



Feedback on Draft Guidelines on Transformative Reforms for Strengthening Periodic Assessment and Accreditation of all Higher Educational Institutions in India

This report is the outcome of stakeholders' and experts' consultation undertaken by
Centre for Educational and Social Studies (CESS)

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Bengaluru**



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Draft Guidelines on Transformative Reforms for Strengthening Periodic
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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. Our key engagement areas are research, capacity building and policy advocacy. We undertake deep research studies on India centric education. CESS is a recognized research centre of VTU with active research scholars pursuing doctoral research.

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 having similar vision. CESS strives to draw the attention of all stakeholders, including State and Central Governments, on issues concerning education through National and State level seminars, dialogues, consultations, research publications and capacity building programmes. CESS' increased engagement in the Education sector has enabled it to be an effective think-tank influencing education policy decisions.

CESS believes that stakeholders' participation in policy making is important to strengthen education system. 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 voices are 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. Since the unveiling of the NEP 2020 to till date, CESS has conducted nearly 200 pan-India level webinars to create awareness among the key stakeholders about the policy and its impact. In its endeavours to facilitate the implementation of the NEP 2020, CESS is now deeply engaged in capacity building of stakeholders. It is our pride to mention that some of the CESS trustees are on the Central regulatory bodies as members. (to know more about CESS kindly visit <https://cessedu.org/>)

ABOUT THE CONSULTATION

This feedback report is the consolidation of the comments/views received from experts and stakeholders. A large number of comments have come from heads of higher education institutions followed by those involved in assessment and accreditation process. The draft guideline was sent out to a list of identified experts and stakeholders soliciting their comments. Given below is the consolidation of the views received from them. The following section captures the views/feedback of CESS research team.

FEEDBACK AND SUGGESTIONS FROM EXPERTS AND STAKEHOLDERS

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

- The report needs to be tuned in the context of multiplicity of the existing academic institutions viz., single stream, double stream etc. governed under govt., grants-in-aid, private, Trust/NGO run which are thousands in number awaiting accreditations by any accrediting agency(s) even for the first time. Students in lakhs are enrolled in these institutions. Among these, a large number of general academic institutions are currently preparing themselves for NAAC assessment and accreditation as directed by the concerned state governments. Some of them also failed to qualify for the first level i.e 30% of quantitative matrices as per NAAC criteria. Sudden changes without emphasizing on these institutions will disrupt quality improvement initiatives already underway.
- There are references to NEP 2020 vision of assessment and accreditation in the report. The NEP 2020 timeline also visualises a structural change in the institution to three categories, viz. Research University, Teaching and Research University and Autonomous institutions by 2029-30. Accordingly, the introduction of a binary system of assessment and accreditation framework needs to be collated in that timeline.
- The existing NAAC methodology may be tuned with more focus on technological interventions to speed up the process so that at least all

general academic institutions get first-hand experience of Quality assessment system. This will enable assessment for institutions and capacity building to help them restructure according to NEP 2020.

- Another option may be to segregate the two categories of the institutions (Accredited/Not Accredited) to avoid implementation of any structural change in the context of "One size not fit for all" in quality assessment and accreditation. The important point is that "institutions Not accredited at all" need to be focused for their capacity building and mentoring to ensure adaptability of quality enhancement parameters.
- For already accredited institutions, the submission of AQAR (Annual Quality Assessment Report) of NAAC needs to be followed mandatorily as compliance for next accreditations. The AQAR may be reviewed by Expert and be a part of the mentoring process. Now AQAR has been taken casually both by institutions and also by NAAC. Institutions are allowed to submit AQAR bundled for various years at any point in time. This system compromises with the very purpose of preparation and submission of AQAR.
- AQAR should be a basis of the continuous assessment framework of the institutions. At present, no weightage is given on AQAR of the institutions. Periodic assessment of AQAR may be considered in the terminal period between two assessment/re-accreditations.
- Since a large number of institutions are familiar with NAAC, NIRF, NBA etc. methodologies, any change needs to be based on strengthening existing methodologies rather than a complete change before the entire system of restructuring of institutions as per NEP 2020 occurs. Mentoring need to be structured by concerned agencies as part of the continuous assessment process. The present system of accreditation without any emphasis on regular/continuous assessment needs to be changed.
- The entire perspective of assessment and accreditation may be restructured with more emphasis on mentoring system tuned with periodic assessment/accreditation of programme/institutions. The one

nation one portal for data submission and validation needs to be considered at the earliest.

- Regular training programs for the faculty of HEIs for understanding and for sharing their inputs on the process of accreditation by the NAC must be held.
- NAC must bring out publications of the cases of the top performing HEIs in each of the identified category (till Green practices), for benchmarking or emulating by other HEIs.
- Institute a National Award for the best performing Public and Private HEIs in terms of the vision of NEP. This could be best way to incentives best performing institutions and also for sharing the best practices.
- HEIs not accredited as of now, should be given stipulated time period for improvement after which assessment maybe carried out. Handholding of those HEIs which are below the standard is equally important.
- Institutional Accreditation is more important than Programme Accreditation.
- The current system of 70:30 using technology and Peer team visit may be more suitable for ensuing assessment process. Assessment entirely based on technology may lead to disastrous consequences.
- The report includes valuable contributions of eminent educators and assessors from the various Institutions known in the field of education. The proposed clubbing of existing assessment and accreditation agencies is properly spelled in the form of NAC (National Accreditation Council) shows concurrence with NEP2020.
- The draft mentions that the task to function as a recognized accreditor shall be awarded to an appropriate number of institutions by NAC. More clarity and details are needed with regard to accrediting institutions.

CESS FEEDBACK

- Introducing Adapted Binary Accreditation System with a new category of institutions-Awaiting Accreditation-institutions that are on the threshold of Accreditation may dilute the purpose of Binary Accreditation proposed in NEP and may lead to a situation wherein a large number of institutions get there and prolong to go further. This may also impact a large number of students passing out from such institutions.
- The proposed category of HEIs-1. Multi-disciplinary Education and Research-Intensive; 2. Research-Intensive; 3. Teaching-Intensive; 4. Specialised Streams; 5. Vocational and Skill-Intensive; 6. Community Engagement & Service-is not in alignment with the types of higher education institutions as recommended in NEP 2020. Instead of having these many categories, an overarching assessment and accreditation framework be worked out with sections focusing on each of the 3 types of HEIs as is recommended in NEP 2020.
- Category 6-Community Engagement and Service could be an activity/academic engagement undertaken by all types of higher education institutions and therefore, should not be considered as an institutional category. The same principle holds good for vocational and skill intensive category. As NEP recommends for integrating vocational and skill education with every academic programme, having such category will only diverge from NEP vision.
- The parameters for accreditation must be carefully developed. Consideration for Inputs, Processes, Outcomes and Impact must be reflective of the NEP vision. The attributes of the HEI listed out in this draft must be in line with the NEP recommendation-deviations and of introducing new elements must be rationalised. For eg., what is extracurricular? And how to measure students support system?
- Building confidence of the stakeholder for use of technology is very essential for successful transition. Hence, capacity building workshops

must be conducted in a mission mode to identified stakeholders prior to the transition.

- Composite Assessment System is a welcome proposal. This will address duplication of processes.
- Successful implementation of NEP hinges on outcomes-based education and on documenting and demonstrating students learning. This implies that there is clear procedure for formulating/ designing the curriculum and assessment-both formative and summative. Assessment and accreditation process need to incorporate learning outcomes as articulated in their curriculum document and clear process how they have arrived while assessing the HEI's. This will encourage and push institutions to take outcome-based approach seriously and put the process of curriculum building in place.
- Sustained quality enhancement will need continuous professional development of teachers which the assessment and accreditation process must require the HEI's seeking accreditation to demonstrate.

CESS received feedback from the following Experts

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2. Dr. Sandeep Nair, Registrar Evaluation, Chanakya University, Bengaluru.
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