

## Chapter 3

### Accreditation of Universities and Affiliation Process

- **UGC Regulations 2012 and AICTE Regulations 2014 provide for mandatory accreditation of the University and the technical programmes of the University from NAAC and NBA respectively. Audit observed that the three sampled Universities and affiliated colleges of the GGSIPU had been functioning for significant time periods without mandatory NAAC/NBA accreditation.**
- **The existing mechanism of Joint Assessment Committee (JAC) inspections to ensure availability of required physical and academic infrastructure in affiliated colleges was inadequate as there were cases of favourable grading by JAC, non-compliance of recommendations of JAC reports and absence of facilities for persons with disabilities in sampled affiliated colleges.**
- **Audit observed delays at every stage of the annual affiliation process- submission of application by applicant colleges, constitution of JAC and its reporting, grant of NOC by the Government, and issue of affiliation by GGSIPU.**
- **There were significant delays in revision of Policy guidelines and constitution of the Admission Regulatory Committee and the State Fee Regulatory Committee by the Government.**

#### 3.1 Accreditation of Universities

University Grants Commission (Mandatory Assessment and Accreditation of Higher Educational Institutions), Regulations, 2012 provides for mandatory accreditation for each Higher Educational Institution (HEI) from an Accreditation Agency after passing out of two batches or six years, whichever is earlier. National Assessment and Accreditation Council (NAAC) accreditation is mandatory for getting grants under Section 12B of the UGC Act. Similarly, All India Council for Technical Education (Mandatory Accreditation of all programmes/courses in Technical Education Institutions/University Departments, etc.) Regulations, 2014 makes it mandatory for all technical education institutions to get all its programmes / Courses accredited by its Accreditation Agency (National Board of Accreditation) after passing out of two batches or six years, whichever is earlier.

All the three sampled Universities had significant periods without the mandatory NAAC/NBA accreditation. Details are in the **Table 3.1**.

**Table 3.1: Periods without accreditation**

Name of University	Type of accreditation	Total Courses/No. of Courses without accreditation	Period without accreditation	Remarks
GGSIPU	NAAC	Accreditation is for the University.	2018-23	University did not apply for NAAC accreditation.
	NBA	30/30	2018-23	University did not apply for NBA accreditation
DTU	NAAC	Accreditation is for the University.	2015-19	University did not apply for NAAC accreditation
	NBA	42/24	2018-23	Student teacher ratio not meeting the NBA requirements and corresponding UG programme for PG programmes not NBA accredited.
DPSRU	NAAC	Accreditation is for the University.	2020-23	University applied for NAAC accreditation in November 2022.
	NBA	4/4	2020-23	University did not apply for NBA accreditation.

Apart from the above, 50 out of 88 institutions affiliated with GGSIPU were functioning without NAAC accreditation and 102 technical courses/ programmes run by 28 of these affiliated institutions were being offered without NBA accreditation.

Lack of accreditation to these Universities/institutions/programmes deprived them of a third-party assurance with regard to the quality of education provided by them, which may discourage students from enrolling in these Universities/programmes. Further, UGC Regulations 2012 and AICTE Regulations 2014 provide for withholding of all grants and financial assistance to institutions without NAAC and NBA accreditation respectively. Also, there is provision for cautioning potential candidates seeking admission to institutions running courses, without NAAC/NBA accreditation, through various forms of the media.

The Department stated (March 2025) that the non-availability of accreditation from NAAC did not affect the quality of functioning of the GGSIPU and as regards NBA accreditation, the five University schools, running technical programmes, have already taken steps to go for NBA accreditation from coming academic session January 2026 to July 2026 by complying the required parameters. The University has issued an advisory to all affiliated colleges encouraging them to obtain NAAC and NBA accreditations.

DTU attributed (March 2024) non-accreditation (NBA) of 24 technical programmes to low Student Teacher Ratio, the corresponding UG programmes not accredited in case of PG programmes, and a smaller number of admissions in the programmes. Further, the Department stated (March 2025) that the process of appointment/recruitment of teachers has already been started by the DTU to improve the student-teacher ratio.

DPSRU stated (May 2023) that Department/School-wise committees were formed in November 2022 to obtain NBA accreditation, but no further progress was made. The Department stated (March 2025) that it acknowledges the concern about the accreditation of the University.

It is thus evident from the above that the Universities were extremely matter-of-fact about the need for obtaining NAAC/NBA Accreditation, impacting the quality of education imparted as well as financial loss due to ineligibility for Union government grants in the absence of accreditation.

### 3.1.1 Non-receipt of Section 12B status from UGC

Section 12B of UGC Act provides that no grant shall be given to a University that is established after the commencement of the University Grants Commission (Amendment) Act, 1972, unless the Commission has, after satisfying itself as to such matters as may be prescribed, declared such university to be fit for receiving such grants. Further, UGC Regulations 2012 stipulate that no university shall be notified or recognized under Section 12B of the UGC Act, if not duly accredited by NAAC.

Audit observed that DPSRU initiated the process for recognition under Section 12B of the UGC Act in August 2015 and got NAAC accreditation only in August 2023. It was yet to get recognition under Section 12B from the UGC, rendering it unfit for obtaining UGC Grants.

The Department stated that DPSRU submitted (November 2023) the compliance report to observations of UGC regarding recognition under Section 12B of the UGC Act, and the final decision of UGC was awaited.

GGSIU and DTU were recognised under Section 12 B in March 2001 and December 2012, respectively.

***Recommendation 5: The Universities should fix timelines for obtaining NAAC/NBA accreditation for the programmes under them, strengthen the mechanism for granting affiliation and fix timeline for notification of fees.***

### 3.2 Process of Affiliation of Institutions to GGSIPU

Chapter 3 of UGC Act clause (12A) (1) (a) states that ‘affiliation’ includes, in relation to a college, recognition of such college by, association of such college with and admission of such college to the privileges of a university. Various commissions viz. Radhakrishnan Commission (The university education commission) (1948-49) and Kothari Commission (Education commission),

1964-66 suggested phasing out the affiliating system. The National Education Policy (NEP) of 2020 recommends phasing out the affiliation system of colleges over a period of 15 years. The NEP's goal is to make all colleges autonomous degree-granting institutions.

However, GNCTD has yet to set out any policy regarding grant of autonomy to affiliated institutions as it contends that Section 5 (14) of the GGSIPU Act empowers GGSIPU to declare colleges and institutions as autonomous.

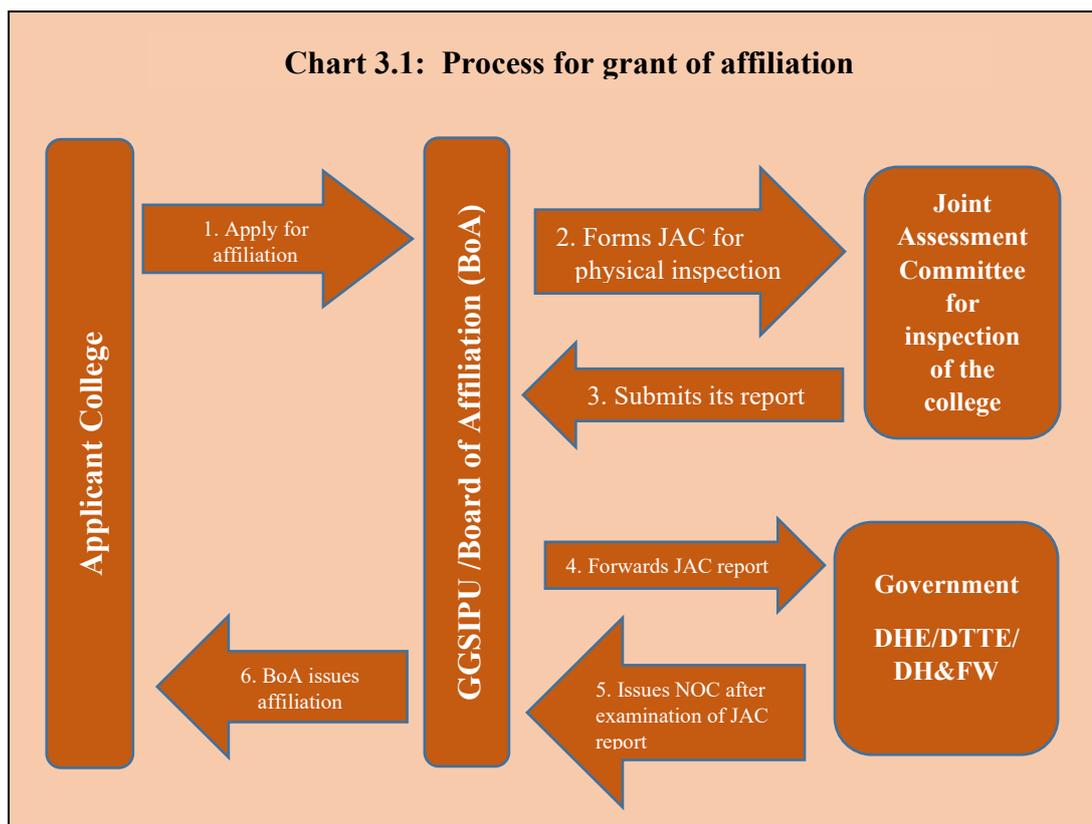
The procedure and issues related to affiliation granted by the Guru Gobind Singh Indraprastha University (GGSIPU), the only University of GNCTD that grants affiliation to government-aided and self-financed institutions that impart higher education and technical education, were examined during this Audit.

As per extant rules, institutions are required to obtain affiliation for each programmes/course of study separately and the process of affiliation is aimed at ensuring that the institutions seeking affiliation have all the facilities required for quality education as per the norms prescribed by the regulatory bodies concerned such as land and building, adequate classrooms and manpower, laboratories/workshops, library, etc. As per Section 4 of the GGSIPU Act 1998, the University can grant affiliation to any institution in the National Capital Region that agrees to abide by GGSIPU's Statutes and Ordinances.

During the academic year 2022-23, 25 government-aided colleges and 88 self-financed colleges (19 located outside Delhi state limits) were affiliated with GGSIPU. Out of 94 affiliated colleges located in Delhi, 14 colleges (two government-aided and 12 self-financed affiliated colleges) detailed in **Annexure 1.1** were sampled for detailed scrutiny using the Simple Random Sampling Without Replacement (SRSWOR) method with IDEA software.

### **3.2.1 Affiliation to Institutions**

The process of granting affiliation to applicant institutions is governed by Policy Guidelines (January 2016) of the Directorate of Higher Education (DHE), GNCTD and Ordinance 1 (November 1999) of GGSIPU. Various stages in the grant of affiliation by GGSIPU to applicant colleges are depicted in **Chart 3.1**.



Issues observed in audit regarding the affiliation process are discussed in the succeeding paragraphs.

### 3.2.2 Functioning of Joint Assessment Committee and compliance with their reports

Ordinance 1 of the GGSIPU and Policy Guidelines of DHE for the issue of No Objection Certificate (NOC) by DHE/DTTE and allied matters of privately managed self-financed institutes bring out the report of the Joint Assessment Committee<sup>1</sup>, after the physical visit to the premises of the applicant college/institute to verify the available physical and academic infrastructure, is the basis for the grant of NOC by the Government and thereafter affiliation by the University.

As per the Policy Guidelines (January 2016) of DHE, GNCTD, the Institutions securing Category A and Category B in the inspection report of JAC during the last three preceding years were eligible for grant of revalidation of NOC for five years and three years respectively. As per the prescribed format of JAC, to secure Category A, an institute had to score 75 *per cent* or above in Part-II (Academic Standards and Infrastructure) and Part-III (Compliance of observations of previous

<sup>1</sup> A committee formed by GGSIPU chaired by retired IAS/DANICS and consisting of subject experts and convener from GGSIPU for physical visit of the premises of applicant self-financed institutions.

Academic Audit and JAC report) of the JAC report separately and for Category B, less than 75 *per cent* but above 65 *percent*<sup>2</sup>.

Securing Category C (with a score of above 50 *percent*) in the JAC report is sufficient to obtain NOC/affiliation.

The inadequacies of the present mechanism of accreditation, JAC functioning, adequacy of their reports and compliance to JAC observations by the applicant colleges are discussed in the succeeding paragraphs.

**(i) Deficiencies in JAC assessments**

Audit observed deficiencies in assessment by the JAC in sampled self-financed applicant/affiliated colleges as under:

(a) JAC report on **Periyar School of Architecture, Jasola** (B. Arch. 5 years' course) for Academic Session 2022-23 revealed that parameters of availability of labs/workshop and students' grievance mechanism (which are part of the JAC report proforma) were excluded while making the assessment. Further, although no Director had been appointed, the institution was given 50 marks out of 100. Similarly, 50 marks out of 100 were given for Faculty Cadre Ratio and Student Teacher Ratio, though there was no faculty in the college. Thus, the aggregate of marks awarded in Part-II of the JAC report to Periyar School of Architecture was 536 out of 800 (Score of 67), while if correct scores were given, it should have been 386 (536 – 150) out of 1000. As a result, the Institution was given a score of 67 instead of 38.60 in Part II of the JAC assessment which placed it in Category B instead of Category D. Falling under Category D would have made the applicant college ineligible for affiliation, but incorrect grading allowed the said institute to obtain an NOC and affiliation.

(b) Similarly, in case of JAC report on **Bhartiya Vidhya Bhawan** (first time applicant) for four new courses for the Academic Session 2022-23, instead of awarding zero marks for presence of a Director, Faculty Cadre ratio and Student Teacher Ratio, as there was no Director or faculty, these parameters were excluded in assessment and the scoring was done on the basis of maximum marks of 670 instead of 970<sup>3</sup>. With 647.50 marks out of 970, the Institution's Part-II score should have been 66.75 (647.50/970), instead of 96.64 (647.50/670) given by the JAC. As a result, Bhartiya Vidhya Bhawan was erroneously placed under Category A by the JAC instead of Category B.

In its reply, University stated (January 2024) that as affiliation was granted to Bhartiya Vidya Bhawan for the first time for Academic Session 2022-23 and in case of Periyar School of Architecture, no student was admitted during Academic

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<sup>2</sup> In case of score above 50 *per cent* and upto 65 *per cent*, category C is granted. For score less than 50 *per cent*, Category D is granted, which puts the concerned applicant college in no admission category.

<sup>3</sup> Parameters with maximum marks of 30 relating to students' grievance resolution was excluded as students were yet to enroll.

Session 2021-22 and in view of aftereffects of Covid-19 pandemic, JAC took a holistic view of the situation while grading these two institutes for Academic Session 2022-23.

Further, the Department stated (March 2025) that in case deficiencies pointed out by JAC are not removed by the Institute, it affects the grading of the Institute, which in turn is the criterion for deciding the fee to be charged by the Institute. Further, it was clarified in respect of incorrect grading awarded to Periyar Institute and Bhartiya Vidya Bhawan by the JAC that such grading does not influence the seat intake of the institute as recommended by the JAC.

Reply is not acceptable as it is evident that grading for both the said Institutes vitiated the prescribed procedure/format of the JAC mechanism (report not based on the availability or otherwise of the infrastructure on the day of JAC visit), and arbitrary marks had been awarded to make them eligible for affiliation. Further, no evidence was shared in support of adverse gradings impacting the fee structure approved for the affected institutions.

(c) Clause 1.1 (iii) (j) of the Policy Guidelines (January 2016) of DHE stipulates that **buildings** of the applicant institutes should be **Divyang/disabled friendly**.

Audit observed that the JAC reports for the academic years 2018-19, 2019-20 and 2022-23, mentioned availability of facilities/infrastructure for persons with disabilities (PwD) in applicant colleges merely in terms of percentage availability and not the specific facilities available. Further, as per the JAC reports, 10 out of 12 sampled affiliated colleges did not have the requisite facilities for PwD during 2018-23. This hindered the envisaged objective of the provisions of the Rights of Persons with Disability Act 2016 and Policy Guidelines of DHE, to maximise academic and social development of PwD consistent with the goal of full inclusion.

In its reply, University stated (January 2024) that in case the deficiencies pointed out by JAC are not removed by the Institute it affects the grading of the Institute, which in turn is the criteria for deciding the fee to be charged by the Institute. University further mentioned that it has incorporated separate marks for facilities for persons with disability in the JAC proforma for the Academic Session 2023-24.

The Department stated (March 2025) that GGSIPU has issued an advisory to all the affiliated institutes/colleges to ensure requisite facilities/infrastructure for persons with disabilities and will also take up the matter with the District administration (being the nodal agency) for effective implementation of the directives.

(d) According to UGC (Affiliation of Colleges by Universities) Regulations, 2009 and Policy Guidelines (May 2011 and January 2016) of DHE, GNCTD, the applicant institutes should have undisputed ownership and possession of land measuring not less than 1.5 acres. Also, Part-I of the JAC report's proforma provides for ownership of land by the applicant institutes as per prescribed norms. Audit observed that six out of 12 sampled self-financed institutions, i.e. 50 per cent of the audit sample, did not have the minimum area of land of 1.5 acres

(Annexure 3.1) thus making them ineligible for grant of affiliation. Additionally, the Fifth State Fee Regulatory Committee, while deciding the fee to be charged by the self-financed institutions, also observed (November 2021) that 42 out of 66 institutes, i.e. 64 *per cent*, were operating with less than the prescribed 1.5 acres of land (Annexure 3.2).

The Department reiterated (March 2025) GGSIPU's reply that 38 out of 42 mentioned institutes were affiliated with the University before the issuance of policy guidelines of DHE (January 2016) and a clause for the minimum requirement of land was added in January 2016 and thus applicable from session 2016-17.

The reply of the University is inaccurate as the clause for the minimum requirement of land (in pursuance of UGC Regulations 2009) was present in the Policy guidelines of May 2011 too. Further, as affiliations by GGSIPU are granted on an annual basis during the review period, compliance with the clause should have been ensured for affiliations granted from 2016-17 onwards.

(e) Statute 24 of the GGSIPU provides that no college or institution shall be admitted to the privileges of the University unless it has **teachers and other employees** who have **prescribed qualifications**, fulfil eligibility criteria and are available in the required numbers as per the norms laid down by the University from time to time.

From the data/information provided by GGSIPU, Audit observed that 22 out of 88 i.e. 25 *per cent* of the affiliated self-financed institutions were running without adequate faculty (March 2023) for 13 programmes. These 13 programmes included programmes in the field of technology, education (B.Ed.), management, law and general graduate courses.

Audit also observed from the information made available by the 12 self-financed colleges selected for audit, that many faculty did not have the requisite qualification during 2021-22 and 2022-23. In 2021-22, 28 *per cent* of Associate Professors in two colleges did not have a PhD as required whereas 19 *per cent* of Associate Professors in four colleges were without a PhD in 2022-23. Similarly, during the Academic year 2021-22, 35 *per cent* of Assistant Professors in nine out of 12 sampled self-financed affiliated colleges did not have the required NET qualification or PhD whereas this deficiency was 17 *per cent* in eight colleges during 2022-23.

Appointment of faculty with lower than prescribed academic qualifications was not only in contravention of UGC regulations but also compromised the quality of education being imparted.

In its reply, University stated (January 2024) that while audit observation is noted for compliance in future, the University ensures maintenance of the prescribed student-teacher ratio and presence of qualified faculty in affiliated colleges through the mechanism of JAC reports and their compliance. The reply is not borne out by facts as examination of available records revealed that faculty without required

qualifications were recruited in several self-financed institutes. Further, inefficiencies in the JAC process have already been discussed in earlier paras. The Department stated (March 2025) that GGSIPU has issued an advisory to all affiliated colleges to maintain the prescribed student-teacher ratio.

**(ii) Non-compliance with issues raised in JAC reports and other deficiencies observed during the Joint Physical inspection of affiliated colleges**

The status of compliance of JAC reports noticed by Audit during the joint-physical inspection (December 2023) of two sampled government-aided affiliated colleges is as given in **Table 3.2**.

**Table 3.2: Non-compliance to issues raised in JAC reports and other deficiencies**

Sl. No.	Name of Institute	Year of JAC report	Percentage of compliance with the JAC report	Issues not resolved by the institute
1.	Panna Dai School of Nursing <sup>4</sup>	2023-24	55	The School did not ensure compliance regarding (a) up-gradation of infrastructure of the computer lab, library, other laboratories and (b) obtaining of requisite statutory certificates like structural safety certificate, earthquake resistance certificate and fire safety certificate.
2.	Dr. BSA Medical College <sup>5</sup>	2022-23	85	Lift/ramp to provide access to Persons with Disability to the First floor
		2023-24	75	Campus of the college is built in four temporarily constructed blocks and the college was to ensure the establishment of a permanent college building.

Other deficiencies observed during physical inspections are as under:

<sup>4</sup> The School was given affiliation for the first time for Academic Session 2022-23 with Category C. For 2023-24, it also received category C.

<sup>5</sup> The College received Category A throughout the period 2018-24.

### **Panna Dai School of Nursing**

1. The building of the School was old, with cracks in the wall and dampness. Hostel rooms on the ninth (top) and seventh floors were not allotted to students due to their damaged condition or non-availability of electricity in those rooms.

2. The School took up (October 2023) the matter with the Medical Director of Deen Dayal Upadhyay Hospital for up-gradation of existing



infrastructure, informing that third to ninth floors of the building required urgent construction/ repair.

3. The solar panels installed at the roof top of the building were not functional.

### **Dr. BSA Medical College**

1. The College had no fire safety certificate.

2. The posts of Librarian, Assistant Librarians and Library Assistants were lying vacant.

3. The AMC of all the equipment was found to have expired.

4. Against 89 sanctioned faculty posts, 58 were filled (21 were filled on a contractual basis), leaving 31 faculty posts (35 *per cent*) vacant.

The above deficiencies in the follow-up of JAC reports rendered the inspections carried out by JAC ineffective in ensuring that all the required facilities for imparting quality education were available in the affiliated institutions.

The Department stated (March 2025) that the University will ensure necessary compliance with audit observations.

## **3.3 Process gaps**

The entire process of granting affiliation was riddled with delays and inefficiencies. Details are as below.

### **3.3.1 Delay in revision of policy guidelines for NOC and other allied matters**

The first Policy Guidelines, applicable for three years, for the issue of NOC and allied matters of privately managed self-financed institutes affiliated to GGSIPU were issued by the DHE, GNCTD in May 2007. Later, these policy guidelines were revised in May 2011 and January 2016 (effective up to 2018-19). These guidelines lay down the criteria and process of issue/revalidation of No Objection Certificate

(NOC) by the Government to applicant self-financed colleges for affiliation with GGSIPU.

The DHE constituted (June 2019) a committee of experts for revision/amendment in the Policy Guidelines of January 2016 which submitted its report to DHE in October 2019. The report has been under consideration of the Government since then and decision on revision of policy guidelines was yet to be taken (December 2023) by the Delhi Government. Resultantly, the guidelines applicable for the academic session 2016-17 were being force forwarded for another 4 years i.e. till Academic session 2023-24, depriving the students from benefiting from revision of curriculum, enhanced infrastructure facilities etc.

The Department stated (March 2025) that the recommendations of the expert committee for revision of policy guidelines were under submission for approval of the Lieutenant Governor of the NCT of Delhi.

### **3.3.2 Constitution and Functioning of the Board of Affiliation**

Section 21 of the GGSIPU Act provides that the Board of Affiliation (BoA), consisting of the Vice Chancellor and not more than seven members, to be nominated by the Board of Management, which shall be responsible for admitting colleges and institutions to the privileges of the University. The term of BoA is for three years and thus it is required to be reconstituted and notified every three years.

Audit observed a delay of more than two months in notification of BOA after approval of the nomination of members by the Board of Management during 2018-19 and 2021-22. Additionally, during the review period, meetings of the BoA were held with a delay of two to seven months after 1 August, the stipulated date for the start of the academic sessions annually. This delayed the whole affiliation process by four to 10 months during the entire period under review.

The Department stated (March 2025) that GGSIPU has taken note of the audit observation for future compliance.

### **3.3.3 Affiliation granted to Guru Teg Bahadur 4<sup>th</sup> Centenary Engineering College without JAC Report**

Guru Tegh Bahadur 4<sup>th</sup> Centenary Engineering College applied for affiliation for its B. Tech (CSE) course in May 2022. However, the application was rejected (June 2022) by GGSIPU as the last date to apply (31 March 2022) was over. The institute then requested Secretary, DTTE (12 July 2022) and Dy. Chief Minister (1 August 2022) DTTE resultantly issued a provisional NOC on 25 August 2022, subject to the submission of the JAC report and compliance to the deficiencies pointed out therein. JAC visited the premises (1 September 2022) after issuance of the NOC and submitted its report the same day. GGSIPU granted affiliation to the Institute on 13 December 2022.

Audit observed that issuance of NOC by DTTE, even though provisional, without JAC report, subverted the affiliation process since there was no assurance that the

Institute fulfilled any of the conditions for affiliation. Even the affiliation fee was not deposited by the Institute at that time. Further, JAC pointed out some deficiencies like non-recruitment of faculty and absence of facilities for Persons with disabilities, to be corrected by 30 September 2022 as per the conditions of NOC. However, GGSIPU sought compliance only when the Institute applied for affiliation for the 2023-24 session.

The Department reiterated (March 2025) the reply of the GGSIPU that affiliation to Guru Tegh Bahadur 4<sup>th</sup> Centenary Engineering College has been granted after compliance with all the procedural formalities. However, no supporting documents were provided with the reply.

### **3.3.4 Delays in the affiliation process**

Ordinance 1 of the University lays down the procedure for considering proposals for the affiliation of colleges and institutions. The schedule for issue/revalidation of No Objection Certificate (NOC) and affiliation to self-financed institutions/colleges as provided under Clause 18 of the Policy Guidelines of January 2016 issued by the Directorate of Higher Education is as given in **Table 3.3**.

**Table 3.3: Timeline for affiliation process**

<b>Sl. No.</b>	<b>Item of work</b>	<b>Timeline</b>
1.	Receiving of applications for affiliation in GGSIPU	By December of the previous academic year
2.	Start of Joint Assessment Committee (JAC) visits	From February onwards
3.	Forwarding of JAC report by GGSIPU to Government	Within 3 days of receipt of JAC report in GGSIPU
4.	Issue of NOC by the Government	Within 10 days of receipt of JAC report from GGSIPU
5.	Finalization of intake by University and issue of affiliation by GGSIPU	By May end
6.	Start of Academic Session	1 <sup>st</sup> August

During the Academic years 2020-22 (two years), due to the Covid-19 pandemic, NOC/affiliation was automatically extended. Examination of records relating to 12 sampled self-financed colleges for the Academic years 2018-19, 2019-20, and 2022-23 revealed that -

- Applications for affiliation were received in GGSIPU with delays of two to four months.
- The Joint Assessment Committee visited the premises of 11 sampled colleges with delays ranging from two to five months.
- There were delays ranging from 15 days to four months in the issue/revalidation of NOC by DHE in all the 12 sampled self-financed colleges for Academic years 2018-19, 2019-20, and 2022-23.
- GGSIPU granted the affiliation to self-financed institutions with delays up to nine months beyond the prescribed timeline of 1 August. Thus, these

institutions started the academic session in those years without affiliation, thereby defeating the very purpose of the process.

The Department stated (March 2025) that GGSIPU has taken note of the audit observation to complete the affiliation process for academic year 2024-25 well in time and DHE has also noted the audit observation for issue of NOC timely.

### **3.3.5 NOC issued/affiliation granted annually instead of for longer periods**

Clause 3 of the Policy guidelines of DHE and Clause 4 of Ordinance 1 of the GGSIPU provide for issuing NOC for longer periods and granting of regular affiliation for those self-financed institutions that were situated in conforming areas as per the Master Plan Delhi (MPD) 2021. This is especially relevant given the delay in grant of affiliation as discussed in **Para 3.3.4** above.

However, Audit noticed that only annual provisional NOC and affiliation were being granted even to institutions that were otherwise eligible for an extended NOC, thereby requiring these institutions to go through the entire process every year.

The Department stated (March 2025) that the matter of granting long-term NOC and permanent affiliation to applicant institutes is under consideration.

Thus, inadequacies in the functioning of JAC and procedural delays indicate that the Government/GGSIPU could not ensure adequate physical or academic infrastructure in the affiliated institutions through the current mechanism, nor could it expedite the process.

## **3.4 Oversight of affiliated institutions by GGSIPU**

Apart from ensuring that all the institutions to which affiliation is granted have the required facilities for imparting quality education, Ordinance 1 and Statute 24 of GGSIPU place responsibilities on the University towards planning and development of these institutions, providing necessary help and guidance, regulating admissions, fees, etc. Audit observed deficiencies in these areas as discussed in the succeeding paragraphs.

### **3.4.1 College Development Council not constituted**

According to the revised UGC guidelines (August 1985), the University may set up a College Development Council (CDC) as an appropriate body at the University Headquarters to ensure proper planning and integrated development of affiliated colleges and to provide the colleges with necessary help and guidance. Audit noticed that GGSIPU had not set up a College Development Council, which deprived the stakeholders of a platform for coordinating the planning, and supervision of the affiliated colleges.

The Department reiterated (March 2025) the reply of GGSIPU that no provision for setting up the College Development Council exists in the University Act, but the University will explore the possibility of setting up a centralized committee along the lines of the CDC.

### **3.4.2 Regulation of admissions in affiliated colleges and fee structure in self-financed institutions**

Matters relating to admissions in affiliated colleges and fee structure in self-financed institutions are regulated by the Government in terms of the Delhi Professional Colleges and Institutions (Prohibition of Capitation Fee, Regulation of admission, fixation of non-exploitative fee and other measures to ensure quality and excellence) Act and Rules 2007. Deficiencies observed in the implementation of the Act of 2007 are as under:

#### **(i) Delay in constitution of Admission Regulatory Committee**

Section 4 of the Act of 2007 provides that the Government shall constitute an Admission Regulatory Committee (ARC), with powers of a Civil Court to regulate the procedure of admission to institutions. Audit observed ARC was not constituted till 2022-23. Thereafter, in compliance to orders of the Hon'ble High Court of Delhi (March 2023), it was constituted in April 2023, after lapse of 16 years. Thus, the regulation of the procedure for admissions, addressing of complaints thereof was left to be managed by GGSIPU since 2007. Even after its formation, the ARC delegated the work of attending to admission related complaints to GGSIPU instead of addressing the issues itself. Since April 2023, 65 complaints were received in ARC out of which, 39 were disposed of after holding inquiry, three required no action and 23 (35 *per cent*) were pending as of October 2023.

The Department stated (March 2025) that ARC has been constituted and is effectively functioning. The reply is not factual as elaborated above, and the functioning of the ARC has remained limited to holding occasional meetings with no substantial policy decisions or guidelines issued, for regulating the admission process for Academic Session 2023-24 or beyond.

#### **(ii) Delayed notification of fee rates recommended by the State Fee Regulatory Committee**

In terms of Section 6 of the Act 2007, the Government had constituted a State Fee Regulatory Committee (SFRC) for the determination of the fees for various courses in self-financed affiliated institutions. Audit observed that while SFRC for academic years (AY) 2017-20 was constituted only in January 2017, it took almost two years to submit its recommendations (December 2018).

DHE thereafter took eight months to notify the revised fee rates (August 2019) and thus the fee rates recommended for 2017-20 by the SFRC had to be made applicable for AY 2019-22 and the rates applicable for 2014-17, as per earlier SFRC's recommendations, had to be extended for two more years viz 2017-19.

The delay in revision of fee rates created confusion over fees to be charged by the self-financed affiliated colleges leading to litigation regarding the applicable fee and withholding of degrees by these institutions for fear of non-payment of enhanced fees after award of degrees.

The Department stated (March 2025) that DHE has notified the fee recommendation of 5<sup>th</sup> SFRC for 2022-25 and the 6<sup>th</sup> SFRC has also been constituted for 2025-28.

### **3.4.3 Non-Implementation of 7<sup>th</sup> Pay Commission recommendations in affiliated colleges**

Statute 24 of the University provides that the emoluments of the teaching or non-teaching staff of the affiliated college or the institution should be in accordance with those laid down for the corresponding posts in the University. Also, DHE decided (August 2018) to implement recommendations of the 7<sup>th</sup> Pay Commission (under AICTE and UGC schemes) for the revision of pay scales of teachers and administrative staff of GGSIPU and its affiliated colleges.

Audit observed that 9 out of 12 sampled self-financed institutions were paying pay and allowances to their teaching and non-teaching staff as per the 6<sup>th</sup> CPC while one institution was paying as per the 5<sup>th</sup> CPC. Information in this regard in respect of one institution was not available. Only one Institution was paying as per the 7<sup>th</sup> CPC (from 2021-22 onwards) norms.

The Department reiterated (March 2025) the reply of the University that the University does not interfere in the day-to-day administration of affiliated colleges but ensures emoluments of teaching and non-teaching staff in affiliated colleges through the mechanism of JAC reports and their compliance.

The reply is not specific to the audit observation. The issues related to the inefficacy of the JAC process have been extensively dealt with in the preceding pages. Thus, of the sampled 12 self-financed affiliated colleges, 10 were not paying pay and allowances to their staff as per recommendations of the 7<sup>th</sup> Pay Commission.