**पत्रांक: H.E.W-7 / Vikram Samwat 2073 / 23.12.2016**

Shri Prakash Javadekar ji,

Hon’ble Minister of Human Resource Development

Government of India

Shastri Bhawan, New Delhi – 110 001

**Subject: Memorandum regarding problems of teachers of**

**higher education**

Respected Sir,

Namaskar!!

The Akhil Bhartiya Rashtriya Shaikshik Mahasangh (ABRSM) is a teacher’s organization of K.G. to P.G. with nationwide presence. ABRSM strives to strengthen the interaction between teaching community and society. We work on the motto *“RASHTRA KE HIT MEIN SHIKSHA, SHIKSHA KE HIT MEIN SHIKSHAK, SHIKSHAK KE HIT MEIN SAMAJ”*. ABRSM has wings for Primary education, Secondary education, Higher education and a separate Women’s wing. It has its presence in nearly 130 universities and various state level teacher organizations of 24 states are its member at present.

The ABRSM (Higher Education Wing) wants to draw your kind attention towards few important issues perturbing the higher education sector in particular. In this regard, we want to submit the following important points for your kind consideration.

Looking forward to an early resolution of these issues

With profound regards



Prof Pragnesh Shah

Secretary (Higher Education Wing)

**Detailed Representation on Various issues related to Teachers of Higher Education**

1. **Various Amendments in Primary UGC Regulations 2010**

The main policy of recruitment and career advancement of university and college teachers (API-PBAS) was implemented as part of 6th pay review committee in June 2010 as per the Gazette notification. This policy has till now been subject to 2nd, 3rd and 4th amendments of the UGC respectively in June 2013, May 2016 and latest in July 2016. The Nigvekar Committee was constituted to look into three main aspects of recruitment and promotion scheme as implemented after 6th pay review committee recommendations for university and college teachers in 2010 and particularly to resolve complexities arising out of 2nd amendment. These are as under:

1. Evaluation of the Academic Performance Indicators (API) Scheme as regards the entry point and career advancement of teachers by taking into account its criticism and suggest suitable improvements / alternatives
2. Evaluation of Ph d / NET qualifications for entry of teachers and to accordingly suggest a policy for selections
3. Consideration of the problems and issues related to Ad-hoc and contractual appointments in Central Universities and recommendations to resolve them

The Nigvekar Committee deliberated for a considerable amount of time and submitted its report to the UGC. The UGC placed this report in its 514th meeting held on 12th April 2016 as item no. 2.04 and approved it. This was notified as 3rd amendment of the UGC in the Gazette. This report has in fact created many hurdles rather than solving them. This committee also touched upon several issues and recommended new policies (for ex., those related to increased direct teaching hours of university and college teachers) to be implemented which are beyond its Terms of Reference (TOR). The ABRSM (Higher Education) had submitted a list of issues to be resolved in the interest of these teachers to the earlier Minister of HRD on 6th June, 2016. The Ministry of HRD was kind enough to resolve four main issues of immediate consideration and necessary directions were given to UGC in this regard. Besides this, two more major issues – a) removal of capping which was implemented by means of 2nd amendment of UGC in June 2013 to compute total points of any teacher for recruitment / promotion and (b) the extension of the 5 year tenure of the principals of the colleges have also been resolved. These resolutions were then adopted by UGC in its latest meeting held in June 2016 and have been notified as 4th amendment of UGC in the Gazette in July 2016. However, there are few additional issues related to the recruitment policy and career advancement of teachers as suggested by the Nigvekar Committee which are still pending to be resolved. An understanding was developed between MHRD and ABRSM (Higher Education) to constitute a committee either by UGC or by MHRD to look into these important issues. This is particularly important in view of the fact that due to API-PBAS scheme, thousands of teachers in various universities and colleges across India are unable to get promotion and the recruitment at substantive posts has nearly become impossible. The shortage of faculty in the higher education sector is a critical problem and further accumulation of complexities is definitely unwarranted. The major hurdles are listed below:

**Table wise hurdles are as following:**

**Category I: Teaching, Learning and Evaluation Related Activities**

1. As per fourth amendment of the UGC after re-instating the workload, the Assistant Professor with 16 hours / week direct teaching workload can earn a maximum of 480 hours ( = 16 hours/week x 30 teaching weeks in an academic year) or 64 points ( = 480/7.5) against a maximum allocation of 70 points. Similarly, an Associate Professor/Professor with 14 hours/week direct teaching workload can earn a maximum of 420 hours (= 14 hours/week x 30 teaching weeks in an academic year) or 54. 2 points (= 420/7.75) against a maximum allocation of 60 points. This is nearly impossible given the total number of hours per week for a teacher as part of the direct teaching workload. This is not possible even without taking any kind of leave in the entire academic session. It is clear that this needs correction and rationalization.
2. In the Choice Based Credit System (CBCS) scheme, the final theory exam is of 3 hour duration and the end semester practical exam is of 3 hour duration. Further, each faculty member has to check a minimum of 25 copies in a day i.e., in nearly 8-9 hours. This means, every faculty member has to perform nearly 180 hours / year of invigilation duties in all, taking theory and practical exam duties together (i.e. 30 invigilation duties each in theory and practical exam in a year), apart from evaluating minimum of 25 copies in each semester. 30 invigilation duties each in theory and practical exam in an academic year for EACH faculty member is practically impossible as the number of duties to be performed are far less depending on the given batch size and course wise sanctioned strength. Moreover, accumulating a maximum of 200 points is therefore impossible for any teacher. Thus, this criterion must be rationalized.
3. Updating subject contents and courses doesn’t take place every year and each faculty member is **NOT** involved in this process. More so, under CBCS scheme the syllabus is designed and developed centrally at UGC level. Thus, it is very difficult to accumulate API scores under this category. Defining innovating teaching methodology is very subjective in nature. Calculation of API scores on this basis shall depend on the consent of authority which may also refuse genuinely accumulated points.

**Category II: Professional Development, Co-curricular and Extension Activities**

It is overlapping in nature. Moreover, as not all teachers have a knack of co-curricular activities, it is a fact that these professional committees only involve a handful of teachers who can really contribute to these. Therefore, giving points on the basis of these activities to the teachers must be supplemented with other activities usually conducted in the institution which are of more generic nature for ex., exclusive training programs for students of academic value, faculty improvement programs, university / college – industry interaction activities and programs designed by the faculty for out of classroom teaching / education beyond the direct teaching workload etc to name a few. It is also important to realize that as per the proposed model, the points to be earned under this category are more under the control of authorities than the teachers. This should not have been the case. The faculty must be given some autonomy to execute the chosen programs as per their own wisdom. **In this category, only public / popular lectures / talks / seminars are presently included. Yet, in the entire document, there is no reference of any API score to be calculated in respect of organizing good international and national conferences as Conference Chair / Co-Chair which support good international indices. This must be included as this is one of the major activity teachers are indulged in besides presenting contributory research papers and / or invited talks.**

**Category III: Research and Academic contributions**

As per third amendment of the UGC (page 39) and also the fourth amendment (page *2*6) – “…*Wherever relevant to any specific discipline, the API score for paper in refereed journal would be* ***augmented*** *as follows: (i) paper with impact factor less than 1 - by 5 points; (ii) papers with impact factor between 1 and 2 by 10 points; (iii) papers with impact factor between 2 and 5 by 15 points; (iv) papers with impact factor between 5 and 10 by 20 points: (v) papers with impact factor above 10 by 25 points. The API score for joint publications shall be calculated in the following manner: Of the total score for the relevant category of publication by the concerned teacher, the First and Principal / corresponding author / supervisor / mentor would share equally 70% of the total points and the remaining 30% would be shared equally by all other authors…”*

The constitution of standing committee to notify Refereed Journals and Other Reputed Journals for publication of research papers and articles by the UGC is a welcome step. Yet, it is observed that the proposed formula to calculate the API score for published research papers and articles is very complex. The institutions will need to appoint staff which shall be proficient in this calculation. Due to these reasons, there is confusion about calculation of points for Table III under API rules and it is floating around that API has been made so stringent that it is almost impossible to get career advancement. This is also due to the fact that API scores for contributory research papers in international and national conferences are done away with both in the 3rd and the 4th amendment of the UGC Regulations. It is a fact that papers presented in several reputed international conference proceedings (ACM, Springer & IEEE indexed with Scopus) have a far greater academic value than several international journals and these at present does not yield any point!!! Please note that various funding agencies such as UGC, DST, DBT, ICSSR, ICHR, CSIR, INSA and DRDO and several other organizations of Govt. of India have been very supportive in encouraging academic deliberations, discussion and exchange of ideas by financially supporting faculty members in organizing seminars/conferences/workshops etc involving paper presentation by researchers as well as faculty members from India and abroad. These agencies also provide travel support to researchers and faculty members to attend seminars/conferences/workshops etc in India and abroad. The papers presented in these may not always fall in the category of “Invited Lecture / Talk” and are often termed as Contributory papers. ***Therefore, contributory research papers presented in seminars / conferences / workshops etc financially supported by UGC / DST / DBT / ICCSR / CSIR / DRDO or any other organization of Govt. of India along with those which follow good international collaborations and also follow good national and international indices and other well established and old international conferences of repute must also be considered for promotion of teachers.***

A case study related to subject areas of humanities and commerce / management in particular becomes very important. As the research articles / papers are to be evaluated and augmented on the basis of impact factor under the API-PBAS scheme, keeping in mind that there is rarely any good journal and international / national conference proceedings in these subject areas which is issued global impact factors and international indices, the teachers shall never be in a position to get promotion based on these parameters. Thus, it is an attempt to neutralize career advancement to teachers at university and college level. Similarly, API scores for book writing have also been reduced drastically.

The 7th pay review committee MUST take note of the fact that the present API-PBAS scheme is a point based scheme which implements quantified score for every activity. It is well established that a teacher-researcher who has to his / her credit only few research papers published in Class A reputed international journals and conferences indexed with good reputed international indices and cited profusely is far better than a teacher-researcher who has a long list of research papers indexed poorly and cited only rarely. The present API-PBAS scheme does not differentiate between these two categories of teacher-researchers. Thus, it is a faulty scheme which only emphasizes upon quantity and not quality. The ABRSM is of the point of view that quantity and quality cannot go hand in hand and are mutually exclusive. Therefore, any attempt to examine the quality of teaching and research on the basis of quantified parameters will only give rise to academic corruption. It demands that the UGC must adopt a SIMPLE AND OBJECTIVE ASSESSMENT SCHEME to examine the issue of quality of teaching and research which is NOT based on quantified parameters. It is also important to note that as the Standing Committee shall be constituted by the UGC to monitor the publication of research papers in well qualified journals, accepting a minimum number of research papers in this category of journals should be accepted for promotion of teachers.

**Category III (C) Research Projects**:– In major research projects of interdisciplinary / applied nature, faculty members from diverse research backgrounds / expertise / subjects / institutions are involved and therefore **same points should be awarded to each Principal / Joint / Co-Project Investigators.**

**Additional points which are critically important to streamline higher education in the country**

1. The present API-PBAS scheme for recruitment and career advancement is undergoing various amendments. However, the UGC chose to implement this policy since 31st December 2008. The teachers who could not get their promotion during January 2009 - June 2013 (2nd amendment) and later between June 2013 – May 2016 (3rd amendment) and during July 2016 (4th amendment) due to multiple modifications in the recruitment and promotion policy during last six years are now stuck up without getting even a single career advancement in their life time. This is particularly due to the reason that all these changes have been enforced from a retrospective date, i.e., 31.12.2008. There is an urgent need to look into this problem given the fact that this is affecting thousands of teachers in different universities and colleges across India. It is important to note that the AICTE has already given relaxation from implementing API-PBAS promotion scheme to their teachers till 07.11.2015. The UGC must also consider giving a similar relaxation at least till 31.12.2015.
2. Although, the UGC has given one time relaxation from the NET exam to the Ph d holders who had completed their Ph d degree prior to 2009 and to those who have registered themselves prior to 2009, yet there are many universities in the country which have implemented the Ph d ordinance in their respective institutions at a later date. Due to this reason, there are many teachers who had completed their Ph d degrees or have registered themselves before enforcement of this ordinance in their respective universities but on a date later than 2009 will remain out of this relaxation. A sympathetic consideration must be given to these teachers as well.
3. The Nigvekar Committee has deliberated on the issue of ad-hoc and contractual appointments and has suggested the following in its report on page 48:

*“The committee has opined that the appointments in the central institutions should only be on regular basis except in cases of exigencies. In case of exigencies, such appointments should be made only for a maximum of two semesters and the candidates shall be selected as per the procedure laid down for regular appointments. The Committee reiterates that the contractual appointments should not exceed beyond 10% of the total sanctioned strength of the university in each category.”*

In view of the above, if the length of the service of a teacher which is spent in the ad-hoc capacity is not counted after having been appointed as permanent teacher, it shall be a big set back to the person who has devoted a long span of his / her lifetime to the teaching profession. The ABRSM is of the view that aforesaid Nigvekar committee recommendation must be implemented in case of ad-hoc / contractual teachers and their length of service spent as ad-hoc / contractual teacher be counted while considering the teacher for eligibility of promotion. An advisory to this affect by the MHRD must also be sent to all state universities as well so that this policy can be implemented across all Indian universities.

1. The Principals at present are appointed for a fixed tenure of 5 years which is further extendable to 5 more years after a successful peer review based appraisal. The ABRSM is of the view that the Principals should be appointed for a minimum period of ten years with a provision of one additional five year term. The working condition of such appointees should include a pay protection at the professorial level where principals are selected through due process and not continue in the position after a term.
2. The ABRSM is of the view that in the present era of restructuring and development economy with special skills and knowledge, the Government of India should increase financial assistance to the present programs as well as promote new educational programs in grant-in-aid institutions / universities / colleges. We are against self finance mode of education in any institution. The quantum of grants to be given to the education sector must be increased significantly in general and to higher education in particular.
3. Parity of librarians and physical instructors of the colleges, research associates and research scientists, systems analysts and systems programmers with the teachers be maintained in terms of pay structures, service conditions and promotions avenues etc.
4. In order to attract and retain the best talent, the retirement age of teachers be increased to 65 years uniformly throughout the country.
5. The new pension scheme imposed on those teachers who have been appointed after 1st Jan 2004 needs to be revisited. This scheme is a denial of the assured retirement benefits. ABRSM reiterates its demand for the restoration of old pension scheme for the teachers and scrapping of New Pension scheme of 2004.
6. The teachers working in the colleges and universities be exempted from the Ph. D course work or they should be granted full time leave to enable them to complete their Ph.D.
7. **7th Pay Recommendations for University & College Teachers**
8. The issue of pay package / pay scales to be given to university and college teachers by the 7th pay review committee must be de-linked with the service conditions. These scales should be implemented on the same lines as those proposed by the 5th pay review committee given to the teachers by Dr. Murli Manohar Joshi led MHRD of the NDA-I government.
9. The pay package should be such that it can attract and retain talent in the teaching profession in general and higher education in particular. In view of this, higher salary at the entry point as compared to employees of equivalent central government services must be given to university and college teachers.
10. At least four Assured Carrier Progressions (ACPs) must be given to teachers at higher education level. The first appointment should start at the level of Assistant Professor. The promotions should be at the level of Assistant Professor (Senior Scale Stage-I) followed by Assistant Professor (Senior Scale Stage–II), Associate Professor and Professor both at the university and college level. The ABRSM (Higher Education) is also of the view that every university should open a teacher training institute within the campus. A teacher appointed as Assistant Professor in the university departments or the colleges should first be given a one year intensive teacher’s training to enable them to take up the job more efficiently. In the present system, this aspect is clearly lacking due to not involvement of research scholars as teaching assistants in the university departments. The teachers completing their rigorous training program of one year duration successfully should be immediately given their first promotion as Assistant Professor (Senior Scale Stage-I) on joining of their duty like their counterparts in civil services and / or defence services. After a fixed stipulated number of years, the Assistant Professor (Senior Scale Stage-I) should be promoted to Stage-II and then to the level of Associate Professor and finally to the level of Professor, both in the university departments and in the colleges. This way, there should be no discrimination between a university and a college teacher. Among these teachers, those who qualify as outstanding and motivated teachers on the basis of an objective criterion can be promoted out of turn to the next higher scale / position within a less span of time or may be given extra increments. This is important to attract talent and to maintain quality in the higher education sector and at the same time giving recognition to a good teacher.
11. Before considering any pay package for university and college teachers, all anomalies which emerged out due to inherent faults in the 6th pay review committee recommendations implemented in 2010 by a gazette notification and its subsequent amendments carried out till July 2016, must be removed by the 7th pay review committee. This is very important due to the fact that in the presence of these anomalies, teachers will not get accurate fixation of their salary leading to huge financial loss for them. These anomalies must include all – financial anomalies and API-PBAS system related academic and administrative anomalies.
12. The University Grants Commission must ensure that all recommendations of the 7th pay review committee for university and college teachers must be implemented uniformly by all states of Union of India. Provision of special grants to state higher education boards under direct scrutiny of UGC may be implemented as it is observed that state government ministries do not enforce policies recommended and approved by the UGC across universities and colleges. Due to this, teachers teaching in state universities and its colleges suffer financial loss. This step is particularly important as UGC maintains the minimum standard and quality of the profession in the entire country.
13. The qualifications and the nomenclature of the posts once decided by the pay review committee and implemented by the UGC must be enforced on all higher educational institutions without any exception. It is observed that several institutions adopt these nomenclatures in different ways leading to multiplicity of names of the degrees with different requirement of qualifications. This is particularly true in case of private universities. This is necessary to maintain uniformity in qualifications and degrees to maintain minimum standards
14. To ensure quality of teaching, research based intensive Faculty Development Programs (FDPs) or Quality Improvement Programs (QIPs) for the teachers must be developed and implemented at least at the beginning of the profession. The old scheme of orientation and refresher programs conducted by different universities has now lost its utility. This must be replaced by subject specific FDPs / QIPs. For this purpose, special cells should be created to initiate, develop and execute these programs of 4-8 week duration. It is also observed that Head of the institutions usually do not sanction leave to teachers to join these programs. Therefore, a rule must be enforced on the Head of the institutions to relieve teachers to undergo the programs.
15. The faculty forms the backbone of any good educational institution. State Universities in most cases suffer from acute faculty shortages, both in terms of poor student-faculty ratios as well as a large proportion of faculty positions (out of those sanctioned) remaining vacant. In most cases, the lack of financial resources restricts the states from appointing faculty. Long bureaucratic processes for appointing faculty as well as ban on faculty recruitment in some states further exacerbate this problem. However, for any significant changes in quality, in some cases even for the routine functioning of institutions, it is necessary to appoint full time faculty in adequate numbers. Hence, the central government and states must ensure that the faculty positions are filled in a phase-wise manner. If any state has imposed a ban on regular recruitment of faculty, the state must ensure lifting of all bans on recruitment, and requisite proof must be produced. States must also present a coherent action plan to fill up all the vacant positions in a time bound manner. This should also take into account the ideal student faculty ratio and the states must be aware of this requirement. If any state has more than 15% faculty positions remaining vacant by the end of first year of UGC monitoring, such states may lose the entitlement for any further grants. The appointments made as well as the faculty already appointed must be remunerated according to UGC regulations and the latest pay scales as prescribed. It is further suggested that the procedural bottlenecks in the recruitment processes must also be actively eliminated. This approach should be promoted in the long run and appointments on contract basis should come to an immediate halt to arrest further degradation of school and higher education in the country.

As UGC is responsible for maintenance of minimum academic standards within the institutions of higher learning, it must enforce the correct teacher – student ratio. It is proposed that for undergraduate courses, at least one teacher be appointed for 25 students for social science and commerce subjects and for 20 students for science subjects. Similarly, for postgraduate courses, at least one teacher be appointed for 15 students for social science and commerce subjects and for 10 students for science subjects. For those courses involving laboratory work, one teacher be allotted a batch size of 12 students for undergraduate courses and a batch size of 10 students for post graduate courses. It is also necessary that this ratio must be strictly enforced on all institutions of higher learning – both public funded and private universities and colleges.

1. Research has now become an integral requirement of the teaching profession. However, it is observed that adequate research facilities are not available to teachers of the state universities and colleges. In the higher education sector, University Innovation Clusters should be set up in all geographical locations within a specific area. A particular state university of the area may be assigned to act as a nodal center of such a cluster, with a view to building an innovation network along with the industry, other universities and Research and Development (R&D) laboratories operating in that area or in vicinity. This would ensure optimum use of human and infrastructural resource. An Innovation Incubator should be established to create the necessary linkages between the state university in question, relevant local / national industry, research labs / Institutions, civil society and the government. The funding for such initiatives on creating clusters and incubators may be realized through Public Private Partnership (PPP). For state universities / institutions located in remote / rural / less developed areas, special steps should be taken to develop their human resource and infrastructural capacities. These steps may include 'mentoring' by reputed National Institutions / Labs / Industry / Individuals etc. A concerted and collective effort may be made by the state universities and research institutions located in various geographical regions to access, coordinate and develop cross border resources and knowledge pools. Measures like incentive networking with the cross border academic and research institutions and exchange of scholars, professionals and experts could be undertaken in order to facilitate the same. To encourage university ‐ industry partnership, adequate measures should be taken including the fiscal incentives. This will expose the teachers particularly those belonging to state universities to the latest research in their respective domain and will help out them to be update with the latest knowledge. The teachers must also be exposed to the issues of Intellectual Property Right (IPR) and plagiarism as they are now more into research activity. Presently, it is observed that they are not well versed with these issues. Special training programs must be conducted by the universities to sensitize teachers on these issues.
2. To effectively manage the state higher education system, the states should be advised to set up State Higher Education Councils (SHECs). State Councils may be formed through an executive order, in the beginning, but within five years they must be converted into statutory bodies by Act of the State Legislature. These Councils will perform multiple roles such as strategy and planning, monitoring, evaluation, disbursal of funds, recruitments of faculty and other staff of school / college / university etc. The setting up of these State Higher Education Councils and the appointments within these on different posts must be in tandem with the prescribed guidelines as stipulated in the RUSA document.
3. Effective grievance redressal mechanisms for teaching and non – teaching staff need to be set up on a priority basis in every educational institution. This will decrease the administrative load from the management and staff would have a fair chance to address its concerns in a more meaningful manner. Although, school tribunals are working in center and many states, this aspect needs immediate attention in the higher education sector.

Looking forward to an early resolution of these issues

With profound regards



 **Prof Pragnesh Shah**

 **Secretary (Higher Education Wing)**