

The Union HRD Minister
Government of India
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Dear Sir,

Sub: Formation of Higher Education Commission of India – Repeal of UGC Act 1956.

The Government of India now took long awaited decision of repealing the UGC Act 1956. The UPA government had constituted a Knowledge Commission under the chairmanship of Mr. Sam Pitroda and another committee headed by former UGC Chairman Mr. Hari Gautham.

Both the committee submitted their report in which it was recommended that UGC in its present form is not meeting the requirement of higher education and instead of this some new commission should be made.

Even the BJP has put in their manifesto that they will abolish UGC and make a new commission. System of UGC and various councils like Medical council, nursing council, dental council, pharmaceutical Council, Bar Council are increasing the corruption, thereby standard of education is deteriorating and education is becoming unaffordable to the common people of India. As UGC is controlling all the council say AICTE, RCI, DCI etc. All these council's malfunction responsibility also has fallen on UGC.

Keeping the above in view, the bold decision taken by the present government is highly appreciable. The draft Act which is put for evaluation of the public and for suggestion is also highly appreciable in real sense. The suggestion of the stake

holders, students, parents, teachers, education providers may be incorporated in the Act if the suggestions are accepted by the Government.

The writer of these suggestions has worked 10 years as a Member of Academic Council and Senate of Mumbai University. Presently he is Chairperson of Shri Jagdishprasad Jabharmal Tibrewala University. He is serving from last 20 years as a president trustee of Shri Rajasthani Seva Sangh. He is presently contributing his efforts as the president of Association of Self Finance Universities Rajasthan.

Under his guidance Shri Rajasthani Seva Sangh is running a self-financed university established by the Government of Rajasthan F2(5)/vidhi/2009 dt 05.02.2009.

The University has faced the problem since its inception some of which are enumerated below. Such type of problem should not happen to the new education provider. This care should be taken by the new Act.

Rajasthan Government earlier assured the trust that they will be giving 150 acres of land and to start the university, but they granted 30 acres land only. However, despite the best efforts, the trust could not secure any further piece of land. University wants to start so many courses for which land is required as with the existing infrastructure; there is no place to construct in the land allocated.

We have participated in Pune and Mumbai the Resurgent Rajasthan organized by the Government and we had personal meeting at Jaipur also in which we have impressed upon the authorities to allocate us land which was recommended by the then Minister and District Collector but it is not done as yet.

We have applied for Ayurveda College, Homeopath College, nursing college, Para Medical courses and the inspection is done but again NOC is not granted.

Even if we get the State NOC then we have to obtain NOC from Central Govt. Which require twice or thrice time and it is a tedious process.

UGC has been biased towards self-financed private universities and since its inception; the universities are facing various problems. Government invites private entrepreneurs to invest in education in their states and these regulating authorities like UGC disrespect and does not give equal treatment to Private Universities at

par with other state and central universities. It is a sad state of affairs. The new Act should take note of it and try to redress the problem.

Though the education is on concurrent list, the approach of UGC towards the self-financed universities is step motherly and unnecessary restrictions are imposed from time to time. Although the private Universities are at par with Government Universities, some of the colleges/Universities are reluctant to recognize the degrees awarded by the Private Universities and are harassing the degree holders by not giving the promotion or the applicable increment. These institutors raise unwanted questions to deny the eligible increment/promotion. To get justice against such biased Acts of Universities/College, the Student approaches the court and gets their grievances settled. My humble suggestion in this regard is that UGC must stop the grant of those Universities & Institutions which are harassing the scholars of other private universities for no good reason. The new should take note of these problems and give good solutions.

In our Act of Rajasthan, the head of the institution was Chancellor and below him there was vice chancellor as is in every University. However, UGC has advised to change the nomenclature of Chancellor to Chairperson and Vice Chancellor to President respectively.

This is a clear cut step motherly treatment and discrimination to self-financed private universities and creating doubts in the minds of student community that the degrees of Private Universities may be second grade degree. UGC should not differentiate in this way as it is the private player who has taken the 70% load of providing education in this country. The new Act should allow the private universities to the use of designation Chancellor, Vice- Chancellor.

To cite an example, Mumbai University has got say 800 affiliated colleges out of which about 15 to 20 are owned by Government and rest of the colleges are set up by Private Education Entrepreneurs. Here, when a college is built by Private Education Providers and running under UGC funded Universities as affiliated, they do not get any discrimination whereas Private Investors running the self-financed Universities, then UGC has a problem and discrimination is done at all levels. Even Anti plagiarism software is not shared by UGC's Library Wing INFLIBNET

just because they are private Universities. The new Act should take care of these issues.

This is utterly wrong and disservice to the nation and making a mockery of fundamental rights of doing business in India. In a civilized nation like India, these types of discriminatory practice should not exist and the designation of Chancellor and Vice Chancellor status in Private Universities originally indicated in the ordinance should be restored by the new Act.

At present UGC gives permission to various central universities/state universities and so many autonomous colleges to run distance education courses, online courses although all these courses are allowed to be run as per in the Act of the State universities, they cannot start online courses or distance education program. These private universities are not treated at par with many central universities/colleges etc. These anomalies should be immediately dispensed with. The new Act should resolve this issue.

India needs educated youths. We have to educate increasing number of population and increase our GER i.e. Gross Enrollment Ratio. When the world has become digital and the government of India is encouraging “**Swayam Portal**” and government wants to give education to students in every nook a corner. When all universities of the world are giving distance and online education in India, why we are denying our universities established by the state as per a Legislative Act. While seeking investments initially in the Acts, all kind of promises are offered and now all promises are conveniently broken.

It is similar to Sardar Patel’s Action as when he wanted to integrate and merge all princely states to merge to make one unitary India the privy parse incentive was given and suddenly one fine morning , government of India withdrew it. Similarly the state wanted investment and people were given certain promises by the Act just by a stroke of the pen all these facilities are withdrawn and their total financial estimates are destroyed. The new Act should resolve this problem.

Hence, for a country like India which is most civilized, developing & advancing nation in the world should follow healthy practice and honor the commitment and new Act must allow all these private universities to provide online education /off line education/ distance education to open their off campus study center anywhere

in India & abroad. The present rigid approach should be changed and there should be flexibility on education as is practiced in foreign countries. The new commission should address this issue.

At present UGC frames vague regulations and keep scope for different interpretation so as to create a License quota permit Raj under the guise of improving or maintaining standard of education. This prevents education to reach to the crores of people who wants to get information, get their knowledge updated but they are denied education under the false notion of quality education. The new Act should be able address this issue.

Education for all will enable our nation to become rich and all private universities must be allowed not only to teach in India also abroad also by way of distance on line learning, off line learning by opening their centers. All these unnecessary restrictions are violating fundamental rights of citizen of getting oneself educated.

There are so many Institutions and colleges and they be allowed to impart education partly in India and partly in collaborative Universities abroad and give them the dual degree. UGC must declare the List of Universities from countries like U.S.A, Canada, Britain, Australia, New Zealand etc. which are fake Universities or un-recognized so that students are not trapped. The new commission should solve this problem.

New Act must make some provision of safeguarding the students going abroad. New commission and HRD must make clear rules how one can associate with other universities. We are having liberalization in industries, banking, insurance, retail and foreigner can come and invest. It is highly surprising why collaboration is not taking place between the universities to impart education in India where students of third world countries of Africa, Bangladesh , Pakistan ,Afghanistan and Arab nation can do the part studies in India and part studies abroad thereby India can become a hub of educational tourism. The problem can be addressed by new commission.

Here rules should be made by HRD and New Act in this direction and all impediments on this must be removed and everything should be in transparent manner. There is a fear psychosis among foreign universities that they will have to give extra money at various stages to education authorities. The new Act should

take note of it. In India today enrollment in medical colleges is very less and our students are going to China or Russia and they take medical degree there and come back to India. While our Medical education and all other education are costly, the new Act must give a thought to it. In my opinion the best thing is all universities can start the course without any prior approval of the councils. The parameter should be put on the website and University should assess themselves that they are fulfilling the parameters and just by intimation they should be allowed to start all the courses whether it is medical, nursing, Ayurveda, homeopath, dental pharmacy, law etc. by updating the form displayed on the website. The online evaluation of information sent can be done. The course should be allowed to start without waiting any approval. This should be prime objective of new Act.

The commission should ensure the practical and reasonable policies for medical education and dispensed with the all illegal requirement of one hospital be in operation at least since last two years should have 600 bed to be operated in the last two years, 1500 OPD every day, as per norms build inch by inch, all rooms in the building, separate buildings. All these are not practically possible and one tends to manipulate all bogus documents for satisfaction and the education provider becomes under duress for fulfillment of all these conditions. As investor already invested lot of money in the hospital project. Hence these types of unnecessary and illegal conditions are having a demoralizing effect on education provider and such conditions should be abolished. Commission should endeavor ensure funding on faculty training program regularly. Commission should encourage holistic medical education and at least one semester medical student should be taught Yoga, Naturopathy Ayurveda , Homeopath, Unani, Siddha i etc. The patient can get advantage of all the medical science thereby reducing the cost of treatment.

Any regulating authority can inspect the facilities after a year of starting the course and suggest if there are any shortfalls for improvement within time frame. Any Institution that does not incorporate the suggestion within the stipulated time, then students studying such erring institutions should be allowed lateral admission in other approved colleges/Universities. When such migration takes place, no students will join in those colleges/institutions which are of poor quality. This will stop all corruptions of all state council as well central councils and education will

spread with leaps and bounds in this country which is required. The new Act should try to take positive Action in this.

Rajasthan High Court has ruled recently that any Institution that has come into being by a Legislative Act do not need any approval from any council to start a course. Yet, all Councils are actively functioning and making the Private Universities to make a queue with application in their doorsteps for starting any new courses. The new Act should be modified in this manner.

We must come out of the clutches of poverty-ridden tag as we have to feed today 28 crores BPL families with cheaper rations i.e., almost 80 crore people are below the poverty line.

Hence all higher education should be freely available to all without any inspection quota and corruption raj. The new Act must restructure the entire education system from the controlled mode to automatic mode and to be made flexible. The new Act should incorporate this.

The commission should give more focus on Teaching in Digital Mode as hereafter it will be Digital Age. The benefit of Digital learning is coming to surface. Recently, in one of the conversation with Prime Minister, a lady confirmed that she has passed IPS by just learning through you tube and Digital Library and sitting at home. She could become IPS.

It is necessary that we must educate our youth of remote areas through online education. There are only ten central universities and some private Institutions which are permitted to give online and distance education. Please allow all private universities also to give education on distance mode and online mode. These Universities be allowed to give coaching on various subject which are skill based and can help in setting some employment.

Please allow all the people to study at home of their own in all fields of education like law, pharmacy etc. sitting at Home. Broadband has reached all remote villages and internet and WhatsApp are available everywhere. As for the practicals wherever required, they can do it in the existing laboratories of colleges on holidays. Practical too can be done through computer stimulation. Thus they can complete the practical as well as theoretical sitting at home.

Please introduce exit test instead of entrance test. If the candidate passes the exit test, let them practice in law or pharmacy or Architecture, Medicine, as per their studied subject. At present these exit tests exist only in CA/IAS/IPS/IRS/IFS etc. Please adopt the practice of exit test which is followed for foreign students who secured MBBS degree from foreign countries. If they pass in India in the test conducted by MCI, then they are allowed to practice in India.

If we do this then we can have a slogan “**Modi ji ke raj me Job kare India khele India and Padhe India**”. The entire country will become educated at no cost as that girl became IPS by studying at home at no cost. The new Act should notice of this.

Please do this then we will become the strongest, highly educated and truly a digital nation.

The question paper for the Exit Test can be set appropriately by the respective councils and student who knows the subject well will only pass.

In India, Demonetization and GST worked and giving results and it is time to give thrust on Digital area. You can create a platform where entire country can study at zero cost and they can get job throughout the world. Now the Digital Library and Swayam Portals are available at no extra cost.

As education providers, we expect that all such problems should be wiped out and things should be made simpler by the new commission under new Act.

Earlier UGC used to make inspection and make report as per their whims and fancies as it depends how the university authorities treat them. The Act should take note of this.

Earlier University Act is passed by States it is written clearly that they can start all the courses which are specified in the Act. Now the clause 16(1) of proposed Act will be wasted in commission put restriction and taking away all the powers of the states. Even the High Court and Supreme Court have ruled that AICTE have no role for university to take permission to start the course and they should not inspect each and every college which are affiliated to some universities and only inspection and approval will be done by the those affiliated universities. However, such rules are put on hold under pressures and instead AICTE is retained as per

this notification. What is the purpose of retaining AICTE whether to increase the corruption or is it for the ease of imparting education. The Act must address this problem.

HRD Minister Dr. M.M. Pallam Raju in the UPA regime has declared in parliament that neither UGC nor HRD ministry have any power to approve or disapprove a university established under a state Act. They have the power to check the standard of education and if the standard is found lower, then they will be given time to improve the standard. Even after giving time they do not approve the standard then till the time, such universities achieve the standard at par, and their degree given power will be suspended up to that period only.

Now there is a clause is added to place the education provider in jail in the Act. This will create fear psychoses among the private entrepreneurs as the authorities will exploit them under this clause. This point must be clarified to public before making any Act whether it is put to increase corruption or decrease the corruption. The Act must address this general grievance.

Such provision of putting the education providers in jail will never be supported by politician as most of the politicians of all parties have opened institutions like medical college, engineering college, nursing College, Pharmaceutical college etc. It would be difficult for the Government to get this bill passed in Rajya Sabha and same fate of this bill will happen an account of punishment as Triple Talaq Bill has not been passed.

The UGC is going to give permission to Universities for teaching in on-line mode with a rider that the Institutions that gets minimum 3.25 score on 4 point scale in the NAAC assessment will only be allowed to operate on-line education. This is unnecessary as it will lead to again License Quota permit Raj & corruption. The Provision of NAAC should be removed for on-line teaching due to the fact that Strength of the students and other factors has no relevance in on-line teaching. The Institution that does not provide quality education will not survive as obviously no students will enroll in such intuitions.

We are witnessing closure of many engineering colleges for want of students. Same yardstick will apply to on-line educating Institutions as the students do not get enrolled in such poorly educating institutions.

Will the new Act empower Universities to start online courses as the Government gives importance to Digital operation? Will the new Act allow the universities to open off campus center in India and Abroad as foreign universities are opening their center in India and conducting their courses and degree is being issued? The new Act must look into it.

Problem faced in providing Ph.D. program UGC 4th Amendment, **Regulations, 2016** dated as the **11th July, 2016**.

1. UGC has made it mandatory that all Faculties supervising the Ph.D. scholar should be a full time Employee of the University even for part time Ph.D. degree course. No part time Faculty and/or ad-hoc faculty will be considered to supervise the Ph.D. scholar.
2. Earlier, Experts holding Ph.D. degree with requisite publications working in any college/university were allowed to supervise Research Scholars of different Universities. In this way, these Ph.D. holders got an opportunity to share their knowledge as also Universities which were short of faculties could recognize them and allocate enrolled Research Scholars. The Guide was also getting full API score.
3. There is a provision in the present rule to appoint a Co-Research Supervisor but stringent conditions are framed and even a Co-Research Supervisor is allotted to the research scholar by the Parent University has to assign Co-PhD Faculty as permanent Research Supervisor to the scholar in addition to Co-Research Supervisor.
4. In Government Universities, the process of enrollment takes minimum one to two years for Ph.D. course. Here, Research Supervisor who is supervising the Research Scholar does not get any remuneration and it is considered as part of their academic work. Hence, very few professors are willing to supervise the Research Scholars and if at all they consent, they supervise the work according to their convenience with the result sometimes it takes 6-7 years to complete the PhD programme. Virtually, the Research Scholar is an unpaid servant of these Research Supervisors and Scholar has to do all type of work as is assigned by the Research Supervisors and Scholar is exploited.
5. To avoid these exploitation and to make a pragmatic approach, the condition of appointing Research Supervisor as permanent faculty should be

removed and external qualified PhD holders should be allowed to supervise the Research work if they are comfortable supervising the Scholar in the chosen topic. Here, the enrolling University for Ph.D. course can monitor the progress of the Research with the help of their Part/Full times Faculties but not necessarily a Ph.D. Faculty as his scope is facilitation, co-ordination and monitoring. If this is not done, Ph.D. will become an impossible course.

6. UGC has also made it mandatory that all Assistant Professors, Associate professors should possess a Ph.D. degree to be eligible for employment in Colleges. There is already a dearth of Faculties in India and with the above, the problem will further aggravate.
7. You have rightly said in the interview that in a Cell Phone, 1, 65, 00000 books and journals are available. Hence, Ph.D. scholar can get all research data in the mobile itself. The search engine "Google" is accessible through Mobile and scholar can down load any journals/books/patent through Mobile. YouTube also containing lot of materials and various website provides useful material and books require for research.
8. In this age of digital era, dependency on Research Supervisor is hardly any as Synopsis and Thesis of several scholars approved by their universities are available in Shodhgangothri and Shodhganga respectively, of INFLIBNET for reference, perusal, ideas and deep knowledge.
9. If we do not move as per the changing times, then we are heading to a disastrous situation. Research is an advanced and higher academic degree. When Undergraduate and Post Graduate courses are successfully completed by the scholar without any help by the Candidate then why external guide cannot complete research.
10. If the terms of permanent faculty for Ph.D. course to stay, the enrollment for this course will drastically reduce over a period of time. For example, one Permanent faculty can supervise only 8 Research Scholars. Presently, a Faculty should be paid a minimum of Rs. 50,000/- month and it will cost around Rs. 24.0 Lac to the university for a teacher for four years. Assuming that 8 Research Scholars are available to supervise with one faculty, and then University will incur an amount of Rs. 3.0 Lacs per scholar. It is not necessary that 8 Research Scholars are available for each faculty and some time it may be one Research Scholar only in the University. Even then the Faculty is to be retained. Can any University afford this burden? Mostly,

though the Ph.D. course is for three years, it always takes four and more years for completion by the Research Scholars.

11. All Government Universities are having several affiliated colleges and all these Universities are outsourcing this Ph.D. programme through their affiliated colleges and affiliated colleges have no interest in pursuing PhD programme. The private university is unitary and permanent faculties are to be appointed of their own. There are many PhD holders who do not get an opportunity to supervise Research Scholars in the Government Universities and their affiliated colleges. Hence, Private universities which is allowed to utilize their knowledge by taking N.O.C. from their employer institution is correct but appointing one full time Ph.D. in addition to co-supervision will become Ph.D. study very costly and unaffordable.
12. Even the course work can also be done in on-line basis as course materials like book on Research Methodology, computer application, quantitative technique are already available with Research Scholar and it is easy to understand through on-line lectures so also to appear in examinations. Even the course work of Research, Lectures on Research Methodology, Computer Application, and Quantitative Technique etc. can also be given online basis. Test for all these subjects can be held on a month wise or quarterly by any central agencies and passing scholar can enroll in university of their choice for pursuing PhD under the eminent guide of India and abroad. The scope of enrolling university shall be to review the research work every six months to check the progress of Research Work, approval of Synopsis approving the topic, review publication of articles, participation of Conferences/presentations, checking the Thesis with Anti plagiarism software, evaluation of thesis by internal and external experts, conducting viva voce examination and posting on INFLIBNET, issue of provisional degree, notification and final degree. For this purpose, University need not employ PhD holders & even management degree holders can do all these jobs. If we continue the existing system, then cost of PhD will increase tremendously and we will get very less PhD scholars and there will be shortage of PhD in future in the country.
13. Passing out the Course Work is the precondition for pursuing Ph.D. programme. Government conducts so many exams like NEET etc. The HRD ministry can conduct the course work exam and only those who

qualify let them be allowed by enrolling University to pursue Ph.D. program. If course work exam is conducted by the central Agency automatically the quality of Ph.D. will improve & student can prepare for course work by self-digital study. This will save time & money of research scholar.

14. The scholar be given free hand to do his PhD on his own without the help of Research Supervisor if he so desires. The Act must look into these aspects.

It is to be made clear in the Act as to how we will amalgamate skill education, value education along with formal education & provision for the same be made very clearly. Various new provisions are made which may increase corruption. How this is going to abolish Inspector & corruption raj? The new Act must address these issues before passing the Act.

As we are having in our constitutions a chapter of directive principles of state policy similar to that in the Act we should have guiding directive principles of commission.

Guiding directive principles for Commission:

The Act should have the guiding directives principles for commission:

Preamble

As the whole world had become a global village and India has to catch up with great speed – the lagging period lost for development should be made up. Whereas it is imperative to make new India by equipping our youth the necessary education and skill. It is also necessary to make India as education tourism Hub. It is imperative to give gainful employment to our youth in India and abroad.

Whereas it has become necessary to teach millions of our youth who wants to get educated and who aspires for good living. The quota of permit & license raj prevailing in education needs to be abolished. Whereas education should not treated as philanthropic work and work of charity alone. The education provider who invests in educational institution is entitled to get reasonable return of his investment for further expansion, modernization, up-gradation and renovation. He should be allowed to make surplus fund from the education to meet all these expenses.

Whereas in India research program has been basically for the purpose of employment and not encouraged for scientific development. Research should be for development and to be feasible in skill based in the industry. Research program should be encouraged by giving special funds. Research Scholar should be allowed to choose the Research Supervisor of eminence from that area of study.

All rules should be amended in most conducive way that more and more scholar opt for Ph.D. course in different discipline and make the country as strong developed to be a living nation. For the times to come it is also necessary to impart multi-disciplinary education by fusing various branches engineering, medicine, bio sciences and other contemporary subjects so as to adept the required knowledge for making equipment's required for medical, agriculture, defense and other important sectors.

It is necessary to encourage digital mode of education instead of class room education so that the drop out is minimized and more number of students can get knowledge through digital mode. Whereas at present it is estimated from high school dropout are 18.0 corer students. This entire drop out students should be given skill education by making such programme in the universities in association with the Industries so that they get gainful employment in India and abroad. Whereas it is necessary that all our formal degrees of undergraduate post graduate should have practical skill program suitable for useful and gainful employment and also development.

It is necessary that education should be provided in such a way that our scholar should have imbibed our rich heritage and culture and learns good value system. For all our occult Science universities should have special department to teach the Indian occult science like astrology, palmistry, face reading, yoga, solution through various worships, naturopathy, ayurveda, home medicines, Unani, Homeopathic , **dance, more painting scruples** etc. Indian practices of performing various poojas, various postures (asanas) should be taught in the University. Certificate course should be given. More R & D should be set up to develop these ancient medicines and Indian science. This should not be considered as unscientific and should be taught. The popular hypnotism is the best way to remove the stress and cure a person, and University should be allowed to develop these sciences and should be given due recognition.

To fulfill all the above objectives, the Higher Education Commission of India should follow the following guidelines while making rules and regulations

1. Commission should not make any discrimination between private universities s viz vis Government universities, Government Institutions. The rule should be uniform for everybody. It should be kept in mind that private institutions are not given any grant by Government.
2. The commission should give anatomy to private institution for framing their fees structure, payment of salary to their employees and should not fix any criteria for appointment of various authorities such as Chancellor, Vice Chancellor, Pro-Vice Chancellor, Registrar etc. as Private Universities /Institution cannot afford their huge salary and their availability may also be difficult& they may not like to join the **private** university as so many **private** universities are set up in village or $\frac{3}{4}$ Tier cities.
3. Commission should make rules and regulations in such a way that all intuitions and universities are free to start any course which they wish to start and they should not encourage inspector raj and corruption in the name of permission to start the course.
4. Commission should make rules in such a manner that the knowledge of retiring professors can be utilized without any restriction for purpose of education and research and there should not be any higher limit of age for employment in private universities as long as they are physically fit.
5. The commission should endeavor to make such rules by merging various disciplines of education to enable making all machineries of medical, agriculture and defense etc. in India only and the import dependence is minimized.
6. Commission should give full autonomy to universities to generate funds for example oxford and other universities of the world develop their land and infrastructure in such a way that they can generate funds by exploring the commercial use of the surplus land. Permission to bring public issues and set funds from the market and issue debt instruments.
7. Each university should be allowed to make a sustainable knowledge hub by utilizing their surplus land and other resources.
8. To maintain the standard of education, commission should take exit test like chartered Accountant association conducts the CA test, Union Public

Service Commission conducts IAS IPS IRS IFS or all government posts are appointed by the exit tests e.g. All Indians holding foreign MBBS degree are allowed to practice in India only after passing the exit test conducted by Medical council of India.

9. Similarly all our councils including Bar council should take exit test for LLB holders and if candidates who pass the test may be given the License to practice in court. Similarly all councils like Architecture, Dental, Nursing, Pharmacy, Ayush should take exit test and if they qualify in the test then and only the license be given to work in the public utility services.
10. Exit test is the only mode that can provide education for all. If this is followed then autonomy of education will be given automatically to all the intuitions and universities for the free pursuit of knowledge, innovation, incubation and entrepreneurship. This will facilitate access to intuition and opportunities to all and this will provide comprehensive and holistic growth of higher education in competitive global environment.
11. The commission shall Endeavour to make industry specific courses and curriculum should be designed by industry experts keeping the requirement of industry in mind.
12. Commission should not indulge in the process of assessment or accreditation. Let it be decided by the market forces. This will avoid corruption and nepotism.
13. To avoid back dated degrees and fake degrees, commission can make rules that every university/ insinuations have to furnish the number of total students admitted, in that particular year by September and total number of pass out students of an institution every year . This information to be sent to commission & should be hosted in university web site also.
14. This will facilitate in storing all degree and can be linked with Aadhar Card.
15. Commission should not indulge into the practice of closure of institution and it should be left to the market forces. Obviously if the standard is lower they will not get admission and will be closed automatically.
16. Commission should use digital platform to find out the short comings. All universities and institutions will furnish all data's in prescribed format of the commission and software should be developed to find out the lapses and its solution for improvement will be displayed by software only.

17. Commission should not to spend costly man hours of academician for physical verification of data as the same can be done by commercial officer of the commission.
18. Commission should discourage the two set of inspection like the separate Council constituted by State and Centre. Commission should form a council of all the state representatives just like GST council & make rules uniformly applicable throughout India & system of separate council be also abolished.
19. Commission should ensure that all universities/Institutions should include skilled based education and should make degrees with a specific knowledge centric for example mechanical engineers specialized in refrigeration specialized in welding, forming, painting specialized, radiology, machining, designing. All these specialized knowledge should be acquired by six months study at college and six months study in the industry at least for three years. This will enhance employability of our youth not only in India but abroad also.
20. Commission should advise medical council of India that first two years in MBBS should be common and another three years human organ specific like heart, liver, lungs, brain, bone, nerves, kidney, pathology, skin, eye, nose, throat, gastro etc. After three years of study, the person will be in a position to function and clinical advice on that particular disease. With another one year of experience, MBBS holders become a full-fledged Doctor and become Surgeons and Physicians to treat the particular organ of human body.
21. The commission should endeavor to design the courses in such a way that our youth become useful and employable not only in India but also in abroad.
22. Commission should allow private institutions for dual degree program with foreign universities so that they can part study in India and partly abroad and can get dual degree. This will enable our scholar to work abroad.
23. The commission has to study the working of all premier Institutions like IITs, NITs, IIMS and other Central Institutions where nearly forty thousand and fifty thousand corer rupees are spent and the beneficiaries run into less than two- three lacs in number. All these beneficiaries after passing out from these Institutions opt to work abroad for enhancement of personal gains knowledge wise and materialistic wise. All these beneficiaries are

made rich at the cost of public exchequer without any return. It is imperative that commission must make a rule that they must work for minimum 5 years in India after their completion of studies in Indian Universities/Institutions. Admission should be given to only those students who are ready to give a bond and surety that it will be honored.

24. Commission should make an endeavor to abolish quota permit raj in education and any industrialist who is ready to invest in education should be welcome and he should be given autonomy to start the course without any permission and if courses conducted by those institutions do not follow the proper quality system laid down, the student can be transferred to other institutions. This will automatically allow opening of more number of Institutions and artificial scarcity created will be over. Survival of fittest rule will be applicable and quality of education will be automatically achieved.
25. Commission should encourage creating educational hub to increase the education exports and allow all universities to give distance education, online education, digital education in all fields of education as now a days the practical can also be done on computer by stimulation.
26. All laboratories set by Government or Government owned universities should allow Research lab to be used by Research Scholars of any universities. The lab work can be done on holidays by distance learner by utilizing the lab of nearby colleges.
27. Allow education on every mode so that entire India can get empowerment for this type of distance/online education without any condition or accreditation. Students will like to opt. online admission to the best education providers only.
28. Commission should not indulge into the coercive policy and resort to criminal procedure and prosecution if we pursue this then the Vice Chancellors of all universities including Government owned Universities will land in Jail as no universities in India follow the present norms as laid by the regulators as far as teaching faculties are concerned as teaching faculties are in short supply.
29. We must not drag education in the area of deterrent provision of prosecution as we are going to take exit test and only those students qualify in the exit test are eligible and get license to work in India.

30. Commission must ensure that a minimum standard syllabus be prepared for every course as distance education provider has prepared. If any addition is to be made, universities or institutions can do so without any subtraction. This will avoid all problems particularly in the curriculum. This will avoid various academic councils and as per the global need considering the whole world as a global village. The commission can prepare a common syllabus.
31. Commission can make with the expert syllabus for all streams which followed uniformly throughout India. The academic hour saved by this will be utilized for the purpose of education.
32. Commission must make such rules which provide various incentives to those institutions who engage teaching of our occult sciences like Yoga, dance, Ayurveda, music, painting, astrology, art etc. and all the sciences are in Sanskrit language hence Sanskrit department must be opened in all universities .
33. The commission should encourage financial assistance to weaker section; give them various scholarships, interest free loan, for higher studies.
34. The commission should encourage giving admission in Govt-Aided University & Colleges to weaker section & financially sound students can study in private universities and unaided colleges as it is happening in school education level.
35. The commission should be empowered by the Act to look after all the councils as there are 16 councils at present and make rules for all the councils. Thus there will be single window system in the country for all type of education.
36. The commission should encourage on the line of smart city in all district places of some designated area just like reserved area for industries. The areas will be reserved for education purpose and anyone who wants to start their educational institution can start without having any necessity of license quota permit in the reserved area for education.
37. The commission should encourage the universities to hold various seminars/symposiums for the purpose of research. The special grant should be given for attending seminar and symposium for scientific research on overseas also. As small scale industries are given incentives to display their products in industrial exhibition abroad similar incentives should be given

for education providers to book the stalls in international exhibition displaying their courses.

38. Every university/institutions be encouraged to start their own journals for publication of research articles and the concept of publishing research articles in peer reviewed journals are withdrawn. This will automatically increase our research publications and with passage of time impact factor of these journals will be increased.
39. Education provider is required to provide details of appointed teachers before the inspection of all these councils. Which faculty will be ready to join as Faculty before granting the necessary permission from council? So there is compulsion to create documents which are fabricated and in fact no education provider would like to do. To do a transparent and honest job, the norms should be reasonable and compliable. It is a place where nation has to build characters of the people and make good citizens.
40. These entire requirements by all these councils have brewed the tree of corruption and new Act must abolish all such rules so that the corrupt practice will end. It will also increase the cost of education and create monopoly of few. The new commission should encourage to issue certificate and diploma degree in all our occult sciences and should encourage spreading the language of Sanskrit and should be made more popular as Sanskrit all our ancient knowledge is written in Sanskrit language and it is the origin of all other languages.
41. “The commission should encourage collaboration of foreign universities and Indian universities for the purpose of research in advanced technologies like space, artificial intelligence, Cyber securities etc.
42. The commission should encourage opening of sports universities and opening of specific colleges for Military, Navy and Air force. The commission should encourage colleges to impart for specific knowledge in railways, marine, mining, petrochemicals, oil rigging, water transportation and manufacturing of technology in Fish Trawlers and other marine equipment. Curriculum for this entire subject should be made and given to universities for conducting the courses including manufacturing of equipment’s, spares and its maintenance/utilities.

43. Commission should encourage joint research program with industries and universities in the area of all branches of science, medicines, and engineering etc.
44. Commission must encourage our defense organization like DRDO etc. to jointly manufacture and design the various components required for defense industries with the research departments and universities.
45. All IITs NITs should take responsibility of designing various industrial machineries. The commission should encourage study of artificial intelligence, robotics nanotechnology, cyber securities, forensic science etc. so that we become equipped in the knowledge of coming century.
46. 'Commission must encourage our universities to take the project for reducing the cost of solar and wind energy, develop systems for desalination and make sea water as potable water, develop agriculture as developed in Israel so that maximum yield with minimum expenses for the betterment of India.
47. Commission should allow PhD program to be conducted after graduation and Post Graduation & PhD programme can be merged if desired by scholar.
48. There should not be any bar of minimum period for any degree if student can pass two or three degrees even in one year he should be allowed to do so as it is done in USA and other advanced nations.
49. Child of 15 years has done PhD and master degree abroad thus education should be based on ability of the learner and none of other criteria should matter. Anyone who has some knowledge and technique to develop a new device product, he should be allowed to PhD and he may complete the process of Ph.D. with the help of Guide or without guide, he should be awarded the degree if research is useful for the society & create new knowledge.
50. For award of graduation and other degrees the menu system should be available and student should have choice of subjects. In nutshell commission should adhere to such rules and regulations which are followed by the advanced nations like USA, UK etc.
51. The commission should endeavor to encourage more and more opening of medical colleges in PPP mode by associating Government district hospitals. The Private Player can open medical college and government hospitals can be used for OPD and training.

52. Govt. should update with latest tools and equipment all district hospitals. The Commission should ensure that various councils do not demand separate building for their course instead vertical high raise building should be allowed in the university/institution.
53. Universities/Institutions should be allowed to commence various courses in the same building. Universities should be permitted for all the courses with common library, common computer lab, common canteen common, girls/boys for all discipline etc.
54. The Commission should encourage sharing the resources of all universities with each other. IITs, NIITs should adopt nearby engineering colleges and share them all physical as well academic resources.
55. Commission should encourage procurement of costly software in various IITs and these software should be shared with all the engineering colleges, aided and unaided and it should be provided at no cost at other colleges.
56. Commission should motivate universities/institutions to start certificate/diploma courses of various skill program launched by NSDC and other State bodies. This will help the certificate holders to get suitable job in abroad.
57. To increase the income of farmers the Commission should encourage universities/intutions to start certificate and diploma courses in the field of Agriculture and encourage the youth of farmers to take interest in farming by giving various incentives.
58. Any amendments in the already framed rules proposed and new rules are to be made then all stake holders should be consulted and seek opinion before finalizing the revised rules and new rules. The Commission should include representatives of Government/Private Universities and colleges while constitution any committee to review or revise the rules. This will enable smooth implementation of revised and new rules without any hitch.
59. It is observed that there are shortage of Academic staff in the country especially in the grade of professors & associate professors and hence it is imperative that while fixing the criteria for department of Academic Staff, the strength of the student should be kept and there should be a ratio to it unlike the present system of department irrespective of the strength of the students.

60. Till the country make abundant number of academically competent staff, the use of Part Time Teachers, ad-hoc Teachers and Visiting Teachers should be allowed. Similarly, the people of Industrial experience of 10-15 years should be treated as professors. They should be also allowed to become the member of the department also.
61. The Universities and institutions can start certificate courses as Add-on Courses. This certificate of various skills by universities will enable then to get the job abroad also.
62. Commission should make every effort to liberalize the education as the economy is liberalized .Corruption has been avoided by more and more use of digital knowledge. Similarly in education also the need of hour is to reduce the corruption.

I am always available for any further consultation.

Thanking you

Yours truly



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