



KERALA PRIVATE COLLEGE MANagements' ASSOCIATION

(Registered under Travancore-Cochin Literary Scientific & Charitable Societies' Registration Act XII of 1955 Reg.S.No.Tr.12 of 1960, 03-05-1960)

E mail : kpcma1960@gmail.com

PRESIDENT

Dr.M.E.Kuriakose
Secretary,
M.O.C Colleges,
Catholicate Aramana,
Devalokam (Po),
Kottayam-686 004
Mob.9447101513

GENERAL SECRETARY

Dr.M.Usman
V/427 Camp Office,
Schoolparamba,
Pazhamallure (Po)
Malappuram Dt.676 506
Mob.9447255581

TREASURER

Rev. Sr.Dr.Vinitha CSST
Director,
St.Teresas' College,
Park Avenue, Marine Drive ,
Ernakulam- 682 011
Mob.9961441698

VICE PRESIDENTS

1.Sri.G.Somarajan

Administrative Officer, S.N.Trust,
Kollam-1

Cell: 9846328700

2.Dr.P.A. Fazal Gafoor

President,

M.E.S, Calicut-1

Cell: 9847233800

3.Sri.P.A.Hilal Babu

Secretary & Manager

M.S.M College,Kayamkulam

Cell: 9846002725

4.Sri.C.P.Kunhimohammed

Manager,

Farook College (Autonomous)

Farook College (Po), Calicut.673632

Cell: 9895099990

JOINT SECRETARIES

1.Manager

Mar Ivanios College

Thiruvananthapuram- 15

2.Fr.James John Mangalath

Principal,

St.Thomas College,Palai- 686575

Cell: 9447140857

3.Sri.O.Abdul Ali

Manager,

KAHM Unity Womens' College

Narukara (Po), Manjeri-676122

Cell: 9895478080

CHIEF ADVISOR

Prof.R.Prasannakumar

(Former President KPCMA . Former

Secretary,

N.S.S.Central Committee of Colleges),

MRA No.21, Mythri Nagar,

Perunna East, Changanasery-686102

Cell: 9847053949

No: KPCMA/UGC –FHEI 2023/1

Dated 16-01-2023

To

The Secretary

University Grants Commission, New Delhi- 110002

Sir,

Sub: Submitting comments / suggestions / feedback on Draft UGC Regulations 2023 on Setting up and Operation of Campuses of Foreign Higher Educational Institutions in India .

Ref: Letter No.1-3/2022(NEP) dated 5th January, 2023 of Secretary, UGC.

With reference to the above,**The Kerala Private College Managements' Association** (the organization of the representatives of various Managements of Government Aided Colleges of Kerala) submit herewith the following for your kind perusal and necessary action.

Thanking you

Your's faithfully

Dr.M.Usman
(General Secretary)



KERALA PRIVATE COLLEGE MANagements' ASSOCIATION

Comments / suggestions / feedback on Draft UGC Regulations 2023 on Setting up and Operation of Campuses of Foreign Higher Educational Institutions in India

Comment. 1

On the basis of the guidelines for Internationalization of Higher Education 2021, U.G.C has already brought out the Regulations on Academic Collaboration between Indian and Foreign Higher Educational Institutions to offer Twinning, Joint Degree and Dual Degree programmes on May 2nd 2022. The implementation of these Regulations has not yet started in different states. This is only in the experimental stage now. We are of the view that the implementation of the Regulations 2023 on setting up and operation of Campuses of Foreign Higher Educational Institutions in India is to be carried out only after drawing lessons from the implementation of the Regulations on Academic Collaboration between Indian and Foreign Higher Educational Institutions to offer Twinning, Joint Degree and Dual Degree programmes 2022. Otherwise it will create utter confusion and chaos in the Indian Higher Education scenario.

Comment.2

While the Indian higher educational institutions are to comply with several laws enacted by the Centre and States and rules and regulations framed by regulatory agencies in setting up and operating in India, the current draft gives unbridled freedom in many respects for the foreign higher education institutions to set up and operate in India. Thus the present draft denies a level playing ground for the Indian educational institutions to compete with their foreign counter parts in India. It will have devastating effects on equity and access to higher education in India in the long run.

Clause wise Suggestions

The title of the Regulations may be changed to: '**University Grants Commission (Setting up and Operation of Campuses of Foreign Universities in India) Regulations, 2023**', so as to allow entry only to universities and not all foreign higher educational institutions. Hence clause 2.7, clause 2.8 and the term '**Foreign Higher Educational Institutions(FHEIs)**' are to be deleted from the Draft, wherever applicable.

Clause 3.1 is to be modified as : the applicant foreign university should have secured a position within the top 200 of overall / subject-wise global rankings, as decided by the Commission from time to time.

Clause 3.2 is to be deleted.

The third bulleted point in Clause 4.2 is to be modified as: In the case of a course or programme disruption or discontinuation or closure of the campuses, details of the alternative arrangements to safeguard the interests of the affected students, faculties and staff, including reallocation to the course or programme;



In Clause 4.2, sub clause (ii) is to be modified as: the qualifications awarded to the students in the Indian campus shall be the same as the corresponding qualifications awarded by the university in the main campus located in the country of origin for all purposes, including higher education and employment.

The Standing Committee stipulated as per clause 4.3 shall be constituted with due representation of all stakeholders from all states in India so that every state Government has a say with respect to the setting up of campuses of Foreign Universities in their states.

Clause 5.1. is to be modified as: The campus of Foreign Universities may evolve their admission process and criteria to admit domestic and foreign students in consultation with the respective State Higher Education Councils.


Clause 5.2. is to be modified as: It shall decide the fee structure in consultation with the respective State Higher Education Councils, which should be transparent and reasonable.

Clause 7.7 is to be modified as: The Foreign Universities should arrange for adequate physical infrastructure in terms of built-up space for their academic programmes and they should operate as stand- alone institutions.

Clause 7.13. is to be modified as: It shall submit Annual Quality Assurance Report to the Commission and undergo a quality assurance audit based on these at the time of an extension.

Other Suggestions

1. The equivalency issues related to foreign degrees awarded by Foreign Universities through their campuses in India are to be settled in a time bound manner.
2. The national and social interests and the constitutional commitment of India to ensure equity and justice to all are to be safeguarded while granting permission to foreign universities to set up campuses in India. Adequate measures for the promotion of equity and access to quality higher education for the weak and marginalized sections are to be taken and appropriate rules are to be framed by Government and University Grants Commission in this regard.
3. The land for setting up campuses of Foreign Universities are to be made available by rent or lease only without ownership, subject to the rules and regulations existing in different states.
4. A review of the entire scheme is to be made by University Grants Commission on the basis of objective norms after a period of ten years.



Dr.M.Usman
(General Secretary)



Dr. M.E.Kuriakose
(President)

