

ALL INDIA PEOPLE'S SCIENCE NETWORK (AIPSN)

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5.2.2021

To
Prof. Rajnish Jain
Secretary UGC
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Sub: **Response on the draft ABC from UGC**
Ref: Yr Lr F.No 14-31/2018(CPP-II) dt 21 Jan 2021

Based on the request in your above referred letter (https://www.ugc.ac.in/pdfnews/5768188_ABC-Regulations.pdf) from the UGC site, please find attached the response from AIPSN on the [draft regulations to establish and operationalise the Academic Bank Credit Scheme](#).

Do acknowledge the receipt of this document.

*Look forward to having all the inputs received made available publicly.
We call upon UGC to abandon this flawed centralised Academic Bank Credit and instead initiate a discussion with the stakeholders to enable the credit system to first function properly*

Yours sincerely

P.Rajamanickam
General Secretary, AIPSN

A Network of 40 People's Science Movements working in 25 states

AIPSN Response to

Draft UGC (Establishment and Operationalisation of Academic Bank Credit (ABC) Scheme in Higher Education) Regulations 2021

The UGC during the pandemic period has brought out the [draft regulations to establish and operationalise the Academic Bank Credit Scheme](#) on 21 Jan 2021 and [has asked for feedback from stakeholders by 5th Feb 2021 via the gmail id](#) abcregulations2021@gmail.com

The response from AIPSN is given in two parts: a) Procedural inconsistencies and b) Long term deleterious impacts

A. Procedural inconsistencies

1. **A democratic exercise has once again been hijacked and made a mockery of in a process that has become familiar.** Force a bill, act, ordinance, directive without any discussion to plead that it is good for the nation, farmer, academic, student, teacher worker. The farm laws have met unprecedented resistance. But that has also given the backdrop to take attention away from matters related to other issues. It is for this reason that the government released the Science, Technology, Innovation Policy document on 31st Dec 2020 with only 3 weeks to respond- the date being extended by eleven more days under demand. The same has now happened with this UGC ABC draft regulations being put up on 21st January on the UGC website with the last date to respond is 5th February, 2021 with not even a press announcement for such an important document!"

2. The question naturally arises **what is the urgency? There has to be more time given especially as colleges and universities are not fully functioning due to the pandemic.** As it is a scheme that is meant for students, **the students need to be involved in the discussion.** The time could be given till 30th April 2021 and then the responses can be made public before a new draft is circulated.

3. There is no postal address and contact person. **The online access and internet access in India is not uniform across the country and in different social strata.** A postal address and contact person must be specified for students and others to respond offline also.

4. It is surprising that **UGC has chosen a gmail id for soliciting responses rather than use an official government email id or website for the responses.** If UGC does not have this capability even, how is it going to operationalise the online Academic Bank Credit? **Or is it an indication that ABC will be outsourced to a private party?**

B. Long term deleterious impacts

5. The Academic Credits are a way to standardize and make education like an assembly line process borrowed from the predominantly commercial education system. **The major limitation of the credit system is that it fragments knowledge** as has been acknowledged in the [World Bank report on American Credit System in Higher Education brought out in 1992](#). What we really need is a discussion on the need and the modification needed in the functioning of the credit system.

6. **In India the Choice Based Credit System (CBCS) is poorly functioning at most in a token manner and mostly a disaster** in many Universities and colleges. It **has been a failure** considering that it does not motivate the student nor does it go towards enriching knowledge skills or broader understanding. Even within a University or College there is no possibility of transferring credits. Building on this to bring about an external centralized institution called the Academic Bank Credit for trying to transfer credits across institutions is clearly **not based on the reality of what exists**.

7. In the US which pioneered the use of the credit system, completing the first two years of a degree at one institution, usually a community college, and then moving to another, is very common. There is a [National Institute for study of Transfer Student](#) that has tried to create website to facilitate transfer. Most States of the USA have a range of approaches from informal efforts of transfer students to more formal institution-based agreements or state-mandated policies. **But there is no centralised Credit Bank in the USA that is involved in the transfers.**

8. In China the credit transfer and inter institutional course selection or student exchange has been limited to smaller universities and those in geographical proximity. This was initiated as part of the Chinese National Outline for Medium and Long-term Education Reform and Development (2010-2020). The goal was mainly towards life long education as in Korea. [A study of four such initiatives in China](#) concluded “procedures and systems related to credit transfer need to be formulated taking into account China's actual situation in regard to college entrance and school registration management, thereby ensuring the reliability and credibility of credit transfer”. **The Chinese systems do not involve any Centralised Credit Bank.**

9. The most successful credit transfer system in place is the [European Credit Transfer System](#). It is a central tool in the [Bologna Process](#), which aims to make national education systems in Europe more comparable internationally. The ECTS grading systems do not replace the local grading systems, but they provide a supplement to local grades, for example, on a transcript of records. It simply provides equivalences and makes degree programmes and student performance more transparent and comparable across all countries that are members of the European Higher Education Area (EHEA). **The ECTS credit system does not involve any Centralised Credit Bank.**

10. The **Academic Credit Bank System (ACBS)** was started in **Republic of Korea** in 1998 to **augment a lifelong learning. It is a degree granting body.** A [recent review in 2019](#) has indicated that the system given the **social stratification does not assure equality of outcomes** though it theoretically provides equality of access. If this is the case in Korea, **in the highly stratified Indian society full of inequities** which has also been pointed out by Babasaheb Ambedkar, this current initiative of **UGC Academic Bank Credit will only further exacerbate the inequalities of outcomes.**

11. The ABC of UGC is a virtual bank (*see 5.1 ‘ABC shall be a digital/virtual/online store-house entity of credit data base of HEIs with students as its stakeholders’*). It is not a degree granting body (*see 5.4. ABC shall not be, by itself, a Degree-awarding organisation; The Statutory degree-awarding power shall continue to be vested with the eligible HEIs which have registered with ABC*). This **therefore does not make it suitable as a vehicle for lifelong education.** Ultimately the **student will be forced to run around between institutions** to get the degree for which the credits are entitled as the ABC will need the HEIs to communicate the credits to the ABC (*see 6.1 However, ABC shall not accept any credit course document directly from the students and shall entertain*

such documents as valid only when they are transmitted by the respective, registered HEI awarding the credits).

12. A fee will be charged to the student to keep the credits in the ABC (*see 8.11 'There would be a credit processing fee to be paid by the registering student to ABC for maintaining the student's Academic Bank Account and related functions. It would be fixed appropriately to encourage maximal usage of the ABC scheme by students'*). **No mechanism has been spelt out to keep the course fees affordable for economically and socially underprivileged students.** This would be a further burden on the students and would work against the utilisation by the marginalised groups further increasing the educational divide.

13. The Higher Education Institutions (HEIs) which are part of the ABC system are those which have the NAAC grade of 'A'. Only 205 out of a total of 875 Universities are eligible which is just 23% of the Universities. In the case of colleges 1844 have greater than A grade out of total 38498 colleges, that is just 5% are eligible. **This scheme is elitist in concept and implementation.**

14. In theory, this UGC ABC sounds as if it is very useful and revolutionary. **In reality it will not help first generation students.** It will benefit 3rd or nth generation learners as they will be able to navigate the system better both conceptually and financially. City based students would fare better in using this ABC than rural students. **In general, this UGC ABC will increase the educational divide in society along caste, minorities, and rural fault lines.**

15. AIPSN calls upon UGC to abandon this flawed Centralised Academic Bank Credit and instead initiate a discussion on the enabling the credit system to first function properly for even in the words of Abbott Lowell who was President of Harvard University in USA: "*The real unit is the student. He is the only thing in education that is an end in itself*".

For clarifications contact:

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