

Observations and suggestions on the proposed Higher Education Commission of India under NEP 2020

Cluster Coordinator/Dean of the Faculty: **Prof. Swati Pal**

Designation: **Principal, Janki Devi Memorial College**

List of Colleges/Departments/ Centres in the Cluster: **CLUSTER NO. 5**

5.1	Janki Devi Memorial College(W)	Dr. Swati Pal
5.2	Deen Dyal Upadhaya College,	Dr. H.C. Jain
5.3	Kalindi College(W)	Dr. Naina Hasija
5.4	Lady Irwin College	Dr. Anupa Siddhu
5.5	Keshav Mahavidyalaya	Dr. Madhu Pruthi
5.5	Durgabhai deshमुख College	Dr. Swati Sanyal
5.7	Maharaja Agrasen College	Dr. Sanjeev Tiwari
5.8	Satyawati College(Eve)	Dr. Vijay Shanker Mishra
5.9	Satyawati College	Dr. Nirmal Jindal
5.1	Shaheed Bhagat Singh College (Eve)	Dr. Sudhir Kumar Sinha
5.11	Shaheed Bhagat Singh College	Dr. Anil Sardhana

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5.12	Shaheed Sukhdev College Business Std	Dr. Poonam Verma
5.13	Zakir Husain Post Graduate (Evn) College	Dr. Masroor Ahmad Beg
5.14	Zakir Husain Delhi College	Dr. Masroor Ahmad Beg
5.15	Delhi College of Arts and Commerce	Dr. Anuradha Gupta

Date of the meeting: 27th March, 2021

(Minutes of the meeting are attached)

Dear Colleagues

As you deliberate and discuss on the proposed concept of Higher Education Commission of India as envisioned by NEP 2020, below are some suggested guidelines that may help you to keep discussion focused and organized:

- 1) The discussion shall be focused with reference to NEP 2020 (section 18 and 19). The soft copy of the policy document is attached with the email.
- 2) It is advised to refer to the Concept Note given with the mail, for more clarity.

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- 3) The next pages of the present document consist of a table with suggestive heads in five sections A, B, C, D, E and the last section F for any other suggestion.
- 4) Cluster coordinators/Dean of faculties shall provide implications/concerns/suggestions under the suggestive heads for each section.
- 5) Suggestions can be supported by examples or by any reference of any exemplary practice.
- 6) Observations and suggestions shall be precise.

Observations and suggestions on the proposed Higher Education Commission of India under NEP 2020

Section A: Higher Education Commission of India (HECI)				
S.No	Role and Objectives	Implications	Concerns	Suggestions
A 1	Autonomous umbrella body responsible for monitoring the regulation, accreditation, funding, and academic standards of all Higher Education Institute (HEIs) through four independent verticals (<i>role and scope of four verticals are mentioned in Section B,C,D and E</i>)	<p>1.The relationship between HECI and public funded Central Universities</p> <p>2.Possibility of Integrated approach for monitoring the regulation, accreditation, funding, and academic standards of all Higher Education Institute (HEIs) in such a manner so as to prevent further centralization</p>	<p>1.To address the requirements of the vast number of students in Central Universities in India,</p> <p>2.DU has a legacy and specific character as a HEI and this uniqueness may be affected,</p> <p>3.Allowance must be made for flexibility in designing and running a course with sustained financial support from the GOI</p> <p>4.Where required, existing structures may need reforms</p>	<p>1. To specify the manner in which it will be different from the existing structure</p> <p>2. To establish coordination between verticals as and when required even as they continue to maintain independent functioning</p> <p>3. To address the question of viability of initiating a pilot study with a limited number of colleges</p> <p>4. To ensure participation of HEIs in decision making process to ensure flexibility in academics and sustained financial support in running the institutions</p> <p>5. To strengthen existing structures by identifying and removing shortcomings if any</p>

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A 2	Resolving disputes among the four verticals	To identify the nature of dispute as the verticals are different and the scope of conflict is thus possible	1.If there is conflict, then this will lead to an obstruction in the smooth functioning of HEIs 2.Existing conflicts will not disappear in the new system	<ol style="list-style-type: none"> 1. To create an adjudicating authority to address the various kinds of disputes. 2. To create different heads for classifying and addressing disputes— Financial/ Academic etc. 3. System of university panel of Arbitrators to be used at college/ institution level for arbitration.
A 3	Monitoring and adjudication for strict compliance of basic minimum norms and standards as applicable to HEIs	If implemented well, it would lead to an improvement of academic standards across the country but if implemented without considering various aspects holistically, it may lead to greater bureaucratization of the system	To keep in mind the varied nature of HEIs and thus allow for flexibility in designing and running a course	<ol style="list-style-type: none"> 1.To define minimum norms and evolve a general plan to scale up the quality of HEIs 2.To ensure that Grievance redressal mechanisms are put in place 3.To ensure participation of HEIs in the decision making process

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Section B: Vertical I National Higher Education Regulatory Commission (NHERC)				
S.No	Role and Objectives	Implications	Concerns	Suggestions
B 1	Single regulator for entire higher education sector except medical and legal education	1.The concerns of Medical and Law Colleges need to be factored in 2.The possibility of increased bureaucratization needs looking into	1.To evolve minimum standards for all HEI to adhere to them 2.The unique character of each institution in a country characterized by diversity would need to be preserved even while ensuring that there is an improvement in academic standards and uniformity of parameters involved	1. There needs to be wider consultation. There must be further sub-divisions to evolve a broad but specific understanding of the shaping of Higher Education 2. The strengths of existing systems should prevail and their weaknesses redressed 3. All HEIs must participate in the decision making process

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B 2	Online and offline public self-disclosure of finances, audits, infrastructure, faculty & staff and educational outcomes by all HEIs on the website managed and reviewed by NHERC	A completely online system of maintaining the intellectual and financial well-being of HEIs should lead to improved transparency and fiscal discipline	<ol style="list-style-type: none"> 1. To extend internet band width to accommodate greater information 2. To take care of the increased cost of compliance 3. Currently the information is being shared on multiple platforms such as NAAC, NIRF, AISHE 4. New commissions (Eg. National Commission for Allied & Health Care Act) that have come up that affect certain subjects like Nutrition, Teacher education, 	<ol style="list-style-type: none"> 1. To evolve broad parameters to be adhered to by all HEIs at the academic level as well as for financial self-disclosure 2. To simplify the process. Multiple uploads to be streamlined into one channel for greater transparency, annually
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			Counsellors. Some of these are conflicting in nature. Thus a concern	
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B 3	Feedback from students managed and monitored by NHERC	To consider student feedback routed via an ethical system leading to improved transparency that will support enhancement of the existing academic ecosystem	<ol style="list-style-type: none"> 1. Legality and Ethics 2. Multiple surveys, fatigue level, low response rate 3. Doctored feedback 	<ol style="list-style-type: none"> 1. Student Feedback Form should be uniform to maintain parity 2. The form should not be teacher specific but content specific 3. To elaborate the mechanism of the complaint system 4. To decide on the parameters to be kept in mind when taking students feedback and to not do so randomly 5. The HEI should be allowed the chance to address/ redress the complaint and this should be the focus of interest 6. Result analysis of feedback to be handled by the college 7. Feedback review and Counselling sessions for students so that an informed procedure is adopted by students while giving feedback 8. Only those students should be eligible to fill feedback who have 70 % attendance
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B 4	Adjudication on the issues related to grievances of stakeholders based on the information provided by HEIs	A robust grievance system	<p>1.Legality and ethics</p> <p>2.Modality of grievance redressal to be spelt out</p> <p>3.Validation of grievance</p>	<p>1. A grievance system that covers all levels ranging from the academic to the administrative in a transparent manner.</p> <p>2.Periodic review of the Grievance System</p> <p>3.Committee at the HEI level to solve the grievances of students and staff (teaching and non-teaching)</p>
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Section C: Vertical II National Accreditation Council (NAC)				
S.No	Role and Objectives	Implications	Concerns	Suggestions
C 1	Meta accreditation body in supervisory and oversee role	May lead to uniformity and improvement in academic standards of HEIs across the country		<ol style="list-style-type: none"> 1. NAAC guidelines to evolve newer yardsticks to facilitate better quality education in HEIs and the minimum standards should be pegged. It should enable HEI the scope of improvement. 2. Dedicated team at NAAC with physical interface to address all queries of HEIs

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C 2	Accreditation based on basic norms, public self disclosure, good governance, Institute Development Plan (IDP) and outcomes	If implemented well, this initiative may lead to improved transparency and uniformity and improvement in academic standards of HEIs across the country		<p>1. This system is already in place. To be able to improve and build on the existing system.</p> <p>2. The score should be multi-dimensional and qualitative. It should not be quantitative.</p> <p>3 The score should be both quantitative and qualitative like existing NAAC</p> <p>4. Good practices of other institutions to be shared on public platform. Regional variations may be considered</p>
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C 3	Suitable system of graded accreditation and graded autonomy to HEIs in a phased manner over a period of 15 years to become self governing degree awarded institutes/clusters	Commercialization of education is a possibility as the question arises, will self governance lead to self financing?	<p>Will there be different levels of colleges in a Central University?</p> <p>The federal structure of DU has benefitted all the colleges and this is likely to be affected.</p>	<p>1. The present robust structure and legacy of DU should be maintained.</p> <p>2. This aspect of the policy be applied to new institutions coming in the future</p> <p>3. To facilitate colleges through revised structure, mentorship and guidance to improve the quality of HEIs</p> <p>4. The government should ensure sustained financial support</p> <p>5. A system has to be devised for entrance for higher degrees if students are coming from heterogenous self governing institutions within same university</p>
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Section D: Vertical III Higher Education Grant Council (HEGC)				
S.No	Role and Objectives	Implications	Concerns	Suggestions
D 1	Granting funding and financing HEIs based on strategic Institutional Development Plan (IDP) and its implementation	Varied requirements by the colleges and there contexts	IDPs will depend on the grants and parity of fund distribution	<ol style="list-style-type: none"> 1. To ensure unconditional basic level of funding for regular functioning of the HEIs (salary and other than salary expenses including maintenance) 2. To evaluate the viability of the IDP prior to implementation followed by a discussion of the IDP with HEGC 3. To assess the impact of this revised formula on student fee. All that is drawn from student fee should be used for their activity only. 4. In the 4th yr students are required to take up research project that should be provided in the budget of HEI to support this activity and should not impact student fees. Such research labs should be established in HEI. 5. Every teacher is entitled to minimum research grant but goes through screening committee of HEI e.g. upto 1 lakh per annum.

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				6. More than 10 lakhs/annum should be availed by faculty based on IDP evaluated by HEGC or its departments.
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Section E: Vertical IV General Education Council (GEC)				
S.No	Role and Objectives	Implications	Concerns	Suggestions
E 1	Framing expected learning outcomes/graduate attributes for higher education qualifications leading to degree/diploma/certificates	LOCF based courses	Student feedback should be based on Learning outcome	<ol style="list-style-type: none"> 1. Involving maximum number of teachers for syllabus revision. 2. The syllabus should match the degree being awarded at the end of one/ two/ three/ four years. 3. Courses to be redesigned to suit the new system. 4. A nuanced and pragmatic approach should be adopted while effectively implementing ideas

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E 2	Formulating National Higher Education Qualification Framework (NHEQF) in sync with National Skills Qualification Framework (NSQF) for integration of vocational education into higher education	Vocational Education vs Higher Education impasse needs to be resolved so that employable graduates are created but academic standards are not compromised	Maintaining standards of Higher Education	<ol style="list-style-type: none"> 1. To distinguish Vocational Education from Higher Education while giving the student the chance to make a shift. 2. To think about new centres/ institutions for skill development 3. To shift to the Annual mode to give the student a chance to develop skills over a substantial period of time 4. To continue skilling and build capacities along with higher education and its principles. It should be an integral part of higher education but built into the system in such a way that academic standards are not compromised with.
E 3	Setting up facilitative norms for issues related to credit transfer, equivalence and others	To facilitate credit transfer and provide students an opportunity to study in those institutions that they consider best	Fluctuating faculty workload will have its own implications	<ol style="list-style-type: none"> 1. Facilitate credit transfers for University accredited courses

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E 4	Re-structured role of professional councils: National Council of Teacher Education (NCTE)/Indian Council of Agriculture Research (ICAR)/National Council of Vocational Education and Training (NCVET) & others as Professional Standards Setting Bodies (PSSB) under GEC	Re-modelling the courses offered by NCTE/ ICAR/ NCVET etc.	Impact on existing Academic Staff Colleges (ASC)	<p>1. There must be a connection between the requirements of the discipline in the new scenario and the courses offered by professional councils for Teacher Training.</p> <p>2. Increase in the number of professional councils for teacher training</p> <p>3. All institutions who train a particular cadre of professionals must follow regulatory authority like NCTE, RCI etc..</p>
E 5	PSSBs responsible for curriculum framework and setting up standards in their respective fields of learning under GEC			These bodies (PSSB/ GEC) should work in collaboration with the teachers of Central Universities to evolve better yardsticks for syllabus development in Higher Education

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Section F: HEIs as Independent Self –Governed Degree providing Institutes/Clusters				
S.No	Role and Objectives	Implications	Concerns	Suggestions
F 1	Adequate funding, legislative enablement and autonomy to HEIs aiming for highest level of accreditation by committing to institutional excellence and engagement with local communities	To define “adequate funding and legislative enablement”	What will be the implications for HEIs without highest level of accreditation?	<ol style="list-style-type: none"> 1. This will be a new step. Hence the parameters of what constitutes a Self-Governed Degree College must needs to be discussed at a wider level. 2. To ensure basic and sustained minimum level funding for colleges irrespective of grade 3. To ensure minimum equity in fund disbursement

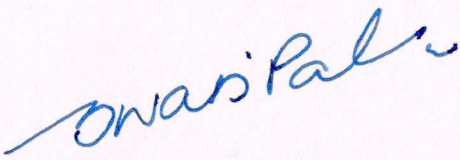
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F 2	Setting up Board of Governance (BoG) for independent self governing institutes, empowered to independently govern the institute	Implications of the BoG for the different colleges.	<ol style="list-style-type: none"> 1. Stating powers of the BoG to evolve an ethical system of operation. 2. De-centralisation of power 	<ol style="list-style-type: none"> 1. All HEIs be given a chance to improve their performance by proper funding. 2. Composition of the BoG should have wider representation including teachers of the concerned HEI and academicians from civil society 3. Basic level uniformity in working conditions and salary structures
F 3	Central and state support to high performing HEIs to expand the reach by attaining more students/faculty and by adding more disciplines/programs		While there will be a thrust on expanding high performing HEIs, a basic level of parity to address the concerns of the average performing HEIs should be there	<p>High performing HEIs should look at the following:</p> <ol style="list-style-type: none"> 1. Offering existing courses in new form 2. Adding more courses 3. To also tie up with other HEIs in the same bracket. 4. System of collaboration with another HEI with an average grade
Section G: Any other				
S.No	Role and Objectives	Implications	Concerns	Suggestions

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			How will multi-lingual teaching and evaluation take place in cosmopolitan cities?	
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Signature with Name and Date:
(Cluster Coordinator)



 (SWATI PAL)
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