

# Analysis of the National Concept of Higher Education Reform

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## Introduction

This policy analysis reviews the National Concept of Higher Education Reform (hereinafter referred to as the "Concept"), presented on October 16, 2025, and approved on December 1, 2025, and identifies several fundamental, conceptual, and procedural flaws. These flaws pose significant risks to the development of Georgia's higher education system. The analysis demonstrates that both the drafting process of the Concept and the initiatives contained within it contradict the Constitution of Georgia, the Law on Higher Education, and the key principles defined for member countries of the European Higher Education Area within the framework of the Bologna Process. These contradictions hinder the sustainable development of the higher education system, endanger the protection of the interests and rights of students and academic personnel, undermine institutional autonomy and academic freedom, and call into question Georgia's obligations and aspirations regarding European integration and the fulfillment of the Association Agreement with the European Union.

Furthermore, a critical weakness of the Concept lies in the absence of a clear and consistent formulation of the goal of the higher education system and the mission of the university in the country, which serves as the foundation for any reform. The declaration of such goals and missions is possible only on the basis of open discussion with the academic community and the general public.

The changes proposed by the Concept contradict quality assurance standards, which creates risks for the international recognition and credibility of Georgian higher education, including in the field of medical education.

Furthermore, the closed format of the Concept's development and deliberation, the absence of an analytical foundation and empirical evidence, the misalignment between identified problems and proposed solutions, and the use of vague and ambiguous terminology significantly undermine the conceptual credibility and political legitimacy of the reform. The Concept, the implementation of which is already underway, lacks the essential elements required for executing a reform, such as: an implementation plan, appropriate resource and financial allocation, defined timelines, responsible bodies and individuals, expected outcomes, and risk analysis.

The analysis indicates that the reform fails to ensure that the best interests of the country and the university community are taken into account, nor does it uphold the norms defined by the Constitution and legislation of Georgia, or the principles of the European Higher Education Area.

## Analysis

The higher education system of Georgia, as part of the European Higher Education Area, is founded upon principles such as: the substantial involvement of the academic community in the higher education governance process, university autonomy, academic freedom, and academic integrity. These matters are regulated by the Constitution of Georgia and the Law on Higher Education and are emphasized in the policy documents of the European Higher Education Area.

## The Concept Development Process

***Substantial participation of the academic community was not ensured in the process of developing, reviewing, and approving the Concept.***

In the process of drafting, reviewing, and approving the National Concept of Higher Education Reform<sup>1</sup>, presented on October 16, 2025, and approved on December 1, 2025, the State failed to ensure the protection of principles defined by the Law of Georgia on Higher Education, as well as those within the framework of the Bologna Process - specifically regarding the substantial involvement and participation of students and staff in the decision-making and governance processes related to higher education. According to Article 3, sub-paragraph "z" of the Law of Georgia on Higher Education, **the State ensures the participation of academic personnel, scientific personnel, and students of higher educational institutions in the decision-making process and the control of its execution<sup>2</sup>.**

Furthermore, the Communiqué adopted at the 2024 Ministerial of the European Higher Education Area (EHEA) (Tirana Communiqué, 2024) once again emphasizes the obligation of **member states and responsible persons to ensure conditions for the substantial involvement of students and staff in matters related to the institutional and systemic governance and development of higher education<sup>3</sup>.**

1. As is known to the academic community, the discussion of the Concept was limited to only three closed meetings between the Prime Minister, the Minister of Education, Science and Youth of Georgia, and university rectors. This excludes the substantial involvement and deliberation of the academic community - students, academic, and scientific personnel - regarding changes to the higher education system.
2. Furthermore, it is noteworthy that the implementation of legislative changes has already begun without substantive discussion or approval of the Concept. For example, on November 11, 2025, an amendment was made to the Rule for Conducting Unified National Examinations<sup>4</sup>, according to which universities must submit questionnaires regarding student admission quotas to the Higher Education Management Information System by February 9, 2026. As revealed by statements made to the media, by this time, student admission quotas will be established based on market research results in accordance with the profiles defined for various universities<sup>5</sup>. On December 10, 2025, amendments were also made to the Law on Higher Education<sup>6</sup>, according to which (along with other changes), grant financing was abolished, and it was determined that the Government of

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<sup>1</sup> [National Concept of Higher Education Reform, October 16, 2025;](#)  
[National Concept of Higher Education Reform, December 1, 2025.](#)

<sup>2</sup> [Law of Georgia on Higher Education, 2004.](#)

<sup>3</sup> [Tirana Communiqué, 2024;](#)

[Statement of the European Higher Education Area on Fundamental Values, 2024.](#)

<sup>4</sup> [On the Amendment to the Order No. 19/N of the Minister of Education and Science of Georgia dated February 18, 2011, "On Approval of the Regulation for Conducting Unified National Examinations and the Rule for Distribution of State Study Grants."](#)

<sup>5</sup> [Quota distribution across faculties will be based on labor market analysis.](#)

<sup>6</sup> [Amendment to the Law on Higher Education, 1198-IVms-XImp.](#)

Georgia will define the list of educational programs (curricula) and the number of students to be admitted by program for universities.

3. This circumstance is confirmed by the explanatory note to the draft amendments to the Law on Higher Education (234/2-XImp, 03.12.2025)<sup>7</sup>, which states that state, non-state, or/and international organizations/institutions, experts, or working groups did not participate in the process.

The process described above violates the legislation in force in Georgia and EHEA principles, and infringes upon the dignity and right of Georgia's academic community to participate substantially in the formation and systemic changes of higher education. Consequently, this process also contradicts the Association Agreement between Georgia and the European Union, as Article 359 of the Agreement specifically implies harmonization with the principles of the Bologna Process.<sup>8</sup>

Furthermore, since the Concept implies large-scale changes to the fundamental laws of the educational system, which will have significant fiscal, institutional, administrative, and social impacts - and given that the issues described in the Concept are connected to obligations undertaken by Georgia under the Association Agreement - it was necessary to prepare a Regulatory Impact Assessment document before drafting the bill on the planned changes. According to Resolution No. 35 of the Government of Georgia, although amendments to the Law on Education are not included in the list of mandatory laws, a Regulatory Impact Assessment "may also be carried out during the preparation of any draft normative (including sub-legislative) act, by the decision of its author/initiator — the Government of Georgia or a state institution of the executive branch of Georgia" (Resolution No. 35, 2020, Article 5, 1b)<sup>9</sup>.

The preparation of a Regulatory Impact Assessment document and the execution of steps associated with this process - open and public consultations with stakeholders and experts, proper quality research, data collection, and the presentation of evidence - constituted the necessary and minimum standard that should have been met when planning such large-scale changes.

## **Autonomy and Academic Freedom**

### ***The Concept grossly violates university autonomy and academic freedom.***

Both the process of developing and approving the Concept, as well as its content, grossly violate the fundamental principles of higher education - institutional autonomy and academic freedom. These issues are guaranteed by Article 27, Paragraph 3 of the Constitution of Georgia. The Law on Higher Education additionally elaborates on these issues and explains that autonomy implies **the freedom of a higher educational institution and its main educational unit to**

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<sup>7</sup> [Draft Law of Georgia "On Amendments to the Law of Georgia on Higher Education" \(234/2-XImp, 03.12.2025\).](#)

<sup>8</sup> [Association Agreement between the European Union and the European Atomic Energy Community and their Member States, of the one part, and Georgia, of the other part, 2014](#)

<sup>9</sup> [Resolution of the Government of Georgia No. 35 on the Approval of the Methodology for Regulatory Impact Assessment.](#)

**independently determine and implement academic, financial-economic, and administrative activities** (Article 2, b).

Furthermore, EHEA policy documents, including the Tirana Communiqué<sup>10</sup>, emphasize the responsibility to protect university autonomy, ensuring that universities have the will and capability to define and implement their own priorities and policies regarding (1) governance/organization, (2) finances, (3) staffing, and (4) academic matters. Institutional autonomy is a prerequisite for academic freedom, which emphasizes the freedom of universities and academic personnel to determine for themselves the fields, scope, goals, and methods of teaching and research in accordance with legislation and academic standards... as well as the values of academic integrity<sup>11</sup>.

The declarations contained in the Concept, as well as the amendments made to the Law on Higher Education on December 10, 2025, grossly violate the aforementioned norms of institutional autonomy and academic freedom.

- 1. Centralized determination of educational programs (curricula) and corresponding student admission quotas for universities. The amendments made to the Law on Higher Education on December 10, 2025,**<sup>12</sup> constitute a grave precedent of infringement upon university autonomy and academic freedom. According to these amendments, higher educational institutions are deprived of the right to independently determine which educational programs they will implement and what the main directions of their educational, research, and creative activities will be. According to the amendment, **the Government of Georgia, upon the recommendation of the Ministry of Education, will define for universities the list of educational programs (curricula)**<sup>13</sup> **that they have the right to implement.** Furthermore, **universities will be able to determine the main directions of their educational, research, and creative activities only in accordance with this list.** According to the same legislative amendment, **the Government approves the number of students to be admitted by higher educational institution and by educational programs (curricula).**
- 2. Rigid determination of student admission quotas based on "state commissioning" and labor market analysis.** Defining student quotas in state universities based on state commissioning and the labor market constitutes a gross infringement of academic freedom, which significantly diminishes the function and goals of higher education. The goals of higher education include (but are not limited to) the formation of an autonomous and responsible individual, the realization of personal interests and intellectual and creative potential, preparing the individual for employment in a changing environment, the formation of a democratic and humane society, and contributing to the resolution of local

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<sup>10</sup> [Tirana Communiqué, 2024.](#)

<sup>11</sup> [EHEA Statement on Fundamental Values, 2024.](#)

<sup>12</sup> [On the Amendment to the Law of Georgia "On Higher Education", 1198-IVms-XImp, 10.12.2025.](#)

<sup>13</sup> Educational Program (Curriculum) – A combination of study courses/modules necessary to obtain a higher education qualification, which includes the program goals, learning outcomes, study courses/modules with corresponding credits, student assessment system, and peculiarities of the organization of the teaching process, including the possibility of using e-learning (if applicable) (Law on Higher Education, Article 2, h5).

and global challenges through scientific, research, and innovative approaches.<sup>14</sup> Consequently, an approach to higher education based on state commissioning and the labor market restricts both the function of universities and the opportunities for students to acquire the advanced knowledge, competencies, and values necessary for a fulfilling life in a changing environment and for addressing current challenges.

3. **"One City - One Faculty" violates institutional autonomy.** The declaration made from the perspective of resource optimization, such as "One City - One Faculty" - which implies the redistribution of faculties operating in state universities "taking into account traditional profile and historical experience" - contradicts the autonomy of universities to independently decide on their own academic activity profile, priorities, resources, and organization.
4. **The restriction on the admission of foreign students in state universities is a gross interference in academic autonomy.** The capacity of universities to admit students, including foreign students, is determined based on their resources and quality interests, in accordance with the authorization standards for higher educational institutions.<sup>15</sup>
5. **Introduction of the 3 (Bachelor's) + 1 (Master's) system. Mandating the 3+1 system is a gross violation of academic autonomy and freedom,** as it restricts the ability of the university and academic personnel to determine the duration of programs based on the program's goals, field specificity, and content, grounded in Georgia's educational context as well as internationally established principles and best practices. Such a rigid approach also poses a threat to the quality of educational programs and the proper achievement of learning outcomes.
6. **The academic personnel staffing policy defined in the Concept and announced during its presentation grossly violates the autonomy of universities in managing academic personnel.** The provision in the Concept and the specific point detailed in the presentation<sup>16</sup> that each direction will be led by 1 professor, with whom 2-3 associate professors and more than ten assistant professors will work, violates not only the principle of autonomy but also that of academic freedom. This approach constitutes a structure defined by hierarchy and fixed ratios, which inherently precludes the academic freedom and autonomy of the subordinate associate and assistant professors. This poses a substantial threat to the free, diverse, and interdisciplinary development of academic and research activities. Furthermore, determining the number of academic personnel through rigid ratios disregards the needs and specifics of current and planned academic and scientific activities in each direction. It will impede opportunities for the promotion of academic personnel, the effective management and consideration of which is possible not through centralized planning, but at the faculty and school levels under conditions of academic freedom.

In addition to violating the autonomy of academic personnel management, the proposed change also poses a serious threat to the status and standing of existing academic

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<sup>14</sup> Law on Higher Education, 2004, Article 3; Magna Charta [Universitatum, 2020; Recommendation CM/Rec\(2007\)6 of the Committee of Ministers of the Council of Europe.](#)

<sup>15</sup> [Order No. 99/N of the Minister of Education and Science of Georgia, 2010.](#)

<sup>16</sup> [Presentation of the National Concept of Higher Education Reform.](#)

personnel. Currently, the distribution of affiliated personnel in state universities is presented in Table 1. If we assume that the total number of affiliated personnel will not decrease, then considering the provisions of the Concept, the current ratio of professors and teaching staff in state universities may change according to the probable configuration of Scenario I presented in the table, meaning that many professors and associate professors will lose their status (Scenario I). If we assume that professors will not lose their status, then the total number of academic personnel, given the proposed ratio, will increase sharply (Probable Scenario II), which is an unrealistic scenario given the reduction in the education budget for the current fiscal year.

**Table 1.** Number of Academic Personnel in State Universities

	Total Academic Personnel	Assistant	Assistant-Professor	Associate Professor	Professor
Now	3816	124	714	1978	1000
Probable Scenario I	3822	2730		819	273
Probable Scenario II	14 000	10 000		3000	1000

**Source:** Authors' calculation based on data from the National Center for Educational Quality Enhancement.

7. **The prospective sale of university buildings without the universities' consent will create a grave precedent of interference in financial and property, as well as academic autonomy.** From the provisions noted in the Concept or interviews with the Prime Minister<sup>17</sup>, we ascertain that the Concept envisages the sale of university buildings located in the central districts of Tbilisi and the construction of new infrastructure in Rustavi. This initiative will undermine the foundation of the academic culture already established in the city center. It is noteworthy that university buildings are distinguished by their historical memory, disciplinary characteristics, artifacts, and scientific laboratories. The sale of these buildings poses a substantial threat to the maintenance of the continuity of higher education and the integrity of the academic space. Furthermore, it is fundamentally important for the development of universities that they possess autonomy in managing their own property, so that they can strategically ensure the effective management of resources.

**These issues unequivocally contradict the rights regarding academic freedom and autonomy defined in the same law, the Constitution of Georgia, and the principles of the Bologna Process, and consequently violate the obligation undertaken under Article 359 of the Association Agreement. The aforementioned change will make academic activity**

<sup>17</sup> [Prime Minister Irakli Kobakhidze on the program "Imedi LIVE", October 17, 2025.](#)

entirely dependent on governmental and political decisions, restricting and hindering free and open academic and scientific development.

## Quality of Higher Education

### Criticism of Higher Education Quality and Outcomes

***The Concept disregards both the State's responsibility for the quality of higher education and the results achieved by universities under conditions of limited resources.***

The Concept emphasizes the goal of improving the quality of higher education. It is noteworthy that institutional autonomy and academic freedom are precisely the prerequisites that enable higher educational institutions to fulfill their democratic mission, ensure high-quality learning, teaching, and research, and contribute to solving societal challenges.

Both the Concept document and subsequent interviews with responsible officials criticize the existing quality of higher education and the malfunction of the quality assurance system. While it is true that the quality of higher education in **Georgia substantially needs improvement, it must be noted that quality is directly linked to the resources allocated by the State for improving higher education quality, funding, implemented support strategies, and the consistent development of the quality assurance system. For years, these conditions have not been ensured.**

**Funds allocated from the state budget for financing higher education and research are extremely meager.** In the 2025 State Budget, 221.5 million GEL was allocated for higher education funding<sup>18</sup>, and 83.6 million GEL for research funding.

**The State covers only 20% of the total expenditure** on higher education in Georgia, while tuition fees paid by students account for approximately **80%**. This implies that higher education in the country is developing primarily through private, rather than state, funds. It is also noteworthy that tuition fees paid by foreign students exceed the amount allocated from the state budget for higher education by at least two times.

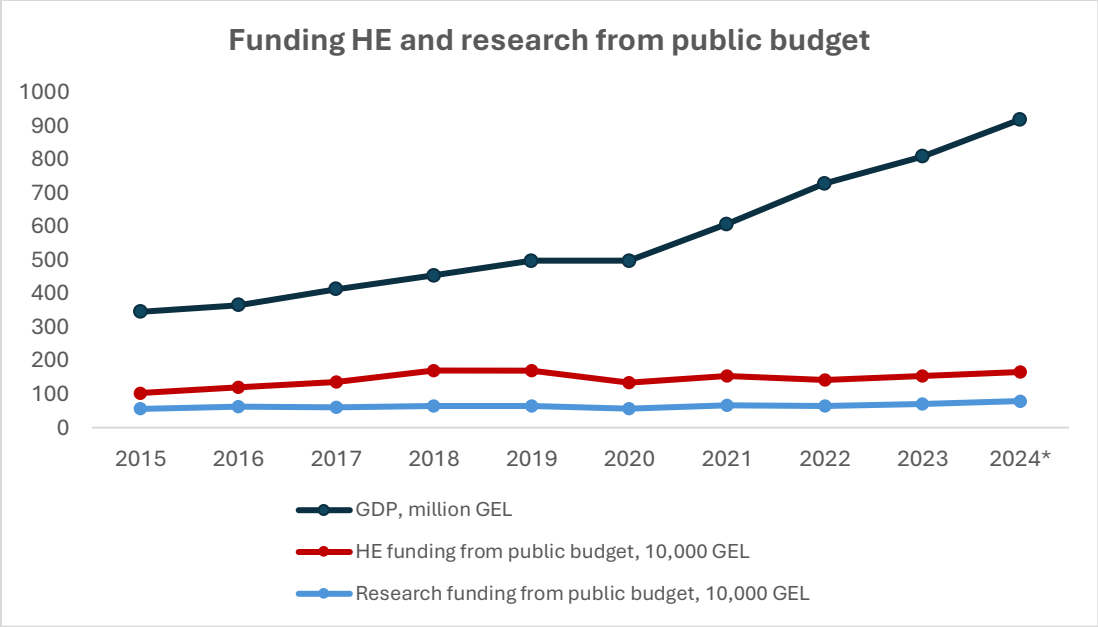
Furthermore, this funding has not increased over the years in line with the growth of GDP and the volume of the state budget.

### Diagram 1. Dynamics of State Funding for Higher Education and Research

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<sup>18</sup> [Allocations of the State Budget of Georgia](#). Of this amount, 20.2 million was allocated for arts higher education, and 30 million for higher education infrastructure. It should be noted that funds allocated for infrastructure development are sharply reduced in the 2026 budget.

*For comparison:* In 2024, [state budget funding for Vilnius University](#) alone was 163.4 million Euros (approximately 520 million GEL), whereas the total allocation for higher education in Georgia in 2024 was 166.4 million GEL. Vilnius University has approximately the same number of students as Tbilisi State University (TSU). Lithuania's Gross Domestic Product (GDP) is approximately double that of Georgia.



**Source:** National Statistics Department, Ministry of Finance of Georgia

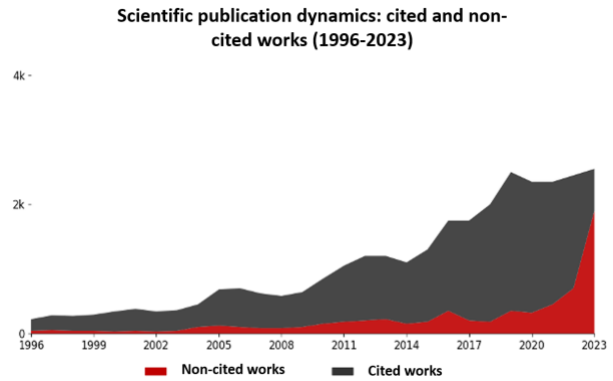
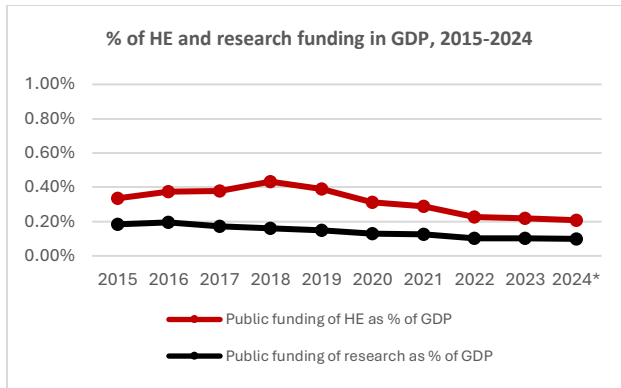
Based on this dynamic, the share of funding for higher education and research within the country's economy has effectively decreased: while in **2018, 0.43% of GDP** was allocated from the state budget to higher education, by 2024, this figure stood at **0.23%**. For comparison: In European Union countries, this figure varies between 0.5% and 2.1%, with the EU average being **0.8%**<sup>19</sup>. The situation is even more dire regarding research. Only **0.1%** of the state budget is spent on research (EU average: 0.71%<sup>20</sup>). It is noteworthy that a substantial increase in higher education funding is not envisaged in the 2026 budget.

When assessing quality, it is critical to take into account the resources allocated to education and science. One significant indicator for the quantitative measurement of quality is the productivity rate of scientific publications. Data shows that in Georgia, since 2018, the share of funding for research and higher education in relation to Gross Domestic Product has almost halved. Despite this, Georgia's scientific productivity increased significantly during this period.

**Diagram 2.** Funding of Higher Education and Research, Scientific Productivity

<sup>19</sup> [General government expenditure on education in the EU, 2023.](#)

<sup>20</sup> [EU expenditure on R&D, 2024.](#)



**Source:** National Statistics Department, Ministry of Finance of Georgia, Scimago Journal & Country Ranking<sup>21</sup>

Furthermore, another significant indicator of quality is the degree of internationalization. Since 2016, 31 programs have obtained international accreditation (EMIS, 2025). Moreover, the position of Georgian state universities in international rankings has improved significantly. Tbilisi State University first appeared in the Times Higher Education World University Rankings in 2017; today, three Georgian universities are represented (Table 2)<sup>22</sup>.

**Table 2.** Position of Georgian Universities in World Rankings

University	Ilia State University	Georgian Technical University	Tbilisi State University
Ranking Position			
2026-2025-2024	1200-1500	1500+	1500+
2022	1200+	-	1200+
2017	-	-	801+
Total Score			
2026	27.3–32.0	10.3–27.2	10.3–27.2
2025	25.2-30.6	10.5-25.1	10.5-25.1
2024	22.8-28.2	9.7-22.7	9.7-22.7
2022	10.6-22.3	-	10.6-22.3
2017	-	-	8.3- 18.5

<sup>21</sup> [Scimago Journal & Country Ranking](#)

<sup>22</sup> [Times Higher Education World University Rankings.](#)

The number of foreign students in Georgia has also increased significantly. Over the last 5 years, this number has doubled (2021 – 17,501 students), and as of 2025, there are 37,125 foreign students enrolled in Georgian universities<sup>23</sup>.

Consequently, it can be stated that under conditions of minimal resources and reduced funding which highlights existing problems in the system and the State's responsibility, universities continue to develop their academic and scientific activities through their own efforts, resources, and autonomy.

Therefore, the main focus of the reform should not be the disregard of university autonomy and the exclusion of the academic community from the process, but rather the State taking responsibility for existing systemic problems. The State must ensure that policy is directed toward supporting and strengthening universities, based on an empirical study of the needs and development potential of the university sector and the substantial involvement of the academic community.

## Quality Assurance System

***The Concept contradicts the quality assurance system currently operating in Georgia and defined within the European Higher Education Area.***

The proposals contained in the Concept contradict the higher education quality assurance standards of Georgia, which is a critical issue for the compatibility of Georgia's quality assurance system with European and other international quality recognition organizations, such as: the European Quality Assurance Register for Higher Education (EQAR), the European Association for Quality Assurance in Higher Education (ENQA), and the World Federation for Medical Education (WFME). **Deviation from these standards poses serious risks to the credibility, comparability, and international reputation of higher education obtained in Georgia.**

The higher education quality assurance system in Georgia is based on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015),<sup>24</sup> compliance with which constitutes a key responsibility for EHEA member countries<sup>25</sup>, ensures trust in the quality of education received in member countries, and simplifies recognition.<sup>26</sup> Compliance with ESG 2015 is a prerequisite for ENQA membership and registration in EQAR. Georgia and the National Center for Educational Quality Enhancement (NCEQE) obtained membership in these organizations in 2019 as a result of a five-year reform of the higher education quality assurance system. However, in 2024, based on the violation of standards defined for quality assurance agencies (3.3 Independence – non-compliance; 2.5 Consistent application of clear criteria for decision-making – partial compliance), the Center lost its registration in EQAR, and its ENQA membership status was changed to "under review."<sup>27</sup> The National Center for

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<sup>23</sup> [Geostat, Number of foreign students, 2025.](#)

<sup>24</sup> [Standards and Guidelines for Quality Assurance in the European Higher Education Area \(ESG 2015\).](#)

<sup>25</sup> [Tirana Communiqué, 2024.](#)

<sup>26</sup> [EQAR Mission.](#)

<sup>27</sup> [ENQA Board letter regarding membership; EQAR negative decision.](#)

Educational Quality Enhancement was given a two-year period to rectify these deficiencies.

The proposed reform not only fails to rectify these violations but also creates risks of non-compliance with additional standards. The issues presented in the Concept and the draft amendments to the Law on Higher Education contradict matters provided for by the Higher Education Authorization Standards, such as: the university's autonomy and responsibility to determine the student contingent in accordance with its own resources, priorities, and strategy (2.3); to define academic, research, and creative directions (3.1; 6.1); and to develop personnel policy, including for academic staff (4.1)<sup>28</sup>. The centralized requirements imposed on state universities and their inconsistency with current quality assurance standards create conditions where private and state universities are evaluated using different approaches. Such disparate approaches raise doubts at the international level regarding the credibility of the quality of the country's universities.

It is noteworthy that in 2024–2025, in accordance with current authorization standards, 15 state universities received authorization for a term of 6 years<sup>29</sup>. The authorization decisions specify the number of students determined for each university, including the admission limit for English-language medical programs<sup>30</sup>, as well as the list of programs the university is authorized to implement. The Concept document and the adopted legislative amendments<sup>31</sup> disregard these decisions made for a 6-year term.

These legislative amendments, which entered into force immediately upon publication on December 16, 2025, also disregard the strategic directions, priorities, and plans defined by the universities and evaluated within the scope of authorization. Instead, universities are forced to function in an ambiguous situation where, at this stage, they do not even know which educational programs the government will allow them to implement. It should be noted that the fee paid for the authorization evaluation for each university ranges on average between 50,000 and 65,000 GEL.

**In the context of the above-described ambiguous and contradictory processes, it should be noted that the National Center for Educational Quality Enhancement did not make use of the two-year period granted to it for addressing identified deficiencies and, in August 2025, submitted an application for re-evaluation in order to restore its ENQA membership status<sup>32</sup>. Within the framework of this process, ENQA experts will, during their visit in February 2026, verify the compliance of Georgia's quality assurance system with European standards. The ongoing changes in the higher education system, as well as the flawed and opaque process, will unequivocally hinder the successful completion of this evaluation, disrupt the process, and once again damage the reputation of Georgian higher education.**

A significant risk to the credibility and transparency of Georgia's higher education quality

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<sup>28</sup> Order No. 99/N of the Minister of Education and Science of Georgia, 2010.

<sup>29</sup> [Decisions on Authorization](#).

<sup>30</sup> According to the Concept, state universities are restricted from admitting foreign students.

<sup>31</sup> [Amendment to the Law on Higher Education](#), 10/12/2025. Upon the recommendation of the Ministry, the Government defines the list of educational programs (curricula) that universities have the right to implement; the Government also defines the number of students to be admitted by program (Article 6). Universities will be able to implement their educational, scientific-research, and creative activity directions only "within the framework of educational programs" defined by the Government (Article 10).

<sup>32</sup> [Agreement with ENQA on the conditions for the re-evaluation of the National Center for Educational Quality Enhancement](#)

assurance system is posed by the exception granted to LEPL – Kutaisi International University, according to which the university is not subject to the quality assurance evaluation system operating in the country<sup>33</sup>. This exception calls into question both the quality of the qualifications awarded to the university’s graduates and the credibility of the national system as a whole. The risk is further heightened in light of the Concept’s presentation of Kutaisi – and presumably Kutaisi International University – as one of the hubs of higher education, where, as a result of the “deconcentration” of students from Tbilisi, student enrollment is expected to increase significantly. This issue additionally jeopardizes the prospects of achieving a positive outcome in ENQA’s evaluation of Georgia’s higher education quality assurance system.

It should also be taken into account that ESG 2015 is currently under revision. The working version of the document, which is expected to be adopted in 2027, places particular emphasis on safeguarding the principles of academic freedom and institutional autonomy (Standard 1.1).<sup>34</sup>

**These issues once again conflict with Article 359 of the Association Agreement, according to which Georgia is required to promote “quality in higher education in a manner which is consistent with the EU Modernisation Agenda for Higher Education and the Bologna process.”**

Georgia’s quality assurance system also incorporates the recognition criteria of the World Federation for Medical Education (WFME)<sup>35</sup>, on the basis of which quality assurance agencies are granted recognition and the medical programs and institutions accredited by them enjoy international credibility. The National Center for Educational Quality Enhancement obtained WFME recognition in 2018 for a period of ten years. However, recognized agencies are obliged to inform WFME of changes introduced within the system. The ongoing reforms create challenges similar to those related to compatibility with ESG 2015 in the case of WFME as well. Particularly critical are the issues concerning the possibility of enrolling international students exclusively in private universities and the differentiated approach applied to state and state universities. Equally critical is the declared objective of the reform to fully revoke the right of state universities – despite having undergone quality evaluation in medical education – to implement medical programs, or to restrict the admission of international students to such programs. In such circumstances, the ability of already enrolled students to receive quality education throughout the full duration of their studies is called into question. During this period, universities would lose significant financial and, likely, infrastructural and human resources necessary to ensure the quality of medical education.

## Higher Education Access and Funding

**The implementation of the Concept is likely to significantly restrict access to higher education.**

According to Article 27 of the Constitution of Georgia, “everyone has the right to receive education and to choose its form.” The Law on Higher Education further specifies that, in order to achieve the objectives of higher education in Georgia, the State shall ensure its accessibility and openness (Article 3).

Although the Concept contains numerous ambiguities, several directions are clearly articulated. In addition, based on media interviews with public officials, it is possible to analyze the factors

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<sup>33</sup>[Law of Georgia on Educational Quality Improvement, Article 5, subparagraph “b”](#)

<sup>34</sup>[ESG 2027 Working Draft](#)

<sup>35</sup>[World Federation for Medical Education \(WFME\) Criteria for Recognition, 2025](#)

that are likely to have a substantial impact on the number, dynamics, and geographical distribution of student flows in the country. Based on the available information, we conclude that the anticipated outcomes of the reform **pose a serious risk of reducing access** to higher education, particularly for vulnerable groups.

## Possible Reduction of the Total Student Admission Capacity

At this stage, there is no precise information on how the total student admission capacity at universities will change. However, it is already known that, as early as February 2026, state universities will be assigned admission quotas based on the conclusions of the ongoing labour market study<sup>36</sup>. Several factors indicate the likelihood of a reduction in the number of admitted students, particularly at state universities.

First, it has been announced that the total number of students in Georgia should decrease from **150,000 to 110,000**<sup>37</sup>. It remains unclear which data serve as the basis for the figure of “150,000.” The number of Georgian students with active status is 154,000, while the total number of active students, including international students, amounts to 197,879<sup>38</sup>.

It may be assumed that the target figure of 110,000 refers to the total number of Georgian students. It is possible that the reduction of the overall number of students from 150,000 to 110,000 implies a mechanical decrease of approximately one quarter of the student population by shortening the duration of studies (the model proposed by the Concept – 3 years of bachelor’s studies + 1 year of master’s studies). However, it should be noted that: 1. According to the legislative amendments, the duration of bachelor’s studies is defined not as 3 years, but as a minimum of 3 years. A two-year master’s program will also remain permissible. 2. The duration of studies will not be reduced in regulated fields, where programs last 5 or 6 years. Accordingly, a reduction in the number of students cannot be calculated solely on the basis of shortening program duration. Therefore, **if the total number of Georgian students is indeed to be reduced to 110,000, it is highly likely that admission quotas will be decreased**<sup>39</sup>.

The introduction of the “one city – one faculty” model also indicates a probable reduction in admission capacity. It is unlikely that, in the event of the abolition of a major field at one state university in Tbilisi, another state university would be able to absorb the entire volume of students previously admitted in that field. It may therefore be assumed that the consolidation or abolition of faculties in specific fields will, with high probability, lead to a decrease in admissions.

**A reduced admission quota will particularly limit access to higher education for students who will graduate simultaneously from grades 11 and 12 in 2028.** Based on trends from previous years, approximately 53,600 twelfth-grade students and around 51,000 eleventh-grade students<sup>40</sup> are expected to graduate in 2028 – in total, **more than 100,000** prospective applicants.

In this context, the total number of admission places across all universities is approximately 45,000, of which only around 31,000 are filled annually. This means that more than 50,000 young

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<sup>36</sup> [Education Reform – Prime Minister’s Interpellation](#)

<sup>37</sup> [According to Kobakhidze, the number of students will decrease from 150,000 to 110,000](#)

<sup>38</sup> All figures are based on data provided by the Education Management Information System on 27 November 2025

<sup>39</sup> Given that neither the reform Concept nor the legislative amendments are accompanied by the necessary analysis or calculations, based on the available data and information it can be concluded that the Prime Minister’s statements on this issue are contradictory ([the number of students will decrease from 150,000 to 110,000](#), [the number of admitted students in state universities will increase](#)).

<sup>40</sup> According to data from the National Statistics Office of Georgia, the cohorts graduating in 2028 are significantly larger than previous cohorts.

people in 2028 may be left without the opportunity to begin higher education, provided that admission quotas are not increased. This would not only reduce access but also create sharp social inequality – the likelihood of entering university would become increasingly dependent on socio-economic status, access to additional resources, and city of residence.

## **The Proposed Funding Model, Allocated Budget and the Promise of Free Higher Education: A Contradictory Picture**

One of the key aspects of the proposed reform is the financing of higher education. According to the amendments introduced to the Law on Higher Education, the grant funding scheme will be abolished. As a result, state universities will receive funding directly from the state budget. At the same time, students enrolled in private universities will not be eligible to receive funding from the state budget. Under the announced plan, students admitted to state universities will not be required to pay tuition fees<sup>41</sup>.

The proposed funding approach itself suggests a reduction in the number of students admitted to state universities, given that the State intends to fully cover the tuition costs of all students enrolled in public institutions. **Even if the per-student allocation (GEL 2,250) remains unchanged, financing all newly admitted students in state universities (on average, approximately 24,800 students are enrolled annually in state universities: around 21,000 at the bachelor’s level, up to 3,600 at the master’s level, and approximately 200 at the doctoral level) would cost the State approximately GEL 56 million per year. This amount is almost double the funds currently allocated annually to finance one cohort of students: in the current year, a total of GEL 29.2 million has been allocated for Bachelor's and Master's student grants, social grants, and program-based funding<sup>42</sup>.** Furthermore, the approved 2026 state budget allocates a total of GEL 136.9 million for financing all students (across all years of bachelor’s and master’s programs), which is nearly the same as the amount allocated in 2025 (GEL 136.2 million). This further calls into question the feasibility of fully funding all students in state universities without reducing admission numbers. Without increasing the total allocation for student financing, the currently envisaged amount (based on GEL 2,250 per student) would be sufficient to fund approximately 13,000 students.

It should be noted that the actual cost of educating one student exceeds GEL 2,250. Depending on the level and field of study, the cost per student ranges from GEL 3,000 to GEL 6,000. Accordingly, if the State finances all students enrolled in state universities under the existing funding framework without reducing admission quotas, universities will face severe financial challenges and will be compelled to operate under reduced budgets, thereby raising serious concerns regarding institutional sustainability and the quality of education. Detailed calculations concerning student admissions and state funding allocations are provided in the Annex (Annex 1).

As assumed, if admissions to state universities decrease as a result of faculty consolidation,

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<sup>41</sup> It is important to note that a certain proportion of students had already been studying “tuition-free” at both public and private universities: 1. Students were eligible to receive state grants of varying amounts based on their scores in the Unified National Examinations. Holders of a 100% state grant paid no tuition at universities and on programs where the tuition fee did not exceed GEL 2,250. Approximately 1,000 students per year received a 100% state grant. In addition, students were awarded 70% and 50% grants based on examination results. 2. In specific faculties and programs identified by the State as priority fields but insufficiently demanded, the State fully financed the tuition of admitted students. Approximately 5,000 students per year are enrolled in such programs.

<sup>42</sup> [Decree of the Government of Georgia No. 111, 2025](#); [Decree of the Government of Georgia No. 33, 2025](#)

competition will intensify, and the likelihood of admission to state universities will most probably decline for students from less privileged and lower-income families. At the same time, they will lose the opportunity to study at private universities under favorable conditions, as grant funding in private institutions is being abolished.

## Sharp Reduction of Access in Tbilisi

Geographical concentration – currently, approximately 84% of students study in Tbilisi. Under the reform, this share is expected to decrease to **60%**<sup>43</sup>. This would require tens of thousands of students to relocate from the capital to other regions, significantly complicating access for students who reside in Tbilisi and rely on the social, family, or health-related infrastructure available there (for example, students with disabilities).

If the total number of students (197,879) is reduced by 40,000, and only 60% of the remaining students are permitted to study in Tbilisi, then only approximately **95,000 students** would be allowed to study in the capital (whereas currently around 166,000 students study in Tbilisi).

Based on a mechanical calculation (reflecting the primary effect of shortening program duration), approximately 30,000 students would lose the opportunity to study in Tbilisi. This would create access barriers primarily for young people who, by residing in Tbilisi, depend on:

- the need to combine studies with employment
- family responsibilities
- health-related considerations
- access to social services and inclusive infrastructure

All of the above indicates that the proposed geographical “deconcentration” effectively creates new barriers, which risk significantly increasing regional and social inequality.

## The Prospects of Regional Universities

According to the Concept of the reform, regional universities (Batumi, Zugdidi, Samtskhe-Javakheti, Gori, and Telavi) are to be transformed into profile-based institutions, with priority given to the development of agricultural and teacher education programs. An analysis of admission and enrollment figures across various programs at these universities demonstrates that: 1. agricultural programs are not available at all institutions; and 2. education and agriculture programs are not popular among prospective students, resulting in a significant number of unfilled places. In none of these universities do education or agricultural programs rank among the top three most demanded fields of study. Accordingly, if these institutions are restructured as specialized universities focused primarily on education and agriculture, it is likely that their overall attractiveness will decline further. The most and least demanded faculties and fields in regional universities are provided in the Annex (Annex 2).

In general, geographical deconcentration, which is one of the central pillars of the proposed reform, has historically proven difficult to achieve in Georgia. A clear example is Kutaisi

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<sup>43</sup> [The share of students in Tbilisi is to be reduced to 60%](#)

International University, which, despite its well-developed infrastructure, has not managed to attract a sufficient number of students: in the 2025–2026 academic year, only 1,645 students were enrolled. A large proportion of places remained unfilled precisely in the programs that should be among the university's most attractive offerings. For example, 62% of the places allocated in Computer Science remained vacant in 2025–2026, and 60% of places in Mathematics and Applied Mathematics were also unfilled. This demonstrates that infrastructure development alone does not guarantee to attract students.

## The Transitional Period and Students' Interests

If implemented in its current form, the reform will create particularly serious challenges during the transitional period in state universities. Public statements and interviews have repeatedly indicated that current students will be allowed to graduate from the institutions where they were admitted and within the originally planned duration of study. However, even a single-faculty example illustrates the practical complexities and potential consequences for both students and academic personnel.

**First, it remains unclear who will teach currently enrolled students until graduation.** For example, at the Faculty of Law and International Relations of the Georgian Technical University, 2,261 active students were enrolled across all years in 2025–2026. If these fields are no longer offered at the Technical University (which appears highly probable), the question arises as to how these 2,261 students will complete their studies. Currently, the faculty employs 42 full professors, 40 associate professors, 15 assistant professors, and 22 assistants. If the entire incoming student cohort is absorbed, for instance, by Tbilisi State University, would this imply the transfer of academic personnel to the corresponding faculty at TSU? And if so, who will teach the remaining 2,261 students at the Technical University? In theory, personnel transfers could occur gradually in parallel with student cohorts. However, implementing such large-scale restructuring across all faculties would require considerable time and careful planning.

**It must also be noted that 124,380 students in Georgia currently have suspended status; of these, 68,195 are Georgian students in state universities.** Under the reform framework, restoring student status and completing studies at the originally enrolled institution would become practically impossible for them. Student status may be restored within five years, and by that time, many faculties in specific universities may no longer exist. Importantly, the majority of these students belong to socially vulnerable groups, as the primary reason for suspension is non-payment of tuition fees. **This directly undermines the principles of access, equality, and fairness.**

**No less important is the issue of infrastructure during the transitional period.** According to the Concept and subsequent public announcements by high-ranking officials, the optimization and/or privatization of state university buildings is planned, alongside the development of new infrastructure. However, it remains unclear how many buildings will be affected and within what timeframe these changes are to be implemented.

Even assuming that new infrastructure projects are completed within a short period, it remains uncertain where currently enrolled students will study if existing university buildings are privatized. Would all current students be relocated to newly built campuses? It must be recalled

that the planned student distribution between Tbilisi and the rest of Georgia is to be 60/40. Under this model, 95,000 students should study in Tbilisi, whereas the current number of active students in the capital significantly exceeds this figure. It therefore remains unclear for how many students the new infrastructure is being designed.

## **Vague Foundations, Concepts and Expected Outcomes of the Concept**

Beyond the fact that the academic community was not involved in the drafting and deliberation process of the Concept, a critical concern lies in the absence of an empirical diagnostic foundation and analytical substantiation underpinning the document. This problem is further confirmed and exacerbated by the explanatory note accompanying the draft amendments to the Law on Higher Education (No. 234/2-XImp 03.12.2025)<sup>44</sup>, which likewise lacks appropriate analysis and justification<sup>45</sup>. Accordingly, both the list of problems identified in the Concept and the proposed solutions raise additional uncertainty and questions regarding their relevance and adequacy.

A fundamental weakness of the Concept is the lack of clarity with respect to key terms, criteria, and methodological approaches, rendering the substance of the reform, as well as its potential outcomes and risks, ambiguous. For example, it remains unclear what is meant by a “faculty,” given that the organizational structure of faculties is not standardized across universities; what is implied by “state commissioning”; what is meant by the labour market study and according to which methodology it has been conducted; and why state commissioning and labour market considerations alone serve as the basis for the centralized determination of educational programs within universities. It is equally unclear on the basis of which approaches and criteria educational programs will be redistributed among universities and institutional profiles defined, or what is meant by a “traditional profile” and “historical experience.”

The document fails to provide a coherent picture of the implementation scenarios for the plans reflected in the Concept, particularly with regard to the risks of chaos during the transitional period. This creates significant threats to the uninterrupted conduct of academic and administrative activities by students and personnel, as well as to the protection of their lawful rights.

The Concept also lacks an assessment of the financial, human, and infrastructural resources required for its implementation. It does not define clear timelines, responsible bodies, operational mechanisms, or expected outcomes, despite the fact that legislative amendments necessary for its implementation are already underway.

## **Conclusion**

The present analysis demonstrates that the National Concept of Higher Education Reform and the ongoing process do not establish a foundation for a well-considered and consensus-based reform of the higher education system – a reform that would serve the best interests of students, academic and research personnel, and the broader public. Both the closed format of the document’s development and its substantive content contradict the principles established by the Constitution of Georgia, the Law on Higher Education, and the Bologna Process. The

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<sup>44</sup> [Draft Law of Georgia “On Amendments to the Law of Georgia on Higher Education” \(234/2-XImp. 03.12.2025\)](#)

<sup>45</sup> According to the Explanatory Note, no state, non-state, or international organization/institution, expert, or working group was involved in the preparation of the draft law; no relevant expert assessment exists, and no review of existing experience was prepared or taken into account.

misalignment between the problems identified in the Concept and the proposed interventions, as well as the incomplete and fragmentary information provided, undermine confidence in the reform and increase the risk of arbitrary or inconsistent implementation.

Decisions adopted without the participation of the academic community, restrictions on institutional autonomy and academic freedom, and approaches incompatible with quality assurance standards and principles produce a policy framework that risks systemic deterioration rather than development. The current reform process fails to ensure the development and openness of Georgia's higher education area, jeopardizes the international reputation of Georgian higher education, weakens harmonization with the European system, and undermines international cooperation. As a result, the reform does not respond to the real challenges facing the higher education system and may itself become a source of crisis.

A fundamental precondition for undertaking comprehensive reform in higher education is the formulation of the goals of higher education in Georgia, as well as the role and mission of the university, on the basis of open discussion involving both the academic community and the broader public. For a thoughtful and outcome-oriented reform to be implemented, it is critically important that each stage of the process be conducted in such a way that universities and the academic community act not as observers and passive recipients, but as co-creators.

The proposed unsubstantiated initiatives disregard the ongoing academic and research processes within universities and their specific characteristics, **threaten institutional sustainability, disrupt continuity, and endanger international partnerships.** Instead of supporting and strengthening universities, the reform appears primarily directed at the sale of university buildings and the abolition of programs in certain institutions under the unfounded slogan of "one faculty – one city."

**The State plans to abolish programs and faculties at certain universities and to redistribute them centrally, ostensibly on the basis of labour market demand and state commissioning, despite the absence of comprehensive research and analysis underpinning such decisions.** Nor has there been an adequate assessment of existing resources and capacities within universities.

**At the same time, the artificial division of disciplinary fields fundamentally undermines both potential and already established interdisciplinary cooperation.** The forced fragmentation of universities disrupts existing research teams, threatens scientific laboratories and infrastructure developed over many years, and erodes collaborative academic culture. Ultimately, the reform disregards the very essence of the university as a multifaceted and interdisciplinary educational, research, and civic community.

**The policy approach toward regional universities further weakens their potential and renders them even less attractive to students.** Without broader regional development, individual universities will be unable to create sustainable academic ecosystems or provide students with appropriate conditions. A clear example is Kutaisi International University, where, despite substantial investment and the ambition to become an international hub, only approximately 1,500 students are currently enrolled.

**The reform poses a threat to academic and research development through its vague and non-transparent policy toward academic personnel.** The hierarchical structure and rigid quantitative distribution established by the reform disregard the specific characteristics of academic and research fields, their interdisciplinary nature, and undermine academic freedom.

The lack of transparency in the ongoing processes creates risks of politically motivated selection or dismissal of academic personnel, which would ultimately have destructive consequences for the development of the educational sphere.

The Concept and the legislative amendments adopted on its basis contradict the quality assurance standards applicable in Georgia and those defined within the European Higher Education Area. **They fundamentally undermine Georgia's ongoing ENQA membership review process, which had already been placed at risk in the previous year due to political interference by the State.** This will further erode trust in Georgia's education area and create risks regarding the international recognition of qualifications awarded in Georgia.

The legislative amendments implemented on the basis of the Concept have, in effect, **eliminated university autonomy and academic freedom.** Under the new framework, the Government determines which programs will be offered at which universities and how many students may be admitted to each program.

The ongoing processes, which disregard university autonomy and exclude the academic community from decision-making concerning higher education reform, are incompatible with the Standards and Guidelines for Quality Assurance in the European Higher Education Area. **This fundamentally contradicts the principles of the Bologna Process and thereby constitutes a breach of Georgia's obligations under the Association Agreement with the European Union (Article 359).**

The presented Concept is oriented not only toward isolating Georgia's higher education system from the European space, but also toward distancing it from global development trends. It disregards contemporary societal challenges, including technological, cultural, economic, and sustainable development imperatives. Rather than articulating the goals and ambitions of higher education, defining its development potential, and outlining a strategic vision, the Concept enumerates unprocessed and unsubstantiated statements that frame higher education within a narrow perspective.

A reform Concept presented without empirical analysis or expert assessment, not discussed or agreed upon with the academic community, and lacking a time-bound implementation plan and financial calculations, creates the preconditions not for development but for disorder and the further deterioration of universities into a deeper state of crisis. This process will significantly harm the interests of prospective students, students, professors and teachers, researchers, and society as a whole.

## Annex

### Annex 1. Student Admissions and State Funding Indicators in Higher Education Institutions

Table 1.1 Student Admissions and Funding in 2025-2026 Academic Year

<b>Student Admissions</b>	
Bachelor's Level Admissions (State universities)	21,039
<b>Bachelor's Level Admissions (Total)</b>	<b>31,345</b>
Master's Level Admissions (State universities)	3,619
Master's Level Admissions (Private Universities)	5,721
Doctoral Level Admissions (State universities)	268
Doctoral Level Admissions (Private Universities)	487
<b>Amount of State Funding for Students Admitted in the Current Year</b>	
Bachelor's Level – Program-based	12,723,750
Bachelor's Level – Grants (Including Social)	14,287,500
<b>Bachelor's Level (Total)</b>	<b>27,011,250</b>
Master's Level – Grants and Program-based	2,000,000
Master's Level – Social	205,000
<b>Master's Level (Total)</b>	<b>2,205,000</b>
<b>Total Funding Allocated for Newly Admitted Students</b>	<b>29,216,250</b>

**Table 1.2** Funding Required for Students Admitted to State universities under the “Tuition-Free Education” Model

<b>Level of Study</b>	<b>Number of Admitted Students</b>	<b>Tuition Fee</b>	<b>Required Funding</b>
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Bachelor's	21,039	2,250	47,337,750
Master's	3,619	2,250	8,142,750
Doctoral	268	2,250	603,000
<b>Total</b>	<b>24,926</b>		<b>56,083,500</b>

## Annex 2. Most and Least Demanded Faculties and Programs in Regional Universities

Program	First Priority	Total Priority	Admitted	Available Places	Unfilled Places
<b>Telavi State University</b>					
Agronomy	34	219	20	60	67%
Biology	10	63	7	20	65%
Food Technology	63	275	44	110	60%
Primary School Teacher Preparation	34	116	29	45	36%
Economics	25	101	21	30	30%
Law	52	250	45	50	10%
Business Administration	22	236	19	20	5%
<b>Zugdidi State University</b>					
Pharmacy	1	10	0	15	100%
Preschool Education	21	59	1	15	93%
Business Administration	28	128	15	30	50%
Veterinary Medicine	16	57	8	15	47%
Elementary Teacher Education	25	79	21	25	16%
Public Administration	42	198	30	35	14%
Georgian Philology	20	117	19	20	5%
English Philology	29	97	20	20	0%
<b>Samtskhe-Javakheti State University</b>					

Economics (Akhalkalaki)	1	12	0	20	100%
Business Administration (180 credits) (Akhaltsikhe)	7	178	3	40	93%
Economics (Akhaltsikhe)	9	82	5	50	90%
Agronomy (Akhaltsikhe)	10	133	5	40	88%
Ecology (Akhaltsikhe)	26	208	18	40	55%
Primary Education Teacher	56	171	33	60	45%
Public Administration (180 credits) (Akhaltsikhe)	119	357	87	100	13%
<b>Batumi State University</b>					
Oil and Gas Engineering	5	252	4	15	73%
Physics	3	75	3	10	70%
Mathematics	23	275	13	25	48%
Food Technology	8	433	20	35	43%
Agrarian Technologies	43	471	34	50	32%
Tourism	157	1,758	150	150	0
English Philology	163	653	120	120	0
Primary Teacher Education	121	664	80	80	0
Georgian Philology	137	825	75	75	0
International Relations	75	1,347	55	55	0
Public Administration (180 credits)	56	1,128	50	50	0
History	68	774	45	45	0
Ecology	27	711	30	30	0
Preschool Education	27	367	30	30	0
Geography	24	472	25	25	0
Journalism	17	732	20	20	0
Philosophy	17	524	20	20	0
European Studies	14	542	20	20	0
Physical Medicine and Medical Rehabilitation	17	117	15	15	0
Turkology	11	167	15	15	0

Law	222	1,045	120	120	0
Archaeology	8	464	10	10	0
Psychology	125	1,070	60	60	0
Romance Philology	7	83	5	5	0
<b>Gori State University</b>					
Hotel Management	10	230	4	20	80%
Biology	5	52	4	20	80%
Information Technologies	16	105	10	40	75%
Elementary Teacher Education	36	141	27	50	46%
Law	94	368	84	110	24%
Psychology	29	266	23	30	23%
English Philology	41	163	37	45	18%
<b>Kutaisi International University</b>					
Computer Science (English)	104	432	76	200	62%
Mathematics & Applications: Foundations for Artificial Intelligence, Scientific Computing, Financial Mathematics (English)	21	229	16	40	60%
Design (English) (180 credits)	60	314	67	100	33%
Management (English)	136	479	108	150	28%
Joint Bachelor's Program in Psychology (Georgian and English) (180 credits)	87	401	82	100	18%
Law (Georgian and English)	99	372	97	100	3%