: Innovative KG** - Fostering environment for innovative projects incl. hiring specialists to run activities outside the professional competence of the KG's preschool teachers - Sharing innovative practices between institutions within the KG, including with the parental community **M3: Together for quality preschool education** - Creating clusters of institutions in the system of preschool and school education with specific joint goals and working together to achieve them - Fostering cooperation to realize joint measures/activities		400000 300000 70000 30000	
1	2	3	4	5	6	7
			PI: 200 KGs to realize activities under this program **PI**: 2500 children to be included in the activities **PI**: 200 pedagogical specialists included			

NP Develop-ment of the System of Preschool Education НП Развитие на системата на пред - училищното образование	Entirely focused *Equal access* *Support to children in preparatory groups to reach school readiness and provision of additional training* *Targeting children from disadvantaged background who are either at risk (§ 1. 11. CPA) or whose mother tongue is not Bulgarian. Additional education in small groups (2-8children)*	2017 *2018*	**M:** *no modules specified for this program* **PI**: 130 KGs and schools to be included **PI**: 1600 children included in project activities **PI**: 1600 parents included in project activities **PI**: 130 KGs and schools to be included **PI**: 1600 children included in project activities **PI**: 1600 parents included in project activities	400 project proposals of 228 KGS and schools 2 680 children with whom 425 teachers will [sic] work 284 KGS and schools are included (203 KGs and 81 schools with 519 specially formed groups 3403 participating children; *2168 of them have received a "preparatory group" certificate. The ones who did not were the 5-year-old children, who will continue their compulsory preschool education next year.* 3397 participating parents *544 teachers were involved in realizing the program*	400000 400000	523709[437] The reporting refers to the 2018/2019 school year
NP	Partly focused	2018				

[437] NPDE Year Report 2018. The reported (financial) information for NP Development of the System of Preschool Education refers to 2018/2019 school year. Source: https://mon.bg/bg/100437

Together for Every Child НП Заедно за всяко дете	Unclear allocation vis-à-vis activities, funding and (reported) results between preschool and school education[438]. *From all mixed NPDE, this one and NP Caring Together for the Pupil could be considered the ones paying the strangest attention on preschool education.*		**M: *Inclusion Teams* Activity 1: *Support for the Inclusion Teams*** **PI**: Reducing the relative proportion of not included in the education system children and pupils in compulsory preschool and school age as a result of the activities of the teams [sic]	[sic] Reduction of the relative proportion of children and pupils not included in the education system by supporting and providing financing to the inclusion team: - for travel expenses - for administrative expenses - for communication.	250000 unspecified of funding & spending preschools & **all years,**	11845 distribution reported between schools re: **all modules**.
		2019 Improving the interaction with parents (especially in the context of	**M: Supporting Inclusion Teams**	91 applications for financing; 79 approved, of which 26 KGs[439] **M1**: 123 KG, schools and RDEs[440] Funded 104 educ.	300000 100000	 34883[441]
1	2	3	4	5	6	7

[438] Activity I "Teams support"– *13398 BGN. For both schools and preschools; Activity 2 „ Promoting the work of the teams" – 26 816 for Regional development units*

[439] NB: the data was reported in the *Interim Report on the Implementation of the Strategy for Reducing the Proportion of Early Leavers from the Education System (2013-2020)*

[440] Report for the Administration of MES as of 31.12.2019.

[441] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

	prevention of dropout): see M2.	**PI**: Reducing the relative proportion of not included in the education system children and pupils in compulsory preschool and school age as a result of the activities of the teams [sic] **PI**: Improved communication between the representatives of the institutions that take part in the Inclusion Teams	institutions, including **5 KGs;** 2992 InclT[442] visits financed; 1428 meetings with parents[443]		
		M2 Good practices of the institutions from preschool and school education for interaction with the parents **PI**: Number of parents participating in the module activities **PI**: Number of information activities and activities for training parents	**M2:** participated 92 KGs and schools[444] & 11576 parents: 7038 in info activities and 4538 in trainings[445]	200000	144631
	2020			200000	
		M1 Supporting Inclusion Teams **PI**: Reducing the relative proportion of not included in the education system children and pupils in compulsory preschool and school age as a result of the activities of the teams financed by this module [sic]		100000	

[442] InclT = Inclusion Team

[443] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

[444] Report for the Administration of MES as of 31.12.2019.

[445] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

			M2 Good practices of the institutions from preschool and school education system for interaction with the parents **PI**: Number of parents participating in the module activities **PI**: Number of information activities and activities for training parents		100000	
NP Caring Together for the Pupil НП Заедно в грижата за ученика	Partly focused Smother transitions, esp.: preschool - primary school; Networks and collaboration preschool - primary school Individual approach. Unclear allocation between	2019	**M2: Provided conditions for team work of the teachers of grades I-IV with preschool teachers and other primary school teachers (grades V-VII)** **PI**: 750 project applications **PI**: 1500 participating teachers **PI**: 52 500 school hours	273 approved proposals 746 participating teachers 11016 financed lessons with 11194 participating pupils[447]	1000000 650000 Unspecified distribution between schools and preschools	141455[446] The reporting refers to the 19/20 school year.
1	2	3	4	5	6	7
	preschool and school education vis-à-vis activities, funding and(reported) results	2020	**M2: Provided conditions for team work of the teachers of grades I-IV with preschool teachers and other primary school teachers (grades V-VII)** **PI**: 250 project applications **PI**: 17 500 school hours **PI**: 1500 participating teachers		300000 200000	
NP No Lesson Missed	Partly focused Uninterrupted education	2018	**M: No Lesson Missed in the Kindergarten** **PI**: 250 KGs to participate **PI**: 1000 replacing teachers in KGs	115 KGs 666 replacing KG teachers	100000	131454

[446] NPDE Year Report 2019.The reported (financial) information for NP Caring Together for Every Pupil refers to 2019/2020 school year. Source: https://mon.bg/bg/100653

[447] NPDE Year Report 2019.The reported (financial) information for NP Caring Together for Every Pupil refers to 2019/2020 school year. Source: https://mon.bg/bg/100653

НП Без свободен час	process. Providing replacement of absent teachers in situations of pedagogical interactions		**PI**: 30000 planned astronomical hours of replacement	16987 hours of replacement		
		2019	**M: No Lesson Missed in the Kindergarten** **PI**: 250 KGs to participate **PI**: 1000 replacing teachers in KGs **PI**: 30 000 planned astronomical hours of replacement	109 KGs 929 replacing KG teachers 22520 astronomical hours of replacement	135000	187705
		2020	**M: No Lesson Missed in the Kindergarten** **PI**: 100 [sic] KGs to participate **PI**: 3000 planned astronomical hours of replacement		250000	
NP ICT in the Preschool and School Education НП Информационни и комуникационни технологии (ИКТ) в системата на пред-училищното и училищното образование	Partly focused Securing access to e-services and content; introducing systems for distant management; hardware equipment and internet connectivity.	2016	**M:** *no specific modules within this program* **PI:** 30% of the pre-schools with access to contemporary technologies in the educational process and 10% trained pedagogical specialists.	17% of the KGs in the country got of multimedia equipment (1 piece) including interactive digital board and a beamer.	7500000	
		2017	**PI:** At least 300 new institutions of the preschool education system with access to contemporary technologies in the educational process and trained pedagogical staff	367 KGs have received financing for purchasing innovative hardware [sic]	10230000	
		2018	Purchasing of interactive multimedia equipment or innovative hardware [sic] for the institutions of preschool education and trained pedagogical staff **PI:** At least 300 KGs	395 KGs	10000000 Unspecified distribution of funding between preschools and schools.	7978677
		2019	Purchasing of interactive multimedia equipment or innovative hardware [sic] for the institutions of preschool education	190 KGs provided with interactive board and	11000000 10934145[449]	

[449] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

BG05M2OP001-4.001-0008 "Provision of information and publicity activities of the Operational Programme Science and Education for Smart Growth, evaluations and studies of Operational Programme Science and Education for Smart Growth and preparation for the next programming period" under priority axis 4 "Technical Assistance" of the Operational Programme Science and Education for Smart Growth"

			PI: At least 300 KGs	beamer with computer and 110 KGs – with laptops[448]	Unspecified distribution of funding between preschools and schools.	
		2020	Purchasing of interactive multimedia equipment or innovative hardware [sic] for the institutions of preschool education **PI:** At least 300 KGs		12000000	
1	2	3	4	5	6	7
NP Provision of Modern	Partly focused	2018	**M:** ***Assessment and approval of educative booklets, textbooks and learning sets***		1700000	571117
Educational Environment	Specific for preschool education: *learning and support materials and*		**PI:** Number of assessed and approved learning booklets for III and IV preparatory groups of the preschool education	Approved learning booklets: for IV preparatory group: 56; for III preparatory group: 54	For the whole module which includes also school textbooks and learning materials (not listed here)	
НП Осигуряване на съвременна образователна среда	*infrastructure.*	2019	**M:** ***Assessment and approval of educative booklets textbooks and learning sets***		1000000	510218[450]
			PI: Number of assessed and approved learning booklets for III and IV preparatory groups of the preschool education	Approved learning booklets: for II preparatory group: 45 for I preparatory group: 55		
		2020	**M: Road safety training sites**		600000	
			PI: 60 Road safety training sites in KGs **PI**: 128 Road safety training sites in schools		of which for KGs: 150000 and for schools: 450000 Beneficiaries should provide co-financing of at least 20% of the value of their project proposal	
NP Native	Partly focused	2016	**M:** no specific module for preschool education		1200000	1404951

[448] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

[450] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

Language and Culture Abroad НП Роден език и култура зад граница	Unclear allocation between preschool and school education vis-à-vis activities, funding and (reported) results.		**PI**: Children, pupils, students learning BG language history and geography abroad	9681 children, pupils, students	**Unspecified distribution** of funding between preschool and school education **for all years**.	
		2017	**PI**: Number of beneficiaries submitting applications **PI**: Children, pupils, students learning BG language history and geography abroad **PI**: Number of children pupils, students who took part in extracurricular activities	147 submitted applications 137 approved Altogether 13287 children, pupils & students. More than 3000 took part in extracurricular activities	1200000	
		2018	**PI**: 90 beneficiaries submitting applications **PI**: 10000 children, pupils, students learning BG language history and geography abroad **PI**: 3000 of children & pupils/students who took part in extracurricular activities	154 submitted applications 147 approved Altogether 12728 children, pupils and students. 4558 children and pupils in extracurricular activities	1500000	1521428[451] The reporting refers to the period 01.07.18 – 30.06.19
		2019	**PI**: 90 beneficiaries submitting applications **PI**: 10000 children, pupils, students learning BG language history and geography abroad **PI**: 3000 of children & pupils/students who took part in extracurricular activities	156 submitted applications 140 approved Altogether 12132 children, pupils and students of whom **900 children**. 3200 children and pupils in extracurricular activities[452]	1500000	1608446[453] The reporting refers to the period 01.07.19 – 30.06.20
1	2	3	4	5	6	7

[451] NPDE Year Report 2018. The reported (financial) information for NP Native Language and Culture Abroad refers to the period 01.07.18 – 30.06.19. Source: https://mon.bg/bg/100437

[452] NPDE Year Report 2019. The reporting for NP Native Language and Culture Abroad Refers to the period 01.07.19 – 30.06.20. Source: https://mon.bg/bg/100653

[453] NPDE Year Report 2019. The reporting for NP Native Language and Culture Abroad Refers to the period 01.07.19 – 30.06.20. Source: https://mon.bg/bg/100653

		2020	**M: Supporting the teaching of Bulgarian language and literature, by History of Bulgaria and Geography of Bulgaria** **PI**: 90 [potential] beneficiaries participating with projects / submitted project proposals; **PI**: 10,000 children, pupils and prospective students who participated in the BG language training language and literature, history and civilizations, and geography and economics; **PI**: 3000 children and students involved in extra-curricular activities aimed at the preservation of national identity, culture and traditions.	1760000
			M: Training of Teachers from Bulgarian Sunday Schools Abroad **PI**: 180 teachers involved in the trainings.	271000
			M: 3 Partnerships **PI**: 20 funded projects; **PI**: 500 students and teachers involved in partnership activities	100000
NP Supporting Municipalities to Implement Activities for	Partly focused Unclear allocation between preschool and school education vis-à-vis	2019	**M**: no modules **PI**: no PI	1000000 56700[454] 10% municipal co-funding required
		2020	PI: 1500 children in compulsory preschool education	1000000

[454] NPDE Year Report 2019.The reported (financial) information for NP Supporting Municipalities to Implement Activities for Educational Desegregation refers to 2019/2020 school year. Source: https://mon.bg/bg/100653

Educational Desegregation НП Подпомагане на общини за реализиране на дейности за образователна десегрегация	activities, funding and (reported) results. Support for the local efforts of educational desegregation of children in compulsory education age, their upbringing and provision of learning materials for them.		and for pupils in primary school included in the process of educational desegregation and for whom learning materials are provided			
NP Qualification НП Квалификация	Partly focused Unclear allocation between preschools and schools vis-à-vis activities, funding and (reported) results.	2017	**M:** no modules in NP Qualification in 19 **PI**: 5000 pedagogical specialists trained **PI**: 41 trainings to be conducted **PI**: 3 National conferences	3019 pedagogists trained of whom 468 assumed trainer of trainers' roles (ToT) 41 trainings; 78 training groups 3 National conferences of which 1 ('*We lead the future by the hand*') devoted to preschool education with 150 pedagogical specialists. *This conference was the only activity within this year that was clearly and entirely devoted to preschool education.*	600000 **Unspecified distribution** of funding between preschool and school education **for all years except for 2018.**	
1	2	3	4	5	6	7
	Educators' qualification upkeeping and upgrading.		**PI**: 2 round tables on good practices **PI**: Researches and analyses **PI**: Development of mechanism for assessing of the quality of the conducted qualification activities.	259 pedagogical specialists participated 2 conducted researches, 2 analytical reports **1 mechanism for assessing quality of qualification activities created**		
		2018	**M: Qualification of pedagogical specialists – managers** **PI**: 300 KG principals	*The only module within this year that was clearly and entirely devoted to preschool education* 285 trained KG principals	800000	637939

			PI: 150 Newly appointed KG principals	121 trained newly appointed KG principals		
		2019	**M**: no modules **RI**:[456] 2400 pedagogical specialists improved their qualification and participated in forums **RI**: 3 discussion forums held **RI**: 4 conferences held **RI**: 1 conducted research **RI**: Number of certificates issued for awarded qualification credits – not specified	5066 pedagogical specialists improved their qualification and participated in forums 3 discussion forums and one round table held 4 conferences held 1 research conducted 4599 certificates issued[457]	850000	818084[455]
		2020	**M**: no modules **RI**: up to 3500 pedagogical specialists improved their qualification and participated in forums **RI**: 4 conferences held **RI**: Number of certificates issued for awarded qualification credits – up to 3500 **RI**: 1 conducted research **RI**: 1 conducted analysis		1100000	
NP Optimization of The School Network	Partly focused Unclear: the proportion preschool vs. school staff	2016	**M: Optimization of the internal structure of schools KGs and dormitories**	1234 compensations paid to KGs: 100% to 1199 KGs; 50% to 31 KGs.	24860000 **Unspecified distribution** of funding between preschools	

[455] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

[456] Result Indicator [sic] This is the term used in the description of the program when to the PIs are assigned values.

[457] NPDE Year Report 2019. Source: https://mon.bg/bg/100653

НП	covered by the program – for all years.			12862 staff members compensated: 9402 pedagogists & 3460 other staff		and schools **for all years**.
1	2	3	4	5	6	7
Оптимизация на училищната мрежа	Restructuring; labor law compensation for staff leaving the (pre) school education system	2017	**M: Optimization of the internal structure of schools KGs and dormitories**	11831 staff members compensated: 8442 pedagogists & 3389 other staff	30717000	
NP **Optimization of the Internal Staff Structure**	Partly focused Unclear: the proportion preschool vs. school staff covered by the program – for all years.	2018	**M:** no modules **PI**: Number of staff who received compensations due to HR restructuring: 8100 pedagogical staff 2900 other staff	7890 pedagogical staff 3115 other staff	28000000 **Unspecified distribution** between preschools and schools **for all years**	49289400[458] The reported financial information refers to the period up to 05.11.2018
НП Оптимизация на	HR restructuring and management. Compensations paid to staff who left the system of the preschool and	2019	**PI**: Number of staff who received compensations due to HR restructuring: 8100 pedagogical staff 2900 other staff	8022 pedagogical staff 3279 other staff[459]	36577400	63494573[460] The reported financial information refers to the period up to 05.11.19
вътрешната структура на персонала	school education as a result of the optimization of the staff structure in the (pre)school education system.	2020	**PI**: Number of staff who received compensations due to HR restructuring: 8000 pedagogical staff 3000 other staff		69677000	

[458] NPDE Year Report 2018. The reported (financial) information for NP Optimization of the Internal Staff Structure refers to the period up to 05.11.18. Source: https://mon.bg/bg/100437

[459] NPDE Year Report 2019. The (financial) reporting for NP Optimization of the Internal Staff Structure refers to the period up to 05.11.19. Source: https://mon.bg/bg/100653

[460] NPDE Year Report 2019. The (financial) reporting for NP Optimization of the Internal Staff Structure refers to the period up to 05.11.19. Source: https://mon.bg/bg/100653

Annex 2

ECEC Policy Mix (available as a separate .xls file accompanying this document).