

REPORT OF THE COMMITTEE TO REVIEW THE UGC (OPEN AND DISTANCE LEARNING) REGULATIONS (2017) AND IDENTIFY THE DISCREPANCIES IN ITS IMPLEMENTATION AT IGNOU

The Vice Chancellor constituted the committee to bring out the discrepancies between the UGC (Open and Distance Learning) Regulations, 2017 and IGNOU's requirements, towards taking up the matter with MHRD and the UGC (refer to the Notification in Annexure 1). This is in conformity to the Second amendment to the said Regulations, dt 6th Feb 2018, wherein vide Clause 4, reproduced below, the UGC has given an opportunity to all Higher Education Institutions (HEIs) to represent to it regarding the difficulties in implementing the Regulations:

“21. Removal of difficulty

UGC reserves the right to remove difficulty/difficulties in the course of implementation of these Regulations in consultation with the Government of India, Ministry of Human Resource Development.”

The committee met thrice, i.e. on 16th April, 27th April and 25th May 2018 (Refer Annexure 2). Considerable discussion took place about the main issue—must IGNOU follow UGC regulations, given that it is a unique autonomous institution created with certain educational and developmental aims? Accordingly, it was decided that the report would highlight this aspect, to be taken up by the competent authority with the MHRD and the UGC. Given the brief of this committee, it was decided that the committee should spell out the difficulties in implementation of certain clauses in the said Regulations.

Thus, the Report of the Committee is presented in two sections: Section 1 is on the issue pertaining to the autonomy of the University, which needs to be taken up with the MHRD and the UGC; and Section 2 on the discrepancies and difficulties in the implementation of these Regulations at IGNOU, which need to be represented to MHRD and UGC.

Section 1

The University Grants Commission, through the Gazette Notification dated 23rd June, 2017, has notified the above mentioned Regulations for maintaining minimum standards of instruction for the grant of degrees at the undergraduate and post-graduate levels through Open and Distance Learning mode. However, with the notification of the said Regulations, the Indira Gandhi National Open University(IGNOU) has been clubbed with all other Open Universities and dual mode Universities offering Programmes through ODL mode.

Here, it is relevant to note that IGNOU was established by an Act of Parliament in 1985, and the very first sentence of the IGNOU Act (1985, p.1) states, “An Act to establish and incorporate an Open University at the national level for the introduction and promotion of open and distance education systems in the educational pattern of the country and for the coordination and determination of standards in such systems”. This statement amply lays out the vision and role envisaged by the Parliament to be accomplished by IGNOU. Clearly, the major responsibility for the promotion and coordination of Open Distance Education systems was vested in IGNOU instead of the UGC. It was envisioned that IGNOU and the State OUs would be different from conventional universities. Further, the establishment of IGNOU was not notified by the UGC but by a Gazette notification of the MHRD, unlike the other Central Universities, which are all notified by UGC . Also, the other central universities receive Central assistance from UGC, whereas IGNOU receives grants directly from the MHRD to perform both its roles, i.e., to function as a national OU and to promote and coordinate the Open Distance Education systems, till date, even after the dissolution of DEC.

The Objects of the University as given in the First Schedule (IGNOU Act, 1985,p. 14) make it clear that there were great expectations from the OU, that it would in substantial measure augment educational opportunities and democratise education to large segments of the population. To substantiate this point the following extracts from the IGNOU Act (1985, p.14) are reproduced below:

- “(a) strengthen and diversify the degree, certificate and diploma courses related to the needs of employment and necessary for building the economy of the country on the basis of its natural and human resources;*
- (b) provide access to higher education for large segments of the population, and in particular, the disadvantaged groups such as those living in remote and rural areas including working people, housewives and other adults who wish to upgrade or acquire knowledge through studies in various fields;*
- (c) promote acquisition of knowledge in a rapidly developing and changing society and to continually offer opportunities for upgrading knowledge, training and skills in the context of innovations, research and discovery in all fields of human endeavours;*
- (d) provide an innovative system of university level education, flexible and open, in regard to methods and pace of learning, combination of courses, eligibility for enrolment, age of entry, conduct of examination and operation of the programmes with a view to promote learning and encourage excellence in new fields of knowledge;*

(e) contribute to the improvement of the educational system in India by providing a non-formal channel complementary to the formal system and encouraging transfer of credits and exchange of teaching staff by making wide use of texts and other software developed by the University;
(f) provide education and training in the various arts, crafts and skills of the country, raising their quality and improving their availability to the people;
(g) provide or arrange training of teachers required for such activities or institutions;
(h) provide suitable post-graduate courses of study and promote research;
(i) provide the counselling and guidance to its students; and
(j) promote national integration and the integrated development of the human personality through its policies and programmes.”

IGNOU has succeeded in establishing its academic credentials both nationally and internationally. As on date, IGNOU has provided educational opportunities to more than 30 lakh learners, many of whom belong to the deprived and denied sections of the society. The University has 67 Regional Centres and more than 3000 Learner Support Centres all over the country and offers programmes at various levels starting from Certificate to Research Degree Programmes, as per the norms prescribed by the UGC.

Given the stature that IGNOU enjoys because of its academic excellence, both at the national and international levels, the University deserves to be treated differently, as also envisaged in its Act.

It would be pertinent to note that to bring in quality and promote innovation in higher education in India, UGC, on the directions of the MHRD, has already granted full autonomy to 60 higher educational institutions (HEIs) (52 Universities and 8 colleges) offering conventional education. These HEIs have been given freedom to decide on their curriculum, academic programmes, research, admission procedure, fee, evaluation, offer ODL programmes, among other academic matters.

In the light of this innovative thinking on the part of MHRD and the UGC, the IGNOU authorities must urge upon UGC the need to give IGNOU full autonomy by recognising its contribution to the ODL system at national and international levels, in order to serve the nation more effectively as a national Open University, and fulfil its role as envisaged in its Act.

Section 2

Several major and minor discrepancies between what is given in the UGC Regulations and what is practised by IGNOU were noted, which are given in Annexure 3 alongside the clauses concerned from the UGC (ODL) Regulations (2017). It was decided to highlight a few major ones from among them in the main report. Accordingly, eight issues are given below, first giving the clause/sub-clause concerned from the said regulations, followed by IGNOU's requirement, and finally the action recommended in the matter.

1. Regarding the definition of 'Higher Education':

1.1 UGC Regulations Part 1, Preliminary-Clause 2(a)-- Definitions (i) 'Higher Education' means such education, imparted by means of conducting regular classes or through distance education systems, **beyond twelve years of schooling** leading to the award of a Degree or Certificate or Diploma or Postgraduate Diploma.

1.2 IGNOU's discrepancy: The eligibility for most IGNOU programmes is at least twelve years of schooling. However, IGNOU also gives an opportunity to people with no formal +2 level of schooling to apply for BA, B.Com, and several other UG Programmes, via the Bachelor's Preparatory Programme (BPP).

1.3 **Action Point:** The ODL system has been created for giving educational opportunities to those who have been deprived of them in the formal system. A large percent of such people are those who are adults with considerable learning through their lived experiences, though they may not have the formal high school certificates. IGNOU offers these people a second opportunity for undertaking UG studies through the BPP, without diluting the conditions for completing the programme of study. This stream should be allowed to continue. Matter needs to be represented to UGC.

2. Regarding the definition of 'open university':

2.1 UGC Regulations **Part 1 Preliminary-Clause 2(a) Definitions (n):** "Open University" means a University which imparts education through distance education or Open and Distance Learning mode using variety of Information and Communication Technology educational aids i.e. online education in the form of Open Educational Resources (OERs) or Massive Open Online Courses (MOOCs) etc.

2.2 IGNOU's Requirements: IGNOU believes an open university should be a University which imparts education through distance education or Open and Distance Learning

mode providing flexible learning opportunities by overcoming separation of teacher and learner using a variety of media, including print, electronic, online and occasional interactive face-to-face meetings with the presence of an Higher Educational Institution or Learner Support Services to deliver teaching-learning experiences, including practical or work experiences.

2.3 **Action Point:** The UGC may be asked to alter its definition.

3. Regarding the definition of 'credit', and the credit range for the degree programmes :

3.1 UGC Regulations **Part 1 Preliminary-Clause 2(a) Definitions (e):** "Credit" means the Unit award gained by a learner by study efforts of a **minimum** of thirty hours required to acquire the prescribed level of learning in respect of that Unit.

Further, **Annexure 7 of the said Regulations** contains

Table1: Norms for offering programmes through distance mode based on the credit system

Level of the Programme	Credits	Duration of Programme
Bachelor's Degree (General)	96-100 credits	3 years
Master's Degree (General)	64-72 credits	2 years

Here there is also no mention of the **credit range for an Honours programme**.

3.2 IGNOU's Requirement: 1credit represents 30 hours of a student's study time.

IGNOU had devised this norm keeping the average learner in mind. A Bachelor's Degree Programme of 3 years can be worth 96 to 124 credits. Similarly, a Master's Degree Programme can be worth 64 to 80 credits. However, after the UGC notification regarding CBCS, the BA/B.Com/B.Sc is expected to be worth 132 credits, for example.

Further, IGNOU has always been offering a 'major' in several disciplines of the Sciences and the Social Sciences as a part of the BDP Degree.

3.3 **Action Point:** Parity between the conventional system and the ODL system is required so that the learners of the ODL system are not discriminated against. Accordingly, the definition of 'credit' and the credit range of the different degree programmes in ODL

need to be relooked by MHRD. Also, IGNOU should be permitted to offer different Honours programmes at the UG level, just as the conventional system does.

4. Regarding “Centre for Internal Quality Assurance”:

4.1 UGC Regulations **Part 1 Preliminary-Clause 2(a) Definitions (c)**: “Centre for Internal Quality Assurance” (CIQA) means a Centre as specified in Annexure I established by a Higher Educational Institution offering programmes in Open and Distance Learning mode for ensuring the quality of programmes offered by it through internal quality monitoring mechanism in accordance with the guidelines as specified in Annexure II.

4.2 IGNOU's Requirement: The various Schools, Divisions and statutory bodies have mechanisms in place for overseeing quality assurance in all the teaching-learning processes. IGNOU has also established the Internal Quality Assurance Cell (IQAC) in 2016.

4.3 **Action Point**: MHRD and UGC may be informed of the different quality assurance mechanisms already in place in IGNOU, and the role of the IQAC.

5. Regarding the Examination Centres:

5.1 UGC Regulations **PART-IV- Admissions, Examinations and Learner Support Clause 13(7)(i)**: The Examination Centre shall be located in Government schools such as Navodaya Vidyalaya, Kendriya Vidyalaya, Sainik school etc. including approved affiliated college under the University system in the country and no Examination Centres shall be allotted to any private organisations or unapproved Higher Educational Institutions.

Clause 13 (7)(ii): The Examination Centre shall have proper monitoring mechanisms for Closed-Circuit Television (CCTV) recording of the entire examination procedure and biometric system and in case of non-availability of the Closed-Circuit Television facilities, the Higher Educational Institution shall ensure that proper videography be conducted and video recordings are submitted by particular incharge of examination centre to the concerned Higher Educational Institution.

Clause 13(7)(iii): The Higher Educational Institution shall retain all such Closed-Circuit Television recordings in archives for a minimum period of ten years.

Clause 13(7) (iv): The attendance of examinees shall be authenticated through biometric system as per Unique Identification Authority of India (UIDAI) records or Unique Identification Number (UIN), issued by the University.

5.2 IGNOU's Requirement: The Examination Centres are opened in private schools, private colleges, jails and NGOs, in addition to what has been provided in the Regulations. This is in view of a large number of examinees (5 to 7 lakhs) in each examination cycle, of which many students are from rural, remote and hilly areas also. It may be noted that the University has over 30 lakh active students on its rolls.

As many as 1000+ Examination Centres are being engaged for the June exams and 800+ for the December exams across the country in order to accommodate large numbers of examinees. Many of these Examination Centres are located in rural and remote areas where basic infrastructure may not be available, but the University is committed/ required to provide educational support the disadvantaged people living in these areas. Currently the Examination Centres do not have CCTV and video recording facilities, being located in rural and remote areas in many cases. However, the examinations are being monitored through WebCam from the Headquarters randomly. The observers are appointed at all the examination centres for all days. Flying squads are constituted for monitoring purposes in addition to visits by local officers in the region. The recordings of the conduct of examinations, is not done by the University currently. The biometric system for attendance of the examinees at the examination centres has not yet been introduced. The attendance is marked by the examinees on the printed attendance sheet and the same is countersigned by the invigilators. The identity of the examinees is established with the help of valid hall tickets and identity cards issued by the University.

5.3 **Action Point:** The reasons for IGNOU's practice in this matter need to be taken up with MHRD and UGC so that IGNOU is allowed to continue working with such centres as they are doing at present.

6. Regarding the Learner Support Centres:

6.1 UGC Regulations **PART-IV- Admissions, Examinations and Learner Support Clause 14(1):** A Higher Educational Institution offering programme in Open and Distance mode shall, within one year from the date of commencement of these regulations, ensure that a Learner Support Centre is established only in a college or institution affiliated to a University or in a government recognised Higher Educational Institution offering

programmes in the same broad areas having the necessary infrastructure and human resources for offering the programme:

Provided that a Higher Educational Institution may establish a special Learner Support Centre for imparting instruction to persons referred to in the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995, the National Trust for Welfare of Persons with Autism, Cerebral Palsy, Mental Retardation and Multiple Disability Act, 1999 and other persons in difficult circumstances, including jail inmates:

Provided further that a Learner Support Centre shall not be set up under a franchisee agreement in any case.

6.2 IGNOU's Requirement: The LSCs in IGNOU are established as per norms in fulfilment of the Objects stated in the **first Schedule Section 4, 1 b, of the Act of IGNOU as:**

(b) provide access to higher education for large segments of the population, and in particular, the disadvantaged groups such as those living in remote and rural areas including working people, housewives and other adults who wish to upgrade or acquire knowledge through studies in various fields.

IGNOU establishes LSCs under three categories: Regular LSC, Special LSC and Programme LSC.

Regular LSC: These are established in Higher Education Institutions/other educational institutions/professional institutes/industry etc. for several programmes.

Programme Study Centres are established to launch specialized certificate/diploma/degree programmes with a major practical component, such as in science, technology, engineering, health sciences, computer, library and information science, education, professional, vocational and other related fields.

Special LSCs may be categorised from the operational point of view into two types –

a) Special Study Centres for Learners of Special Groups/Areas with an arrangement of academic support from within or with academic support from outside institutions of higher learning/others; and

b) Special Study Centre in Jails, where administrative, financial and academic arrangement is somewhat different. Their basic functions remain the same, differing only in the modus operandi.

6.3 **Action Point:** IGNOU must be allowed to continue having LSCs in a variety of institutions to meet its aims and objectives. The matter may be taken up with MHRD and UGC. They may also be informed that **the quality of academic counselors approved by the faculty concerned for each LSC is not compromised.**

7. Regarding Student intake

7.1 UGC Regulations **PART-IV- Admissions, Examinations and Learner Support:**

Clause 12(1)(f)(iii): The number of seats approved in respect of each course or programme of Open and Distance Learning mode, which shall be in consonance with the resources;

7.2 IGNOU's Requirement: Student intake is as per the eligibility criteria programme wise and, in most programmes there is no upper limit, in line with the mandate of the University. Intake is fixed for each LSC in the case of M.Sc(Mathematics with Applications in Computer Science), MA(Education), BEd, BSc (N) (PB) and other programmes of Health Sciences---as per the infrastructure available and the norms laid down by NCTE, Nursing Council of India etc.

7.3 **Action Point:** IGNOU must be allowed to continue with its policy of student intake in order to fulfill its mandate as per the IGNOU Act (1985). The matter may be taken up with MHRD and UGC.

8. Regarding Delivery of Study materials

8.1 UGC Regulations **PART-IV- Admissions, Examinations and Learner Support-**

Clause 12 (2) (i) (iv): Arrangement to ensure the delivery of study material to learners within a fortnight from the date of admission.

8.2 IGNOU's Requirement: The distribution of study materials is centralised at the IGNOU HQs. The dispatch is done through postal delivery by business parcel (India Post), to learners across the country in urban, rural, tribal and other geographically disadvantaged locations as well. Hence, the time line for dispatch is more than a fortnight from the time of registration in a programme by the learner.

8.3 **Action Point:** IGNOU tries to deliver study materials to the learners enrolled in each admission cycle at the earliest. However, given the scale of operations, this cannot be completed within a fortnight of registration. To offset this handicap to some extent, IGNOU maintains soft copies of all courses on the largest online repository of study materials, eGyankosh, for the reference of students. This may be informed to the UGC.

Apart from these major difficulties, there are several that have been noted in Annexure 3 alongside the clauses concerned of the UGC-ODL Regulations.

Recommendations

The above mentioned matter in Section 1, and each of the “Action Points” in Section 2, may be taken up by the competent authority of IGNOU with the MHRD and the UGC, on priority.

All members are signatories to this Report.

**Sd/-
Convener**