



**Centre for
CIVIL
SOCIETY**

SOCIAL CHANGE THROUGH PUBLIC POLICY

National Education Policy 2020

One-time
~~Continuous~~
Comprehensive
Evaluation





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First published in 2021
by Centre for Civil Society

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Please cite the work as follows:
Agarwal, A & Narang, P. (2021). National Education Policy
2020: One time comprehensive evaluation. Centre for Civil
Society. New Delhi.

Cover design and page layout: Ravi Kumar Yadav
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ISBN: 978-81-87984-53-5.

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Acknowledgment

National Education Policy 2020: A One-Time Comprehensive Evaluation offers a critique of the governance aspects of K-12 education covered under the latest national education policy of India.

We are immensely grateful to the Friedrich Naumann Foundation for their financial support, without which this research would not be possible. We would also like to extend our thanks to Professor Geeta Gandhi Kingdon, a faculty member at the University College London and Ms. Priyamvada Tiwari for their comments. Their guidance has greatly benefited this work. Special thanks to Anirudh Goel and Tarini Sudhakar for their inputs and comments on the document. Lastly, we would like to thank our CEO Lakshmi Sampath Goyal for her support and encouragement.



List of Abbreviations

ASER	Annual Status of Education Report
CABE	Central Advisory Board of Education
CBSE	Central Board of Central Education
CCE	Continuous Comprehensive Evaluation
CPI	Consumer Price Index
DIKSHA	Digital Infrastructure for Knowledge Sharing
DfE	Department for Education
DoSE	Department of School Education
ECCE	Early Childhood Care and Education
EVS	Environmental Studies
MHRD	Ministry of Human Resource and Development
MoE	Ministry of Education
NAS	National Achievement Survey
NCERT	National Council of Educational Research and Training
NEP	National Education Policy
NCPFECCE	National Curricular and Pedagogical Framework for Early Childhood Care and Education
NIOS	The National Institute of Open Schooling
OBC	Other Backward Classes
ODL	Open and Distance Learning
PARAKH	Performance Assessment, Review, and Analysis of Knowledge for Holistic Development
PISA	Programme of International Student Achievement
PPS	Probability Proportional to Size
SARTHAQ	Students' and Teachers' Holistic Advancement through Quality Education
SBA	School Based Assessments
SC	Scheduled Castes
SCERT	State Council of Education Research and Training
SOS	School of Open Schooling
SIOS	The State Institute of Open Schooling
SQAACF	School Quality Assessment and Accreditation Framework
SSS	Simple Standard Sanskrit
SSSA	State School Standards Authority
ST	Scheduled Tribes
STS	Sanskrit through Sanskrit
UDISE	Unified District Information System for Education
UT	Union Territory



Introduction

In July 2020, the Union Cabinet released the National Education Policy (NEP) 2020 (henceforth NEP 2020 or the policy) after nearly 34 years. This policy comes after several guidelines, consultations, and iterations. Centre for Civil Society (CCS) has been closely following its development for school education, particularly inputs from the Subramanian Committee in 2016 and the Kasturirangan Committee in 2019 (see here)

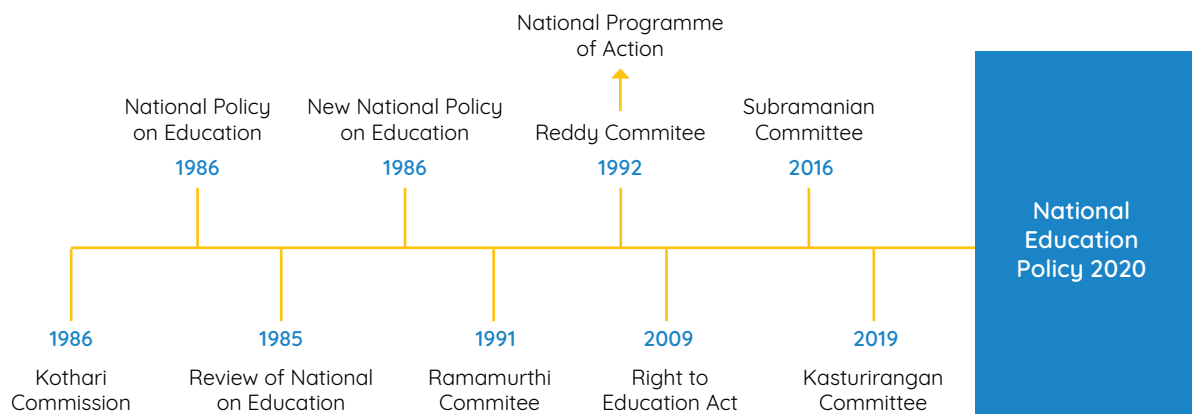


Figure 1: Development of India's Education Policy

In this monograph, we take a deep dive into the NEP 2020, and analyse the key proposals spread across its eight chapters for school education. In particular, we focus on:

1. Extending the **right to free and compulsory education**;
2. Choosing **medium of instruction** for school education;
3. Measuring **learning outcomes and assessments**;
4. Reviewing **standard-setting/regulatory framework for schools**;
5. Separation of **functions of the government**;
6. Regulation of **fee**;
7. Improving access and quality to **early childhood care and education**;
8. Strengthening **foundational literacy and numeracy**.

NEP 2020 takes a strong approach to each of these issues. Importantly, it examines regulatory architecture, attempts to correct flaws and moves towards providing quality education for all.



01

Extending the right of children to free and compulsory education

The Right of Children to Free and Compulsory Education (RTE) Act was passed in 2009. It provided for free and compulsory education for children aged 6 to 14 years. NEP 2020 aims to extend this provision, particularly for students from underprivileged and disadvantaged sections, from early childhood (age 3 onwards) through higher secondary education (Grade 12) (p. 32).

By 2030, NEP 2020 seeks to achieve a 100% gross enrolment ratio in preschool to secondary level. It promises to bring children who have dropped out back into the educational fold and prevent further students from dropping out (p. 10). To achieve these goals, NEP 2020 will undertake the following steps:

1. Provide effective and sufficient infrastructure, thereby ensuring that students have access to safe and engaging school education at all levels—from pre-primary school to Grade 12. This will be done by upgrading and enlarging existing schools, building additional schools, and providing safe and practical conveyances and/or hostels, especially for girl children (p. 10);
2. Ease building of schools with a lower impetus on inputs and more focus on learning outcomes through partnership with the philanthropic sector;
3. Strengthen Open and Distance Learning (ODL) programs by The National Institute of Open Schooling (NIOS) and expand School of Open Schooling. States will be encouraged to develop offerings—such as Grade 3, 5, 8, 10 and 12 equivalent open programs, vocational education, adult literacy program—in regional languages by establishing new/strengthening existing State Institutes of Open Schooling (SIOS);
4. Track students, as well as their learning levels, so that they (a) are

enrolled in and attending school, and (b) have suitable opportunities to catch up and re-enter school in case they have fallen behind or dropped out (p. 10);

5. Connect counsellors or well-trained social workers to schools/school complexes (p. 10).

NEP 2020 recommends extending Section 12 to K-12 without addressing bottlenecks

NEP 2020's recommendation to extend the RTE Act from 3-18 years seems to be in line with goal 4 of the UN Sustainable Development Agenda 2030, which is to "ensure inclusive and equitable quality education and promote lifelong learning opportunities for all" (The Sustainable Development Goals Report, 2020). Among the subgoals of goal 4 is to "ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes" (ibid). While NEP 2020 is likely to increase enrollment (Shah & Steinberg, 2019), the quality must be focused upon.

NEP 2020 is silent on the poor implementation of Section 12 of the RTE Act. It must advise concrete reforms, given the documented evidence regarding its implementation (Bhattacharjee, 2019; Sarin et al., 2015). The problems regarding social inclusion (Dutta & Khan, 2021, Mehendale et al., 2015; Lafleur & Srivastava, 2019) must also be addressed. The policy must direct reform on the low per child expenditure and infrequent recalculation of per child expenditure (Mittal & Shah, 2010). As

many states do not periodically review and notify the "per child expenditure" in government schools, reimbursements are undervalued and often delayed. In a study on the per pupil expenditure (PPE) of government schools in Uttar Pradesh (UP), it was found that while the PPE in government schools was Rs. 3,064 per month, the upper limit of reimbursement notified by the government was Rs. 450 per month. Thus, the PPE calculation did not represent the actual cost calculation, violating reimbursement provision under the RTE Act (Kingdon & Muzammil, 2018). Moreover, according to a response to a Lok Sabha unstarred question, only 15 states proposed an amount towards reimbursements under Section 12 of the RTE Act¹. Out of this, three states received Rs. 0 since they had not reimbursed any amount to the private schools.

Furthermore, as per the Annual Work Plan & Budget 2019-20, most states declared a single cost per child for both lower primary and upper primary classes². This is despite upper primary classes requiring a different set of inputs and more qualified teachers. For instance, as of 2015, the starting salary of a primary teacher in UP was Rs. 39,683 per month, whereas that of an upper primary teacher was Rs. 47,716 per month—about 20 percent higher (Kingdon & Muzammil, 2018). The government's per child cost planning and calculation did not account for such differences at different levels of schooling.

As outlined by the Kasturirangan Committee 2019, the RTE Act 12(1) (c) goes against the policy's overall principle of autonomy to institutions

1. Government of India. Per Child Cost under Right to Education. Lok Sabha, Unstarred Question No. 2165. 12 Dec. 2019, <http://164.100.24.220/loksabhaquestions/annex/172/AU2165.pdf>. Accessed 20 May 2020.

2. Government of India. Per Child Cost under Right to Education. Lok Sabha, Unstarred Question No. 4724. 23 Mar. 2020, <http://164.100.24.220/loksabhaquestions/annex/173/AU4724.pdf>. Accessed 20 May 2020.



(MHRD, 2019, p. 193). The committee recommends that if the Section 12(1)(c) is to remain, it must be strengthened to ensure that admissions are conducted via transparent mechanisms across all private schools in the country, that schools provide support for integrating the students, and that credible grievance redressal mechanisms be provided in case of discrimination. One way to address both access and inclusion is through school choice. The state governments should empower parents by directly transferring cash into their accounts and allowing them to choose a school for their ward.

Thus, mandates included in Section 12 of the RTE Act must be strengthened and reformed.

Drop out issue: ‘Why’ should come before the ‘how’

Without taking cognisance of the reasons for dropouts, NEP 2020 prescribes various solutions, ranging from infrastructure

and counsellors to curriculum redesign and student tracking. NEP 2020 aims to serve the children of migrant labour with alternative education/innovative education centres, while providing no indication of how these centres would be regulated and what the quality standards would be. Information on who will set up these centres and run them is absent.

Moreover, the policy recommends “a system of incentives” for deploying teachers with knowledge of local language in areas with high dropout rates. But it does not outline what those systems will be, who will be responsible for them and how they will be funded.

Open schooling interventions: On what basis?

The prescription to strengthen open schooling and expand their offerings (A, B and C levels equivalent to Grade 3, 5 and 8 respectively) is based on weak evidence since major national surveys,



such as the National Achievement Survey (NAS) and the Annual Status of Education Report (ASER), leave out open schools in their learning outcomes data. There is also evidence that salaried learners find NIOS useful for exit certification but not so much for learning outcomes (Jha et al., 2016). Thus, it is not prudent to simply expand the services without exploring the quality of services currently offered and whether they need an overhaul.

Moreover, it is not clear how the NIOS and the SIOS would resolve conflict of interest given their dual roles as exit certification agency as well as service provider. The service provider is providing exit certification, which in turn is a proxy of how well the service is functioning. This can incentivise making certification easier without improving the service provision. A separation of functions is, therefore, desirable.

Bringing in social workers: details missing

NEP 2020 recognises the need to bring in social workers and counsellors. However, it suggests doing so from other departments. While advocating for these well-trained personnel as a solution, it does not consider the ramifications of an increased workload for said personnel.

Even though the school complexes will benefit from sharing social workers and counsellors (p. 29), the policy fails to concretely state how many of such social workers will be brought in and the level they would work at. Further, the proposal of school complexes can result in problems if not thoroughly thought through. Teacher absenteeism is already high (Chaudhary et al., 2006). Expecting teachers to travel across schools within a school complex can become an excuse for teachers to get away with even higher rates of absence.

secondary school (Grade 8).

As per NEP 2020, Sanskrit will be offered at all levels of school and higher education as an important option and taught in contemporarily relevant ways. Sanskrit textbooks at the foundational and middle school level may be written in Simple Standard Sanskrit to teach Sanskrit through Sanskrit (p. 13). In addition to Sanskrit, other classical languages of India, including Tamil, Telugu, Kannada, Malayalam, Odia, Pali, Persian, and Prakrit, will also be widely available in schools as options, possibly as online modules (p.14).

Indian Sign Language will be standardised across the country with National and State level curriculum developed for use by students with hearing impairment. Local sign languages will be respected and taught, wherever relevant (p. 14).

Medium of instruction: a tussle between experts and parents

NEP 2020 recommends instruction in the mother tongue till Grade 5, preferably till Grade 8. Literature, such as by Jeffcoate (1984), UNICEF (2014, 2016), and Jhingran (2005), also supports this and stresses on the importance of instruction in the mother tongue. Moreover, not only is using the mother tongue pedagogically more effective, it also provides a social and emotional identity to individuals (in this case, the child), expresses the essence of the child's culture, and provides a sense of rootedness (Pattanayak, 1990). Thus, schooling in the child's mother tongue reflects respect for the child's culture,

while exclusion of the mother tongue is "harmful for child's self esteem" (Edwards, 1984). Furthermore, the NEP's recommendations regarding encouraging multilingualism are justified by its cognitive benefits seen in literature (Wiles, 1985).

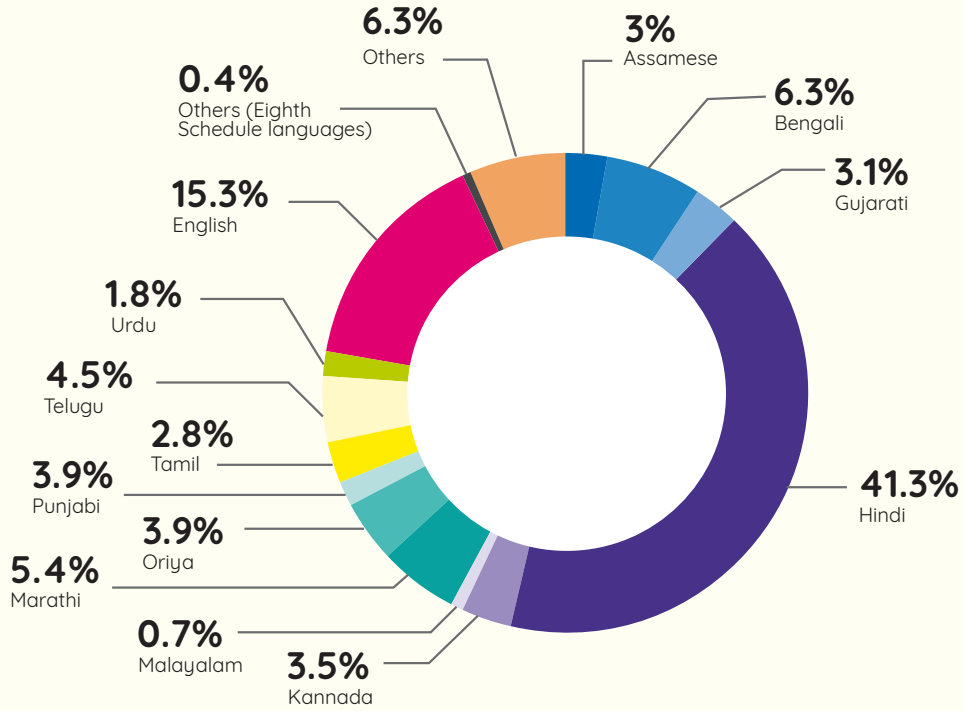
The policy seems prudent in its recommendation that instruction in the mother tongue be encouraged in both public and private schools. This will nudge private schools towards adopting instruction in the mother tongue. In absence of such a norm, private schools are more likely to choose English as the medium of instruction over regional languages as is evident by the disproportionate number of English medium private schools.³

However, private schools offer what parents want. The numbers indicate a high parental preference for English medium instruction but the policy leaves out this parental choice. The policy recommends that the languages taught be chosen as per the preferences of the state, the region and the child (p. 13). Though the regional medium of instruction might be pedagogically more suited, it is important to consider the parents' opinion since they are the primary decision makers for the child.

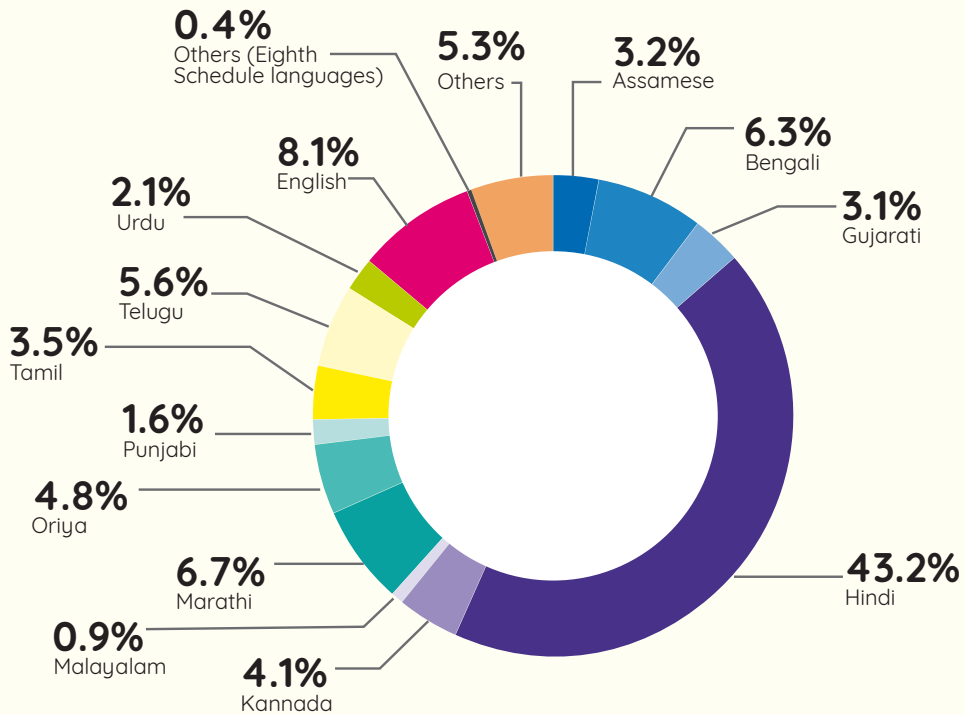
There is also a need to balance the importance of multilingual education with the benefits that accrue to a student from English medium instruction. Given that English is the language used in most competitive exams across the country, using it as the medium of instruction from the commencement of children's education makes them comfortable and proficient in the language. This helps

3. Out of the government run/aided schools and private schools, while the public schools are fairly distributed among the regional languages, the private schools tend to be English or Hindi medium. While the percentage (36.1%) of private schools with Hindi as a medium of instruction is proportionate to the overall Hindi medium schools (41.3%), the percentage of private schools with English as a medium of instruction is disproportionately higher (38%) than the overall English medium schools (15%) (UDISE 2018-19)

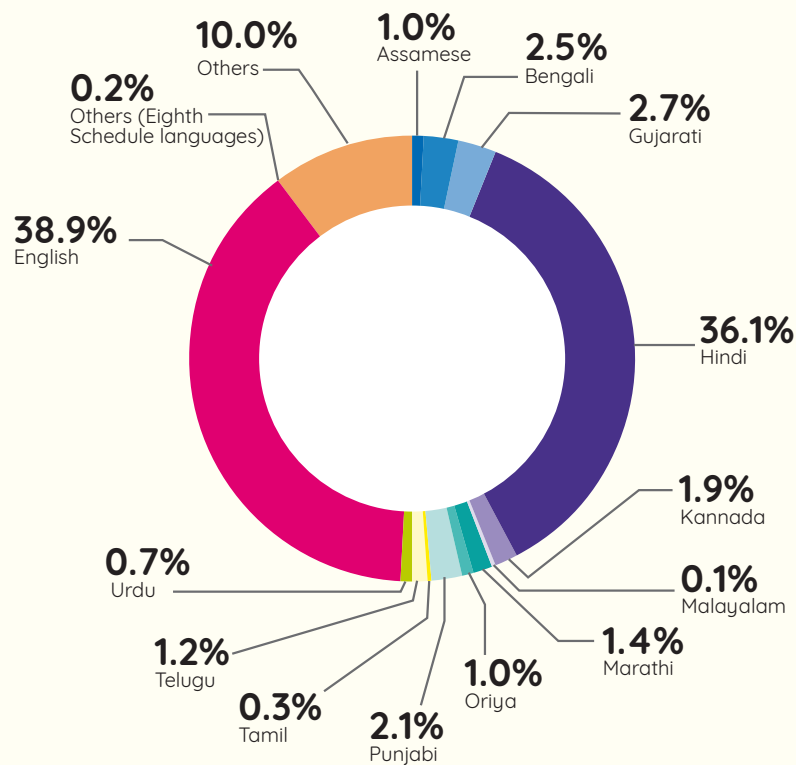
Overall schools and their medium of instruction



Government Run/Aided Schools and their medium of instruction



Private Unaided Schools and their medium of instruction



them pursue their career goals and excel in the professional sphere. Studies also estimate that fluency in the English language increases an individual's hourly wages by upto 34%, while only partial knowledge increases the hourly wages by just 13%. It has been found that being fluent in English yields as much return to a person as completing their secondary school or half as much return as getting a bachelor's degree (Azam and Chin, 2013).

No clarity on what "regional" level means

The three-language formula, with its added flexibility for the state, region and student, provides more freedom for decentralisation of decision making and

thus, allows for customisation as per the regional needs. However, higher clarity on what qualifies as "regional" level is desired as this has implications on students from tribal backgrounds who, at times, come from small pockets with widely diverse languages.

Use of ed-tech: Need for a separate policy

NEP 2020's advice to use technology to make learning more engaging is positive. The NEP also acknowledges that "digital education cannot be leveraged unless digital divide is eliminated" (p.58) and calls to "invest in creation of open, interoperable, evolvable, public digital infrastructure in the education sector" (p. 59). Thereby,

NEP 2020 acknowledges the digital divide as evident from the recent reports by OXFAM (Vyas, 2020) and Azim Premji Foundation (2020). It is strongly recommended that the steps to bridge the digital divide go hand in hand, if not prior to, ramping up education provision through the digital medium. However, given the recently launched Students' and Teachers' Holistic Advancement through Quality Education (SARTHAQ) plan, an increased flexibility in using ICT funds available under Samagra Shiksha Abhiyaan is the only step proposed to build the technology infrastructure (Department of School Education and Literacy, 2021, p. 232), thereby raising doubts about the attainability of the goal.

To realise NEP's goal of using technology, India also needs a National EdTech Policy that can set a roadmap for all stakeholders in the education system. Between January 2014 and September 2019, more than 4450 EdTech Startups were launched in India, but only 4.17% of them managed to raise funds. For India to make the best out of this emerging sector and increase access to education, initiatives are also needed in the field of creating requisite infrastructure for children to pursue online education. In view of this, NEP 2020 has proposed the setting up of a dedicated unit for digital learning to build digital infrastructure, content, and enhance capacity (p. 60). It is also suggested that the government should adopt an open source licensing model for the EdTech sector such that

it enables educational institutions, public institutions and nonprofits to access standardised and cross-functional technology (Joshi, 2021).

Standardising the Indian Sign Language: Consult and collaborate

Focus on the Indian Sign Language and the time bound goal (Department of School Education and Literacy, 2021, p. 97) to standardise the same across the country is a forward thinking step. However, the absence of corresponding steps regarding identification and teaching of local sign languages leaves the intervention wanting. Dr. VP Shah, Former Principal of Ali Yavar Jung National Institute of Speech and Hearing Disabilities estimates that, currently, less than 1% of those with hearing and speech impairments have formal training in sign language (Khandekar, 2020). The proposal to standardise sign languages also brings the fear that one dialect may be prioritised over another. Sign languages are different in different parts of the country, and the process of standardisation should be consultative and collaborative to ensure that India's diverse and multilingual character is upheld. Some experts in the area of sign language have also expressed the view that more than standardisation, it is the availability of quality educational content in the language that is important (Kalra, 2020).



03 Assessments and Learning outcomes measurement

NEP 2020 proposes to transform the way students' performance and potential will be assessed. The primary purpose of assessment will be to help the teacher, student and the entire schooling system continuously revise teaching-learning processes to optimise learning. The nature of assessment will shift from one that is summative and primarily tests rote memorisation, to one that is more regular and formative (p. 17).

The Ministry of Human Resource Development (MHRD) will set up a separate National Assessment Centre, PARAKH (Performance Assessment, Review, and Analysis of Knowledge for Holistic Development) as a standard-setting body, which will undertake the NAS and guide the State Achievement Survey (SAS) (p. 19) to monitor achievement of learning outcomes in the country (p. 19). NAS will be undertaken with suitable cooperation with other government bodies and will be a sample based assessment, covering both government and private

schools. States will also be encouraged to conduct their own census-based SAS (p. 32). Until PARAKH is established, the National Council of Educational Research and Training (NCERT) will continue to conduct the NAS (p. 32). If the current NAS methodology were to be followed, school level samples will be drawn in each district using the Probability Proportional to Size model, same as that used by the Programme of International Student Achievement every year. Furthermore, Language, Maths and Environmental Studies will be covered for Grades 3 and 5, while Language, Maths, Science and Social Science will be covered for Grade 8 (National Council of Educational Research and Training, 2017, p. xv).

States will use the results of the SAS only for developmental purposes, public disclosure by schools regarding their overall and anonymised student outcomes, and for continuous improvement of the school education system (p. 32). As per the latest

SARTHAQ report, SAS will be conducted every alternate year starting 2022, while NAS will be conducted every alternate year from 2021-2027 (Department of School Education and Literacy, 2021, p. 45). However, the policy is silent on how the additional surveys will be funded and what the cost estimates will be.

Additionally, to track progress throughout the school years, all students will take school examinations in Grades 3, 5, and 8 which will be conducted by the appropriate authority. These examinations will test basic learning outcomes by assessing core concepts and knowledge from the national and local curricula, along with higher-order skills and application of knowledge in real-life situations (p. 18).

The SARTHAQ plan mentions School Based Assessments (SBAs) that “will form an integral part of the teaching learning environment and it will be embedded in the teaching learning process so as to ensure a non-threatening, stress free, participatory conducive learning environment in the school” (Department of School Education and Literacy, 2021, p. 48). As per the policy, the progress card for SBAs will be completely redesigned by the states under the guidance of PARAKH, NCERT, and the State Council of Education Research and Training (SCERT), and will communicate a 360 degree profile of the learner. This will include the uniqueness of the learner in cognitive, affective, and psychomotor domains, self assessment, peer assessment, progress in project-based and inquiry based learning and the teacher assessment (p. 18).

While board examinations are to continue, the format will be reformed to eliminate the need for undertaking coaching classes and encourage holistic development. The exams will be

made “easier” so that they test only the primary competencies of the student. Thus, making a basic effort at school will be sufficient to clear the exams. To reduce the pressure further, the student will be allowed to take board exams on up to two occasions, one main and one for improvement, if deemed desirable. Students will be able to choose many subjects as per their interests. Apart from the above, other steps “may” be taken to reduce the pressure that board exams put on students, such as modular board exams where the exam is held right after the course is completed, all subjects may be offered at two levels: standard and higher, and exam in certain subjects may be split into two parts: a multiple choice question part and a descriptive part (p. 18).

Learning outcomes based instruction: need for a balancing act

It is justified to use learning outcomes to monitor and improve the schooling system. Majority of students find the learning outcomes as “useful learning aids” which help “them in various ways to support their studies” (Sara et al., 2014). Assessments help provide assurances to stakeholders that students have attained the expected competencies and they are ready for employment and/or further study (Coates, 2016, p. 1). In the absence of any other national official assessment to gauge the health of the system with regards to learning of the students, NAS and SAS will continue to provide data for effective governance. Since the policy places impetus on strengthening Open and Distance Learning (ODL), it is recommended that NAS also assess learning levels of students served by open schooling such as NIOS. Such data will plug the information gap that



currently makes assessing the efficacy of ODL difficult.

However, one must be careful of using standardised assessments. There is data to support criticism against relying solely on learning outcomes (Hussey and Smith 2002, 2003, 2008, 2010). Reliance on learning outcomes can also “lead to a narrowing of focus and preclude extended learning” (Sara et al., 2014). Over reliance on only one aspect of education might be perilous and assessment must have a variety of learning outcomes that have been widely accepted. These include intellectual skills (procedural knowledge), verbal information (declarative knowledge), cognitive strategies (executive control processes), motor skills, and attitudes (Gagné, 1984). As such, over reliance on outcomes related to language fluency and mathematics will fail to capture education aims as defined in the NEP, such as social, ethical, and emotional capacities and dispositions (National Education Policy, 2020, p. 4). However, as per the NEP, there will be a shift in assessment from rote memorisation based test to more regular and

formative test (p. 17) which could be a step in the right direction.

Holistic report card: beware of the pitfalls

The NEP states that the newly proposed report card will contain a “holistic, 360-degree, multidimensional report that reflects in great detail the progress and the uniqueness of each learner in the cognitive, affective, and psychomotor domains”. It will include self-assessment, peer assessment, and the child’s progress in project-based and inquiry-based learning, group work, quizzes, etc., besides teacher assessment. Thus, the new model assimilates the best components of the earlier Continuous Comprehensive Evaluation (CCE) and introduces a more holistic assessment. It supports the inclusion of more well-rounded activities that students are engaged in at school, and reduces the importance of summative marks (Sengupta, 2020). Insofar as the transformation to this new assessment system is concerned, NEP 2020 states that guidelines for the same will be prepared by NCERT

in consultation with major stakeholders such as SCERTs, Boards of Assessment and others. Teachers shall be prepared for this assessment system by the academic session 2022-23 (p. 18). It, however, does not provide a detailed roadmap of how this transformation is supposed to take place.

With regards to curriculum, a redesign to include a “formative/adaptive assessment” does not outline how it will be different from CCE, and how the system will tackle the pitfalls of CCE (Yagnamurthy, 2017). Similarly, though a focus on foundational literacy and numeracy is positive, it fails to comment on how the curriculum will be different from the one which is already in place. Even now, the curriculum in the early grades focuses on building basic reading and math skills of the students, as was recommended in the National Curriculum Framework 2005 (National Council of Educational Research and Training, 2005). How, and whether, the policy plans to take them a step ahead is not clear.

Who will conduct Grade 3-5-8 assessments?

The policy provides no indication as to who will conduct the Grade 3-5-8 assessments and whether they will be separate from the NAS, SAS and the SBAs. The SARTHAQ plan does not provide a clear indication of how these assessments will be undertaken either. Under the comprehensive report card, it is not clear how teacher assessments are different from the progress in project and inquiry-based learning and what unique facets it will touch upon.

Making board exams “easier”: is the goal right?

Though the policy makes some useful recommendations regarding the board exams, the primary focus must be on testing primary competencies rather than making the exam “easier”. Though steps such as choice of subjects and best-of-two attempts would lower the pressure associated with the exams, the education system will fail to reform if the examination questions are not revised. In the current scenario, where students manage to score 100% marks even in subjects like literature, it is worrisome and the problem lies “with the way questions are set and the model answers developed for it” (Shah, 2019).

Frontline educational bureaucracy: Elephant in the room

In bringing reforms that emphasise learning outcomes to monitor and improve the education system, organisational culture has a significant role to perform. For reforms to be embedded in the education system, efforts should be aligned in accordance with the dynamics of the organisational culture and “investments should be made in building professional identities around norms of service delivery”(Aiyar et al., 2015). Three distinct management processes: “recruitment; socialisation and training of new recruits and finally, regular discussion and dialogue amongst line agents and managers about work processes” can influence the evolution of organisational cultures in this respect (Piore, 2011). Piore emphasises more on the central role of discussion and dialogue.

For ground implementation of assessment, the NEP 2020 should push for reforms in the frontline educational bureaucracy on these lines.



04

Regulatory framework for schools

As per NEP 2020, overemphasis on inputs will be changed and requirements will be made more responsive to ground realities, such as those regarding land areas, room sizes and practicalities of playgrounds in urban areas. The policy will adjust the mandates to leave suitable flexibility for each school, safety, security, and a pleasant and productive learning space will be ensured (p. 32). By 2021-23, the states will set up the State School Standards Authority (SSSA) for ensuring that a minimal set of standards based on basic parameters⁴ is followed by all schools. SCERT, in consultation with various stakeholders, especially teachers and schools, will create these parameters (Department of School Education and Literacy, 2021, p. 174). An effective self-regulation or accreditation system, with online access and an annual

cycle, will be established under SSSA so as to enable it to enforce a regulatory regime, including withdrawing approval to operate schools, if necessary (Department of School Education and Literacy, 2021, pg. 178).

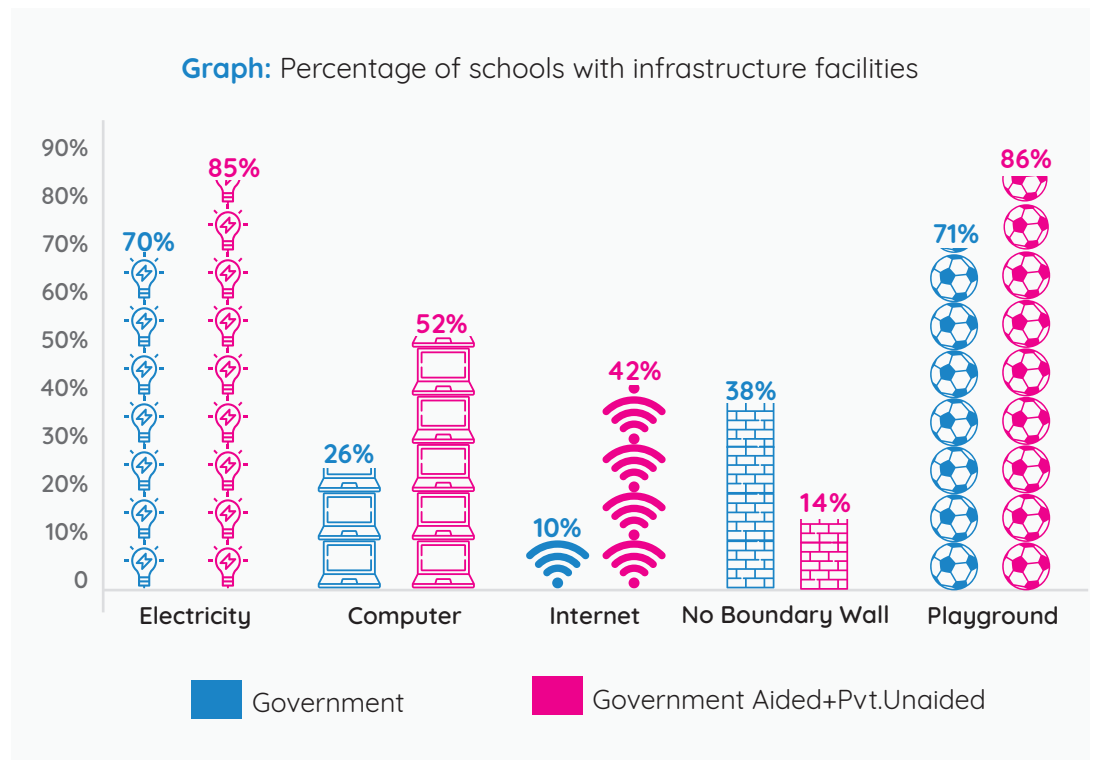
Public schools (except the schools that are managed/aided/controlled by the Central government) and private schools will be assessed and accredited on the same criteria, benchmarks, and processes, emphasising online and offline public disclosure and transparency. For schools controlled/managed/aided by the Central government, CBSE shall prepare a framework in consultation with the MHRD. All schools will also be held to the same auditing standards and disclosures as a “not-for-profit” entity (p. 32).

4. Namely, safety, security, basic infrastructure, number of teachers across subjects and grades, financial probity, and sound processes of governance.

Welcome the level playing field

Same accountability standards for all schools is a welcome step. Such a move levels the playing field (Centre for Civil Society, 2019a) and as the NEP 2020 puts it, will “ensure that public-spirited private schools are encouraged and not stifled in any way” (p. 32). It ensures that all schools are held to the same standard given their common purpose— to provide quality education. This is when government

schools fare as poorly, if not worse, on physical infrastructure requirements as private unaided schools. For instance, though 85% private and aided schools have electricity, only 70% government schools have that facility; while 14% of private aided and unaided schools do not have a boundary wall, 38% government run schools do not have a boundary wall; and while 86% private and aided schools have a playground, only 71% government schools fulfil that requirement (UDISE, 2018-19).



Regarding regulation of central schools, though CBSE will create the framework for regulation along with the Ministry of Education (MoE), the policy is silent on who will regulate the schools. A separate regulatory body at the central level is desirable (equivalent of SSSA) for regulating schools that have presence in more than one state. This will cater to not only the schools run by the central government but also schools having branches in multiple states.

Allow private investment in K-12 sector

NEP 2020 advocates that the schools be run as “not-for-profit” entities and philanthropic efforts be encouraged. Some scholars perceive privatisation to be problematic for “communities who find themselves on the wrong end of the hierarchies” (Rizvi, 2016). Education institutions are not only for learning and skilling, but also for interaction among people - both intergenerational and



international (Béteille 2005). Replacing academic values with commercial considerations, social concerns and purposes with individual interests, and long term needs with short term demand will have serious repercussions (Tilak, 2008)⁵. It is necessary to encourage the private sector while also keeping in mind the equity concerns and stability of the education service (Rizvi, 2016).

It is a widely accepted idea that education funded and managed entirely by the state is no longer feasible. The inputs of the private sector are therefore necessary and can greatly benefit the education system (Rizvi, 2016). Even the Mid Term Appraisal

report of the 11th five year plan states that “necessary legislative measures to facilitate private participation must be initiated and viable models for PPP (Public Private Partnership) in education be worked out as early as possible” (Planning Commission, 2011, p. 141). The benefits of private players, as outlined by Savas (2000) can range from better quality of goods and services to more cost effective governance and control. It is argued that school systems can benefit from allowing private unaided schools by the potential gain in efficiency and productivity (Baum et al., 2014). Though some studies have found that , performance of the

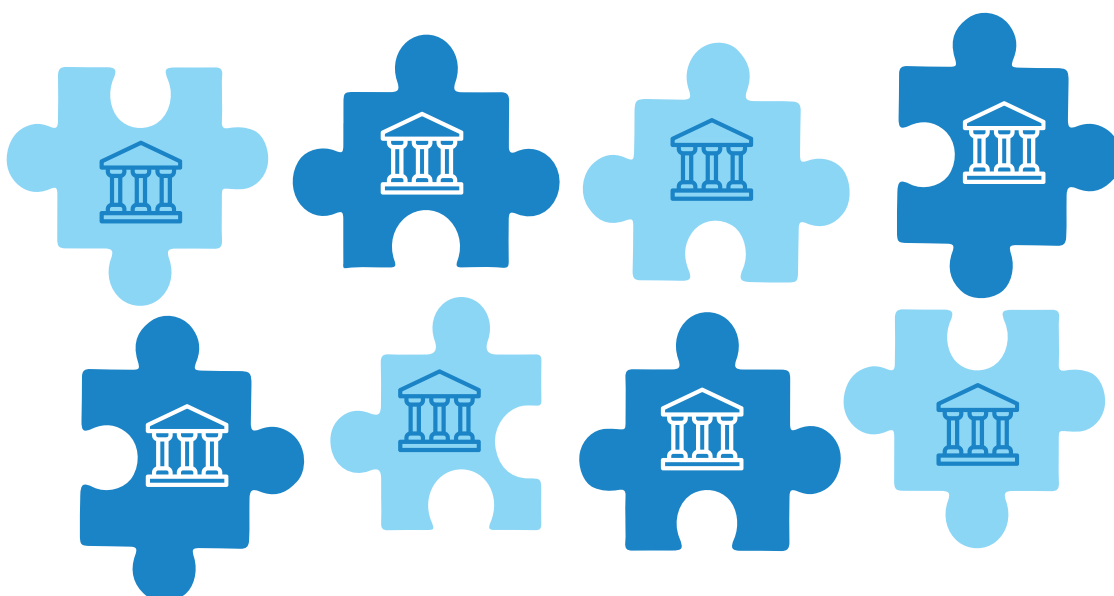
5. Although the piece argues about higher education, the argument can be applied to school education as well.



private sector, even when adjusted for socioeconomic status, is higher than government schools when comparing the achievement on standardised tests (Desai et al., 2008; French & Gandhi, 2010); other studies (Chudgar & Quinn, 2012) have argued that private unaided schools perform at the same level as their government counterparts when adjusted for socio-economic metrics. However some studies have shown that teacher absenteeism is lower and per student time is higher in private schools as compared to government schools (Kingdon & Banerji, 2009). Moreover, for-profit schooling is legally permitted across the developing world and in many developed countries such as the USA, China, Japan, Germany, UK, Canada, Sweden, South Korea, Singapore, Hong Kong and many more (EY and Parthenon, 2019).

An argument that is made against for-profit education is that private

institutions indulge in unfair practices (Tilak, 2011). However, to ban all for-profit ventures because some indulge in unfair practices would be as unfair as banning all software companies because a software company (such as Satyam) duped its shareholders (Narang, 2019). Another argument against for-profit private schooling is that since private schools avail subsidies and concessions, they shouldn't be allowed to earn profit (Tilak, 2011). However, it can be argued that if the private schools were to register as companies and raise capital from the market, they wouldn't need subsidies and concessions (Narang, 2019). Though Indian courts have allowed education institutions to generate a surplus, it has asked them to put the surplus back into the institutions. This judicial regulation that undermines diversity and innovation, and mandates charity-based education, has no constitutional basis (Kapur & Khosla, 2011).

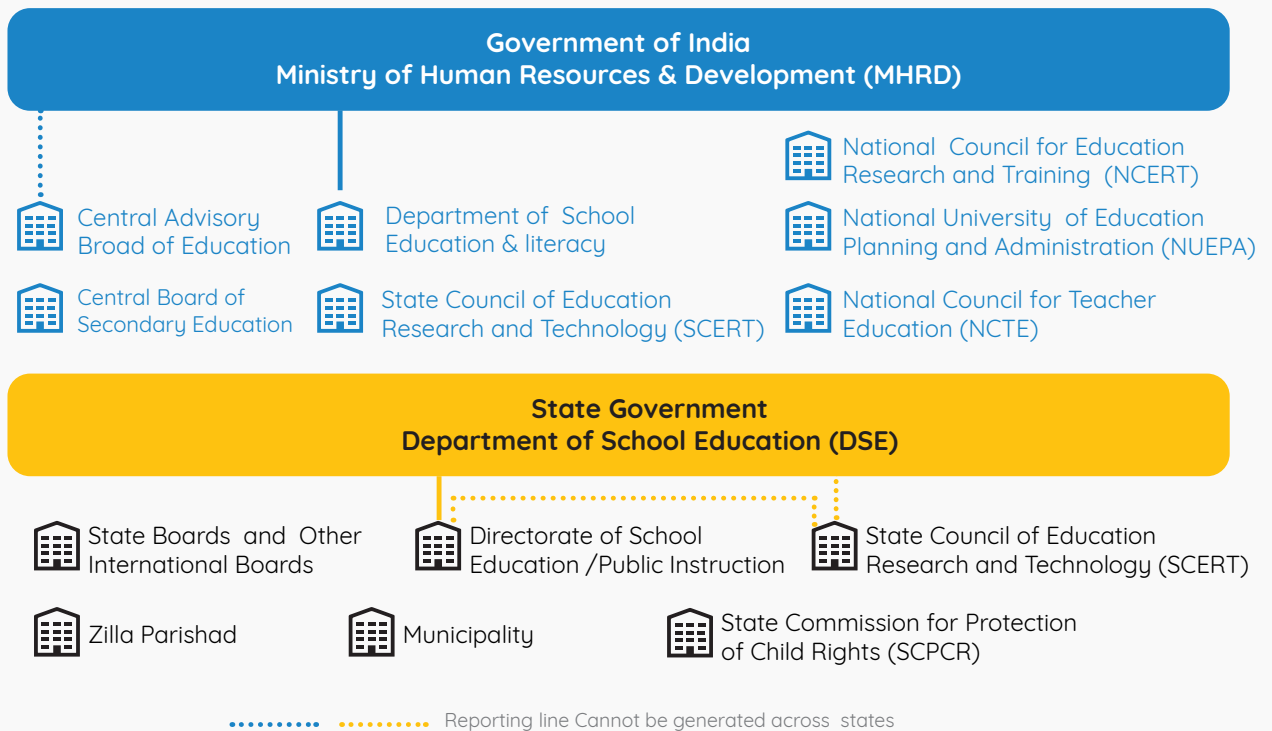


05

Separation of functions of the government

NEP 2020 proposes separating functions in the following way:

1. **NCERT** will guide the **SCERT**, which will handle academic matters, including academic standards and curricula in the state. SCERT will develop a School Quality Assessment and Accreditation Framework through consultations with all stakeholders.
2. **Boards of Assessment/ Examination** in each state will handle the certification of competencies of students at the school-leaving stage and **PARAKH**, the new National Assessment Centre, will carry out a sample-based NAS periodically to test the efficiency of the education system (p. 31).
3. **The Department of School Education** will be responsible for overall monitoring and policymaking while the **Directorate of School Education** will handle the educational operations and service provision for the public schooling system of the whole state.
4. **SSSA**, an independent state-wide body will ensure that all schools follow certain minimal professional and quality standards. It will also establish standards based on basic parameters such as safety, security, basic infrastructure which all schools will be expected to follow.



Separation of functions = better accountability

Currently the Union and state governments perform regulatory functions (Centre for Civil Society, 2019a), along with financing (Tilak, 2002, pp. 12-13) and assessment functions; including standardised assessments via the CBSE and State Boards. All three levels of government,⁶ including the local government, are also responsible for service delivery, i.e. managing operations of government schools (Centre for Civil Society, 2019a).

The officials in these departments can hold conflicting functions. For instance, the Director of Education is responsible for compliance, enforcement as well

as service delivery. Such presence of regulatory and service delivery responsibilities can incentivise stifling of competition. Similarly, the District Education Officer is responsible for regulation, service delivery as well as assessments. This is again a conflict of interest where the service provider is responsible for measuring the quality of service (Anand & Sudhakar, 2020; Centre for Civil Society, 2019b).

It is a welcoming decision to separate the functions of the government. A conflict of interest, such as the one outlined in the previous paragraph, violates the principle of regulatory neutrality where a market player not only self-regulates, but also regulates its competition. The current structure of the

6. Municipal Corporation, Nag ar Panchayats and Nagar Parishads.



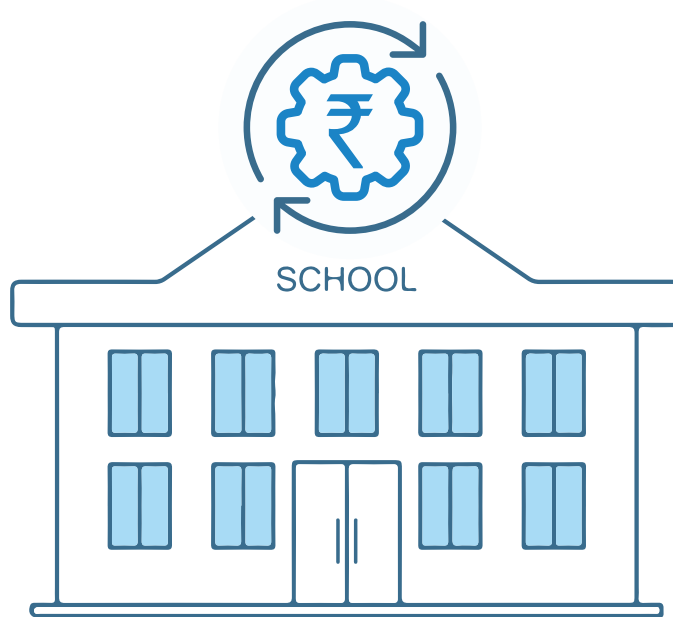
Figure 3: Responsibilities of functionaries in 5 states (MH, DL, HR, JH, UP) (Anand & Sudhakar, 2020)

state department violates the principle of natural justice: “no one should be a judge in his own cause”. When such fundamental principles of governance are violated, it leads to several practical problems of public administration (Patnaik & Shah, 2014).

The separation of roles of the government has its merits and is seen in other education systems. In Chile, the MoE is the central authority that oversees education in the country. A law passed in 2012 applied separation of powers and reassigned many MoE’s functions to other agencies. It also created two agencies for better enforcement and accountability—Superintendence of Education, and the Education Quality

Assurance Agency (National Laboratory for High Performance Computing, 2018; Pont et al., 2013).

The Department for Education in the United Kingdom, is the central authority supported by 18 independent agencies (Government of UK, 2018) and oversees education in the entire country. Service delivery is done through public schools financed by Local Education Authorities whereas compliance is ensured by two inspecting agencies—Office of Qualifications and Examinations Regulation and Office for Standards in Education—which report directly to the Parliament.



06

Fee regulation

NEP 2020 states that while the private philanthropic efforts for quality education will be encouraged, parents and communities will be protected against arbitrary increases in fee hikes (p. 32). However, the policy is silent on how said protection will be provided. If one looks at the norms set for Higher Education Institutions, it is understood that the document leans towards transparent mechanisms for fixing fees with “upper limits” for different types of institutions (p. 49). Thereby, the institutions will be able to independently set fees within the “laid-out norms” and the “broad applicable regulatory mechanisms” (p. 49). A similar process may be applicable for school education institutions as well.

NEP 2020 accords due importance to the disclosure of educational outcomes of students as well as the academic, financial and operational matters (p. 32). This is to ensure “integrity of the system through the enforcement of

complete transparency and full public disclosure of all finances, procedures, and educational outcomes” (p. 30) and to allow for parents to make better informed decisions while choosing schools.

“Arbitrary fee” is not defined

NEP 2020 does not define what an arbitrary hike would constitute. It does not cite any data or studies on: (i) the number of schools engaging in arbitrary fee hikes; (ii) the cost of compliance with respect to the regulations and board affiliation, and (iii) whether the existing state level laws curbing fee hikes have been effective.

10 states and union territories in India have acts regulating the collection of fees in private schools. Some states, such as Delhi, employ orders and circulars to regulate fees. Bihar, Chandigarh, Madhya Pradesh and Punjab have

a cap on fee hike. Assam, Gujarat, Maharashtra and Rajasthan have fee regulatory committees for approvals. Uttar Pradesh has a formula (Consumer Price Index + 5% of the last year fee) for fee hike.

Fee control thwarts innovation

By laying down a “formula”, the government encourages schools to raise fees to the fullest extent possible and reduce price differentiation (Knittel and Stango, 2003). As school owners begin to see the government as protection from the harsh realities of competitive markets (Grayson, 1974) it weakens the incentive for schools to respond to parental demands, and reduces diversity of offerings as seen in other sectors (Sheahan, 1961; Ma, 2007; Knittel & Stango, 2003). Furthermore, it reduces the investment in education in the private sector. Cap on fee hikes naturally makes it difficult for private schools to match revenue with costs. With fee caps, schools have to trade-off innovation (Murphy, 1980). Most of the states employ the use of price caps to regulate fees. In unhampered markets, market prices coordinate supply and demands and ration existing resources efficiently. By manipulating the market price, price caps distort this process and prevent mutually beneficial exchanges (Coyne & Coyne, 2015).

Fee curbs impacts access to schooling

It must be noted that the complaint of unreasonably high fees is relevant to only a few private schools. For low cost private schools, educators who see no chance of increasing prices end

up having to cut costs and are unable to function efficiently, thereby losing incentive to perform better (Santhosh, 2014, p. 6). Thus, a fee cap would weaken the private school ecosystem, and lead to a large number of students unable to access education when the government infrastructure is unable to absorb them while providing quality education.

Fee controls make it difficult for smaller schools to innovate, grow and expand. Small schools would close down sooner or later, leaving the market only to big private schools who are capable of competing on factors other than price. Thus, while the control of fees by the government is intended to help the parents who cannot afford the fees charged by big private schools, it ends up leaving very big schools as their only option. Artificially low prices leads to less competition, and dominance of a few bigger players in the market.

It is recommended that the government should refrain from price-setting and instead focus on increasing the quality of government schools so that they can provide a genuine alternative to parents. Disclosures should be the preferred tool to pre-empt parent-school disputes regarding fees. Given the NEP 2020's recommendation for “transparent disclosure of educational outcomes” as well as “finances” and “procedures” (p. 30), schools should, at the time of admission, declare the fee structure for the previous three years, current fee structure for each class, and an indication or a formulae for calculating future fee hikes. If the school ever hikes fees beyond what is represented in the disclosure, parents should have the option of questioning the misrepresentation in court.



07

Early Childhood Care and Education

NEP 2020 envisions **universalisation of quality early childhood education** at the earliest, latest by 2030, while acknowledging the importance of appropriate care and stimulation of the brain in early years (p. 7). In this regard, NCERT will develop the National Curricular and Pedagogical Framework for Early Childhood Care and Education (NCPFECCE) to cater to two age groups—0-3 years and 3-8 years old—aligned with the latest research on Early Childhood Care and Education (ECCE), and national and international best practices. Moreover, the mid-day meal program will be extended to the “Preparatory Classes” (before Grade 1) in primary schools (p. 7-8).

NEP 2020 prioritises the **socio-economically disadvantaged districts and locations**. It recommends the delivery of ECCE through: (a) stand-

alone Anganwadis; (b) Anganwadis co-located with primary schools; (c) pre-primary schools/sections covering at least ages 5 to 6 years co-located with existing primary schools; and (d) stand-alone pre-schools. These schools will recruit teachers specially trained for curriculum and pedagogy in ECCE. Furthermore, ECCE will be introduced in *Ashramshalas* in tribal dominated areas and in all formats of alternative schooling in a phased manner, using the same process for integration as other schools.

The responsibility of the ECCE curriculum and pedagogy will be with the MHRD, now renamed MoE. The Ministry of Women and Child Development, the Ministry of Health and Family Welfare and the Ministry of Tribal Affairs, through a special joint task force, will carry out planning and implementation.



Much-awaited emphasis on early cognitive development but silent on financing

NEP 2020 takes a step in the right direction by including early childhood care under the ambit of free and compulsory education, given evidence of the importance of a child's first six

years in lifelong learning (Sylva et al., 2010; Barnett et al., 2002). It is also welcoming to see pre-primary classes being included under the mid-day meal scheme with high malnutrition rate for the same age group and slow progress towards the global nutrition targets (Global Nutrition Report, n.d.).

The policy hits the mark with a separate play-based curriculum framework and

training of the ECCE teachers under a six month certification program— to be available both offline and online. Past research has well documented the importance of such play in early childhood education (Lifter et al., 2011; Burriss & Tsao, 2012; Bodrova & Leong, 2005).

The policy also places special impetus on ensuring that the ECCE be provided in tribal areas, with focus on districts that are socio-economically disadvantaged. However, it falls short on explaining what this focus might be. Despite its strengths, NEP 2020 does not provide clarity on the pupil-teacher ratio of Anganwadis and whether each Anganwadi will be provided with a teacher and a sevika (helper), . In addition, it remains unclear how the expanded scope of the RTE Act will be funded.

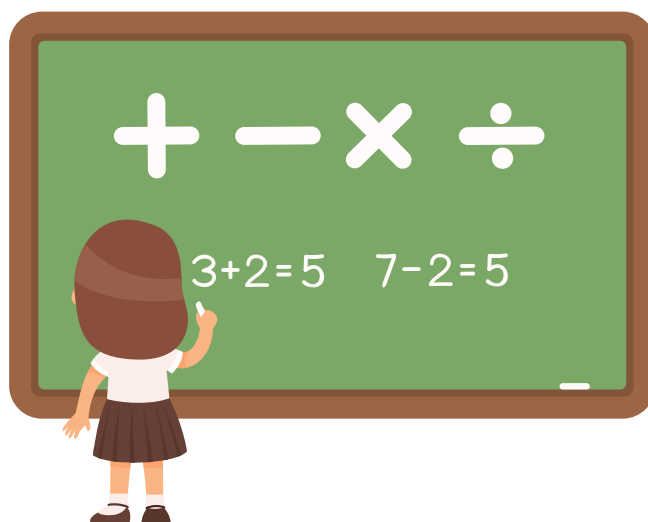
What about the Nurturing Care Framework?

A major gap in the policy is the way in which it envisions early childhood care and education. Though the policy provides inputs regarding the opportunities for early learning, it fails to address the other important components of the Nurturing Care Framework (World Health Organisation, 2018). For the ECCE policy to be truly holistic, it must look beyond the school and consider the larger learning environment of the child.

The Nurturing Care Framework (World Health Organization, 2018) emphasises the roles of parents, families and caregivers in the early development of a child, providing a roadmap for policies that can support them. It articulates the need for responsive caregiving and addresses the broad range of stakeholders involved, from pregnancy to age 3, which is when children are most susceptible to environmental influences (Shonkoff et al., 2012).

Various aspects of the NCPFECCE build on the National Early Childhood Care and Education Policy, 2013. Yet, it fails to include the 2013 policy's focus on "strengthening capabilities of families, communities and services to ensure quality care and education", which outlines the roles of several care providers for three sub-stages, from conception to six years of age. This follows the Early Childhood Development Guide (Naudeau et al., 2011) which points to various interventions relevant during different subperiods and the importance of a nurturing home environment with responsive caregiving.

NEP 2020's ECCE must therefore be enhanced and made more comprehensive, incorporating the Nurturing Care Framework and detailing the ways in which the policy can support both the school and home environments.



08

Strengthening foundational literacy and numeracy

NEP 2020 acknowledges a “learning crisis” in India: low attainment of foundational and numeracy skills, i.e., being able to read and comprehend “basic text” and carry out basic addition and subtraction with Indian numerals. The policy proposes setting up a National Mission on Foundational Literacy and Numeracy. Under this Mission, all states and UTs would set plans and targets for attaining universal foundation literacy and numeracy in all primary schools by 2025 and close monitoring of the same.

The policy further recommends filling teacher vacancies in a time bound manner, especially in disadvantaged areas, areas with large pupil-to-teacher ratio, and areas with low literacy rates; making it easier for trained volunteers to participate in achieving the goal of building universal foundational skills and; encouraging “each one, teach one” within the community and supervised peer-tutoring.

NEP wants NCERT and SCERT to redesign the early grade curriculum to

emphasise the foundational literacy skills and numeracy throughout preparatory and middle school “with a robust system of continuous formative/adaptive assessment” to ensure individualised learning. Additionally, the same bodies will develop an interim 3-month play-based ‘school preparation module’ for Grade 1 students, around basic literacy and numeracy in collaboration with peers and parents.

Digital Infrastructure for Knowledge Sharing platform will have a national repository of high-quality resources on foundational literacy and numeracy.

NEP should focus on accountability rather than inputs

The policy recommends no mechanism to nudge the low performing states to perform otherwise. Moreover, though the policy advocates for filling teacher vacancies, filling vacancies without accountability reforms will not help

ensure universal quality education (Muralidharan, 2019). In absence of accountability measures, even schools with teachers perform poorly and suffer from low teacher motivation and absenteeism (Ramchandran et al., 2005). Rather, a stronger focus must be on what NEP 2020 mentions as “basic methods of quality control and accountability” in the context of teachers (p. 4). Furthermore, teacher apprenticeship programs can vastly improve the quality of education (Muralidharan, 2019).

There is a common perception in India that there is an acute shortage of teachers, and that there is a need to recruit more teachers to resolve this shortage. However, a detailed examination of this view by Geeta Gandhi Kingdon and Sandip Datta based on Unified District Information System for Education (UDISE) data, showed that there is hardly any net teacher deficit in the country since the number of teacher vacancies is roughly the same as the number of surplus teachers. It is demonstrated in the paper that if the estimated fake enrolments are accounted for, the calculation of number of teachers required becomes too high, and that removing fake enrolments reduces vacant posts giving a surplus of 3,42,000 teachers (Datta & Kingdon, 2021). Therefore, greater focus should be on ensuring teacher accountability rather than filling vacancies.

Unconditional increase in teacher salaries is also a proposal often posed as a means to improve their performance and consequently improve learning outcomes. The raise may lead to significant improvement in teachers’ satisfaction with income and reduce their financial stress. However, an increase in teachers’ salaries brings no corresponding improvement in terms of productivity and learning (Ree et al., 2015). In a similar experimental study of other sectors as well, for instance in the health sector, increasing the salary of health workers has been found to fail in producing considerable positive outcomes (Das et al., 2016).

Reliance on informal ways to achieve literacy goals

The recommendations for introducing trained volunteers and an “each one, teach one” approach lacks implementation details. It is not clear whether:

- A. There will be a minimum qualification requirement for trained volunteers;
- B. An ‘Each one, teach one’ approach will complement school education;
- C. These programs will be formalised or encouraged informally.

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