

Consultation Report
on UGC
Guidelines for Multiple Entry and Exit in Academic Programmes
Offered in Higher Education Institutions

Submitted by
Centre for Educational and Social Studies
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ABOUT CESS

Centre for Educational and Social Studies (CESS) is a not-for-profit registered society based in Bengaluru. The vision of CESS is to bring about 'Social transformation with and through Education'. The core domain of CESS is education sector and India centric studies. Our key engagement areas are research, capacity building and policy advocacy. Since its inception in 2006 to till date, CESS has carried out numerous research studies, capacity building workshops and policy advocacy activities.

CESS primarily collaborates with government departments, quasi-government bodies and other educational institutions with similar vision. CESS strives to draw the attention of all stakeholders including State and Central Governments on vital issues through series of National and State level seminars, dialogues, consultations, research publications and capacity building programmes. CESS's involvement in the key sectors, especially Education, has enabled it to be an effective think-tank influencing policy making.

CESS believes that effective participation in policy making through Policy Advocacy is key to a vibrant democracy and strong nation. To formulate its Policy Advocacy, CESS widely and deeply engages with all important stakeholders in the identified areas. CESS undertakes research including field surveys, stakeholders' consultations, brainstorming sessions with domain experts and reaches out to individuals and institutions whose voice is influential on policy formulation. The outcomes of CESS' consultations are documented and submitted to concerned government departments to help them develop evidence based policies. In the recent past, to engage stakeholders in policy debates, CESS conducted series of seminars and dialogues across India on the Draft National Education Policy 2019. This nationwide engagement led to wide participation by stakeholders leading to a better understanding of the draft policy. Since the unveiling of the NEP 2020 till date, CESS has conducted nearly 100 pan-India level webinars to create awareness among the key stakeholders of education about the letter and spirit of the policy. In its endeavours to facilitate the implementation of the NEP 2020, CESS is now deeply engaged in capacity building of stakeholders, especially the faculty and institutions of higher education in the state of Karnataka. (to know more about CESS kindly visit <https://cessedu.org/>)

BACKGROUND

The University Grants Commission (UGC) released ***Guidelines for Multiple Entry and Exit in Academic Programmes Offered in Higher Education Institutions*** on July 29, 2021. The day also marked the completion of one year of the unveiling of National Education Policy 2020. The Guidelines for Multiple Entry and Exit is one of the major initiatives announced by UGC towards implementation of the NEP 2020. The letter by the Secretary of the UGC addressed to the Vice-Chancellors of all the Universities and Principals of all the Colleges mentions that the proposed guidelines on multiple entry and exit system is built on imaginative and flexible curricular structures facilitating students to choose their learning trajectory and programmes. The system provides learners with varied certification options and paves the way for seamless student mobility between and among degree-granting HEIs through a formal system of credit- recognition, accumulation, transfer and of redemption. The flexibility in academic programmes will enable learners to seek employment after any level of award and join back as and when feasible to upgrade qualification.

ABOUT THE CONSULTATION

In pursuance of its vision Centre for Educational and Social Studies (CESS) reached out to select few education experts and stakeholders of higher education seeking their views and comments from implementation perspective. The soft-copy of the proposed Guidelines document was shared with the identified experts and stakeholders with a request to share their views. Apart from external experts and stakeholders, CESS associates were also invited to share their views, including those who have had participated in NEP drafting committee and in the state constituted Task Force for implementation of the NEP.

COMMENTS AND SUGGESTIONS RECEIVED

The comments/responses received from the experts and stakeholders are presented below:

1. There is no substantive justification for year 4 in the guidelines, the entire tone is for status quo with entry – exit options and not for a 4 year degree. It appears the same 3 year degree is being carried forward with an option of multidisciplinary courses in year 4. Why would any student or institution want to pursue year 4? The entire NEP recommendation's spirit has not been imbibed, just some expressions accommodated into it.
2. In one of the states' the model curriculum circulated under NEP suggests vocational courses only in year 3, this is not in keeping with the spirit of NEP. The UGC guidelines should be clear about the need for domain core courses/ vocational/ ability enhancing/electives and to what extent in each year of the program.
3. In the event it is felt there is a need to provide complete flexibility in this regard, then, graduate attributes at the end of each certification year should be indicated in the guidelines. The whole idea to offer an exit option at the end of year 1 is to provide for employability for those who cannot complete year 3 or 4 continuously and need the option to work and either come back to complete the degree or remain employed with a certificate.
4. The ABC does not appear compulsory for all HEI's even over time. This removes the flexibility of real credit transfer for students as only those in institutions whose credits are accepted will be bankable. HEI should be equal before the regulators and provide similar outcomes for students. One recognised diploma with credit transfer option and another equally recognised diploma without the transfer of credit option will neither be fair nor practical.
5. A one year Master's program (in integrated mode) and one year PG diploma program is not fair, unless the integrated program offers similar credits to an undergraduate degree + 2 yrs. master's. The

minimum number of credits for the integrated master's needs to be stipulated.

6. Assessment and credit hours calculations for MOOC could be included in the guidelines.
7. With regard to wider social context, one recognizes the logic behind Multiple Points of Entry and Exit in the wider frame of `continuous learning`. While this has worked extremely well in the West, one needs to pause and ask the question of its suitability to the Indian social context, values and cultural setting. In typical families across class settings (lower class, lower middle class, middle class and upper middle class families besides the case of the affluent), there is a strong focus on education and its completion at a stretch. Parents often advise children to complete all their studies before taking to a job. Family financial support is a critical variable. Until such time as learners pay for their education and take loans for the same or/and work full time to save for the same, we would need to look at the practicality of the scheme.
8. On multiple entries and exit, it is fair to refer to a certificate after one year, diploma after two, degree after three and honours degree after four years of undergraduate. In the credit bank system, can a student carry forwards credits that were earned for a Certificate if they were to seek a diploma or do the credits get exhausted after the certificate as it appears in the scheme. There needs to be a provision for carry-over of the same for the next level of achievement within a undergraduate degree.
9. The Guidelines doesn't throw light on the syllabus variation over time? These need to be clearly defined.
10. People seeking degrees are of two categories. There are those who register for degree programmes in pursuit of knowledge. They can start anytime in their life and mostly pursue through distant education or evening classes. Other category is those who undergo degree programme for its market value. For them the brand of programme, marketability of the degree, core concentration, and

duration matter a lot. They are the younger groups who are in the employment market, are risk averse, and are looking for value for money education. This policy caters very well to the knowledge seeking category. It has one critical gap when it comes to second category which forms the largest category. One suggestion is that the students can register themselves with Institutions they desire or prefer and pursue the entire programme with that Institutions. That Institution should certify qualifying MOOC courses, core and peripheral courses, and skills courses. They will monitor the quality and delivery. Else, this will become unbridled explosion of degrees which is fine but that will carry no value.

11. Today IIMs and IITs are also entering liberal arts programme. These can provide leadership in design, development and operation of these degrees. These can also offer degrees under this programme. Other Institutions can choose to affiliate with them. The Brand Value of the sponsoring Institution is the insurance and guarantee for quality and employment.
12. The title of the UGC guidelines 'Guidelines for Multiple Entry and Exit in Academic Programmes Offered in Higher Education Institutions' doesn't align with the spirit of the NEP 2020. Instead the guidelines must be called as guidelines for '4-Year Multidisciplinary Undergraduate Program' as the Policy states that the 4-Year multidisciplinary program is the 'preferred options' for students. The multiple 'Exit' and 'Entry' is only the flexible options to be exercised by student if one has to cut short the 4-Year program. The Exit and Entry are only operational part of the student's choice and flexibility given in the policy.
13. With regard to integrating vocational education with higher education, the Guidelines only speaks of integrating with polytechnics offering NSQF-aligned vocational courses and bachelor degrees in vocational studies. It doesn't give a comprehensive roadmap for integrating vocation education/skill development with higher education. Instead of asking the HEIs to refer to SAMVAY for skill component, the Guidelines should have included to make it clear and comprehensive.

14. Given the fact that the Policy recommends students to complete the 4-Year UG program, introducing a minimum CGAP of 7.5 to pursue 4-Year UG program in Research may discourage students to specialize/major in research. Therefore, the 4-Year UG Program must be treated as one continuum with no eligibility criteria at any point throughout the 4-Year Program for specialising in any discipline, including research.
15. There is a need to set minimum credits to be studied in the parent institution, if ABC to be implemented. Also in how many institutions can a student study to be clearly defined. Can the student repeat the courses , if he is not happy with X Institution?
16. The variability of Teaching Learning process exists among institutions. How to address this while transferring credits to ABC? Ex: the pre- requisite course studied in parent institution may not be sufficient to study in other X institution because of variation in TLP. The student may want to come back and study the same course in the same institution. Is it allowed?
17. The requirement for transferring ABC could be NBA / NAAC / NIRF accreditation or Ranking. But, will it ensure quality since there is again a variability in accreditation and ranking process by committees?
18. None of the Guidelines specify fee structure for institutions. It is a state policy. Is it credit wise or yearly fees? Very important factor as far as managements are concerned. The existing fee structure will not suffice to run such a varied and flexible system. Private universities may have advantage, since they charge their own fees. The private Institutions under affiliated and autonomous system will face problems of admission and running the system. Rationalisation of the fee structure across the country is important to implement NEP effectively.
19. The level 5 to level 9 skill enhancement looks to be good for multiple entry and exit. However, the employment potential at each level to

be surveyed through industries. Industries perception to be done in detail. Even though professional associations and some industrial bodies are involved since beginning of NEP, it is observed that many industries are not fully aware of the implications of multiple entry and exit and ABC. There is an immediate need to organise workshops among various industries including MSME's for better employment of students. Job roles at each level is not know to students in advance since it is an evolving system. Initial batches may have disadvantage.

20. Are IITs / NITs / IOE are a part of ABC and multiple entry and exit ? Many students may opt to take courses for ABC to improve employment potential.
21. The ranking of the programs in the institution is important for a student to select the institution for MEME and ABC. Many times it may be miss-leading and advertisement may play a major role than quality of TLP.
22. Collaboration and networking among institutions / universities is important for effective implementation of ABC. Otherwise, students will suffer. Guidance and mentoring is important for students while selection.
23. Minimum CGPA and no backlog to be considered while taking / giving credit transfers. Otherwise, monitoring such students is operationally difficult.
24. Setting up a separate committee at institution level to monitor ABC and MEME and to obtain necessary approvals from statutory bodies for the same may be included in the operational roadmap. And also a separate data bank to be made available to students and institutions for selection of institutions for ABC.

SUMMARY OF THE COMMENTS AND SUGGESTIONS

- ✚ The Guidelines doesn't reflect the spirit of the NEP. The very title of the Guidelines 'Multiple Entry and Exit' must be replaced with the

Guidelines for the 4-Year Multidisciplinary UG Program. The proposed guidelines should only be a part of the comprehensive framework to operationalize 4-Year Multidisciplinary UG Program.

- ✚ The Guidelines has failed to give a comprehensive and clear direction with regard to integration of vocational education with academic programs offered by higher education institutions.
 - ✚ Introducing minimum CGAP to pursue research in the 4-Year is very discouraging. The 4-Year UG Program must be treated as one continuum, even if one opts for research.
 - ✚ The Guidelines must be comprehensive enough to clarify operational challenges and complexities, especially keeping in mind the diversity of HEIs and of higher education system.
 - ✚ The NEP 2020 explicitly states that comprehensiveness in implementation is the key, as this policy is interconnected and holistic. The piecemeal approach to implementation of the NEP will impair the Policy vision and spirit. Therefore, it is appropriate to bring out a comprehensive roadmap for implementing the Holistic Multidisciplinary Education at UG, PG and beyond with all the relevant components including multiple Entry and Exit.
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