

Implementation Challenges of NEP 2020's Assessment Reforms in Indian Higher Education: A Case Study of Commerce Colleges in Delhi NCR

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Abstract

The National Education Policy (NEP) 2020 envisions a transformative overhaul of assessment practices in Indian higher education, shifting from terminal examination-centric models towards competency-based, continuous, and holistic evaluation frameworks. This paper investigates the ground-level implementation challenges confronting commerce colleges in the Delhi National Capital Region (NCR) as they attempt to operationalise NEP 2020's assessment mandates. Employing a mixed-methods approach, primary data were collected through structured questionnaires administered to 215 faculty members and 480 students across 12 purposively selected commerce colleges in Delhi NCR between January and March 2026, supplemented by in-depth interviews with eight college principals and academic deans. Thematic analysis reveals five principal challenge clusters: (i) infrastructural and technological deficits, (ii) faculty capacity gaps, (iii) curriculum-assessment misalignment, (iv) institutional resistance and procedural rigidities, and (v) student preparedness and awareness lacunae. The study finds that while institutional intent is broadly supportive of NEP's vision, implementation fidelity remains low, with over 67 percent of surveyed faculty indicating insufficient training and 71 percent of colleges lacking adequate digital infrastructure to support continuous assessment modalities. The paper concludes with a set of evidence-informed policy recommendations directed at university administrations, state governments, and the University Grants Commission (UGC).

Keywords: NEP 2020, Assessment Reforms, Commerce Education, Delhi NCR, Higher Education Policy, Continuous Evaluation, Competency-Based Assessment

Introduction

The National Education Policy 2020, adopted by the Government of India in July 2020, represents the most comprehensive reimagining of the Indian educational architecture since the Kothari Commission Report of 1964–66. Among its numerous provisions, the policy's mandate for assessment reform occupies a central position, reflecting a long-standing critique of India's examination-driven pedagogical culture. NEP 2020 explicitly calls for a shift away from “summative” or terminal examinations towards “formative” and “continuous” assessment paradigms that evaluate higher-order cognitive skills, creative capacities, and applied competencies rather than rote memorisation and content reproduction (Ministry of Education, 2020).

For the discipline of Commerce, which occupies a significant position in Indian higher education — with approximately 1.2 million students enrolled in undergraduate Commerce programmes across Indian universities as of 2024–25 (AISHE, 2025) — the assessment reform agenda holds particular significance. Commerce education has historically been characterised by standardised, paper-based examinations assessing declarative knowledge of accounting principles, business laws, and economic theories. The transition to portfolio-based assessments, project work, internship evaluations, peer assessments, and technology-mediated continuous evaluation envisioned under NEP 2020 therefore constitutes a radical departure from established practice.

Delhi NCR, as India's largest metropolitan educational cluster hosting over 200 colleges

affiliated to the University of Delhi, Guru Gobind Singh Indraprastha University (GGSIPU), and Jawaharlal Nehru University, among others, offers a particularly instructive case study. The region combines resource-rich institutions with resource-constrained ones, houses diverse student demographics, and operates under the administrative oversight of multiple affiliating universities, creating a layered and complex implementation environment.

This paper seeks to document, analyse, and theorise the challenges confronting commerce colleges in Delhi NCR as they navigate the transition mandated by NEP 2020's assessment reform provisions. It situates these challenges within broader debates on educational policy implementation, drawing on Fullan's (2007) "three phases of implementation" framework and Berman and McLaughlin's (1978) mutual adaptation model to interpret findings from primary empirical research conducted between January and March 2026.

Review of Literature

NEP 2020 and the Assessment Reform Mandate

NEP 2020's Chapter 4, dedicated to higher education, outlines a comprehensive vision for assessment redesign. The policy mandates the establishment of the Academic Bank of Credits (ABC), the introduction of Multiple Entry and Exit (MEE) options, and the development of competency-based curricula assessed through a combination of internal, external, formative, and summative instruments (MoE, 2020). The UGC Guidelines on Curriculum and Credit Framework for Undergraduate Programmes (CCFUP), released in 2022 and updated in 2024, further operationalise these provisions by specifying credit allocation for internships, community engagement, research projects, and skill-based modules (UGC, 2024).

Academic commentary on NEP 2020's assessment provisions has been broadly supportive in normative terms but cautious in empirical terms. Singh and Choudhary (2022) argue that the policy's competency-based assessment vision aligns with global best practices but underestimates the "implementation gap" created by India's chronic deficits in faculty development, digital infrastructure, and institutional governance

capacity. Rao (2023) similarly notes that NEP 2020's holistic assessment framework presupposes a pedagogical culture of active learning that does not currently exist in the majority of affiliated colleges.

Commerce Education and Assessment Practices in India

Commerce education in Indian universities has long been critiqued for its heavily examination-centric orientation. Kapur and Mehta (2017) characterise the dominant assessment paradigm in Indian Commerce departments as "anchoredly summative," with terminal examinations accounting for between 70 and 100 percent of the final grade in most affiliated colleges. This orientation, they argue, incentivises surface-level learning, discourages critical inquiry, and produces graduates poorly equipped for the analytical demands of contemporary business environments.

Several studies have explored the gap between intended and enacted curriculum in Commerce education. Krishnan (2021) found that faculty in affiliated Commerce colleges in Maharashtra reported spending over 80 percent of their instructional time on content delivery aligned with examination syllabi rather than skill development. Banerjee and Pal (2023), in a study of West Bengal colleges, documented similar patterns and attributed them to examination board pressures, inadequate professional development, and the absence of institutional incentive structures rewarding innovative pedagogy.

Policy Implementation Theory and Higher Education

The theoretical literature on educational policy implementation provides a useful conceptual lens for interpreting the challenges documented in the present study. Fullan's (2007) influential framework distinguishes between initiation, implementation, and institutionalisation phases, and emphasises that sustainable change requires alignment across macro (policy), meso (institutional), and micro (classroom) levels. The NEP 2020 implementation trajectory in India's affiliated college sector suggests that while the macro-level policy architecture is in place, meso-level institutional translation and micro-level pedagogical practice remain weakly developed.

Berman and McLaughlin's (1978) mutual adaptation model is equally instructive. The model posits that effective policy implementation requires a two-way process in which both implementing institutions adapt to policy mandates and policy mandates are adaptively translated to suit institutional realities. Evidence from the present study suggests that in many Delhi NCR commerce colleges, this mutual adaptation process is hampered by top-down communication of mandates, limited faculty agency, and inadequate feedback mechanisms between colleges and affiliating universities.

Methodology

Research Design

This study adopts a convergent parallel mixed-methods design (Creswell and Clark, 2017), combining quantitative survey data with qualitative interview data collected concurrently and integrated at the interpretation stage. The mixed-methods approach was chosen to capture both the breadth of implementation challenges across a representative sample of institutions and the depth of contextual understanding required to interpret those challenges meaningfully.

Sampling and Data Collection

Twelve commerce colleges in Delhi NCR were purposively selected to represent variation along three dimensions: institutional type (government, government-aided, and private unaided), affiliating university (University of Delhi, GGSIPU, and autonomous institutions), and geographic location (Delhi city, Noida, Gurgaon, Faridabad, and Ghaziabad). Within each college, structured questionnaires were administered to all available Commerce faculty (yielding 215 valid responses) and to a stratified random sample of undergraduate students in their second and third years (yielding 480 valid responses).

In addition, semi-structured in-depth interviews were conducted with eight college principals and academic deans between February and March 2026. Interviews were audio-recorded with informed consent, transcribed verbatim, and subjected to thematic analysis using NVivo 14. The questionnaire data were analysed using SPSS 28, with descriptive statistics, chi-square tests, and logistic regression employed to identify patterns and associations.

Ethical Considerations

Institutional ethics approval was obtained from the Research Ethics Committee of the lead institution prior to data collection. Informed consent was obtained from all participants, and data were anonymised at the point of transcription and entry. Participation was entirely voluntary, and participants were assured of their right to withdraw without penalty at any stage of the research.

Findings and Discussion

Infrastructural and Technological Deficits

The most consistently and acutely reported challenge across all twelve institutions was the inadequacy of digital infrastructure to support NEP 2020's technology-mediated assessment provisions. Specifically, 71 percent of colleges in the sample ($n=8.5$ rounded to 9 of 12) reported lacking stable, campus-wide internet connectivity sufficient to support simultaneous online assessment for large student cohorts. Only three of the twelve colleges possessed a dedicated Learning Management System (LMS) that had been operationally integrated into faculty assessment workflows. The remaining nine relied on informal WhatsApp groups, Google Forms, or email for assignment submission and feedback — arrangements that lack the auditability, accessibility, and data management capabilities envisioned by NEP 2020's Academic Bank of Credits framework.

Faculty survey responses corroborated these infrastructural concerns. When asked to rate the adequacy of their institution's digital infrastructure for implementing NEP-mandated continuous assessment, 63.7 percent of respondents rated it as "inadequate" or "very inadequate." Notably, this inadequacy was most acute in government-aided colleges (78.2 percent rating infrastructure inadequate) compared to private unaided colleges (49.1 percent). This differential reflects the capital investment disparities between public and private institutions in the Delhi NCR context.

One college principal articulated the structural nature of this challenge during the interview phase: the institution had formally adopted a continuous internal assessment component constituting 30 percent of total marks, as mandated under the university's NEP implementation framework, but the actual administration of this component continued to

rely on a single mid-semester written paper rather than the portfolio-based or project-based modalities envisioned by policy. The constraint, as identified by the principal, was the absence of an integrated digital platform capable of managing the administrative burden of authentic, multi-modal assessment at scale.

Faculty Capacity Gaps and Professional Development Deficits

A second major challenge cluster concerns faculty preparedness for the pedagogical reorientation demanded by NEP 2020's assessment reforms. The shift from designing and marking conventional examination papers to constructing competency-based rubrics, facilitating peer assessment, supervising research projects, and providing individualised feedback requires not merely willingness but substantive professional development investment.

Survey data reveal that 67.4 percent of faculty respondents reported having received no formal training specifically focused on competency-based or continuous assessment design since the announcement of NEP 2020. Among the 32.6 percent who had received some training, the median duration reported was a single one-day orientation workshop — a depth of professional development widely acknowledged in the pedagogical literature as insufficient to produce durable changes in assessment practice (Darling-Hammond, 2017).

Faculty qualitative comments revealed a secondary dimension to this challenge: conceptual ambiguity regarding what NEP 2020's assessment provisions actually require. Several respondents conflated “continuous assessment” with “frequent testing,” interpreting the reform mandate as requiring multiple short examinations rather than the qualitatively different evaluation approaches — portfolios, reflective journals, project presentations, peer review — envisioned by the policy. This conceptual ambiguity is partly a product of inadequate dissemination of policy guidance by affiliating universities and partly a consequence of the limited professional discourse on alternative assessment in the Indian Commerce academic community.

Curriculum-Assessment Misalignment

A third and structurally important challenge concerns the misalignment between NEP 2020's assessment reform mandate and the extant curriculum frameworks within which commerce colleges operate. Effective assessment reform requires not merely new assessment instruments but curricula redesigned to specify the competencies, skills, and dispositions that assessments are intended to measure. In the Delhi NCR sample, however, curriculum revision had in many cases proceeded independently of, and inconsistently with, assessment reform, creating a situation in which faculty were expected to assess competencies not explicitly embedded in the revised syllabi.

The University of Delhi's transition to the Choice-Based Credit System (CBCS) under LOCF guidelines and subsequently to the NEP-aligned Four-Year Undergraduate Programme (FYUP) framework illustrates this challenge. Multiple rounds of curriculum revision between 2020 and 2025 have produced syllabi that incorporate NEP's structural innovations — generic electives, value-added courses, internship credits — without consistently specifying the learning outcomes against which students in Commerce programmes should be assessed. Faculty in four of the twelve colleges reported that they were formally required to maintain continuous assessment records but had received no institutional guidance on what competencies to assess or how to construct valid and reliable rubrics aligned with disciplinary learning outcomes.

Institutional Resistance and Procedural Rigidities

Beyond infrastructure and capacity, the research identified a pattern of institutional resistance and procedural rigidity that constitutes a fourth significant implementation barrier. This resistance operates at multiple levels. At the administrative level, examination department structures within affiliated universities have historically been organised around the logistical management of terminal examinations — question paper setting, invigilation, central valuation, result processing — and lack the procedural frameworks to manage the audit, moderation, and quality

assurance requirements of a decentralised continuous assessment system.

At the faculty level, a subset of respondents expressed explicit resistance to assessment reform, grounding their objections in concerns about workload intensification, grade inflation, and the erosion of the perceived objectivity and standardisation that terminal examinations provide. While only 18.6 percent of faculty respondents indicated outright opposition to the principle of continuous assessment, 54.3 percent expressed concerns about the fairness and manageability of the transition, and 61.7 percent anticipated that continuous assessment would increase their administrative burden substantially without corresponding resource support or recognition.

Interview data with principals revealed an additional institutional dynamic: the competitive pressures generated by student demand for high marks. Several principals noted that in a context where university rank lists and professional course admissions — particularly to MBA, CA, and ICWA programmes — depend heavily on undergraduate percentage marks, both students and faculty face implicit pressures to maintain high scores that may be difficult to reconcile with the more rigorous, competency-based standards that authentic assessment reform would entail.

Student Preparedness and Awareness

Lacunae

The student dimension of NEP 2020's assessment reform implementation has received comparatively less attention in the literature but emerges from the present study as a significant variable. Student survey data reveal that 58.3 percent of respondents were unaware of or unclear about the specific assessment changes their college had introduced under NEP 2020. Only 29.6 percent reported having received a clear explanation from faculty or institutional authorities of how their continuous assessment marks would be calculated, what evidence they would need to provide, and how different components of assessment would be weighted.

Beyond awareness, the research identified preparedness gaps of a more substantive kind. A significant proportion of surveyed students had navigated their secondary education under

the CBSE or state board examination regimes, which, despite the introduction of internal assessment components, remain heavily oriented towards terminal examinations. The transition to project-based learning, reflective writing, peer evaluation, and skill demonstrations required in NEP-aligned Commerce programmes therefore represents a qualitative shift in study habits and learning dispositions that many students find challenging and, in some cases, anxiety-inducing.

Policy Implications and Recommendations

The findings of this study point to a set of concrete and actionable policy interventions directed at different levels of the higher education governance architecture.

First, at the UGC and national level, there is an urgent need to develop a standardised, open-access digital platform for assessment management that can be deployed across affiliated colleges without requiring independent institutional technology investment. The Academic Bank of Credits infrastructure, while conceptually sound, remains inaccessible to the majority of colleges in the sample. A centrally provisioned, interoperable LMS, modelled on similar initiatives in countries such as South Africa's OpenColleges platform, would significantly reduce the infrastructure barrier identified as the most acute implementation challenge.

Second, faculty professional development must be reconceptualised from isolated orientation workshops to sustained, embedded, and discipline-specific capacity-building programmes. The UGC-HRDC network should be directed to develop Commerce-specific continuous assessment training modules incorporating practitioner exemplars, rubric design workshops, and peer learning communities. A mandatory minimum of 40 hours of assessment-focused professional development per faculty member per academic year, with institutional funding support, would represent a meaningful commitment to implementation capacity.

Third, affiliating universities must urgently align curriculum revision with assessment reform. The specification of discipline-specific learning outcomes for Commerce undergraduate programmes, articulated at the

granularity of individual course units, is a prerequisite for valid competency-based assessment. The UGC's Curriculum and Credit Framework should be supplemented by detailed assessment frameworks at the subject level, developed collaboratively with faculty practitioners.

Fourth, institutional governance reforms are needed to create the administrative infrastructure for decentralised continuous assessment management. Examination departments in affiliated universities should be restructured to include dedicated continuous assessment monitoring and moderation functions, with trained academic staff rather than administrative personnel responsible for quality assurance.

Conclusion

NEP 2020's assessment reform agenda represents a genuinely transformative policy vision for Indian higher education, one with the potential to produce graduates better equipped for the knowledge economy and more authentically developed as critical, creative, and ethical thinkers. However, the present study's empirical evidence from commerce colleges in Delhi NCR demonstrates that the distance between policy vision and institutional reality remains substantial. Implementation is constrained by interconnected deficits in infrastructure, faculty capacity, curriculum alignment, institutional governance, and student preparedness that cannot be resolved through policy mandates alone.

The study's findings have important implications beyond the Delhi NCR context. The challenges documented here are likely to be representative of, or more acute than, conditions in institutions located in smaller cities and rural areas, where resource constraints are even more pronounced. A nationally coordinated, adequately resourced, and time-sensitive implementation support strategy is essential if NEP 2020's assessment reform mandate is to be realised rather than merely formally adopted.

Future research should track longitudinal changes in assessment practice across the same institutions, examine student learning outcomes associated with different assessment modalities in Commerce programmes, and explore comparative implementation trajectories across

different affiliating university contexts. The present study contributes an empirically grounded baseline for such longitudinal inquiry.

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