

## Comments on Draft National Education Policy 2019

### I. Multidisciplinary approach (Chapter 9)

**P 9.1** All higher education will happen in multidisciplinary institutions with teaching programmes across disciplines and fields to ensure optimized resources, integration across disciplines and vibrant, large education communities. (page 207)

This move towards large multidisciplinary HEIs will be carried out as swiftly as possible and in a systematic and thoughtful manner, by consolidating and restructuring existing institutions (page 207)

*Comment / Suggestion: The emphasis on multidisciplinary approach is well taken. However, this should not be pushed too far as it may defeat the quality of specialized technical education, which was the purpose why institutions like IITs, IIMs etc came into existence. Institutes of technology, engineering or management should be told to widen the number of courses offered in the humanities, social sciences and liberal arts. Making them (IITs, IIMs etc) compulsorily a part of a university may defeat the very purpose of improving quality. It is neither the lack of inter disciplinary approach nor the silo approach that has led to the deterioration of the quality of higher education in the universities. The lack of quality faculty, infrastructure, funding, and examination system are the main causes for deterioration in quality.*

#### **P9.4 Curriculum, pedagogy, assessment, and student support will be revamped:**

Curriculum, pedagogy, and assessment will move away from solely rote learning of facts and mechanical procedures. The examination system in higher education will be recast; evaluation will be guided by curricular objectives and overarching educational goals. Faculty will be supported to achieve these transformations. P 208-209.

*Comment: Examination system should test the analytical ability of the students rather than memory and rote learning. It is the overhaul of the assessment system which will be the driving force for getting rid of the rote learning and improving the quality of education. This is apart from quality faculty, infrastructure and funding, which are crucial factors for transformation of higher education.*

## II Institutional Restructuring and Consolidation (Chapter 10)

The aim is to double the Gross Enrolment Ratio in higher education from 25% to 50% by 2035 and make universities the hubs of research (with Type I Universities / Institutions devoted primarily to research and some teaching, Type 2 universities devoted to teaching and some research, and Type 3 institutions comprising mainly colleges by focusing only on teaching at undergraduate levels. All such institutions will gradually move towards full autonomy – academic, administrative and financial.

**P10.3. New institutional architecture for higher education:** “To make quality higher education accessible to all who desire to pursue it and to foster high quality research, a new institutional architecture with three kinds (or Type) of institutions shall be developed. These three kinds of institution will differ in their focus of goals and work, but will have equal commitment to ensuring high quality education. All HEIs, by 2030, will develop into one of three types of institutions.” (page 213)

*Comment / Suggestion: The greatest challenge is restructuring the present 41,000 institutions to about 15,000 including abolition of affiliated college system. It is a stupendous task. We need robust mechanisms to implement. It should be noted that only about 600 colleges have got autonomous status during the last quarter century but they do not have the power to grant degrees. They still depend on parent institution.*

## III. Towards a more Liberal Education (Chapter 11)

The focus of Chapter 11 is on liberal education. It draws its observation from the fact that Indian universities in the past like Nalanda and Takshasila had education in sciences, mathematics, philosophy, politics, astronomy, commerce, music, dance, etc. The report says that by exposing to this liberal education, students could become more creative. IITs should move to a more liberal education integrating arts and humanities. While arts and humanities students must aim to learn more science.

Indian universities such as Takshashila and Nalanda were the oldest universities in the world, and of the very highest quality. These ancient universities definitively emphasized the liberal arts and liberal education tradition. (P-223)

*Comments / Suggestions 1: Integrating liberal education with the existing education system is a good idea. It also needs to be examined as to how the liberal education system can contribute to elevating some of the Indian universities to the top 200 Universities in the world in the next few years, and into the top 100 universities in the world in the next 10-15 years. It is true that Nalanda and Takshashila were the world top institutions at that time. But we should benchmark against the existing top universities in the world to move forward and achieve global recognition.*

*Core purpose of establishing specialized institutes such as IITs, IIMs, IIITs, ISERs should not be diluted. There should be ample opportunities to include the components of liberal education in such specialized institutions.*

P11.2.1 “All Doctoral students will take a unit on communication in at least one Indian language other than English (e.g. as part of their course on teaching) in order to develop the capacity to communicate their discipline/field in that language. This is considered important to e.g. write newspaper articles and conduct interview in Indian languages, and to visit and speak in areas (e.g. at schools) about their subject where that language is prevalent.” (p 233)

*Comment / Suggestion: The requirement of Indian language is fine for Indian nationals. However, for foreign nationals, this can be dispensed with. But what is important is to produce excellent quality Ph.Ds who will at a future date become faculty members. Every university should aim to address the problem of faculty shortage, which is the greatest challenge for higher education in the country. We wish to point out that the doctoral program should include rigorous coursework in research methodology and the domain area, followed by PhD qualifying examination. Further, seminar presentation every semester, PhD proposal defense before a competent committee, data seminar, and subsequently the final thesis defense should*

*constitute the core of the program. In addition, there could be a visiting scholar program, where students get an exposure to research and teaching in internationally / nationally reputed institutions (for a semester or a year). This exposure will help produce quality PhD scholars and could contribute to solving the dearth of quality faculty.*

*Further the PhD scholars should get an exposure to teaching pedagogy by means of a number of workshops, such as, teaching aids, curriculum design and courseware development, student counselling and mentoring, content development and delivery, student evaluation and feedback, etc.*

11.3. “The four-year Bachelor of Liberal Arts / Education will provide the full range of liberal education with choice of major and minors. The three-year program will lead to a Bachelor’s degree. Multiple exit options, with appropriate certification, will be available.” (p 235)

*Comment / Suggestion: For those who want to specialize in the liberal education subjects, the suggested four-year program of Bachelor of Liberal Arts and the provision for an exit after three years is a good option. However, if the BOG so desires, some of the colleges may continue to offer three year undergraduate program with a proper balance between liberal arts and other disciplines.*

P11.4.2.c “Research and teaching in the culture and history of India’s neighbors: Research and teaching in the languages, culture, and history of India’s neighbors should be strongly encouraged, such as the culture and civilization of China. Understanding and knowledge of our neighbors contributes to regional peace and mutual economic growth.” (p 236)

*Comment: This is a good idea. We may give these as elective subjects in colleges and universities, so that the interested students may opt for them. But this requires adequately trained faculty.*

## IV Optimal Learning Environment, Student Support, ODL and MOOCs (Chapter 12)

P12.3.5. **Online digital repository:** “To ensure efficient utilization of resources and to avoid unnecessary duplication of effort, all content developed for ODL will be included in an online digital repository. An appropriate mechanism will be put in place for creating and continually reviewing content to ensure their quality. The content will be available freely to all students and faculty across the country.” (page 247)

*Comment / Suggestion: ODL must play a significant role in increasing GER from 25% to 50%. To facilitate this, the distribution of ODL content may be free for users, but HEIs involved in development of content for ODL programs may be fully funded to meet their cost of development.*

### **Internationalization of Higher Education**

P12.4.6. “**Student Exchange:** Indian students will be supported to have ‘a global immersion’ experience through short-duration visits to reputed universities abroad.” (page 251)

*Comment / Suggestion: The short duration programs (one semester) can also be extended to PhD students. Students working on their PhD in the Indian universities may be given opportunity to spend a semester abroad to sharpen their skills of research and teaching and get international exposure, where such exposure is necessary. We believe it will enhance the quality of the PhD programs as well as the quality of the faculty.*

P12.4.11. & P12.4.8. “The policies propose that select universities (i.e. those from among the top 200 universities in the world) will be permitted to operate in India. It

also encourages strategic partnerships between universities in India and abroad.”  
(page 252)

*Response: We feel that to start with top 200 is a good number. In course of time the number of foreign universities could go up to top 500. However for collaborative research a much wider net of institutions should be considered.*

## V Quality in Higher Education including Faculty Development (Chapter 13)

P13.1.2 “Every institution must have adequate faculty, ensuring that all programs, subject and field needs are met, a desirable student-teacher ratio (not more than 30:1) is maintained and diversity is ensured.” (p 259)

*Comment / Suggestion: Maintain status quo regarding the student-teacher ratio (not more than 20:1). This will help maintain quality in higher education by promoting research by every faculty member, adopting a student centric learning / teaching method and reforms in the assessment system. It may be noted that the student-teacher ratio is 1:6 in the top 100 universities in the world, and 1:16 in China.??*

P13.1.5. **Empowering and motivating institutional culture:** “An enabling and participative culture characterized by equality, and respect for the value and dignity of each member will prevail in every institution. The environment should be open with new ideas being encouraged, with a commitment to dialogue even in the face of dissent. A sense of ownership will be fostered through shared institutional vision and goals. Faculty must be informed about their roles and responsibilities, and should be accountable for fulfilment of the same, while contributing to the furtherance of the larger goals of the institution. Space must also be accorded for them to share challenges and to seek support for professional development. The most important element of the empowering culture must be **academic freedom** for the faculty, including **the freedom to pursue their research, write, and adopt innovative pedagogical and curricular practices**. Developing such a culture would be one of

the most important facets of the role of the institutional leaders, including the Vice Chancellor/Director.” (page 260)

*Comment / Suggestion: This is an excellent observation and touches the core of the value system to be developed in HEIs. This is a leadership skill and requires specific training. Government may consider setting up of National Academic Leaders Institute for training and nurturing leadership talent for HEIs. This should train academic leaders and administrators in both public and private HEIs.*

*It should be noted that faculty freedom is relevant only when we have good quality faculty.*

P13.1.10: The evaluation of research will ensure that the quality of work is assessed rigorously, and will not be driven by mere number of publications, being especially careful about the credibility and reputation of the publication platforms (journals, etc), ensuring that no credence is given to low quality (some being ‘fake’) journals. (P-262)

*Comment / Suggestion : There must be a mechanism to strictly regulate publication of journals, which should ensure total discouragement of fake journals and identify and publish a list of fake and predatory journals. Every HEI should identify reputed journals and black list fake journals.*

P13.1.11. “Faculty recruitment and development, career progression and compensation management to be part of the Institutional Development Plan: All matters pertaining to faculty, from number of faculty to be recruited to recruitment criteria and processes, to career progression, and compensation determination will be part of the IDP, and will be owned by the BoG.” (p 263)

*Comment / Suggestions: The challenge is in implementation. We must ensure that the BOG of every institution has a good representation of distinguished academicians and men of high integrity to meet this challenge.*

## VI National Research Foundation (Chapter 14)

The objective of National Research Foundation is to catalyze and energize research and innovation across the country in all the academic disciplines, with a special focus on seeding and growing research at universities and colleges. It is also aimed at creating a conducive ecosystem for research through competitive peer-reviewed funding, mentoring and facilitation. A new NRF will be an autonomous body to fund, mentor, incentivize, and build capacity for quality research across the country in all disciplines, primarily at universities and colleges, both public and private.

P 14.1.10. “Institutions that currently fund research at some level, such as DST, DAE, DBT, ICAR, ICMR, UGC, as well as various private and philanthropic organizations, will continue to independently fund research according to their priorities and needs.” (page 272)

*Comment / Suggestion: There should be role clarity between NRF and other funding agencies such as ICSSR, ICHR, DST, DBT, UGC, etc. in the allocation of funds, identifying priority areas of research and monitoring of research.*

## VII Professional Education (Chapter 16)

*Comments: Professional education : One of the greatest challenges in Indian economy now and in the next 10-15 years is employment. For this purpose, we must establish a center for innovation, entrepreneurship and incubation in every institute of higher education. Further, these centers should encourage entrepreneurial spirit among all students and work closely with the industries and also with the Government institutions. This must be made popular in professional as well as in undergraduate programs. We should give entrepreneurship high priority and must work towards developing budding entrepreneurs as part of the higher education system. This will contribute to employment and economic growth in the country.*



## **VIII. Empowered Governance and Effective Leadership for Higher Education Institutions (Chapter 17)**

P17.1.1.a: Central Universities/HEIs (Type 1 or 2): The President of India will be the Visitor to the university, who may from time to time review the work of the university and provide advice. The Chancellor of the university will be appointed by the Visitor, who will be a person of high eminence. The Chancellor will preside over the convocation (when present) and chair the Court (see P17.1.3) if it exists in the said university.

P17.1.1.b. State Universities/HEIs (Type 1 or 2): The Governor of the State will be the Chancellor of the university, who will preside over the convocation (when present), and may from time to time review the work of the university and provide advice.

P17.1.1.c. Private Universities/HEIs (Type 1 or 2): The Governor of the State in which the university has been established shall be the Visitor to the university, and will preside over the convocation (when present). The sponsoring body of the university will appoint a person of high eminence as the Chancellor of the university, who may from time to time review the work of the university and provide advice. (page 313).

*Comment / Suggestion: As per this policy, the governance structure for central, state and private universities is clear. The governance structure of the existing deemed to be universities is to be specified.*

## **IX Accreditation as the basis for regulation (Chapter 18)**

The functions of standard setting, funding, accreditation and regulation will be separated and be carried out by independent bodies.

**P18.2.1. Accreditation of HEIs:** “For the next 10 years, the graded accreditation (GA) of HEIs with concomitant graded autonomy, as per the system already in place,

will continue. This will be reviewed for improvement by 2020. After 10 years (by 2030) there shall only be a “Yes or No” accreditation - Binary Accreditation (BA). It is this step that shall fully empower HEIs and give them autonomy. The BA system should be introduced at the earliest, certainly by 2022. Till 2030, HEIs would be free to choose between the GA or BA regime.” (page 328)

*Comment Suggestion: The direction for moving from GA to BA is clear and is a positive move. As there would be large number of accredited institutions it will be difficult to distinguish among them. Therefore, to differentiate and to foster healthy competition among the HEIs, we suggest continuing ranking of HEIs by the regulators (such as NIRF).*

P18.2.1. ODL: “The institutional accreditation norms shall pay specific attention to the matter of ODL, which in the past has been marred by inadvertent and advertent misuse and questionable quality. Accreditation of the HEI shall include an assessment of the capacity of the HEI to offer high quality ODL, which may lead to accreditation without ODL” (Page 328)

*Comment / Suggestion: Keeping the objective of doubling the GER by 2035, the policy needs to be flexible in the offering of ODL. The current policy is to allow HEIs, which have secured A++ grade only to offer ODL programs. But this restricts the offering of ODL programs. Keeping the enrolment challenges in mind, we suggest that all HEIs which have secured ‘A’ grade by an AI should be allowed to offer ODL in the programs offered by the HEI in campus mode up to 2030.*

P18.2.4. There shall be Accreditation Institutes (AIs) under NAAC. NAAC shall issue licenses to these AI to function as accreditation institutes for a period of 2-3 years. NAAC shall train these AIs in accreditation process. NAAC also acts as a regulator to resolve disputes arising between AIs and HEIs. (Summary of the Para in page 329)

*Comment / Suggestion: Easier said than done. It is a tall order for NAAC to bring the element of 100% objectivity across the 100-150 Accreditation Institutes (AIs) with which all HEIs are accredited by an on-going basis. It is suggested that initially NAAC may start with 5-10 AIs and gradually increase to 20-30 AIs by 2030 by providing required training and other resources. Maintaining credibility of the AIs is extremely important.*

P18.3.1 “Accreditation of programs may be made available. However any such accreditation by *Professional Standards Setting Bodies (PSSBs)* viz AICTE, COA, BCI, MCI shall be entirely voluntary for the HEIs.” (page 330, para 4)

*Comment / Suggestion: The role of the PSSBs shall be to set minimum standards. All HEIs shall have the autonomy to maintain standards over and above it. Make BoG accountable for implementation of standards set by Professional Standards Setting Bodies (PSSBs). The PSSBs should not be involved in accreditation process at all.*

## **X Rashtriya Shiksha Aayog (RSA)/ National Education Commission (NEC) (Chapter 23)**

An apex body, RSA/NEC to be constituted. The RSA will be responsible for developing, articulating, implementing, evaluating, and revising the vision of education in the country on a continuous and sustained basis. It will also create and oversee the institutional frameworks that will help achieve this vision. It will be chaired by the PM. Union Minister of HRD will be the Vice Chairman. NEC will comprise eminent educationists, researchers, union ministers, representation of State CMs, eminent professionals from various fields.

P23.5 “The RSA will consist of approximately 20-30 members. Membership will include some of the Union Ministers, in rotation, whose ministries impact education directly (e.g. health, woman and child development, finance), as well as a few Chief Ministers of States, in rotation, the Principal Secretary to the Prime Minister, the Cabinet Secretary, Vice-

Chairperson of the Niti Aayog, the senior-most Secretary in the Ministry of Education, and other such senior bureaucrats/administrators as the government may deem appropriate. At least 50% of the members will be eminent educationists, researchers and leading professionals from various fields such as arts, business, health, agriculture and social work. All these members will be people of high expertise, unimpeachable integrity and independence.” (page 393)

P23.6. “A RSA Appointment Committee (RSAAC), consisting of the PM, the Chief Justice of India, the Speaker of the Lok Sabha, the leader of the opposition in Parliament, and the UME, will be constituted to enable the appointments to the RSA and to other key related roles and structures.” (p 393)

*Comment / Suggestion: While RSA Appointment Committee (RSAAC) includes the leader of opposition in parliament as a member, the RSA itself does not include the leader of opposition. RSA can be made more representative by including representatives of Industry Professional Bodies and promoters of private higher education institutions.*

P23.9. “The Executive Council will have 10-15 members who will be nominated by the RSA for five-year terms which will be renewable just once. All members of the EC will be people with expertise, integrity, and distinction in their respective fields. Two-thirds of the members of the EC will be people from education and research. One-third of the members of the EC will be people who have significant leadership roles in administration, policy, and other fields of development. This will also include senior bureaucrats from the Ministry of Education, the Secretary from the Ministry of Finance, and the Chief Executive Officer of the Niti Aayog.” (p 394)

*Comment / Suggestion 1: There should be balanced representation from private universities, state universities and central universities in all the committees.*

*Comment / Suggestion 2: The contemplated structure of Rashtriya Shiksha Aayog (RSA) is too complicated comprising of executive council, standing committees, joint*

*review and monitoring board, advisory council, etc. This may lead to bureaucracy and red-tapism. The policy repeatedly talks about the autonomy of the individual HEIs. There is a need to relook at the multiplicity of regulatory institutions viz., RSA, National Higher Education Regulatory Authority (NHERA), Higher Education Grants Commission (HEGC), Professional Standard Setting Bodies (PSSB), General Education Council (GEC), National Higher Education Qualifications Framework (NHEQF), National Accreditation and Assessment Council (NAAC) and so on. This is conflicting with the objective of more autonomy to HEIs.*

*We should explore the possibility of reducing the number of committees but ensure that there should be a greater representation in these committees of distinguished academicians of national and international repute.*

#### **XI Financing Adendum-1:**

*Comments / Suggestion: The draft policy mentions about the financial autonomy to HEIs. Does it mean providing the required finance to the government funded HEIs with no interference in the functioning of the HEIs.*

*The policy talks of concessions and scholarships. The burden of providing scholarships to private HEIs may result in substantial hike in the fee. How do we balance?*

*The draft education policy reaffirms the commitment of 6% GDP for education. The first National Education Policy 1968 had recommended public expenditure in education at 6% of GDP which was reiterated by the Second National Education Policy in 1986. In 2017-18 public expenditure on education was 2.7% of GDP. The roadmap to achieving the 6% target by 2030 may be spelt out. (Page -402)*

## **XII: Way Forward: Addendum2**

**Policy Implementation:** No one can deny that the policy is ambitious in its goals. But the road map, by taking the ground realities into account, is not clear. For example the report mentions about abolition of several thousands of affiliated colleges. But so far during the last 30 years only 600 colleges have got the autonomous status. So given this past performance it is not clear whether one can realize the target of abolishing all affiliated colleges and making them autonomous, financially, academically and administratively within a decade. Similarly meeting the financial requirements through endowments / philanthropy seems far-fetched.

## **XIII Institutions of Eminence**

The draft National Education Policy is silent on the scheme of “Institutions of Eminence”, which the government initiated to transform 20 Indian educational institutes into world class universities. The aim is to first get into the top two hundred institutes of the world and over the period of next 10 to 15 years to get into the top 100. Currently, 3 private and 3 public universities have been granted the tag “Institutions of Eminence” by the HRD Ministry.

*Comment / Suggestion: Finding a place among the top 100 universities in the world is very difficult. Institutes from all over the world compete for this. We should therefore try hard to achieve this goal. It is true that Nalanda and Takshasila were top Institutions in the world. But how do we achieve the old glory? Those institutes existed more than 1000 years ago. What is needed is to look at the best universities in the world today and see how we can reach their quality. To conclude, we should continue with the idea of “Institutes of Eminence” and encourage them so that they get into the top 100 universities in the world. It may be a good idea to upgrade 50 existing institutions with excellent track record into institutions of eminence to be provided with funds of Rs.100 crores each per year for ten years in a phased manner.*