

Recommendations on “New Education Policy”



(Submitted to Shri T.S.R. Subramanian, Former Cabinet Secretary & Chairman,
Drafting Committee for framing the New Education Policy, constituted by the
Ministry of Human Resource Development, Government of India, on 28th December, 2015)

Disclaimer

Any type of copying / publication of these recommendations by any other agency would be treated as violation of IPRs and EPSI shall be free to take legal recourse against the offenders.



EPSI'S Policy Document Recommendations for "New Education Policy"

**(Submitted to Shri T.S.R. Subramanian, Former Cabinet Secretary & Chairman,
Drafting Committee for framing the New Education Policy, constituted by the
Ministry of Human Resource Development, Government of India, on 28th December, 2015)**

The Recommendations being submitted are based on the thought process initiated by EPSI Advisory Committee and interaction during various Conferences organised at Delhi, Bangalore, Chennai, Chandigarh and Pune alongwith responses received from the Education Providers against the Questionnaire circulated across the country. The analysis and Recommendations are the output of the vigorous research undertaken by EPSI.

Contents

Introduction	01
Pre-text of Subject	02
EPSI's Recommendations	03





Introduction

Post Independence era i.e. 1947-2014 has witnessed considerable growth in the Higher Education sector, more so after 1986. As the Higher Education sector expanded in the country, the concerns of quality, relevance, access, employability and contribution to the national economy have also come to the fore. On the other hand, the prospects have also increased in the emerging global scenario in the post WTO era, when India stands to use the strength of its professional manpower for development, especially to the socio-economic needs of society.

The last comprehensive Educational Policy, the National Policy on Education (NPE-1986) and Program of Action – 1992 (POA-1992) as approved by the Parliament, need a revisit in view of the liberalized economy of the country as well as the sectoral strength of education sector in India, which is developing as one of the major attractions for the developed countries. There is an urgent need for reform and revitalization of education sector to meet the socio-economic, global and political realities. The Government has also realized that “National strategy for education has to ensure the availability of highly educated, trained and motivated manpower for dealing with the challenges”. India has to compete with most advanced countries in many fields of production to hold its own position. Keeping in view of these challenges and present deficiencies of the higher education system, it is imperative to initiate discussions/undertake reform and revitalization of the higher and professional education sector in India.

Expectations from the New Government

The new Union Government headed by the Prime Minister, Shri Narendra Modi, has generated lot of expectations in all spheres, including education. Reforming the policies of the MHRD will mean several big initiatives in elementary, secondary and tertiary or higher education. Aiming for radical improvements in higher education will require setting up some higher goals which may be achievable in next five to ten years. As a nation, we cannot dream to become 3rd largest world economy by 2025 or 2030, unless we ensure that our manpower will be comparable with the available human talent in China, USA or any other developed nations. It will require that education is given top priority by the new Union Government. The private sector is now a big stakeholder in education, especially in higher education as more than 70% seats in professional courses including engineering and technology, medicine, dentistry, nursing, pharmacy, management, architecture, computer application, etc., have been created in private self financing institutions established by Not for Profit Societies/Trust. These private self financing education providers need not be distrusted as was done by the Central Government under UPA-II, which lead to a chaotic conditions all over.



Pretext of Subject:

- (i) The presumption with which National Education Policy 1986 and POA-1992 were framed have undergone a significant change and are not in tune with the present time frame with major contribution from the private sector, economic development, information technology, international developments of education and economy. This necessarily needs a review.
- (ii) With the increased pressure on the need of the education at all levels, the roles and responsibilities of statutory agencies must be reviewed to ensure that they act as facilitators and not as inspectors or police. There has been only one-way communication by government to the education providers for any kind of regulations, governance, finances, etc. The functioning of the statutory bodies should be participatory with all the stake holders. Presently there is lack of open minded wider consultation process inspite of the fact that Section 12 of UGC Act, 1956 provides for mandatory consultation with the Universities.
- (iii) Over a long period the statutory agencies and institutions have not been able to establish relevance and meaningful relationship with the industry, trade and commerce.
- (iv) Industry has so far not recognized the potential of educational institutions due to the absence of a tangible model and utility definition. Accordingly the Governments have also, not taken Industry into confidence nor involved them in a participatory role to develop or invest in higher education. Industrial conglomerates need to be involved more actively in discussion and offer recommendations for the complete and holistic development of relevant higher education.
- (vi) Education policy revisit becomes mandatory in view of the changing global scenario, which includes WTO agreement and privatization of Indian economy, introduction of public-private partnership model, skilled manpower requirement by the industry in view of evolving professional / vocational roles, the access of higher education to disadvantaged communities and enhancement of research and development output, regional imbalances, etc.



EPSI’s Recommendations

There is a universal agreement that Education and Literacy is mandatory for the development of an individual and a nation. It is an accepted fact that better GER in higher education is directly linked to the higher Gross Domestic Product (GDP) in various countries. USA with a GER of 85 in higher education is one of the most robust economies in the world followed by countries like Japan, Germany, Australia, UK, France, Singapore, China etc., which have higher GER more than the world average of 30. India with a current GER of about 23 in higher education is a developing economy with very high potential to match the developed nations in terms of per capita income as well as GDP. In India, primary focus of the Central and State Governments has been on primary education and rightly so, duly supported by the funding from World Bank in projects like Sarva Siksha Abhiyan.

Various committees constituted by the Central Government for advancement and development of education have recommended that 6% of the GDP should be spent on education but we have never gone beyond spending 3.6% of GDP ever since independence. India has achieved GER of more than 92 in primary education with significant drop out at secondary level but GER at higher education has reached at 23 in higher education, which is much lower than the developed countries as well as China, which could achieve GER of 30 in higher education, with the sustained efforts in last 10 years. Indian Universities and Colleges do not figure in the International Rankings of higher educational institutions inspite of huge investments in Apex Institutions like IITs, IIMs, NITs and Central Universities, whereas other Asian countries including Japan, Singapore, China, Hongkong and even Malaysia have improved a lot in last ten years. School education sector, which is largely dominated by the State Governments, is primary concern because it lays down the foundation for robust higher education system.

EPSI, which is an education forum of education providers in public as well as private sectors, is actively engaged in raising the issues related to various levels of education including elementary, secondary and higher education including professional and vocational education etc. EPSI is actively involved in seeking feedback of all stakeholders on various aspects of education system in India be it education providers, employers, faculty and staff, students and parents. It conducts conferences, seminars, workshops, symposia, interactive sessions etc., in the entire length and breadth of the country to elicit the views of various stake holders on the status of education and is thus a true representative of the stakeholders. The major concerns for education system in India seem to be Access, Inclusiveness (equity), Quality, Governance, Relevance and Resources. Based upon various activities held by EPSI in the whole country in last nine years, following recommendations are made for reinventing and rejuvenating education system in India.



A. SCHOOL EDUCATION

There is a wide gap in quality of education, infrastructure/facilities and attitude of teaching staff of Government and Private schools. It is more evident in comparison to urban with rural areas.

Since, School Education is primarily dominated by State Governments, which owns more than 2/3rd of schools in the States affiliated to State Boards of School Education; the major concerns are inadequate facilities, such as class rooms, toilets, computers, laboratories, library, qualified and quality teachers in adequate numbers. With a huge diversity in terms of regional languages, most of the Government Schools teach in vernacular language medium. English is taught as a subject in class – VI and onwards in some States.

As per policy of the Central and State Governments, normally students are not subject to examination upto class-X. Quality of teachers, instructions and attendance of the students remains to be major concerns in government schools. Academic results of secondary and senior secondary classes in government schools affiliated to state boards remain to be quiet low as compared to academic results of these classes in private public schools affiliated to CBSE except in few cases. Knowledge of mathematics, science and communication skills in English amongst the government schools pass outs is one of the grey areas.

State Boards of School Education prescribe different curriculum specifically in science and mathematics at secondary and senior secondary level, whereas all students are required to sit in common entrance examinations for admission in professional courses like engineering and medicine, which puts students enrolled in government schools in disadvantageous position. Hence, such students resort to taking coaching in private coaching academies shelling out huge amount of money.

According to Programme for International Student Assessment (PISA) Report 2009 of ranking in School Education, India is ranked at 72 out of 73 countries, which indicates that a lot is required to be done in improving the quality of school education in addition to the efforts already being made. State Boards of School Education must standardized their curriculum and bench mark the same specifically in science and mathematics with the curriculum adopted from CBSE, which is mapped with the syllabus of entrance examinations like JEE-Main and AIPMT.

It is not that all private schools are above board, the levels of infrastructure facilities and quality of staff differs. These qualitative differences reflect the caliber and vision of respective managements. However, one aspect is common to all and encouraging is that all private schools endeavor to improve and compete with their peer/neighborhood schools and aspire to do better. The quanta of admission seekers justify their quality and value for money indicating their preference over Government Schools.



Most private schools, barring schools established by corporate houses, start with meager resources and investments from personal contributions and borrowings and then upgrade over the years to make their name and fame.

The RTE Act, with its aim and objectives to provide free and compulsory education to all between 6 to 14 years of age, is laudable but the Act is questionable and has its very many inherent flaws: financial, academic and administrative. Many a states had raised their hands to implement this Act.

In one stroke, the Government shifted its educational responsibility on to the private schools by forcing them to reserve 25% at elementary level rather than increase capacity of Government schools and create/establish many more. This created a sudden shortfall for fee paying parents and denying others the Right, Freedom and Opportunity to educate their wards in desired schools.

Studies indicate that 80% of the brain develops by the age of 5 years. Thus, the age group of 2-5 years is very crucial. The concept of Anganwadis /Play schools or pre-schools is thus relevant and needs emphasis. Accordingly, the policy of not being allowed to screen students till the age of 14 years is thus faulty. Continuous assessments have to be done to ensure that each child is in the appropriate mental age group to gain advantage for fruitful development.

The shortcoming of the RTE Act were sought and forwarded to the Parliamentary Standing Committee in December 2011 for reconsideration of the RTE Act. The issues pertained to No Screening Test, No Detention Policy, Re-imburement, threatening tone in the Act for punitive actions for violation and closing down/de-recognition of educational institutions etc. The outcome is unknown.

Taking a cue from the RTE Act, some state governments framed and inserted rules in their Acts for free and compulsory education (Haryana Education Act Rule 134A), to pass the Government burden on to private schools. The RTE Act and the State Acts on Education are thus most discriminatory and biased between Government and private schools, with least amount of thought due towards the short-comings of Government schools and action plans to improve their status & reputation. Private Schools have only single source of income and that is fees collected from the students. Hence, it is discriminatory on the part of 75% fee paying students, who share the financial burden of 25% non-fee paying students, making their education cost high and in certain cases beyond paying capacity. It is pertinent to mention here that the eleven Judges Constitution Bench of the Hon'ble Supreme Court of India struck down similar scheme in TMA Pai case in 2002, which was suggested by the Constitution Bench of the Apex Court in Unnikrishnan case in 1994 and implemented as such.



It would not be out of place to say that the private schools be regulated by a separate body and the state Education Dept and Education Board be solely answerable for the performance of Government school education.

The Centre and State Acts and Rules have become a handy stick in the hands of Education Department and politicians to literally terrorize, threaten and rein in schools to obey their dictate to seek favors & obligations. The Acts, they feel, have placed the private schools at their disposal. As a result, they have further and completely ignored the Government schools and their deterioration continues unabated.

The policy to reimburse the fees of EWS students by a fraction of actual expenses is unfair. It amounts to cross subsidy by full fee paying students. Some of the states like Haryana are pressuring for completely free education by private schools to the EWS. The issue is under litigation in the Punjab & Haryana High Court. Karnataka schools too had this problem and have got a relief from their High Court.

Even though education is considered as a charitable activity and exempt from Income Tax, the State Governments charge commercial rates for electricity and water. Property Tax on school buildings is not exempt. Construction material and related transactions are all taxed at par with traders.

All privately financed schools function on no profit basis and all excess funds are reinvested in upgrading school infrastructure or to establish new educational institutions. They are thus fulfilling Government task without receiving any aid.

Keeping in view the above mentioned problems EPSI recommends the following for new education policy:

1. The State Governments and Union Territories must concentrate on opening new schools and increase the capacities at primary and elementary level. They must help, facilitate and encourage opening of private schools to meet the ever increasing demand.
2. The Legislature must reconsider and review all Acts and Rules. These should recognize and respect the contribution of private schools and remove punitive and threatening clauses from the Acts and Rules.
3. Recruitment and transfer policy for teachers of State Governments needs complete overhaul and reconsideration and transparency to improve quality, culture and confidence among teaching fraternity of Government schools. Corruption and indifference in the system is the root cause of poor quality of education in Government schools needs stern action against defaulters.



4. For every simple issue, the horns get locked between private schools and Government officials. Relief comes only from Courts after long drawn litigations. An open mind and proper dialogue between these partners in education can save time and money for both.
5. The education department should concentrate on Inspection of Government schools and improving & overhauling their facilities.
6. The private schools should be left to be governed by their respective managements and School Management Committees (SMCs), as they are themselves engaged in stiff competition to outdo their peer schools and are under constant scrutiny of their respective affiliating Boards and parents.
7. Private self financing schools be allowed to fix their own fee structure without any interference from the government agencies with procedures in place to ensure that private schools do not indulge in profiteering.
8. Private Self financing schools be also compensated for implementing reservation policy for 25% free seats for economically backward students from the government exchequer. Alternatively, Corporate Social Responsibility (CSR) Funds of Corporates, which have become mandatory under Companies Act, 2013 may be partly used for this purpose.
9. Due to globalization of economy, not only there are considerable movements from one country to another but there is a huge mobility of students and workers from one State to another State in India. It will be appropriate to introduce three language studies in schools at certain level so that students apart from being conversant in their vernacular language and English are also conversant with Hindi and/or other vernacular/foreign languages. It will also lead to national integration and unity.
10. Open schooling to be promoted for migratory laborers and dropouts who are unable to cope up with regular Classes.
11. Public Private Partnership (PPP) programs be restructured to encourage private players to come forward and contribute.
12. The time frame for considering the applications of Schools and other educational institutions applying for permission/approval by the Authorities should be fixed for three months.
13. Autonomy should be considered for Schools who maintain the quality.

14. Some state governments have imposed learning of regional languages compulsory for CBSE schools also, which is a major hurdle to the linguistic minorities in States. It is requested that the request of the parents belongs to the minorities can be considered favourably.
15. Some State Governments are not granting the minority status to the deserving institutions. In such cases, the National Minority Commission should be requested to consider them favourably.
16. All private schools in the country, which have completed ten years, should be granted permanent affiliation/recognition.
17. CBSE should not insist on NOC from the State Government, while applying for affiliation to CBSE.
18. Schools are being taxed directly or indirectly in similar lines as commercial establishment. It is requested that educational institutions should be exempted from all taxes/levies/toll tax to bring down the cost of education.
19. The Central Government should establish Science City at each District Head Quarters, so that the student community can be benefited at large.
20. Separate Vehicle Insurance Policy may be formulated exclusively for educational institutions in the country.

Lastly, the Government must respect and encourage establishment of private schools by philanthropists, who come forward and invest money for the cause of education. They should be allowed to function with a free hand without any interference or pin pricks. The Income Tax Laws are in place to look into other aspects of profiteering or mal-practices.



B. HIGHER EDUCATION

Higher education, as already mentioned above is a principal vehicle for promoting sustained growth in the economy of a country. It is a major instrument for achieving upward mobility for individuals. The major concerns of higher education are to achieve better access, quality and inclusiveness (equity). Higher Education is supposed to create capability of earning decent livelihood and social status for all sections of the society. This can be possible only if higher education leads to adequate applied skills in the relevant fields. Indian Higher Education system has got its legacy from the British system in the pre independence era in which higher education was knowledge centric aimed at training man power to implement government policies. Over a period of time, specifically after Second World War, the face of the higher education changed from knowledge focus to skill focus in the wake of advancement of science and technology. All the so called developed nations moved from knowledge centric higher education to skill centric education with a lot of stress on quality assurance in the form of accreditation, but Indian education system inspite of having the collective wisdom of large number of education committees/commissions failed to bring out the necessary change. Resultantly, most of the pass outs from the higher education system lack employability and life skills to excel in the world of work although, large number of them because of their commitment and value system come up to the expectations of the employers over a period of time. It is believed that Indians by inheritance have high analytical ability and logical thinking but the present higher education system is not designed to exploit these inherent strengths. All the Indian students who joined foreign universities specifically in developed nations have performed exceptionally well in comparison to the local communities.

Indian Higher Education system is one of the largest in the world. There are about 760 universities and 38000+ colleges affiliated to about 300+ State Universities in India. Student Enrollment in Higher Education system in India in regular course is in the range of 30 million. There are approximately 4000+ engineering colleges/university departments offering UG and PG programs in engineering and technology out of which about 80% are privately managed and self financing institutions. There are approximately 350 medical colleges/university departments offering UG and PG programs in Medicine out of which again 80% of the seats are in privately managed and self financing institutions. Same is the case more or less in Dental/ Nursing/ Management/ Pharmacy/ Teacher/ Architecture Education. Government colleges primarily catered to general education such as sciences, commerce, humanities and social sciences except for few self financing courses in the field of management and computer applications. Tuition Fees in Government and Government aided schools remains to be very low as the cost of education is highly subsidized by the Central and State Governments.

The research output from Indian Universities and colleges is one of the lowest amongst various countries in different continents and none of the Indian Universities figures amongst the top 200 Universities in the World. Central/State Governments have failed to provide adequate funds for higher education and government funding on education remains to be less than 3.5%



of GDP as compared to the targeted investment of 6% of GDP recommended by various committees/commissions.

Indian constitution does not provide education as a business activity and hence it is a not for profit activity even for the private players. Government agencies including statutory bodies try to control and regulate higher education system without meaningful facilitation and encroach upon the autonomy of Universities/Colleges, Government Institutions also not being exception. Political leaders and bureaucrats interfere in the working of Government as well as private self financing institutions leading to erosion of quality in education. Thousands of legal cases are pending in Districts/ High/ Supreme Courts due to inept handling of educational institutions by the political leaders and bureaucracy. Education Policy is determined on the basis of whims and fancies of the authorities at the helms of affairs in State Governments and Central Government.

In UPA-II, initially the Central Government talked about providing autonomy to educational institutions and addressing all major concerns of higher education system but most of the legislation drafted for rejuvenating higher education, without any consultation with the stakeholders, aimed at not only encroaching the autonomy of educational institutions but also stifling their independence and innovative thinking. Resultantly, none of the proposed legislation could be passed in the Parliament and the entire country has been pushed behind into oblivion in terms of higher education.

Statutory bodies also lack permanency of qualified work force and the key decision makers are appointed on contract/tenure basis for few years leading to chaotic functioning of such bodies. Such actions lead to intellectual bankruptcy and policy paralysis. There are inadequate facilities for teacher training and huge shortage of qualified faculty.

There are anomalies in fixation of qualification and experience for teachers at various levels and industrial/research experience is given a complete go by. For example, in an engineering college/university department, an Associate Professor may be appointed with first class B.Tech., M.Tech and Ph.D degree in the relevant field with no mandatory requirement of industrial/research experience. In Engineering graduate qualifying Indian Engineering Services Examinations, who raises to the level of General Manager or Member of the Railway Board or the one who raises to the level of Executive Director, Director, Managing Director in reputed PSU like ONGC, IOCL, BHEL, NTPC etc., is not eligible to hold the post of Assistant Professor in a Engineering College. With total enrollment of about 45 lakhs students in B.Tech programs in India, there is a faculty requirement of 3.00 lacs teachers based upon norms of 1:15 teacher student ratio and 1/3rd of this, i.e. 1 lac teachers must hold Ph.D degree, as per AICTE norms. Actual availability Ph.D qualified teachers in the entire country is not even 20,000 leading to a man made scarcity and exploitation of the private engineering colleges by the Government agencies. Same is the case more or less with other streams of professional education, i.e. Medicine, Pharmacy, Architecture, Management etc.

Government funding for its universities and colleges remains to be quite inadequate, which hardly meets the requirement of salaries and routine maintenance. There is a huge shortage of funds for lab equipment and teacher training. Many State Universities have resorted to offering self financing courses in the vocational streams and distance education courses to tide over the financial crisis. Quality of education in such courses is always causality because the faculty for such programs is appointed on contract or adhoc basis and in case of distance education programs; some companies with vested interest have been given franchise to run study centers across the country. Buildings in most of the State Universities and Government colleges are poorly maintained because of either lack of resources or diversion of funds to other Government entities.

In most countries of the world, education has been considered to be the responsibility of the State but private sector has performed a significant role in establishing educational institutions not for profit as well as for profit depending upon the law of the land. In United States, which claim to be having best Universities in the world, large number of top ranking Universities are private and self-financing. Enrollment in private education is steadily increasing across the Globe except Western Europe. It ranges from about 80% in Japan and Korea to about 40% in Malaysia and 30% in India. The United States have a mix of educational institutions, which are public funded; private not for profit as well as private for profit. The cost of education in these institutions is very high in public funded institutions, high to moderate in private not for profit institutions and low in private for profit institutions because of the expenditure incurred on research. In India, although no educational institutions can be established for profits but there are serious concern about some players, who restore to profiteering. Since, Central/State Governments in India are not in position to meet the entire demand of higher education in the country, there is no alternative except to encourage private sector to come to the rescue to ensure that Indian economy grows and competes with the best economy of the world.

Public Private Partnership is now being talked about to have a set of educational institutions, which are established with the help of the Government but are operated by the private and autonomous bodies. No such success story, however, has come to the fore in India so far.

Since, there is a huge gap between the supply and demand in higher education and the cost of education is going up with more and more private players offering degrees, the trend for distance education has increased substantially. Distance education offers flexibility in terms of choice of courses and period of study and has the potential to play a decisive role in meeting the demand for access, quality and retraining. With advent of ICT, blending learning is becoming quite popular under which the classes are conducted through virtual class rooms and internet, which can be access by the students as per their convenience. But this asynchronous mode is suitable only for those students, who are highly committed.



Cross Border Education is also becoming popular specifically for those, who have higher paying capacity and want to explore the global curriculum and education practices. Many Universities in India have tied up with foreign universities to offer varied experience in cross border education through dual degrees, twining programs, student exchange programs etc.

Keeping in view the feedback received from the stakeholders, EPSI makes the following recommendations for reinventing and rejuvenating higher education in the modern concept.

(a) General:

- (i) Statutory Bodies controlling the process of approval for establishment of various professional/vocational courses such as MCI, DCI, INC, BCI, COA, PCI, AICTE etc., shall lay down norms and standards for starting new courses, which should be recommendatory in nature and not mandatory. Approval process by the statutory bodies be discontinued. Accreditation should be made mandatory for starting new courses for which periodic checks could be made by the Accrediting agencies even before the start of the programs. The Accrediting Agencies should check and control the outcomes and outputs of educational institutions rather than checking and controlling inputs.
- (ii) The responsibility of Accreditation of educational courses should be left to independent and autonomous non-government organizations including industry forums such as CII, FICCI, PHDCCI, ASSOCHAM, EPSI etc., which may operate under a broad framework of Accreditation controlled by a Federation of such bodies to ensure standardization. Statutory and Government bodies may be associated with the federation for laying down frame work for accreditation.
- (iii) The jobs in public and private sector should not be based only on degrees and may be provided on the basis of requisite skills for which proper evaluation methods could be developed. Such evaluation test may include written papers as well as skill tests. This will ensure seriousness and commitment of student in acquiring right kind of skills coupled with requisite knowledge sets in Universities/Colleges.
- (iv) The faculty recruitment norms shall also be based upon the competency of a person to teach and carry out research in the designated areas rather than merely position of paper degrees. Professionals with proven competency in their specific fields and Public life be allowed to teach in higher education system. For example no distinction should be made between a Teacher having Ph.D degree and ten years experience in teaching and research, viz-a-viz., a professional, who has worked in industry, PSUs or a Research Lab and has acquired knowledge and skills in the specified field and excelled thereof.



- (v) Government spending on education should be increased to the level of 6% of GDP at the earliest and further to about 8% to ensure increase in GER at par with the developed nations so as to produce competent and trained man power which could contribute for creation of knowledge and wealth. Private sector should be encouraged to invest in education sector and a limited profit/dividend should be permitted to the investors to sustain their interest.
- (vi) Statutory bodies and Government agencies should act as facilitators rather than inspectors and controllers and suitable laws should be made to provide more autonomy to educational institutions with accountability. Frame work should be made for self regulations and transparency in operations of the educational institutions to avoid corruption and undue profiteering. Boards of Management of Private Self financing educational institutions should not have any representative of the Central/State Governments and/or statutory bodies.
- (vii) Central/State Governments must create agencies for manpower assessment surveys to identify skill shortages in various fields and provide guidelines for equitable distribution of seats in educational institutions in various disciplines. For example there is a huge gap between demand and supply in medicine and wellness courses in India, which leads to charging capitation fee by some dubious players. If Government plans and facilitates sufficient number of seats in educational institutions offering professional courses, not only the problem of capitation fee can be arrested but the exodus of students going to foreign countries for attaining such degrees can be stopped.
- (viii) Private Self financing colleges be allowed to fix their own fee structure with a condition that no undue profiteering can be made from educational activities. However, there should be a complete transparency on the part of educational institutions in fixation of fees which should be proportional to the facilities provided and infrastructure created.
- (ix) More and more colleges must be given autonomy and be allowed to award their own degrees subject to proving their credentials in terms of academic excellence and transparency. Affiliating system, which is predominantly prevalent only in Indian Sub Continent be dismantled slowly and steadily. A long term plan in this regard may be prepared by MHRD through wide consultations with the stakeholders and such plan be implemented in the scheduled manner. In India about of 38000+ affiliated colleges, only 526 colleges have been designated as Autonomous colleges as per UGC norms. Autonomous colleges also are not free to award their own Degrees and the same are awarded by the Universities to which they are affiliated. Well performing autonomous colleges having a standing of five years and demonstrating accountability and transparency may be allowed to award Degrees. It will require an amendment in UGC Act, 1956 only to the extent that Autonomous Colleges may also award Degrees subject to



meeting certain laid down preconditions. Thus in next 10 years, affiliating system can be totally dismantled.

- (x) There are several Engineering and Management seats are lying vacant. There was huge investment incurred for making this infrastructure, which is going waste. To utilize the same, they should be allowed to run multi disciplinary and skill development courses, where there is a demand.
- (xi) Academics and Research are integral part of the higher education system and cannot be divorced. However, autonomous colleges offering predominantly UG and PG programs may not be forced to undertake research of higher order to reduce the cost of education. Universities and autonomous colleges of higher stature offering Doctoral programs should only be encouraged to carry out critical and applied research for which research grants should be made available to private self financing educational institutions on par with Government/Government aided institutions.
- (xii) Industry, Trade and Commerce is the largest beneficiary of the output and outcome of higher educational system. As per the new Companies Act, 2013, companies engaged in business activities are required to be spent 2% of their profit for meeting their corporate social responsibilities. Substantial funds from such companies should be diverted towards research and development in educational institutions and training of teachers. Industry Academia Interaction should be taken at the meaningful level in which Industry contributes to the advancement and growth of higher education through sharing of resources and knowledge.
- (xiii) Central Government must ensure level playing field for private self financing institution and Government institutions in terms of developmental grants specifically in the fields of Research and Development and Teacher Training. A separate fund must be created at the disposal of University Grants Commission, which should disburse such grants to the educational institutions without any discrimination based upon their research output and academic performance. Equal opportunity should be given for both private and public University's students in terms of scholarships also.
- (xiv) Restriction for registering private self financing colleges/universities under section 12B of UGC Act be lifted. All recognised institutions should be eligible to register themselves under 12B of UGC Act.
- (xv) Wider open minded consultation with all stake-holders should be made mandatory part of the decision making process by all statutory bodies and government departments. Committees/Commission should have proportionate representation of private players in education sector.



- (xvi) Infrastructure norms including requirement of number of teachers and cadres should be realistic and based upon the actual number of students enrolled rather than the sanctioned intake as in many cases large number of seats remain vacant. Providing infrastructure and teachers based upon sanctioned intake results in sheer wastage of resources and increases the cost of education for the actually enrolled students.
- (xvii) Previously the educational institutions were given incentives of 10% on the foreign currency received under SFI scheme, which has been discontinued from this year. The same is to be restored as many of the institutions are promoting Indian education by bringing the foreign student to our country.
- (xviii) The Union Government should allow continuing education for industries by Universities and there should be no restriction on jurisdiction of Universities within country.
- (xix) To encourage top students to join teaching profession and to attract Indian Professors from foreign countries, they should be given incentives by ways of fixing a ceiling of 5% of Income Tax.
- (xx) Single window system should be made available for educational institutions for various approvals, NOC, Permission and recognition from the State and Central Government.
- (xxi) Colleges/Universities are being taxed directly/indirectly in similar lines as Commercial Establishment. It is requested that educational institutions should be exempted from all taxes/levies to bring down the cost of education.
- (xxii) All degree programs may have mandatory training on entrepreneurship to encourage more and more students to start their own small business to change them from job seekers to job providers. Universities/Colleges must support student ready to establish their own business ventures through innovation and incubation centers.



(b) ACCESS & INCLUSIVENESS (EQUITY):

- (i) Higher Education must be available to all eligible candidates without any discrimination of caste, creed, religion, economic status, region etc., on merit. However, some reasonable reservation for the identified groups as provided in the Constitution may continue.
- (ii) Steps may be taken to reduce gender disparity in enrollment of students in various courses. Women may be provided certain incentives for joining courses in higher education.
- (iii) Central/State Governments must create funds for educational loans to the deserving and meritorious candidates, who are not able to afford the cost of education. Liberal loans at low rates of interests be provided to the students for undertaking higher education courses with a reasonable moratorium and without insisting on collateral security up to some specified limits, which may be Rs.20.00 lacs for the entire course in India.
- (iv) The Government should encourage migration of students from one State to another State so that it will strengthen the National Integration.
- (v) Private Educational Institutions should also be given loans at lesser rate of interest, so that the infrastructure will be on par with the world standards.

(c) QUALITY:

- (i) Accreditation should be made mandatory for release of development grants to the educational institutions without any discrimination, whether they are funded by the Government or Self financing. However, the eligibility criteria for accreditation may be revisited and the same should be carried out even before the admission process starts. Alternatively, provisional accreditation may be considered in first four years and regular accreditation may be provided on merit in fifth year and onwards.
- (ii) The accreditation of the educational institutions/programs should be on the basis of outcomes and outputs rather than inputs. For example, research output in the form of high quality research
- (iii) Publications, patents, development and transfer of technologies, publication of books etc; number of start-ups facilitated; number of recognized international awards won by the faculties and students; placements and pay packages obtained by the pass-outs; social contribution made by the alumni etc., may be considered for award of grades for accreditation rather than the land, number of classrooms, cost of equipment, number and qualification of teachers etc.



- (iv) Establishment of Internal Quality Assurance Cells in Universities/Colleges must be made mandatory and the quality processes be made transparent and available to the stakeholders in the public domain.
- (v) Universities/Colleges should be allowed to start, restructure and discontinue courses as per requirement of the industry, trade and commerce in terms of skills required. Educational institutions must have the autonomy to develop the curriculum for various courses within the specified frame work for which the statutory bodies may issue guidelines from time to time.
- (vi) Faculty Development Programs should be offered by the Government agencies in the fields of content updating, guidance and counseling, evaluation and assessment, research and development, IPRs, ICT etc., free of cost to the teachers without any discrimination between Government and private self financing institutions. Teachers should get adequate facilities for training and retraining to update themselves and acquire new skills as per the requirement of the industry to remain relevant to the education system.
- (vii) Accreditation Agencies may encourage internal and external competitive bench marking in educational institutions to ensure that best practices in education system are followed without duplicating efforts.
- (viii) Government must create National Qualification Framework (NQF) under which qualification and skill sets for various posts/job responsibilities are properly defined. NQF must mention the assessment pools for measuring and evaluating knowledge and skill tests in an objective manner so that suitability of the candidates for specific jobs could be adjudged without any favour or bias. NQF may also define skill sets for awards of various degrees by the educational institutions as well.
- (ix) Choice based Credit System should be introduced in all the Universities and Credit transfer facilities be made available between all Universities in India both Government and private subject to Accreditation of the Universities.
- (x) All Universities must establish Innovative and Incubation Centres, which encourage the students and faculty members to think innovatively and convert their ideas into reality through sustained efforts in such centres, which facilitate new product development, identification of sources for raw materials, equipment procurement markets, funding agencies etc. Universities may create funds for supporting new start ups within the University till they are mature enough to stand at their own.



(d) GOVERNANCE:

- (i) Vice Chancellors in State Universities should be appointed purely on merit without any interference from the Government. Central Government may lay down norms for qualification and experience for the post of Vice Chancellors and prepare guidelines for their fair selection. Ideally a candidate for the post of Vice Chancellor should have a fair blend of experience in academics, research and administration. The tenure for the post of the Vice Chancellor in State Universities should be five years instead of three years, which will be at par with Central Universities.
- (ii) Central Government should notify a Model Act for establishment of a University to be notified under Section 2(f) of UGC Act, 1956 covering various aspects of governance and quality frame work, which should act as a guide for the State Governments.
- (iii) Boards of Management of private self financing institutions which do not get Government funds except developmental grants should not have Central/State Governments nominees as well as affiliating Universities nominees as per law of the land lay down by the Supreme Court in TMA Pai Case.
- (iv) Central/State Universities should also be made totally autonomous without any interference from the Governments. Rather experts from industry, trade and commerce shall be associated in various universities bodies to seek their opinion on academics and research so that gap between the knowledge and skills possessed by the graduates and required by the employers could be reduced to minimum.
- (v) Central/State Governments should establish Academic Leadership Training Institutes for continuing education of the senior functionaries of the Universities both Government and private including Vice Chancellors, Pro Vice Chancellors, Registrars, Deans, Controllers of Examination, Heads of the Department etc., who could be regularly trained in the modern aspects of governance and academic administration. Even some amount of training can be made mandatory for these functionaries to ensure that they don't become stagnant.
- (vi) All Universities in the country should be encouraged to network and shared resources for their sustained development and optimum utilization. Joint Degrees between various Indian Universities be encouraged within the standard academic frame work.



(e) RESOURCES:

- (i) Central/State Governments should create suitable land banks throughout the country and the land for establishing educational institutions be provided to the societies/trust on subsidized basis for equitable development. For example 640 districts in India about 275 districts does not have even a single engineering college. If Government provides subsidized lands in such districts, societies/trusts may come forward for establishing such institutions in these backward areas.
- (ii) Educational institutions should be allowed to take loans from international banks/agencies including World Bank, International Monetary Fund, Asian Development Bank etc.
- (iii) Industries be encouraged to donate their obsolete machinery and equipment to the educational institutions for which industries may be provided suitable incentives. Since, obsolescence in machinery and equipments in industry occurs very fast and such equipment may remain relevant to the educational institutions, such scheme will ensure availability of adequate equipment for training of students. This step shall also help in reducing the cost of education.
- (iv) Educational institutions must be encouraged to generate revenue through various activities from their campuses in the form of hiring of facilities during non working hours, consultancy, sale of the products made in the institutions as part of student training etc., and revenue so generated should be utilized for reducing the cost of education.
- (v) Government and PSU employees, who are expert in various fields of life be encouraged to work as visiting faculty in educational institutions during their non working hours, which will not only result in enhancing the earning capacity of the people but shall also result in enhancement of knowledge and skills of students at a reasonably low cost.



EPSI earnestly requests that the above mentioned recommendations may be considered favorably and included in the New Education Policy Document in the right spirit. It is once again emphasized that participation of private education providers must be encouraged in decision making process by various statutory bodies and concerned government departments.

With Regards,

Yours sincerely,

Dr G Viswanathan
President, EPSI
Founder & Chancellor
VIT University, Vellore

Dr H Chaturvedi
Alternate President, EPSI
Director
BIMTECH, Greater Noida

Dr. Prashant Bhalla
Treasurer, EPSI
President
MREI, Faridabad

Dr. M R Jayaram
Sr. Vice President, EPSI
Chancellor
MSRUAS, Bangalore

Dr. Vedprakash Mishra
Vice President, EPSI
Chief Advisor
DMIMS University, Nagpur

Dr. M K Panduranga Setty
Chairman, EPSI (SR)
President
RSST, Bangalore

S. Satnam Singh Sandhu
Chairman, EPSI (NWR)
Chancellor
Chandigarh University, Punjab

Prof. (Dr.) Mangesh T Karad
Chairman, EPSI (WR)
Secretary & Trustee
MIT Group of Institutions, Pune

Taranjit Singh
Chairman, EPSI (ER)
Managing Director
JIS Foundation, Kolkata



www.epsfi.org



Education Promotion Society for India

DTJ 504, Fifth Floor, DLF Tower-B, Jasola
(Near Indraprastha Apollo Hospital), New Delhi 110025
Ph: 011-26953647/48/49
Fax: 011-26953645
e-mail: mail@epsfi.org, exeseecretary@epsfi.org