

AIFUCTO

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अखिल भारतीय विश्वविद्यालय एवम महाविद्यालय शिक्षक महासंघ

ALL INDIA FEDERATION OF UNIVERSITY
&
COLLEGE TEACHERS' ORGANISATIONS
(Regd. Under Act XXI of 1860)

Ref.....

Date.....

To
The Chairman
UGC,BSZ Marg.
New Delhi.

20-02-2022

Dear Sir,
Greetings from AIFUCTO.

Response of Association of All India Federation of University & College Teachers' Organisations(AIFUCTO) regarding the Draft National Higher Education Qualifications Framework (NHEQF) proposed by UGC. Ref.:F. No.15-2/2021 (QIP) dated January, 2022.

(1) The National Higher Education Qualifications Framework (NHEQF) is framed in accordance with the NEP 2020. It aims to integrate vocational education into higher education. The Policy also envisages the setting up of facilitative norms for issues, such as, credit transfer, and equivalence. However many aspects are not realistic and might fail at the operational level. This will lead to total chaos and will eventually lead to serious damages. In India, good public education is a right. There exists a significant link between public education spending and empowerment. States like Kerala, which spent more on public education, score higher on the empowerment index. Even as the central government promises an increasing the share on education, the share of the union budget allocated to education is seen to decrease over the years. The NEP 2020 and the NHEQF formulated on the basis of the former will encourage this tendency further. The framework calls for a complete overhaul of the system. An abrupt change can have disastrous effects. The policy proposes to make the medium of instruction of higher education in local/Indian languages. However introducing local languages for each subject in academic institutes is a problem and is totally unrealistic. This gets aggravated when it comes to premier institutes, where students get admitted from all over India. Opting a particular local language as the medium of instruction in such cases is thus impractical. As per the framework, students are given the liberty of multiple entry and exit. This idea can create an assortment of problems. First, those students who are willing to complete their graduation have to study for four years while one can easily complete his/her diploma degree in two years. This might encourage the pupil to leave the course midway. Secondly, accommodating students on re-entry can

create operational difficulties. A student moving out in the midst of a course will need to be readmitted where he left.

- (2) As the number of seats is fixed in a [2] programme such re-entry can affect the distribution of students as well as the teacher-student ratio. The problem gets aggregated when it comes to programmes having laboratory courses. Administrative difficulties that might pop up will have to be addressed separately. Transforming HEIs into large multidisciplinary universities, colleges, and HEI clusters/Knowledge is envisaged in the framework. Over a period, it is envisaged that Colleges would transform either to an Autonomous degree granting College, or a constituent college of a university. The colleges are left with the option of changing them to institutes of other kinds like Research-intensive or Teaching-intensive Universities. A possible outcome would be that research will not be encouraged in conventional colleges as funds will not be available for them. This will affect their grades during accreditation and might prevent them from moving up the ladder. Many of the Government Colleges in different states currently carryout research activities along with teaching. Labelling them as teaching intensive institutes, will put a setback to their research activities. The framework envisages a holistic and multidisciplinary education system. Though holistic education has its own advantages, introducing this concept to the present higher education system demands too many prerequisites. It may underemphasize academic learning and is time consuming. Time constrains are a pertinent issue. The document proposes to set up an Academic Bank of Credit (ABC). Students will be able to obtain credits from a variety of HEIs (possibly through SWAYAM or other online platforms) under ABC regulations, which will encourage blended learning. However this option may not be accessible to all students as there exists a digital divide. Initiatives to address such issues have not been included in the framework. Moreover, the Academic Bank of Credit system is part of a larger effort to internationalise higher education and make our institutions more global. The giants who come to play in this scenario will provide education that best suit the interest of their client. This will prove to be detrimental with respect to national objectives and needs. Funding of public higher education will be significantly reduced and institutions will be left to find sources for their survival. Such an orientation only on profit aims have to be discouraged. These exercises can be viewed only as an effort made for the entry of foreign universities into our higher education system. Moreover Student's selection of the courses/teachers need not be well informed; it might occur as a result of arbitrary/subjective preferences for a particular teacher or because of the transient influence of the market. The intervention of the state, institution and teacher are advised in guiding the student in this regard. [3] Section 2 of the Draft document talks about the graduate attributes and outcomes of a programme. It projects that the basis underlying the NHEQF is that higher education qualifications such as a certificate, diploma and degree are to be awarded based on the demonstrated achievement of learning outcomes and academic standards expected of graduates of a programme of study. Students must possess and demonstrate the graduate profile/attributes defined in terms of the expected learning outcomes upon completion of the chosen program(s) of study under the NHEQF and are free to choose any mode of study like regular, distance, online, blended etc. This is a

significant shift from our existing system. Such an overhauling cannot be done overnight. The time span available for this is not clear from the document. Moreover the pressure of facilitating the students to achieve this graduate attributes without being conscious about the available transaction time will make the efforts merely mechanical. In view of the above, we propose the following 1. A complete overhaul of the existing system without realising ground realities is to be done away with. 2. English language should continue as the medium of Instruction in HEIs. Regional languages can be given due encouragement but not at the cost of replacing English. This impo competence and mobility.

3). Multiple entry and exit provisions lead to develop a market of higher education. Hence are to discouraged, have operational difficulties and clarity regarding handling such issues is to be made.

4). The document gives undue importance to vocational education. Discipline specific skills are to be preferred rather than vocational skills.

5). The classification of HEIs into different categories as Teaching Intensive and Research Intensive should not prevent them from engaging in activities other than that are expected out of them. Moreover such a distinction is flimsy in nature.

6). Holistic education can underemphasize academic learning and hence careful design is to be proposed.

7). Students do not need to be on campus for a major chunk of their academic life, according to ABC plans. This should not be supported because it will cause operational problems. It will also have an impact on extracurricular activities and positive student-to-student interactions. As a result, it is proposed that mandatory credits be assigned to social activities in which students must engage directly on campus. [4]

8). There exists a digital divide in the country and hence plans of practising blended mode must be introduced after empowering states with resources (Financial) to bridge the gap.

9) We strongly oppose the Internationalisation of higher education and doubt malicious intentions. Government should not withdraw from its duty to provide quality education to its citizens.

10).The freedom of Universities to design the curriculum and syllabus should be preserved. To sum up, an abrupt move in this direction may not yield expected results. Any exercise of this kind requires systematic planning; designing and careful formulations bearing in mind the aims and objectives of education.

Finally , we have clear understanding that UGC should hold serious discussion with all stake holders including AIFUCTO before going ahead for implementation.

Hope your serious considerations on AIFUCTO 's suggestions.

Yours' sincerely,



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Copy to The Secretary, UGC