Comments on National Education Policy (NEP) 2020
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The National Education Policy (NEP) 2020, aimed at making India a global knowledge superpower, is path breaking and visionary. These reforms, both in school and higher education, would have profound impact on the gross enrolment ratios, quality of education, research, employability and internationalization in the years to come. This would transform India’s educational landscape from one of local presence to global leadership with quality, equity, inclusion and access. Effective implantation of several changes initiated in this Policy would pave way for achieving Atmanirbhar Bharat sooner than expected.

1. **Gross Enrolment Ratio (GER):** The aim of increasing GER in higher education including vocational education from 26.3% in 2018 to 50% by 2035 is much needed and laudable. This requires synergistic approach among the Governments, public and private higher educational institutions.

2. **Holistic Undergraduate Education:** The long overdue correction of large affiliating universities resulting in low standards of undergraduate education is rightly diagnosed and remedied in the Policy. By introducing holistic 3 or 4-year multidisciplinary undergraduate education embedded with flexible curriculum with quality education with multiple exit options backed by appropriate certificates would encourage and develop capacities among our youth. Their intellectual, aesthetic, social, physical, emotional, and moral capacities would develop in an integrated manner. This initiative is indeed forward looking.

3. **Affiliated Colleges:** Phasing out the system of affiliated colleges over a period of 15 years is a welcome step. Transforming affiliated colleges to become autonomous degree-granting colleges is a formidable challenge. It is a promising reform in higher education. It is worth the efforts considering the outcomes it offers for enhancement of quality, equity and access in higher education.

4. **Multidisciplinary Education and Research Universities (MERUs):** The idea of setting up model public universities for holistic and multidisciplinary education to attain the highest global standards in quality education would catapult some of the Indian universities in to the top 100 global HEIs in the years to come. However, this should be supported by funds and other resources.

5. **Specialized Single Discipline HEIs:** The direction and emphasis on multidisciplinary universities is laudable. Specialized single discipline educational institutions such as IITs, IIMs, etc. have served the nation in producing some outstanding technocrats, entrepreneurs, managers, leaders, etc. Transforming them into multidisciplinary
universities is desirable. However, the core purpose of establishing such institutes needs to be protected. Navigating the conversion of single discipline outstanding institution to multidisciplinary university requires delicate balancing, commensurate resources and top class managerial and leadership skills.

6. **Ph.D Program**: Discontinuing M. Phil. Program and eligibility criteria for Ph.D. program either a Master’s degree or a 4-year Bachelor’s degree with Research are welcome policies. Making Ph.D. entrants to take credit-based courses in teaching/education/pedagogy/writing related to their chosen Ph.D domain area during their doctoral training period; exposure to pedagogical practices, designing curriculum, credible evaluation systems, communication, and so on will prepare them for future talent requirements in HEIs. Re-engineering the Ph.D programs is much needed reform which will address the problem of faculty shortages, which is one of the greatest challenges in implementation of this Policy.

*Comment*: We recommend that the doctoral program should include rigorous coursework in research methodology and the domain area, followed by Ph.D qualifying examination. Further, seminar presentation every semester, Ph.D 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 would ensure 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, online teaching, production of courseware, student counselling and mentoring, content development and delivery, student evaluation and feedback, etc.

7. **Professional Education**: Employment generation is a perpetual challenge for the country. We need more ‘job creators’ than ‘job seekers’. There is a compelling need for establishing a center for innovation, entrepreneurship and incubation in every HEI offering professional as well as in undergraduate programs. Such centers should drive entrepreneurial spirit among students, faculty and work closely with the industries and Government institutions. The policy rightly promotes this culture.

8. **Academic Bank of Credit (ABC)**: Establishment of Academic Bank of Credit which would digitally store the academic credits earned by a student from various recognized HEIs so that the degrees from an HEI can be awarded taking into account credits earned is a path braking policy. This would promote healthy competition among HEIs and flexibility for the students.
9. **Transforming Assessment System**: A shift in assessment system from one that is summative that primarily tests rote memorization skills to one that is more regular and formative, is more competency-based, promotes learning and development and tests higher-order skills viz., analysis, critical thinking, and conceptual clarity is a step in the right direction.

*Comment: This requires capacity building in terms of faculty competencies and infrastructure.*

10. **PARAKH**: Setting up of a National Assessment Centre, PARAKH (Performance Assessment, Review, and Analysis of Knowledge for Holistic Development), as a standard-setting body for student assessment and evaluation would drive the assessment patterns towards meeting the requirements of the 21st century.

11. **National Research Foundation (NRF)**: Vibrant research and innovation culture across HEIs, research labs, and other research organizations is the backbone for innovations in a technology driven competitive world. The initiative of NRF, in addition to the existing research funding organizations such as the Department of Science and Technology (DST), Department of Atomic Energy (DAE), Department of Bio-Technology (DBT), Indian Council of Agriculture Research (ICAR), Indian Council of Medical Research (ICMR), Indian Council of Historical Research (ICHR), and University Grants Commission (UGC), as well as various private and philanthropic organizations, to recognize and promote outstanding interdisciplinary research is indeed need of the day. NRF would play a very crucial role in creating a culture of high quality research and build capacity in disciplines that are critical.

*Comment: This is an excellent idea. But it is important to have role clarity between NRF and other funding agencies such as DST, DAE, DBT, ICAR, ICMR, ICHR, UGC, etc. in the allocation of funds and monitoring of research.*

12. **Higher Education Commission of India (HECI)**: A transformative strategic initiative is setting up of Higher Education Commission of India, a single umbrella body for the entire higher education, excluding medical and legal education. HECI, with four verticals viz., National Higher Education Regulatory Council (NHERC) for regulation, General Education Council (GEC) for standard setting, Higher Education Grants Council (HEGC) for funding, National Accreditation Council (NAC) for accreditation would re-energize the higher education and promote synergistic working towards achieving common national goals. Further the professional councils, such as the Indian Council for Agricultural Research (ICAR), Veterinary Council of India (VCI), National Council for Teacher Education (NCTE), Council of Architecture (CoA), National Council for Vocational Education and Training (NCVET) etc., will act as Professional Standard Setting Bodies (PSSBs).
Comment: Restructuring of higher education apex bodies is an excellent policy initiative. However, it is important to have appropriate linkages among them for effectiveness and efficiency in their functioning.

13. **National Educational Technology Forum (NETF):** Creation of the National Educational Technology Forum (NETF) for free exchange of ideas on the use of technology to enhance learning, assessment, planning, administration, etc. both for school and higher education is a right step for dealing with projected growth and associated challenges.

14. **Internationalization:** Vishwa Guru, envisioning India as a global destination for providing premium education at affordable costs is a right step for internationalization of education, for attracting students from overseas and for facilitating faculty/student exchange with the best institutes across the world. Encouraging high performing Indian universities to set up campuses abroad and permitting selected universities that is from among the top 100 universities in the world, to operate in India would facilitate top Indian universities to benchmark and model them to be world class.

Comment: To start with even opening the top 200 global universities to operate in India is a good number. However the government should ensure only not-for-profit institutions offering multiple programs to set up campuses in the country. In course of time the number of foreign universities could go up to top 500.

15. **Uniform Nomenclature:** It is a welcome step to rationalize the current complex nomenclature of HEIs such as ‘deemed to be university’, ‘affiliating university’, ‘affiliating technical university’, ‘unitary university’ by simply terming them as 'university' on fulfilling the norms. Implementation of this may take some time, but it is much needed reform.

16. **Vocational Education:** Integrating vocational education into all school and higher education institutions in a phased manner over the next decade with a focus on skills gap analysis and mapping of local opportunities would strategically align employment opportunities to required skills. The setting up of a National Committee for the Integration of Vocational Education (NCIVE) to oversee this effort would go a long way in operationalizing this aspirational goal.

17. **Liberal Education:** Integration of liberal education with the existing education system is indeed a great idea considering the need to promote creativity and innovation. This would also significantly contribute to catapulting some of the higher educational institutions to world class universities. However, this requires continuous benchmarking of educational processes with the best of the institutions world over for which necessary mechanism has to be in place.
18. **ODL and Online Programs**: Development of a framework for quality of ODL and online programs would bring in a paradigm shift in the higher education. Maintaining the standards and quality of all ODL programs with the highest quality programs run by the HEIs on their campuses is much needed reform. This would enhance the credibility of ODL programs. ODL and online programs significantly contribute to increasing the access to quality higher education in geographically diverse a country as India. This would auger well in achieving the targeted GER envisaged in the Policy. The new normal in higher education is envisaged as a hybrid of ODL/online programs and classroom instruction.

19. **Increasing the Public Investment**: The goal of 6% of GDP to be spent on education is indeed laudable, but implementation is important.

20. **Treatment of Private HEIs**: Treating all HEIs, public and private, on par within the regulatory framework will boost the private HEIs and encourage them to pursue private philanthropic efforts in education. Sanctioning of research grants for private universities at par with public universities promotes healthy competition and results in quality research. This would boost the research activities in the country.

21. **Governance and Leadership for HEIs**: The vision to make all HEIs in India to become independent self-governing institutions pursuing innovation and excellence in the next 15 years is aspirational. Its implementation is very important for the growth of higher education.

   *Comment: There is a need to create structures for development of academic leaders to serve the future needs of HEIs.*

22. **Academic Freedom**: Academic freedom including the freedom to pursue research, adopt innovative pedagogical and curriculum practices is a welcome step.

23. The core of the National Education Policy 2020 can be summarized as follows:

   a) No hard separation between arts and sciences; vocational and academic streams; curricular and extra-curricular activities, etc. in order to eliminate silos between different areas of learning.
   
   b) Multidisciplinary and holistic education across the sciences and social sciences and sports.
   
   c) Emphasis on conceptual understanding (with focus on applications) rather than rote memorization and learning for examinations.
   
   d) Creativity and critical thinking to encourage logical decision-making and innovation.
   
   e) Ethics and human and Constitutional values and life skills.
f) Teachers and faculty as the heart of the learning process.
g) Outstanding research as a core requisite for outstanding education.

Whether new or old policy having excellent faculty with competencies in world class teaching and cutting edge research is the only way for bringing transformation in Higher Education. The new policy rightly places the importance on teachers and faculty at the heart of the learning process. It also rightly emphasizes on the recruitment, continuous professional development, positive working environment and service conditions in HEIs.

Implementation of this policy in true spirit will transform higher education in the country. It would set India on the path for global educational leadership and pave way for attaining the past glory attracting international scholarship. In due course, it will also help in achieving the long cherished goal of some of the Indian universities getting into the top 100 universities in the world.