

## **Recommendations for Early Language and Literacy in the National Education Policy Draft, 2019 by Ministry of Human Resource Development**

### ***Submitted by Professionals Working in the Domains of Early Language, Literacy and Literature***

The draft National Education Policy, 2019 has rightly emphasized the importance of Early Childhood Education with a focus on the 3-8 year age group. The upward continuity it recommends between the pre-primary and primary (Grades 1 & 2) years is laudable and essential. Likewise, its emphasis on mother tongue-based education and oral language development is critical. It is also wonderful to see a chapter dedicated to Foundational Literacy and Numeracy in the early years - acknowledging the central role it plays in all school-based learning and literacy activities beyond school.

As a group of experts working in this domain, we have put together a set of recommendations that could be helpful in strengthening the policy's foundational language and literacy sections. While there are several other dimensions to foundational learning, our feedback and suggestions are limited to language and literacy. **Part A** of this document lists **nine sets of recommendations (brief)**; while **Part B** provides slightly **elaborated versions** of the same. We hope that the committee will engage with both parts of the document.

#### **Part A: Recommendations (Brief)**

**Recommendation 1. The vision and aims of foundational language and literacy need to be broadened significantly (Chapters 1 & 2).**

Include a section early in Chapter 2 that lays down the vision and aims of a strong foundational curriculum from 3 to 8 years that supports the development of early language and literacy. The aims that can be deduced currently for the foundational stage focus on developing conversational skills in multiple languages, alphabet recognition and reading of simple words (see, for example, Ch. 1, p. 49; and Ch. 4, pp. 84-85). These aims should be broadened substantially to emphasize the central role that language plays in developing humanistic, aesthetic and critical capabilities starting in the foundational years. The aims for developing cognitive capabilities should also be broadened beyond alphabet recognition and reading simple words in the Foundational Stage to include higher-order meaning making, critical reading, responding to literature, engaging with writing as a mode of self-expression, and so on<sup>1</sup>, which are currently emphasized for older age groups only.

**Recommendation 2: Integrate the curricular and pedagogical vision for early language and literacy learning across the 3-6 year and the 6-8 year age groups that comprise the Foundational Stage (Chapters 1 & 2).**

***Recommendation 2a: The policy should emphasise the integrity of the 3-8 year learning continuum more strongly for early language, literacy, literature learning.*** Continuities should be clearly articulated between the recommendations in Ch. 1 (ECCE) for the 3-6 year

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<sup>1</sup> The Ambedkar University and CARE India's *Position Paper on Early Language and Literacy Learning in India* (2016) presents a more comprehensive set of aims that can be referred to in reframing this section of the policy (Chapter 4, p. 25). The document can be accessed from [http://eli.tiss.edu/wp-content/uploads/2017/08/Early-Language-and-Literacy-in-India\\_Position-Paper.pdf](http://eli.tiss.edu/wp-content/uploads/2017/08/Early-Language-and-Literacy-in-India_Position-Paper.pdf).

age group, and Ch. 2 (Foundational Literacy and Numeracy) 6-8 year age group, given the integrity of the Foundational Stage envisaged by the policy. If this is not done, the two age groups (3-6 years) and (6-8 years) are likely to be treated in dichotomous ways in practice.

***Recommendation 2b. Support oral language development beyond developing conversational proficiency.*** Oral language development involves more than acquiring conversational proficiency. In places where it is discussed, (for example, Ch. 1, p. 49; Ch. 4, pp. 84-85), using language for a broader set of functions in a child's life, such as reasoning, inquiring, associating, and so on, should be emphasized.

***Recommendation 2c. Teach L-S-R-W simultaneously, drawing upon the 'Emergent Literacy' framework<sup>2</sup>.*** Ch. 4 (pp. 84-85) uses language that paints a sequential view of language development – moving from oral language proficiency, to reading of basic texts, to writing. This should be changed to emphasize the current understanding that children should engage with listening, speaking, reading and writing *simultaneously*, not *sequentially* in the mother tongue. To counteract developmentally inappropriate practices that are prevalent in the early years of schooling, the policy should emphasize that curriculum and pedagogy should draw upon the Emergent Literacy framework that proposes developmentally appropriate opportunities for young learners to experiment with continuities between oral and written languages. These include rich opportunities to handle books, have books read aloud to them (in addition to storytelling and poems, rhymes and conversations), participating in discussions, and having multiple opportunities to scribble, draw, and experiment with writing, which together contribute to establishing a strong foundation for early language and literacy learning. Good literature should be introduced through teacher read-alouds to children at an early age.

***Recommendation 2d. Broaden and deepen articulation of the foundational aspects of learning beyond school readiness.*** P. 1.11 (p. 49) and P. 2.11 (p. 62) should emphasize building on foundational aspects of learning, such as addressing the diversity of learner contexts, building students' positive self-concepts, easing their home to school transitions, getting schools ready for children, orienting parents regarding how children learn and what school offers, and so on, which goes beyond ideas of "school readiness" as currently articulated.

**Recommendation 3. Provide greater clarity about the importance of home-languages as Media of Instruction (MoI) and about Multilingual Education (MLE) (Chapter 4).**

***Recommendation 3a. Include a discussion of the historical and social contexts of multilinguality in India.*** The policy should include a discussion under Section 4.5 (p.79) that introduces readers to the diverse contexts of multilinguality in India (including key linguistic data from Census 2011), along with a commentary on why certain policies or approaches pertaining to this aspect have succeeded or failed in the past.

***Recommendation 3b. State unequivocally that the policy's intent is to value home-languages for their own sake, and not only as means to transition students to regional***

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<sup>2</sup>See: Dyson, A. H. (1990). Symbol makers, symbol weavers: how young children weave play, pictures and print. *Young Children*, 45 (2), 50-57; Strickland, D. (1990). Emergent literacy: How young children learn to read. *Educational Leadership*, 18-2; Teale, W. H., & Sulzby, E. (1986). *Emergent literacy: Writing and reading*. Norwood, N.J: Ablex Pub. Corp.

**language instruction.** Remove seemingly contradictory language in the document (e.g., P.4.5.1 and P.4.5.2, p. 80) about this intent. The policy should state (P 4.5.1) that when homogenous groups of students are present in a classroom, *under no circumstance* should they be transitioned from the mother tongue (MT) before Grade 5 (preferably before Grade 8). The policy should also state (in the same sections) the number of students from a given linguistic background who need to be present in a class for the MT policy to kick-in (e.g., if there are more than 10 students in a class, or more than 40 students in a school who speak a certain language, then the school is obliged to provide MT instruction in that language).

**Recommendation 3c. Separate out the strategy for addressing multilingual scenarios where students from a homogenous linguistic background are present, from scenarios where multiple home languages are present.** The policy should separate out the strategy for addressing multilingual scenarios where students from a homogenous linguistic background are present, from scenarios where multiple home languages are present. It could clarify that each of the recommendations in P4.5.1 and P4.5.2 perhaps suit different linguistic scenarios. Under these same sections, the NEP should signal the urgent need for building knowledge-bases about effective ML pedagogies that can be used in classrooms where multiple linguistic groups are present. Until credible knowledge-bases are built for such contexts, certain stop-gap measures can be proposed.

**Recommendation 3d. Remove focus on script acquisition in second and third languages in the Foundational Stage.** At present, the language of the draft is somewhat contradictory, leading to confusion in interpretation. In P 4.5.3, the following alterations are recommended: (a) the logic that children at this age can learn multiple languages should mean that children are *encouraged and not required to* learn multiple languages at this age; (b) clearly state that the focus of learning languages other than MT/Medium of Instruction (MoI) should be on *oral language proficiency up to Grade 3*; (c) state that exposure to scripts other than the MT will happen in a non-threatening and developmentally appropriate manner (e.g., through read alouds); (d) remove the part about children being expected to recognize scripts and read basic texts in all three languages by Grade 3; and (e) avoid recurring references to the “enhanced language learning abilities” of young children when discussing script acquisition (see corresponding section of Part B for an explanation).

**Recommendation 3e. Three Language Formula: State which three languages a young child will be expected to learn.** In P.4.5.5. (p. 83), the policy needs to be clear about which are the three languages that a young child will be expected to learn at school, especially for a child whose MT is different from the regional language. This is especially pertinent to the learning of tribal students in diverse parts of the country.

**Recommendation 3f. Articulate clearly the policy’s commitment towards fostering the MTs that lie outside the 8<sup>th</sup> Schedule.** The Census 2011 identifies 1369 rationalised MTs in the country, only approximately 40 of which are currently taught in schools, and less than 30 are used as Media of Instruction. In P.4.5 (p. 79) the policy needs to state clearly whether it intends to sustain *all* the MTs identified by the census in its schools; if so, how does it plan to do this; and if not, how will it prioritize languages that lie outside the 8<sup>th</sup> Schedule.

**Recommendation 3g. Discuss perspectives and historical approaches to the teaching of tribal languages.** The policy currently discusses tribal languages and the education of tribal students in various parts of the document, including P.4.5 (p. 80), P.4.6.9.2 (p 99), P.5.2.7 (p. 127), P.6.4 (p. 149). The policy needs to discuss (using historical precedent and examples)

how tribal languages and cultural knowledge systems have been brought successfully into the classroom<sup>3</sup>. It also needs to clearly explain and justify why tribal languages that do not historically have a script should not be excluded from the curriculum.

***Recommendation 3h. Provide more coherent and historically grounded discussions of the contexts, issues and curricular and pedagogical approaches to the teaching of English in the Foundational Stage.*** The complexity of the economic and political impetus to teach English from the earliest of grades needs more coherent and historically grounded discussions (e.g., in *Multilingualism and the Power of Languages*, pp. 81-83). The implications (pros and cons) of providing exposure to English in the Foundational Stage should be discussed. The lack of English in many environments in which it is expected to be learned, the lack of teachers who can teach English, and other contextual considerations need comment; the policy should also include a brief discussion of effective curricular and pedagogical approaches for teaching English to young learners in Indian contexts.

***Recommendation 3i. Remove incorrect (and unnecessary) statements about the superiority of Indian scripts over English.*** The draft policy seems to imply that Indian languages have scripts that are easier to learn than the Roman script used by English (p.81). Indian scripts are highly regular but they are also visuo-spatially very complex, with an extensive set of symbols that take several years for children to master (see corresponding section of Part B for an explanation).

***Recommendation 3j. Emphasize the need for building cultural continuities for young learners.*** In Section 4.5, the policy must emphasize the need not just for linguistic, but also *cultural continuities* that need to be built into the curricular and pedagogical strategies to ensure a smooth transition between the home and school cultures of diverse groups of young learners in the classroom. While allusions to this idea are present in several parts of the document, a clearer statement of the same in the chapters on the Foundational Stage (Chapters 1, 2, and relevant sections of Ch. 4) would be helpful.

**Recommendation 4: Emphasize the need for adopting a Comprehensive Language and Literacy curriculum (Chapters 2 & 4).**

***Recommendation 4a. State clearly that children need access to a comprehensive early language and literacy curriculum in order to develop strong foundations.*** P. 2.2 (p. 59) needs to provide a discussion and recommendation for adopting a comprehensive early language and literacy curriculum. In recent decades a consensus has emerged in the domain that children need a *balance* in terms of *what to teach, how to teach, and with what to teach*<sup>4</sup>. This is referred to in the literature as a “comprehensive” or “balanced” model of early literacy teaching<sup>5</sup>. It includes balanced attention to oral languages, literacy and children’s literature in the curriculum; attends to higher-order thinking as well as script level work; and employs a variety of pedagogical strategies and materials. This is a fundamental shift in approach to the teaching of early language and literacy in the Foundational Stage, and must reflect in all chapters and sections relating to this topic, including teacher education.

<sup>3</sup> For example, Mohanty, A. (2019). *The multilingual reality: Living with languages*, Multilingual Matters.

<sup>4</sup> Fitzgerald, J. (1999). What is this thing called “balance”? *The Reading Teacher*, 53(2), 100-107.

<sup>5</sup> See Ambedkar University and CARE India (2016)’s *Early language and literacy in India: A position paper*, for a clearer elaboration of the Comprehensive Literacy framework.

**Recommendation 4b. An average of 2-3 hours per day should be set aside for early language and literacy.** A substantial part of the Grades 1-5 time-table should be devoted to opportunities to grow in language and literacy capabilities — an average of two-three hours per day, as per the recommendations of the Ministry of Human Resource Development (MHRD, 2014) in the *Padhe Bharat Badhe Bharat* document<sup>6</sup>. Without this allocation of time, it will not be possible to implement a high-quality comprehensive early language and literacy curriculum.

**Recommendation 5. Bring Children’s Literature Centrally into Conversations on Building Foundational Language and Literacy (Chapters 2 & 4).**

While the policy alludes to the importance of literature and libraries at different points of the document, it is not discussed as a central aspect of early language learning. The policy should explicitly state the role and centrality of literature to early language and literacy learning; and recommend ways to support the availability or development of high quality and contextualised children’s literature in multiple Indian languages and English. The policy must also list initiatives that would support the pedagogical use of children’s literature in the classroom by language teachers, in addition to the initiatives suggested in Chapter 2 (e.g. P2.2).

**Recommendation 6. Teacher Education should be emphasized over Remedial Instructors, Peer Tutors and Community Volunteers (Chapters 2 & 5).**

**Recommendation 6a. Identify knowledge-bases that teachers need to teach foundational language and literacy successfully.** In the Section: *What can be done to reverse this crisis?* (Chapter 2, p. 57-64) the policy needs to signal that there is an urgent need to understand the knowledge bases that teachers require to teach language and literacy successfully in a richly multilingual country like India. These knowledge bases include (a) an understanding of the aims of early language and literacy education; (b) an understanding of how children from diverse contexts learn, and therefore, how to teach languages and scripts in different contexts; and (c) multilingual capabilities to conduct teaching and learning. In Chapters 2 and 5, the policy should emphasize the role of knowledgeable and reflective teachers, literacy coaches; and intensive in-service trainings for foundational literacy.

**Recommendation 6b. Downplay the role of tutors, aides and volunteers (p. 57-58, P2.5, P2.6) even as temporary or stop-gap measures.** While tutors, volunteers and aides can play a small role in the formal educational system, a long-awaited national policy that foregrounds foundational literacy should not rely on volunteerism as a primary mechanism to deliver even temporary relief! Instead, alternative mechanisms, such as urgent in-service trainings and the appointment of block level Literacy Coaches drawn from the experienced teaching cadre should be emphasized.

**Recommendation 6c. Clearly articulate the need for flexibility and greater teacher autonomy to address learner diversity along multiple dimensions.** A diverse and heterogeneous country like India can deliver strong education only be de-centralizing

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<sup>6</sup> Ministry of Human Resource Development. (2014). *Padhe Bharat Bhade Bharat: Early reading and writing with comprehension & early mathematics programme*. Retrieved from <http://ssa.nic.in/pabminutes-documents/Padhe%20Bharat%20Badhe%20Bharat.pdf>

teaching-learning processes, and encouraging greater teacher autonomy, flexibility and reflexivity. This would go hand-in-hand with a well-prepared teaching force as a longer-term goal.

**Recommendation 7. Discuss the teaching and learning of language and literacy across the curriculum (Chapters 2 & 5).**

The policy should state that teachers of all stages, irrespective of whether they teach mathematics, science or social studies, need to have a foundational understanding about teaching content through the language(s) of their students. A language across the curriculum module should be a compulsory part of all teacher training courses (Ch. 5).

**Recommendation 8. The policy should include discussions on the need for differentiation, inclusion and remediation if foundational language and literacy is to be accomplished for all (Chapters 2 & 5).**

In the section, *What can be done to reverse this crisis, and urgently?* (Chapter 2, p. 59), the policy should state clearly the need for knowledgeable teachers who are comfortable with *differentiation* of instruction for students with different capabilities; *inclusion* of early language learners; and with *early identification and remediation* of specific language learning difficulties. It is also recommended that the policy not use language that appears to treat remedial instruction as equivalent to informal, well-intentioned tutoring conducted by volunteers (even if these volunteers receive some training, and work under the supervision of trained teachers). These same recommendations should also find mention in Chapter 5.

**Recommendation 9. Discourage Large-Scale Assessment of Language and Literacy Learning in the Foundational and Preparatory Stages (Chapters 4 & 8).**

The negative effects of large-scale standardized testing (such as state census examinations) are well known; while the benefits remain contested. They are not advisable for highly heterogeneous and diverse societies and go against the tenets of child-centred education which the policy upholds. Instead, States should be allowed to arrive at workable assessment patterns for both Grades 3 and 5.

## Part B: Recommendations (with Elaboration)

### ***Recommendation 1. The vision and aims of foundational language and literacy need to be broadened significantly (Chapters 1 & 2).***

Most classrooms across India view the task of foundational literacy as teaching children to master the script, and being able to read simple words and passages with comprehension. The existing recommendations in the draft policy reinforce these limited commonplace ideas and do not present a comprehensive understanding related to this issue. The aims that can be deduced currently for the Foundational Stage focus on developing conversational skills in multiple languages, alphabet recognition and reading of simple words (see, for example, Ch. 1, p. 49; and Ch. 4, pp. 84-85).

The policy should include a section early in Chapter 2 that defines literacy. In light of the importance the policy accords to foundational literacy, it should articulate an expanded idea of what it means to be literate, highlighting its critical, humanistic and aesthetic aspects. It should also describe the vision and aims of a strong foundational curriculum that supports the development of early language and literacy<sup>7</sup>. The aims for developing cognitive capabilities should be broadened beyond alphabet recognition and reading simple words in the Foundational Stage to include higher order meaning making, critical reading responding to literature, writing, and so on, which are currently emphasized for older age groups only. This articulation should inform the language and literacy curriculum and pedagogy throughout the school grades, *including* the foundational years. The draft already promotes supporting logical thinking, problem-solving, and ethical reasoning for later grades, but these are currently not highlighted as important in the early years.

### ***Recommendation 2: Integrate the curricular and pedagogical vision for early language and literacy learning across the 3-6 year and the 6-8 year age groups that comprise the Foundational Stage (Chapters 1 & 2).***

#### ***Recommendation 2a: The policy should emphasise the integrity of the 3-8 year learning continuum more strongly for early language, literacy, literature learning.***

We are heartened by the commitment of the draft to emphasize a learning continuum for the 3-8 years age range, and by its plans to integrate systemic, curricular and pedagogic provisions and planning for this age group. This resonates with the literature on **emergent literacy** that suggests that even before children learn to read and write conventionally, they learn much *about* reading and writing; and they learn a lot about language. However, currently, the draft does not attend sufficiently to the 3-6 year age range in Chapter 2 on acquiring Foundational Literacy; it would be greatly strengthened by more attention to this age group.

Continuities should be clearly articulated between the recommendations in Ch. 1 (ECCE) for the 3-6 year age group, and Ch. 2 (Foundational Literacy and Numeracy) 6-8 year age group, given the integrity of the Foundational Stage envisaged by the policy. If this is not done, the

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<sup>7</sup> The Ambedkar University and CARE India's *Position Paper on Early Language and Literacy Learning in India* (2016) presents a more comprehensive set of aims that can be referred to in reframing this section of the policy (Chapter 4, p. 25). The document can be accessed from [http://eli.tiss.edu/wp-content/uploads/2017/08/Early-Language-and-Literacy-in-India\\_Position-Paper.pdf](http://eli.tiss.edu/wp-content/uploads/2017/08/Early-Language-and-Literacy-in-India_Position-Paper.pdf).

two age groups (3-6 years) and (6-8 years) are likely to be treated in dichotomous ways in practice.

***Recommendation 2b. Support oral language development beyond developing conversational proficiency.*** Oral language development involves more than acquiring conversational proficiency. In places where it is discussed, (for example, Ch. 1, p. 49; Ch. 4, pp. 84-85), using language for a broader set of functions in a child's life, such as reasoning, inquiring, associating, and so on, could be emphasized.

***Recommendation 2c. Teach L-S-R-W simultaneously, drawing upon the “Emergent Literacy” framework<sup>8</sup>.*** Research evidence conducted over the past 40 years from around the globe demonstrates unequivocally that even very young children are capable of using early forms of reading, writing and drawing to express themselves and to communicate much before they enter school. They are also capable of inferential meaning-making, critical thinking, and so on. This entire body of scholarship, referred to as “Emergent Literacy”, has been ignored in the draft. This has powerful consequences for the recommendations in the Chapter 2, Foundational Literacy and Numeracy, which propose largely oral activities for the pre-primary grades, reading hours for Grades 1-3, with an additional hour for writing starting only in Grades 4 and 5 (see, for example, Ch. 4, pp. 84-85). To counteract developmentally inappropriate practices that are prevalent in the early years of schooling, the policy should emphasize that curriculum and pedagogy should draw upon the Emergent Literacy framework that proposes developmentally appropriate opportunities for young learners to experiment with continuities between oral and written languages. These include rich opportunities to handle books, have books read aloud to them (in addition to storytelling and poems, rhymes and conversations), participating in discussions, and having multiple opportunities to scribble, draw, and experiment with writing, which together contribute to establishing a strong foundation for early language and literacy learning. Good literature should be introduced through teacher read-alouds to children at an early age.

***Recommendation 2d. Broaden and deepen articulation of the foundational aspects of learning beyond school readiness.*** P. 1.11 (p. 49) and P. 2.11 (p. 62) should emphasize building on foundational aspects of learning, such as addressing the diversity of learner contexts, building positive self-concepts, easing home to school transitions, getting schools ready for children, orienting parents regarding how children learn and what school offers, and so on, which goes beyond ideas of “school readiness” as currently articulated. Since language and literacy are social practices, they develop within supportive contexts. Home-school transitions, in particular, need to be articulated in fuller ways than currently articulated in the school readiness model. Based on research evidence, the Harvard University Centre on the Developing Child<sup>9</sup> has clearly articulated that children learn with fullness and actualise their potentials when they experience:

- Emotional well-being and acceptance. They need to feel safe and not afraid to make mistakes.
- Social competence and a positive self-concept. When a child feels good about herself she is able to participate actively and meaningfully in learning in natural as well as planned ways.

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<sup>8</sup> See: Dyson, A. H. (1990). Symbol makers, symbol weavers: how young children weave play, pictures and print. *Young Children*, 45 (2), 50-57; Strickland, D. (1990). Emergent literacy: How young children learn to read. *Educational Leadership*, 18-2; Teale, W. H., & Sulzby, E. (1986). *Emergent literacy: Writing and reading*. Norwood, N.J: Ablex Pub. Corp.

<sup>9</sup> Center on the Developing Child, Harvard University (2011).



- A stimulating learning environment that allows each child to think and learn in ways that are meaningful for her. Such an environment enables all children to unfold their emerging cognitive abilities with fullness.

***Recommendation 3. Provide greater clarity about the importance of home-languages as Media of Instruction (MoI) and about Multilingual Education (MLE) (Chapter 4).***

It is commendable that the committee recognizes that the medium of instruction be the home language/mother tongue/local language, at least until Grade 5, but preferably until Grade 8 (P4.5.1, p.80). This draws upon established knowledge that learning is easier for children in their home languages, and that they fall behind if they have to learn in languages they do not understand, or that they lack proficiency in.

The importance of cultivating multilingualism in our country and providing early and sustained opportunities at school to become multilingual, are also significant proposals in the draft. Based on this, the draft states that children be immersed in three languages simultaneously from the Foundational years (that is, pre-school and up) (P.4.5.3, p. 81).

These two main ideas in the draft—the importance of the child’s home language in education and the importance of multilingual education—require more nuance, as discussed here.

***Recommendation 3a. Include a discussion of the historical and social contexts of multilinguality in India.***

As noted scholar, Prof. Krishna Kumar<sup>10</sup> put it, “There is no acknowledgement of where we are [in the draft NEP]”. This applies to the discussion on multilingualism as well. The diverse and complex ML contexts in India, and the different challenges they present in the classroom need to be articulated in the policy. The policy should include a discussion under Section 4.5 (p.79) that introduces readers to the diverse contexts of multilinguality in India (including key linguistic data from Census 2011), along with a commentary on why certain policies or approaches pertaining to this aspect have succeeded or failed in the past.

For example, a suggestion with regard to the implementation of the three-language formula, that states get into bilateral agreements to recruit language teachers, bears no mention of the history of prior arrangements of this nature and the degree of their success (Haryana – Andhra Pradesh; Bihar – Andhra Pradesh, etc.). The draft NEP does not address the complexity of the linguistic, socio-political and administrative contexts and their relevance to the current crisis in establishing foundational language learning and literacy.

***Recommendation 3b. State unequivocally that the policy’s intent is to value home-languages for their own sake, and not only as means to transition students to regional language instruction.***

While P4.5.1 (p. 80) promotes mother tongue based instruction until at least Grade 5 (and preferably till Grade 8), this sentiment is diluted in P4.5.2 (p. 80) to state that bilingual materials and methods will be used to transition students whose language is different from the

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<sup>10</sup> From newspaper article, ‘Modi government’s draft education policy reads like a bad PhD thesis’ (National Herald India, 7 June 2019. Retrieved from: <https://www.nationalheraldindia.com/amp/story/education%2Fmodi-governments-draft-national-education-policy-saffron-mohandas-pai-rss>)

medium of instruction. Is the intent of the policy to transition students quickly, or to provide them with a home-language based education for a number of years? Remove seemingly contradictory language in the document (e.g., P.4.5.1 and P.4.5.2, p. 80) about this intent. The policy should state (P 4.5.1) that when homogenous groups of students are present in a classroom, *under no circumstance* should they be transitioned from the mother tongue (MT) before Grade 5 (preferably before Grade 8). The policy should also state (in the same sections) the number of students from a given linguistic background who need to be present in a class for the MT policy to kick-in (e.g., if there are more than 10 students in a class, or more than 40 students in a school who speak a certain language, then the school is obliged to provide MT instruction in that language).

***Recommendation 3c. Separate out the strategy for addressing multilingual scenarios where students from a homogenous linguistic background are present, from scenarios where multiple home languages are present.***

While the draft highlights the idea of instruction in mother tongue; there is a lack of specificity and clarity on how to go about providing this at a national policy level (p. 4.5.1). Multilingual contexts in the country vary greatly, such that one-size solutions do not fit all. We recommend separating the policy vision for minority languages in homogeneous linguistic groups (e.g., in an area where most students speak the same language), from one where a mixture of languages are present in the classroom (e.g., in an urban context). The policy could clarify that each of the recommendations in P4.5.1 and P4.5.2 perhaps suit different linguistic scenarios.

The policy needs to acknowledge that there is an urgent need for more research on effective ML pedagogies in the Indian context. and that teachers need intensive training to feel equipped to attempt such pedagogies in the classroom. The problem requires more concerted thinking than just making textbooks and TLMs available in local languages and bilingual formats, or deploying teachers who know the local languages -- though these may be an important steps in the process. Until credible knowledge-bases are built for such contexts, certain stop-gap measures can be proposed.

***Recommendation 3d. Remove focus on script acquisition in second and third languages in the Foundational Stage.***

The draft repeatedly invokes the “enhanced language learning abilities of young children between the ages of 2 to 8” refrain as the basis for immersing children in three languages *simultaneously* from *preschool years*. More precisely, it sets the aim as, “*Developing speaking proficiency and interaction, and the ability to recognise scripts and read basic text, in all three languages by Grade 3. In terms of writing, students will begin writing primarily in the medium of instruction until Grade 3, after which writing with additional scripts will also be introduced gradually*” (P4.5.3, p. 81). This recommendation seems to be based on a flawed understanding of language and literacy development in children, especially in Indian languages. As Dhir Jhingran<sup>11</sup> points out, the draft seems to have confused ‘acquiring languages’ with ‘language learning’ and ‘literacy’. Young children might be able to acquire multiple languages (oral proficiency) when given meaningful and appropriate opportunities to use it in their context. But this “enhanced ability” does not apply to new, unfamiliar languages introduced in school without considerable instructional intervention. Learning

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<sup>11</sup> *The three-language formula is a bad idea.* Dhir Jhingran interviewed by KuKum Dasgupta (Hindustan Times, 3 June 2019). Retrieved from <https://www.hindustantimes.com/analysis/why-the-three-language-formula-is-a-bad-idea/story-xkmmLnWyJGq6PaleIRdhJ.html>)

scripts requires intense instructional inputs instead of simply “leveraging enhanced language abilities of young children”. Expecting this proficiency (even if for reading basic text) in three languages (that is, three different symbol sets in most cases) by Grade 3 is imposing a “heavy cognitive burden” on young children (Jhingran, 2019) and is highly developmentally inappropriate. Ideally, children would be exposed to languages other than the mother tongue or medium of instruction through stories and conversation, along with appropriate children's literature in these languages. There would be some element of exposure to script in these other languages, no doubt. This exposure to scripts other than the MT in the Foundational Stage should happen in a non-threatening way for the child, without expecting the child to be able to recognize scripts and read text in languages other than MT.

At present, the language of the draft is somewhat contradictory, leading to confusion in interpretation. In P 4.5.3, the following alterations are recommended: (a) the logic that children at this age can learn multiple languages should mean that children are *encouraged and not required* to learn multiple languages at this age; (b) clearly state that the focus of learning languages other than MT/Medium of Instruction (MoI) should be on *oral language proficiency up to Grade 3*; (c) state that exposure to scripts other than the MT will happen in a non-threatening and developmentally appropriate manner (e.g., through read alouds); (d) remove the part about children being expected to recognize scripts and read basic texts in all three languages by Grade 3; and (e) avoid recurring references to the “enhanced language learning abilities” of young children when discussing script acquisition.

***Recommendation 3e. Three Language Formula: State which three languages a young child will be expected to learn.***

P4.5.5 (p. 83) states that children will be immersed in three languages starting from the Foundational Stage onwards. The policy needs to be clear about which are the three languages that a young child will be expected to learn at school, especially for a child whose MT is different from the regional language. This is especially pertinent to the learning of tribal students in diverse parts of the country. For example, a tribal language speaking child will have to learn the tribal language (MT), the regional language, English, and Hindi, which add up to more than three languages.

The committee will have to think through how these multiple recommendations (e.g., MT medium instruction and Three Language Formula) shared in different points of the NEP will come together in the classroom.

***Recommendation 3f. Articulate clearly the policy's commitment towards fostering the MTs that lie outside the 8<sup>th</sup> Schedule.*** The Census 2011 identifies 1369 rationalised MTs in the country, only approximately 40 of which are currently taught in schools, and less than 30 are used as Media of Instruction. In P.4.5 (p. 79) the policy needs to state clearly whether it intends to sustain *all* the MTs identified by the census in its schools; if so, how does it plan to do this; and if not, how will it prioritize languages that lie outside the 8<sup>th</sup> Schedule. Although the draft mentions in several places that multilingual education and provisions for it will not be limited to languages on the 8th schedule, no clear, committed or coherent vision for maintenance or support of languages that lie outside of this schedule is clear to the diligent reader. Without a certain level of well thought out clarity, the policy's commitment to MT-based education appears to be either lip-service, or a measure of pedagogical convenience to help transition children quickly to other media of instruction.

**Recommendation 3g. Discuss perspectives and historical approaches to the teaching of tribal languages.** The draft states its commitment to tribal languages and including tribal knowledge in several place in the document, including P.4.5 (p. 80), P. 4.6.9.2 (p 99), P. 5.2.7 (p. 127), P. 6.4 (p. 149). Yet, issues pertinent to the teaching of tribal languages are reduced to the provision of materials in those languages, or of teachers from those communities. While important, other issues also require consideration. First, what are the historical precedents in our country for teaching tribal children in their own languages? What have we learned from these experiments? Learnings from the field (for example, from Mohanty, 2019<sup>12</sup>) need to be discussed, and policy suggestions drawn from them. Second, tribal languages often have no scripts attached historically to them. This is often cited as a reason for their exclusion from the curriculum. The policy could state clearly (using examples from the field) that the written form of the tribal languages could be taught using the script of the regional language, for example, Kui speaking children could be taught Kui in Odiya script; Lambani speaking children in Karnataka could be taught Lambani using Kannada script, and so on. Else, the historical lack of scripts will be cited as a reason for their exclusion from the formal curriculum.

**Recommendation 3h. Provide more coherent and historically grounded discussions of the contexts, issues and curricular and pedagogical approaches to the teaching of English in the Foundational Stage.**

Concerns about lack of coherence, specificity and historical knowledge apply to the draft's proposal that "*English must also be available and taught in a high quality manner at all government and non-government schools*" (p.82). The impact of English on local languages and cultures has been discussed to a certain extent in the draft (see for example, pp. 81-83). However, the discussion portrays the spread of English only in terms of a historical choice made by the Indian elite after independence; and ignores the larger global spread and political and economic power structures that have entrenched its hold over societies and economies. It also does not discuss why the government now proposes to teach English from the earliest of grades, rather than waiting until later, as was the case in earlier times. Clearly, there are pressures to provide English to the youngest of learners – what are those pressures facing the government? How will the education system balance the "killer" aspect of English (its tendency to limit local languages and cultures) with its real potential for providing access to social/economic mobility and power? The complexity of the economic and political impetus to teach English from the earliest of grades needs more coherent and historically grounded discussions (e.g., in the section on Multilingualism and the Power of Languages, pp. 81-83).

In addition, pedagogical and contextual issues related to the teaching of English in India must be considered. Since English is not present in many Indian contexts, teaching of English in certain contexts must borrow from the Teaching of English as a Foreign Language (TEFL) knowledge-base; while in other areas, ideas from second language pedagogy could be used. Pedagogical issues, such as the role of first language in second language teaching, and balancing conversational language acquisition with reading/writing abilities must be considered. The elephant in the room with English language teaching is the lack of teachers with sufficient knowledge of English, and hence the policy should also highlight the issue of teacher training on this aspect. Finally, the implications (pros and cons) of providing access to English in the Foundational Stage should be discussed.

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<sup>12</sup> Mohanty, A. (2019). *The multilingual reality: Living with languages*, Multilingual Matters.

***Recommendation 3i. Remove incorrect (and unnecessary) statements about the superiority of Indian scripts over English.***

The draft policy seems to imply that Indian languages have scripts that are easier to learn than the Roman script used by English (p.81). Indian scripts are highly regular (that is, they have a high degree of correspondence between the symbol and sound, such that one symbol has just one sound, and one sound is associated with just one symbol) but they are also visuo-spatially very complex, with an extensive set of symbols. Several longitudinal studies (e.g., Menon et al., 2017<sup>13</sup>, Nag, 2007<sup>14</sup>) have shown that children need several years and repeated opportunities to interact with even one Indian script to attain mastery over it.

***Recommendation 3j. Emphasize the need for building cultural continuities for young learners.***

Children fail in the early years of school not only because of linguistic disconnects, but also cultural disconnects. Menon et al. (2017) have provided three case-studies documenting the cultural divides that face young learners from disadvantaged communities when they enter formal schooling – and the impact this has on their language and literacy learning. In Section 4.5, the policy must emphasize the need not just for linguistic, but also *cultural continuities* that need to be built into the curricular and pedagogical strategies to ensure a smooth transition between the home and school cultures of diverse groups of young learners in the classroom. The draft policy does implicitly acknowledge this in several places by discussing the need to recruit teachers and instructional aides from local communities; and for bringing local knowledges into the curriculum. It would be useful if a clearer statement of the same is provided in the chapters on the Foundational Stage (Chapters 1, 2, and relevant sections of Ch. 4).

**Recommendation 4: Emphasize the need for adopting a Comprehensive Language and Literacy curriculum (Chapters 2 & 4).**

***Recommendation 4a. State clearly that children need access to a comprehensive early language and literacy curriculum in order to develop strong foundations.***

In recent decades a consensus has emerged in the domain that children need a *balance* in terms of *what to teach, how to teach, and with what to teach*<sup>15</sup>. This is referred to in the literature as a “comprehensive” model of early literacy teaching<sup>16</sup>. It includes balanced attention to oral languages, literacy and children’s literature in the curriculum; attends to higher-order thinking as well as script level work; and employs a variety of pedagogical strategies and materials. This is a fundamental shift in approach to the teaching of early language and literacy in the Foundational Stage, and must reflect in all chapters and sections relating to this topic, including teacher education.

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<sup>13</sup> Menon, S., Krishnamurthy, R., Sajitha, S., Apte, N., Basargekar, A., Subramaniam, S., Nalkamani, M., & Modugala, M. (2017). *Literacy Research in Indian Languages (LiRiL): Report of a Three-Year Longitudinal Study on Early Reading and Writing in Marathi and Kannada*. Bangalore: Azim Premji University; and New Delhi: Tata Trusts. It can be accessed from <http://eli.tiss.edu/reports-teacher-guides/>

<sup>14</sup> Nag, S. (2007). Early reading in Kannada: the pace of acquisition of orthographic knowledge and phonemic awareness. *Journal of Research in Reading*, 30(1) 7-22.

<sup>15</sup> Fitzgerald, J. (1999). What is this thing called “balance”? *The Reading Teacher*, 53(2), 100-107.

<sup>16</sup> See Ambedkar University and CARE India (2016)’s *Early language and literacy in India: A position paper*, for a clearer elaboration of the Comprehensive Literacy framework.

A comprehensive model of early language and literacy includes an attention to the following aspects:

- *What should be taught* in the teaching of early language and literacy? Both meaning-based (vocabulary, comprehension) and script-based (phonological awareness, phonics, fluency) aspects need to be stressed upon, along with oral language development, appreciation of good literature and writing for expression and communication.
- In terms of *how to teach*, a variety of pedagogical methods including teacher read alouds, shared reading and writing, guided reading and writing, and opportunities for students to individually explore reading and writing are required.
- *With What to Teach*: This balance of methods needs to be supplemented by a balance of materials - which needs to go beyond textbooks and worksheets to include good children's literature, news articles, children's own writing, and so on.

Adapting this approach means shifting from considering issues related to early *literacy* alone, to thinking about issues of literacy in relationship to oral languages and literature; this shift requires taking a more comprehensive approach to envisioning the curriculum for the foundational stage.

P. 2.2 (p. 59) needs to provide a discussion and recommendation for adopting a comprehensive early language and literacy curriculum.

***Recommendation 4b. An average of 2-3 hours per day should be set aside for early language and literacy.***

A substantial part of the Grades 1-5 time-table should be devoted to opportunities to grow in language and literacy capabilities — an average of two-three hours per day, as per the recommendations of the Ministry of Human Resource Development (MHRD, 2014) in the *Padhe Bharat Badhe Bharat* document<sup>17</sup>. Without this allocation of time, it will not be possible to implement a high-quality comprehensive early language and literacy curriculum.

**Recommendation 5. Bring Children's Literature Centrally into Conversations on Building Foundational Language and Literacy (Chapters 2 & 4).**

The draft NEP rightly recommends the expansion of school libraries and building a culture of reading (P2.15) and briefly mentions the use of literature in school (e.g. P4.5.11, P2.2), but it does not seem to view the use of literature as *central* to language and literacy education in the early years. The policy should explicitly state the key role of deep engagement with children's literature in early language and literacy learning; and recommend ways to support the development of high-quality and contextualised children's literature in Indian languages and English. The policy must also list initiatives that would support the *pedagogical use* of children's literature in the classroom so that language teachers are equipped to engage children with books beyond activities like book reports and presentations suggested in Chapter 2 (e.g. P2.15, P2.2).

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<sup>17</sup> Ministry of Human Resource Development. (2014). *Padhe Bharat Bhade Bharat: Early reading and writing with comprehension & early mathematics programme*. Retrieved from <http://ssa.nic.in/pabminutes-documents/Padhe%20Bharat%20Badhe%20Bharat.pdf>

**Recommendation 6. Teacher Education should be emphasized over Remedial Instructors, Peer Tutors and Community Volunteers (Chapters 2 & 5).**

***Recommendation 6a. Identify knowledge-bases that teachers need to teach foundational language and literacy successfully.***

Chapter 5 of the draft policy opens with the objective -- “Ensure that all students at all levels of school education are taught by passionate, motivated, highly-qualified, professionally-trained and well-equipped teachers” (p.113).

P2.1.3 states that “Teacher education and development, both pre-service and in-service, will have a renewed emphasis on the teaching of foundational literacy and numeracy, including the school preparation module, ECCE, and multilevel activity-based learning; this emphasis will be particularly relevant for teachers of Grades 1 and 2.” Multiple calls are made throughout Chapters 1 and 2 for teachers who are well trained in activity-based, discovery-based and play-based modes of learning. While acknowledging the need for moving away from mindless rote learning in early language classrooms, strong foundational language and literacy learning also requires teachers to access more specialised knowledge-bases.

The policy needs to signal (in the Section: What can be done to reverse this crisis?, pp. 57-64) that there is an urgent need to understand the knowledge bases that teachers require to teach language and literacy successfully in a richly multilingual country like India. These knowledge bases include (a) an understanding of the aims of early language and literacy education; (b) an understanding of how children from diverse contexts learn, and therefore, how to teach languages and scripts in different contexts; and (c) multilingual capabilities to conduct teaching and learning. In Chapters 2 and 5, the policy should emphasize the role of knowledgeable and reflective teachers, literacy coaches; and intensive in-service trainings for foundational literacy.

***Recommendation 6b. Downplay the role of tutors, aides and volunteers (p. 57-58, P2.5, P2.6) even as temporary or stop-gap measures.***

We begin this recommendation by acknowledging that the Remedial Instructional Aides Programme (RIAP) is seen as a *temporary 10-year measure* that, along with the National Tutors Programme (NTP) and the Community Volunteers Programme are not intended to take away from the creation of a committed and knowledgeable teaching cadre. Further, the draft states clearly that these tutors and aides would receive some training (P2.6, p. 61) and would work under the supervision of trained teachers.

Nevertheless, this group of experts wishes to express its alarm at the commonsensical idea reinforced by this “temporary 10-year solution” that any literate person can help make the next person literate! As stated in the preceding section, specific knowledge-bases related to curriculum, pedagogy, assessment, child development, and the teaching of early language and literacy are required for good teaching. This is especially true in the case of children who did not receive a good first education to begin with, or who are struggling. The instructional aides are expected to offer remedial classes during and after school hours as well as run classes during the summer vacation (p.60) – which is a lot of responsibility to give to partially trained volunteers, even if working under supervision, and only for the first ten years. If fixing the problem of foundational literacy was as simple, then we would not be having the crisis that we have today! It would make more sense for the policy to propose other stop-gap measures, such as, teachers of the Foundational Stage would receive intensive in-service training for addressing foundational literacy and numeracy; or, that specially trained Literacy

Coaches (drawn from a cadre of experienced teachers) would be appointed at the block level to support teachers in their efforts to provide foundational literacy to all. While both tutors and aides can be useful *supplements* to the system (we are not arguing that they be removed completely), there is no reason to give them the prominence that they currently enjoy in our national policy on education, and they definitely should not be viewed as the *primary* stop-gap measure.

We also recommend spending more time in Chapter 2 describing the longer-term solutions than the transitional solutions.

***Recommendation 6c. Clearly articulate the need for flexibility and greater teacher autonomy to address learner diversity along multiple dimensions.***

The need for building highly capable, reflective teachers who are autonomous decision makers is critical to ensuring foundational language and literacy for all students. In an enormously diverse country like India, centralized solutions will always have limitations, and local solutions will have to be developed by capable, reflective individuals. Flexibility, autonomy and reflectiveness are ideas that need to be emphasized in both Chapters 2 and 5.

**Recommendation 7. Discuss the teaching and learning of language and literacy across the curriculum (Chapters 2 & 5).**

The draft has ignored the role of language across the curriculum, which is a huge oversight, given that most of the curriculum is transacted through language. The policy should state that teachers of all stages, irrespective of whether they teach mathematics, science or social studies, need to have a foundational understanding about teaching content through the language(s) of their students. A language across the curriculum module should be a compulsory part of all teacher training courses (Ch. 5).

**Recommendation 8. The policy should include discussions on the need for differentiation, inclusion and remediation if foundational language and literacy is to be accomplished for all (Chapters 2 & 5).**

If strong foundational literacy for all is the goal, teachers need to know how to *differentiate* instruction for learners at different levels and how to provide specific help to students who are struggling. Some students will struggle with different aspects of language learning, despite a comprehensive curriculum and good first teaching. In keeping with current thinking and policy-making on inclusive education, teachers need to know how to *include* children with varied learning needs in their classrooms, in coordination with special educators, where necessary. The need for inclusive education is sometimes seen as contradictory to the need for special educators. Yet, in our collective experience, general educators often need to collaborate with special educators, even within inclusive settings, in order to reach all students effectively. Early identification and remedial teaching will be necessary for a small (but significant) percentage of students who might have specific learning difficulties, such as dyslexia. *Remedial teaching*, in particular, requires a specialised pedagogic knowledge base, such that we cannot rely (even temporarily) upon the functional knowledge of literate volunteers.



In the section, *What can be done to reverse this crisis, and urgently?* (p. 59), it is recommended that the policy states clearly the need for knowledgeable teachers who are comfortable with *differentiation* of instruction for students with different capabilities; *inclusion* of early language learners; and with *early identification and remediation* of specific language learning difficulties. It is also recommended that the policy not use language that appears to treat remedial instruction as equivalent to informal, well-intentioned tutoring conducted by volunteers. These same recommendations could also find mention in Chapter 5.

**Recommendation 9 (Chapters 4 & 8). Discourage Large-Scale Assessment of Language and Literacy Learning in the Foundational and Preparatory Stages.**

The draft recommends State census examinations starting in Grade 3. On p. 107, the drafts states unequivocally that “...all students will take State census examinations in Grades 3, 5 and 8”, while on p. 179, it appears to leave the decision up to individual states: “States will also be encouraged to conduct their own census-based State Assessment Survey....”.

Irrespective of whether it is nationally mandated, or encouraged but left to the discretion of individual states (several of which are already conducting such examinations), the group of experts formulating this response believes that Grade 3, or even Grade 5, is too early to subject young children to high-stakes, large-scale standardized assessments, even if only to check-in on the health of the public education system. The negative effects of large-scale standardized testing (such as state census examinations) are well known; while the benefits remain contested. They are not advisable for highly heterogeneous and diverse societies and go against the tenets of child-centered education which the policy upholds. Learnings from other countries that engage in such assessments suggest that under such scenarios, teachers often start teaching to the test, rather than in the more thoughtful manner imagined by the policy. Young learners can experience stress; and feedback from the assessments seldom reaches classrooms in a useful and timely manner to facilitate the teaching-learning process..

Instead, we support the emphasis that the draft policy places on well thought out plans for formative assessment and record-keeping of individual students’ progress at local levels. In addition, the policy must highlight the need for teachers to be taught to *respond* to insights gained from the formative assessments; else, such efforts will generate data without improving learning outcomes. Perhaps states could collect well-selected samples if they wish to keep track of the efficacy of the learning of students in their schools, rather than subjecting *all* students to early and compulsory standardized testing.

### Conclusion

In conclusion, it is the opinion of this group that the relevant chapters of the NEP will be greatly strengthened by engaging seriously with the advances made by scholars, practitioners and policy-makers in the field of early literacy, some of which have been outlined in this document. Initiatives like the Early Literacy Initiative (TISS Hyderabad) ([www.eli.tiss.edu](http://www.eli.tiss.edu)) have been making academic knowledge widely available for Indian contexts and have a list of resources that might be of use to this committee. NGOs like the *Language Learning Foundation* (New Delhi), the *Organization for Early Literacy Promotion* (Rajasthan), *Quality Education Support Trust* (Maharashtra), *Pragat Shikshan Sanstha* (Maharashtra), *Eklavya* (Madhya Pradesh), *Kalike* (Karnataka), *Parag Initiative* (Tata Trusts), *Room to Read*, *Muskaan* (Madhya Pradesh) and several others have also collaboratively engaged on the issue of foundational literacy in India and have been key in building a shared knowledge base and

shared understanding of the issues related to this domain. They would be valuable partners to consult in developing policy measures.

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