

Specific Recommendations for Higher Education

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Introduction

Post Independence era i.e. 1947-2004 has witnessed considerable growth in the Higher Education sector, more so after 1986. As the Higher Education sector expanded in the country, the concerns of quality, relevance, access, employability and contribution to the National economy have also come to the fore. On the other hand, the prospects have also increased in the emerging global scenario in the post WTO era, when India stands to use the strength of its professional manpower for development, especially to the socio-economic needs of society.

The last comprehensive Educational Policy, the National Policy on Education (NPE-1986) needs a revisit in the new liberalized economy of the country as well as the sectorial strength of education sector in India, which is developing as one of the major attractions of the developed countries. There is an urgent need for reform and revitalization of education sector to meet the socio-economic, global and political realities. The Government has also realized that “National strategy for education has to ensure the availability of highly educated, trained and motivated manpower for dealing with the challenges. India has to compete with most advanced countries in many fields of production to hold its own position. Keeping in view these challenges and present deficiencies of the higher education system, it is imperative to initiate discussions/undertake reform and revitalization of the higher and professional education sector in India.

More so, the objectives of **10th plan** are to raise enrolment in Higher Education from 6% in 2002 to 10% by the plan period i.e. 2007. The strategic focus is on increasing access, reach, quality, and adoption of state specific strategies and liberalization of the higher education system. Emphasis is laid on the relevance of the curriculum, vocationalization and networking through use of Information Technology tools. The Plan focuses on distance education convergence of formal, non-formal, distance and IT education institutions; **“increased private participation”** in the management of colleges and deemed Universities, research in frontier areas of knowledge; and meeting challenges in the area of internationalization of Indian education initially marketing it to neighboring countries, where India holds a distinct edge.

Over all the 10th plan emphasizes that higher education whether in the general or in technical stream, must have links with all national goals and endeavors. A large number of centers of excellence to turn out quality man power in areas relevant to industry and society need to be established with triangular partnership of the **academia, the industry, the private players in education with an overarching mechanism provided by the Government**. It is necessary to introduce independent accreditation agencies and make the accreditation process transparent, time bound and free from the regime of controls to ensure quality of education. Tangible gains of Accreditation will have to be very clearly spelt out, so as to create awareness and invoke interest among institutions to seek quality certification. Modernization of syllabi, examination reforms and governance of Universities and colleges requires urgent attention. These can be achieved

through proper, issue-specific area-specific and time-bound planning, which needs to be adjusted with resource management and manpower planning.

Pre Text of Subject:

- (i) The presumption with which National Education Policy 1986 was framed has undergone a significant change and is not in tune with the present time frame with major contribution from the private sector, economic development, information technology, international developments of education and economy. This compulsorily needs a review.
- (ii) With the increased pressure on the need of the education at all levels, the roles and responsibilities of statutory agencies must be reviewed in order to act as a facilitator. (Facilitate the educational institutions.) The functioning of the statutory bodies should be participatory with all the stake holders
- (iii) Over a long period the statutory agencies and institutions have not been able to establish relevance with the industry.
- (iv) Industry has so far not recognized the potential of educational institutions due to the absence of a tangible model and utility definition. Accordingly the Governments have also, not taken Industry into confidence nor involved them in a participatory role to develop or invest in higher education.
- (v) There has been only one-way communication by government to the education providers for any kind of regulations, governance, finances, etc. Industrial conglomerates need to be involved more actively in discussion and offer recommendations for the complete and holistic development of relevant higher education.
- (vi) A Education policy re-visit is due to account for the changing global scenario which include the following:

WTO agreement and privatization of Indian economy, introduction of public private partnership model, involvement of industry in demand of relevant and quality education, growth of education sector in non-developed areas, the access of higher education to dies-advantaged population, controlled expansion, technical expertise development and meeting the evolving needs of economy, sciences, research etc., litigation, quality, resource development, international market expansion, regional imbalances, independent accreditation body and access to higher education and autonomy with accountability

Primary Survey on ‘Education Providers Responses on Autonomy’:

A questionnaire has been under circulation to the Education Providers, Directors, Deans, Administrators, Academia, Industry Professionals, Lawyers, Policy Makers, and Social Figures for the generation of statistical data on the views of the Industry, Society, Educational Providers, and Government Officials etc. An Analysis of the responses colleted from two national seminars is as follows:

- (i) It has been unanimously agreed that with the economic development of the country, privatization has played a major role for the development of education.
- (ii) Education has been considered as a social responsibility at all levels, and it is responded by more than 90 percent respondents that higher education should have a changed face now.
- (iii) Globally, the higher education has been accepted as Service Industry. 80 percent respondents feel that education, as a service industry is very much needed in India. On the other hand about 50 percent are also of the view that social disharmony may prop up if education as a service industry is implemented without appropriate attention to the change.

(iv) On the issue of Autonomy, responses are as follows

Issues	Responses (%)		Remark
	Yes	No	
Those who advocate Operational Autonomy to be given to the institutions	95%	5%	
Those Advocating Financial Autonomy to be given to the institutions	90%	10%	
Advocating Academic Autonomy to be given to the institutions to develop and review their programme curriculum	95%	5%	
On the Autonomy of educational programmes offering within the approved overall capacity of Institutions: Institutions should have: i) Authority to add or delete any programme ii) Flexibility enough to increase or decrease the programme capacity with in the approved limit, and iii) Programmes can be offered in different shifts for optimum utilization of infrastructure	80%	20%	About 50 percent of the participants are of the view that there should be strict norms for the governance of the educational programmes with appropriate autonomy awarded to them.
	95%	5%	
	90%	10%	
Those who advocate for open system of foreign collaboration with defined quality in advance	95%	5%	New programme offered should be reviewed by the appropriate authority within defined timeframe
Autonomy (Flexibility) in the procedure of admission and Fee structure	95%	5%	But flexibility based on the Status/ reputation and other parameters of the institutions with appropriate accountability and transparency. The fees charged by the institutions should be based on the quality, facility and standards of the education offered

- (v) More than 95 percent respondents say that there should be a minimum standard fixed on parameters of infrastructure, faculty, research and development, degree offering etc. by statutory bodies.
- (vi) On the affordability, it is accepted by all that initially government should take charge of creating a financial base for the institution.
- (vii) On Accreditation the responses collated from the respondents are as follows;

Issues	Responses (%)		Remark
	Yes	No	
Need for Independent Accreditation Bodies	95%	5%	
Those who advocate Accreditation of Degree	70%	30%	
Those who advocate Accreditation of Institutions	60%	40%	
There should be a timeframe defined for the clearance of decision at various level.	55%	45%	

- (viii) It is felt by about 60 percent of the respondents that new programme inspired and needed by the economy and other utility areas should be offered even if there is no accreditation policy available.
- (ix) Almost 90 percent of the respondents say that blending of the formal courses with the distance learning courses with assurance of the quality on offering is good. The respondents view is mixed and they express that this should be differential by nature, depending on the quality, offering mode, facility provided etc. of the programme.
- (x) Almost 75 percent of the participants expressed that there should be an independent body to deal with all and any kind of collaborative effort or entry consideration on foreign universities to India and Outgoing of Indian Universities.
- (xi) It is strongly felt that the foreign university movement should be TWO way (From and In India) and should be in the agenda of the government, and should be addressed properly with complete planning like UK and Australia have done it.
- (xii) Almost all were of the view that there is an urgent need to change/review the existing educational policy to make it more relevant and progressive.

EPSI's Recommendation:

National Educational scenario in India, as envisioned in its different education policies, is a key instrument in ensuring *access, equity, quality and relevance* of

education at all levels. Education has been identified as a critical input for economic development, more so, for human resource development and a key instrument of national development and individual welfare. Developed countries are characterized by high quality of adult literacy and universal school education. The participation rate in higher education in USA is 89%, in industrial countries 60% and in developing countries around 9% whereas in India it is only 6-7 %. There is a clear case for tremendous increase in capacity in our existing institution/Universities, besides the need of many more such institutions. The Government alone cannot meet this mammoth task. The State Government has already been spending 20-30 percent of its revenue budget on education. It will not be able/could not afford to spend more neither on its existing institutions nor for expansion. It's even more critical in the realm of professional and vocational education, so it is obligatory on the citizens, industry and the non-governmental/private education providers to come forward for sharing this onerous responsibility and *provide access to all those who desire and deserve higher education*. Supply should cater to all those who aspire for higher education of their choice and be employable.

It is time for all those concerned with policymaking, planning, administration and implementation of Education to revitalize the very thinking on the subject and put it on the right track.

Now under this existing scenario it has been widely accepted that private participation in higher education is inevitable. However, growth of private participation, over-regulation and concerns of quality has become a major issue of debate. Privatization is a world wide phenomena and a careful perusal of the happenings in the arena of higher education demonstrate that new private providers may enhance the capacity to meet the unmet aspirations of the people in the regime of declining state budget, if a procedure of autonomy coupled with accountability is put in place and especially the issues of admissions, fee structure (model) and reservations are amicably addressed and resolved.

With proper encouragement given to the establishment of private universities it is proposed to introduce a system of education in India a complementary system of government-funded universities and self-financing institutions and universities which can co-exist and become partners in strengthening the higher education system. Such University System has been successfully working in other countries (USA, UK, Canada, Australia and Western Europe etc.), for the last several decades. For instance, in USA, several leading universities like Harvard, Stanford, Chicago, Princeton, Yale, Northwestern etc are all private universities. There are instances for such change in Singapore, China and other Asian countries, which have worked on the model and made this a huge success in quality educational offering and resource building in infrastructure and finances.

The *precision* and *consistency* that is required to be imposed on the largely varied and diverse picture of educational opportunities is based on the following *pronouncement*.

- (i) Creation of a conducive and favourable climate/environment, which facilitates and encourages private investment and speedy establishment of Institutions and programmes. **Single-window clearance system approach.**
- (ii) Allow private entrepreneurs to enter in the field of education without any hindrance.
- (iii) The status of government and private universities is the same under Indian law. Accordingly it is important that the regulation for both, government and private should be at par.
- (iv) A level playing field to be provided to the government and the private universities and performance of these universities must be measured from time to time.
- (v) By establishing private universities, the state will be in a position to provide good quality education with least or no financial assistance from the government.
- (vi) In the government funded universities, the state can promote more self financed courses, and encourage industry-based consultancy and research so that the government funded universities become self sufficient over a period of time.
- (vii) Fixitation of fees to be left to supply and demand. The fees can be raised to the level of realistic cost of education. The **equitable fee**, will enable the institution to be both independent, self-reliant and grow with their own resources. **(EPSI also suggest to restrict profit up to 15%)**
- (viii) Admissions should be based on merit. The Government can regulate admission procedure for this purpose. The institutions should also be allowed to frame their own admission criteria/procedure in terms of interviews and other methodologies.
- (ix) With the WTO agreement by India, international universities are approaching India and also very limited universities are approaching the potential countries. There ought to be an environment and system which encourages and supports the international expansion In-coming and Out-going institutions and universities.
- (x) Not enough emphasis is being given to enhance the reach and access of Indian higher education in neighboring countries. It is essential that a **single-window clearance system may be established**, which can allow Institutions of repute to market higher education abroad. A joint Task Force, with representatives of the Industry Chambers, representatives of statutory agencies and Educationists of repute as well as few bodies like EPSI, EdCIL, ISTE may select institutions who can offer quality education abroad. The administrative control of such a committee may be given to a third party, away from the government, so that the process is fair and objective.

Autonomy:

Build self-sustaining models of institutions critical for autonomy and long –term viability and student-support. This issue is valid for both public and private sector. In fact, this issue is divorces from how education for the student is financed. Regardless of whether the financing is done by the user (i.e. students), by the government, by the universities, through private scholarships the long-term financial viability and autonomy needs to be safeguarded. There is a need to define the involvement of different stakeholders in the process to ensure adequate representation and yet retaining the autonomy of the universities and other institutes engaged in the delivery of higher education.

- (i) Autonomy not just for the private institutions and the self-financed institutions but also autonomy for the institutions, which are under the government either fully or partly financed .
- (ii) Autonomy which ensures that all the stakeholders are protected- particularly the students-against dilution in quality or being misled.
- (iii) Concerning autonomy, the law must delegate the necessary decision making power to the institution – for changes in curricula and teaching methods, for internal self-governance, for interaction with other organizations/institutions nationally and internationally and for economic transactions.
- (iv) *Autonomy coupled with Accountability.* In all fields where the institution has been given the responsibility to make its own decisions, the decision process should be transparent and results should be made public.
- (v) The quality assurance systems as an important cornerstone in our system of higher education must be independent of political and institutional interaction and it must have a basis in the legislation. (i.e. only regulate what is essential to regulate, it cannot effectively be regulated in any other way and it should be written to allow for change, in order to be applicable as the higher education system develops).
- (vi) *There should be full operational, financial and academic autonomy coupled with accountability.*

Need for Independent Accreditation Bodies:

National Policy on Education 1986 provided the provision for establishment of National Accreditation body for the maintenance of quality in Higher and Technical Education.

UGC and AICTE Act provides for the establishment of Accreditation bodies. Accordingly bodies like NAAC and NBA have been established by UGC and AICTE respectively. There has been a very fast growth and development in the expansion of private education. Over the last (almost 20 years) the impacts of

accreditation process have been very marginal. This calls for a serious review of the provisions made so far.

One of the foremost requirement of International Accreditation bodies has been that quality assurance must involve all stakeholders and it should not vest with the agencies, which control higher education. As a result, a conglomerate of 29 bodies called ABET (USA), Engineering Council (U.K.) are involved in accreditation as a third party evaluators of quality. In the new emerging scenario, if Indian higher education has to get acceptability of the International community, with provisions of equivalence and mobility of professionals across borders, a third party evaluation model must be put in place with participation of all stakeholders of higher education.

It is estimated that hardly 10 – 15% of the total Higher and Technical Education System have gone through the Accreditation process because of inadequate infrastructure facility and possibly because of inadequate participation of all the stakeholders.

- (i) Since the Higher Education has to compete and fulfill the needs of quality education and economic sectors competitively, it is our considered opinion that the government facilitate or provide enabling provisions for the establishment of **Independent Accreditation Agencies** which is expanded to have regional centres to sustain the demand and reach, which are also accepted by industry. Objective should not be to shut down or close down the non-performing institutions but to help them to upgrade standards and facilitate them.
- (ii) It is felt that one institution like NAAC may not be able to bear the burden of the accreditation process. Independent Accreditation Agencies with regional centres would be capable to offer services with defined benchmark of quality and performance.
- (iii) A well laid out imperatives and benchmark need to be defined and tangible benefits of accreditation must be put in place.
- (iv) The Accreditation Agencies should be a conglomerate of government, industry, academia, society etc. (all stakeholders of the education) that proves the credentials of the agency.
- (v) There should be further provisions to Accreditation even for the Accrediting Agencies.
- (vi) The criteria and norms created by these Independent (proposed) Accreditation bodies should necessarily meet the characterised minimum and maximum level/standard.
- (vii) The accreditation should be a TWO level rating both on Institutional accreditation and programme accreditation.
- (viii) The process and procedure of Accreditation should be made simple and it should be on a continuous basis.

- (ix) Autonomy with self – regulation is important for proper growth of the institution
- (x) The institution, which excels in obtaining Accreditation, should be encouraged to levy higher tuition fees from those who can afford to pay, compared to those who do not receive Accreditation. This would not mean to eliminate the responsibility of all other Higher education Institutions from providing adequate facilities for loans and scholarships as and when needed.
- (xi) All institutes of higher learning must make public the acceptability of their courses and degrees. (i.e. the status, recognition and acceptability of their courses by other institutions)
- (xii) Any misrepresentation of facts to the general public should make the institute and its promoters, directors and staff liable for civil prosecution.
- (xiii) One of Government's biggest concerns in education seems to be a feeling that the private sector would cheat the public if there were no government regulation of the education sector and "profiteering" if they are allowed autonomy. The accreditation process would ensure the necessary infrastructure and quality needed for offering education. There are bodies formed in other facets of economy, which have become the catalyst of Quality assurance and development with the introduction of *Quality assurance bodies like ISO, ISI etc. and rating agencies like CRISIL, ICRA and RBI* respectively.
- (xiv) It shall be mandatory to publicise/ make public the accreditation report for the informed choice to the students and other stakeholders in education.

Benefit: An Educational Accreditation and Grading/rating Agency for both non-professional and professional education would help the students and the employers in making informed choices about the quality of education and its programmes in each institution.

It will be beneficial for all universities and educational institutions (both public and private) to get themselves accredited by an Educational-Accrediting Agency. This will ensure that all fly-by-night operators will have no chance to cheat the public as well as the students and this will also put pressure on the public universities and force them to work towards all-round improvement. This will also help international universities to develop confidence in the Indian education system and also Indian universities going abroad.

Admission in Professional Institutions:

- (i) Admission of students in the professional colleges should strictly be made on the basis of Merit
- (ii) No meritorious student should be denied admission on the basis of his caste, creed or class.

- (iii) If there is a common admission test conducted by the state then the individual institution should also be allowed to formulate their own admission criteria like interviews and other methodologies.
- (iv) The process of admission should be made transparent and the cut off mark should be known. (i.e. made available on the web site etc.)
- (v) If a candidate is denied admission the reason should be made public. (Maintain total transparency in admission)

Reservations in Admission:

- (i) As far as government institutions are concerned, since the government is supporting financially, they have the right to put in the kind of social agenda in their admissions process which they deem fit for the welfare of the nations.
- (ii) As far as the government aided institutions are concerned, whatever are the social concerns that they would like an institution to take up on the grounds that it has been aided should be spelt out right at the beginning so that there are no surprises later on, and the aided institution is aware that if it is to receive aid from the government, then these are the norms which they are supposed to meet and put together as a social agenda of the government in the country.
- (iii) (There has to be uniformity in the policy of reservation among different states)
- (iv) As far as the private unaided education sector is concerned they also have the social obligation but at the same time it should not be imposed but rather a dialogue should be conducted to find the best method of getting this done.
- (v) In the process of admission there should be a merit cut off for the reserved category also. I.e. admission based on merit.
- (vi) The system of reservation should be based on the analogy that- even in the government sectors; the reservations are at the recruitment level. When it comes to promotions there is a priority system, so that there are fast track promotions.
- (vii) (10% -15% leverage in the merit for the reserved category). There merit may be 10%-15% low then the lowest merit of the student admitted from the general category. But it should be mandatory for those students to qualify the minimum passing marks.
- (viii) There should be some mechanism to recover or compensate the cost incurred on those students who belong to the weaker section (reserved category). i.e. the state should come forward to take the burden or the institution should be allowed to raise the fees of the general category.

- (ix) Certainly there is no point in making reservations where seats are just going empty and nobody is benefiting out of the situation. (If sufficient students are not found in the reserved category, the institution should be allowed to fill those seats based on merit and accordingly intimate the concerned authority/regulatory body). Similarly there should be a cut off date for admission.

Fees, Financing and Affordability:

There is need for increasing financial inputs for higher education. Currently the Government is also subsidizing the higher education by charging low fees to those who can pay. The cost of higher education is not being met by the educational institutions themselves (because of subsidy and fee restrictions). There is also a severe mismatch in the costing at school level and higher education level.

Expansion and Quality are not possible without a sound infrastructure, financial and other resources to institutions and universities. There is a strong need for increasing financial inputs for higher education.

There is no single solution for educational **affordability** as every circumstance will be unique. However, a number of solutions exist which together can solve this problem. The following measures are suggested

- (i) Fee to be based on the minimum norms prescribed by statutory authorities giving due credence to the quality of the program, faculty, infrastructure, recurring and non-recurring expenses.
- (ii) Fixation of Fees should be based on economic modeling. It should have some economic relationship with costs of education; 'differential' fee system based on the cost of the intellectual capability of the programme offering, infrastructure, research base, quality offering, employability etc.
- (iii) There may be a set of models developed with standards or benchmark for fixation of fees. The fee so fixed should include the genuine cost as explained in point (ii) along with the development cost
- (iv) The fee should have the provision of surplus of 15 percent, for the developmental activities of the institutions and universities.
- (v) The institutions should be allowed to levy 15% separately for the Research Purpose i.e. on R&D, if it's a research based institute. This will ensure the quality and research development and contribution of the university to the economy and society.
- (vi) Institutions or programmes with high accreditation ranking may fix the higher fees as they desire, by providing due justification about the fee so fixed. Only in such cases the fee may be more than the maximum prescribed.
- (vii) The government/State can fix fees based on their own actual cost, which they really invest. Based on that the realistic fee may be fixed.

- (viii) Student welfare programmes should be given priority. The present scheme of providing loans to students should be streamlined and made facilitating. Instead of charging low fees from universities/Institutions, the Government should create a separate bank (Education Development Bank) to give soft interest loans to students on pre-defined criteria such as, on an understanding that once the students start paying Income Tax or they leave the country, these loans will become payable. This will bring accountability in the educational system.
- (ix) Alumni's to be encouraged to finance their institutions and projects of their choice directly University should establish an Alumni association and get as many of its former students engaged in mobilising resources for the university. A detailed project should be prepared in this connection and implemented with vigour and enthusiasm. Models of such a project would be available from some of the leading universities of the USA such as Harvard. By and large the governance of higher education institutions should be largely participated by the alumni who have concerns about their alma mater.
- (x) Efforts to be made to raise resources from other non-transitional sources also such as commercial concerns, Encouraging public and private partnership. Mobilising resources for the university, MP and MLA funds, foreign gifts and funds, creating a Corpus Fund which should accept all donations, voluntary contributions etc. The Fund should be deposited in fixed deposit and only interest be drawn from it for development purpose
- (xi) The institutions and universities must maintain the accountability and the transparency.

Industry - Institute Interaction Model:

- (i) Industry, science institutions and other users of the higher education holders be encouraged and invited to participate in partnering the institutions and university and vocational training centres.
- (ii) Identify the specific needs of the industry and Involve Industry in curriculum development, particularly in courses which have integral relationship with industrial process
- (iii) Design of research plans, field study, training, curriculum development and other academic activities should be in partnership with the industry.
- (iv) Industry should be encouraged to contribute to the academic funds, offer industry short-term space for practical updates to the professors.
- (v) With the opening up of the sector or growth and development of the economy in general, there has to be an enabling environment where the industry along with academia come forward to contribute towards development of the skilled manpower.

- (vi) Industries to be provided incentives for making substantial contribution towards education and training. These types of linkages to be developed in all higher education.
- (vii) Industry Associations like CII, FICCI, ASSOCHAM should encourage and promote industry to mark their projects, after testing quality aspects, to the academia which can deliver quality at low cost.
- (viii) Companies of 400 – 600 rupees crores turnover should appoint One Academic Quality Assessor, 600 – 1500 crores turnover should have a team of two, and more than 1500 crores turnover should have a team of four professionals in their organization, which should also interact with the academia and provide inputs to both academia and company.
- (ix) There should be an industry expert nominated in the Independent Accreditation Body.

Foreign Participation:

It is very much sought to have a very clear policy which is effective and efficient to perform with the Indian and worldwide changes.

- (i) There should be a policy frame for the foreign universities coming to India for investment to open campus, for offering degree or diploma programme, for establishing of fee for the programme etc.
- (ii) There should be cost based FEE definition on differential basis to offer the quality, which is been offered at the main campus of the university coming to India.
- (iii) The programmes offered by the coming University in India should have accreditation of the programme or institutions in their respective countries by a national level accreditation agency like AACSB, EQUIS etc.
- (iv) There should not be any regulatory framework needed for low-end collaborations like student exchange, faculty exchange, research tie-up, training and consultancy etc.
- (v) Foreign collaboration with existing Indian institution to be **encouraged**. Needs to be ensured (a) level playing field (b) Accredited Institutions and programmes of the country, and (c) the programmes
- (vi) Unnecessary/excessive restriction on such collaboration to be avoided, as it will hinder up -gradation.

Promotion of Socially Relevant Education Programme:

- (i) Vocational streams have to be developed and expanded to equip larger numbers of high school students with occupation-related knowledge and skills.
- (ii) A comprehensive strategy is needed to enhance the nation's employable

skills. It must begin by preparing a catalogue of the entire range of vocational skills needed to support the development of the country.

- (iii) More & more vocational programmes should be introduced after secondary education for employment generations. At the same time there should be provision of lateral entry in Higher education
- (iv) The network of vocational training institutes and the range of vocational skills taught needs to be expanded substantially to impart those skills for which institutional training is most suitable.
- (v) The private sector, which promoted the rapid proliferation of computer training institutes throughout the country, should be encouraged to recognise the commercial potential of vocational training in many other fields.
- (vi) A national network of community colleges, similar to the highly successful American system, is needed to provide knowledge and job-oriented skills to millions of young people who lack interest in or capacity for more stringent academic studies.
- (vii) Programme to introduce a career & market oriented skill enhancing add-on courses that have utility for job, self-employment and empowerment of the students

On the advice of MHRD, these recommendations are capable of being converted into MODELS on various issues for more practical use of the suggestions.

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