

**ALL INDIA PEOPLE'S SCIENCE NETWORK (AIPSN)**

Regd. No. PKD/CA/62/2020.



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**13.2.2022**

To  
Prof. Rajnish Jain  
Secretary UGC  
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**Sub: Response on the draft NHEQF from UGC**  
Ref: Yr Lr F.No 15-2/2021(QIP) dt nil Jan 2022

Based on the request in [your above referred letter](#) from the UGC site which was released on 30<sup>th</sup> Jan 2022, please find attached the response from AIPSN on the [draft National Higher Education Quality Framework \(NHEQF\)](#)

**Do acknowledge the receipt of this document.**

*Look forward to having all the inputs received made available publicly.  
We call upon UGC to abandon or keep in abeyance this flawed National Higher Education Qualification Framework (NHEQF) and instead first enable the infrastructure and functional requirements for such a Qualification Framework to function properly.*

Yours sincerely

P.Rajamanickam  
General Secretary, AIPSN

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**A Network of 40 People's Science Movements working in 25 states**

AIPSN Response to

Draft National Higher Education Quality Framework (NHEQF)

The UGC during the pandemic period has brought out the [draft National Higher Education Quality Framework \(NHEQF\)](#) on 30 Jan 2022 and through [an undated public notice released at the same time on the website](#) has asked for feedback from all stakeholders by 13<sup>th</sup> Feb 2022 via the gmail id nepnheqf@gmail.com

The response from AIPSN is given in two parts: a) Procedural inconsistencies and b) Long term deleterious impacts

A. Procedural inconsistencies

1. **A democratic exercise has once again been hijacked and made a mockery of in a process that has become familiar.** Force a bill, act, ordinance, directive without any discussion to plead that it is good for the nation, farmer, academic, student, teacher worker. The farm laws have met unprecedented resistance. But that has also given the backdrop to take attention away from matters related to other issues. It is for this reason that the government released the Science, Technology, Innovation Policy document on 31<sup>st</sup> Dec 2020 with only 3 weeks to respond- the date being extended by eleven more days under demand. The same happened with this UGC ABC draft regulations being put up on 21st January on the UGC website with the last date to respond being 5th February, 2021 with not even a press announcement for such an important document. And the draft NHEQF followed the same trajectory.

2. The question naturally arises **what is the urgency? There has to be more time given especially as colleges and universities are not fully functioning due to the pandemic.** As it is a scheme that is meant for students, **the students need to be involved in the discussion.** The time could be given till 30<sup>th</sup> April 2022 and then the responses can be made public before a new draft is circulated.

3. It is surprising that **UGC has chosen a gmail id for soliciting responses rather than use an official government email id or website for the responses.** The same was done for the ABC. If UGC does not have this capability even, how is it going to operationalise the online ABC or the NHEQF? **Or is it an indication that these will be outsourced to a private party?**

B. Other comments

4. Giving a clause by clause response to the NHEQF is futile. Reading the draft itself is like wading through some verbose pronouncements. It is not written as if by academics but rather reads like a bureaucratic piece obtained by outsourcing it to a management consultants for writing.

5. The **qualifications and outcomes are repetitive in places and make no meaning in terms of assessment.** How is the ability to "listen carefully" (under general learning outcomes which have been copy pasted for all levels) going to be assessed? Without providing any means for the outcomes to be evaluated and a rehaul of the evaluation

machinery currently in operation, it is impractical and illogical to implement the NHEQF. **The implementation of NHEQF must be deferred now and may be considered after another 5-10 years based on modifications from discussions and local trials involving the community of students, teachers and select institutions.**

6. **The NHEQF treats all students as having the same capability which obviously is not true.** The learning outcomes for example do not take into account persons with disabilities. How will a deaf person be able to “listen carefully” for example?

7. On p14 the draft says “The NHEQF envisages increased flexibility and choice of courses of study by students, particularly at the undergraduate level. A wide choice of subjects and courses, from year to year, will be the new distinguishing feature of undergraduate education. Students who wish to change one or more of the opted courses within the programme(s) of study that they are pursuing may do so at the beginning of each year, as long as they are able to demonstrate the required prerequisites and the capability to attain the defined learning outcomes after going through the chosen programme and course (s) of study.” But this is only wishful thinking because given the ground realities **even now credit based choice systems do not work even well established Universities due to a variety of reasons** including lack of faculty, lack of student involvement in planning and execution. First generation students typically have no clue about the choices and how they operate. Privileged students naturally find it easier to cope with. Till such time as the social reality changes and we have sufficient pool of students who are all either second or third generation **NHEQF type of mechanisms will only lead to privileging the already privileged. Thus the NHEQF must not be implemented now but should be kept in abeyance.**

8. **The mobility that this framework is supposed to give is theoretical.** Given our ground social realities even teachers and scientists find it difficult to move easily to different institutions. How will first and second generation students coming from rural and tribal backgrounds be able to move to different far off universities or colleges considering that there is no corresponding logistics provided for fellowships, accommodation transfers etc. **Instead of putting the cart before the horse the Government would do well to consider putting in place enough accommodation and fellowships for underprivileged and marginalised students all across the country before embarking on such exercises as the NHEQF which will only favour the elite.**

9. **The only actionable part will be the credit system and the filtering mechanism.** Earlier if one joins for 3 year course, even if there are arrears one could complete them later. **Now every year if the credits are not met the student cannot continue.** Only privileged students will get through. It will result in first generation and marginalised getting discontinued maybe with a certificate or diploma. **This contradicts the very purpose of flexible higher education. Students should be permitted to either complete the missed/failed credits and rejoin the Course or repeat the whole if number of credits is half or more than the total.**

10. An **important aspect of the NHEQF** is that by allowing lateral entry through acquired credits and preventing those with insufficient credits to carry on the course, **the reservation system would be bypassed** as the reservation would apply only at the entry level of the course. So at the end of the 3 or 4 year BSc course or the second year of a MSc course the number of students would be tilted in favour of the privileged.

11. The draft NHEQF does not make clear what/where are the **Equivalences between the Vocational and Academic Qualification Frameworks** i.e. at what level can Students from the Vocational stream shift to the Academic stream and how many credits can they bring with them? **If such Equivalences are not specified, this would again build a firewall between the Vocational and Higher Education streams which is against the very idea of flexibility and lateral entry/exit.**

12. On p16 the **NHEQF glibly mentions the Academic Bank of Credit** “An Academic Bank of Credit (ABC) has been established which would digitally store the academic credits earned from various recognised HEIs so that the degrees from an HEI can be awarded taking into account credits earned.”. This ABC was itself introduced during the pandemic time without discussions and despite several objections which seem to have been lost in the electronic blackhole that this regime seems to favour for all its ‘invited feedback for draft regulations’. But it does not go into the section 6.1 and 8.11 of the ABC which allow only the HEI to submit credits of a student to another HEI while making the students pay credit processing fees for keeping the credits in the ABC. **No mechanism has been spelt out to keep the fees affordable for economically and socially underprivileged students. This would only further be a barrier to retention of marginalised students.**

13. **Section 2 outlines the global scenario but fails to mention that the United States does not have a national qualifications framework.** The Washington Accord is an accreditation system for technical education. Moreover it does not touch upon the important lessons learnt in establishing National Qualification Frameworks since 1990s following the WTO push to standardize education based on learning outcomes. The points are summarised below (as given by Bateman, A, Keating, J, Burke, G, Coles, M & Vickers, A (2012) Concept Design: ASEAN Regional Qualifications Framework, Education and Training Governance: Capacity Building for National Qualifications Frameworks (AANZ-0007) -Volume II):

- there are **limitations to the learning outcomes approach in terms of how to quality assure the way they are defined and applied;**
- there are **dangers in over specifying or over engineering NQFs;**
- NQFs need to be **transparent, free from jargon and easily understood by all users;**
- NQFs **should be developed in consultation** with the key and long established education and training providers, and other key stakeholders including employers, relevant government agencies and professional bodies;
- NQFs **must be supported with effective infrastructure for assuring standards and quality;** and
- NQFs **need to evolve within national education and training and qualifications systems**

**The draft NHEQF put out by UGC has not looked at any of these points. It is better that UGC takes back this draft and does not implement the NHEQF for another 5 to 10 years till it does a more thorough process, the necessary effective infrastructure within and between HEIs develop. In the Indian context it is also necessary to ensure that social justice is not subverted in the process of bringing in a system that is fraught with potential to further marginalise the already marginalised and privilege the already elite sections of society.**

**14.** The draft for NHEQF by UGC has been planned to implement the NEP formulations. **But NEP recommends the dissolution of UGC, AICTE, NCTE, etc and planning for a single regulating authority National Higher Education Regulatory Authority. Under such situation how can UGC can recommend this NHEQF.** If it recommends now it has no authority to give multidisciplinary courses varying from fine arts, vocational education to teacher education. UGC with its capacity can recommend only NHEQF to humanities, arts and science.

**15.** The inclusion of moral, ethical and constitutional values has been recommended. **But the experience of Centre for excellence for Indian Knowledge, IIT Kharagpur, is dismal promoting Vedic knowledge. Vedic traditions..etc... through its calendar.** We fear of such type of promotion as moral and ethical values to all.

*We call upon UGC to abandon or keep in abeyance this flawed National Higher Education Qualification Framework (NHEQF) and instead first enable the infrastructure and functional requirements for such a Qualification Framework to function properly.*

*For clarifications contact:*

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