

India's RTE Act: An Analysis

Anuradha Gupte

Independent Research Professional, Pune, India

Abstract: An analysis of policies laid down under India's RTE Act enacted in 2009 and its implementation in the last five years reveals that the Act has led to undesirable outcomes. The paper attempts to uncover the problematic issues that have arisen through the RTE Act, which in turn have led to deepening the crisis in the education sector. Through studying the undesirable outcomes, this Review Article attempts to identify 1) the problematic aspects of the RTE Act that lead to undesirable outcomes and 2) the lacunae in the Act that create implementation difficulties and lead to confusion and problematic outcomes. The paper attempts to arrive at policy implications based on these findings.

Keywords: Right to Education (RTE), private school closure, learning outcomes, 25% quota, elementary education, compliance, norms.

I. THE RIGHT TO EDUCATION (RTE) ACT, 2009

1. Background:

Efforts to strengthen the elementary education system in India have been ongoing and the introduction of the Mid-Day Meal scheme in 1995 and the *Sarv Shikshan Abhiyan* in 2001 were steps in this direction. School enrolment is said to have increased manifold due to these initiatives and percentage of out-of-school children declined considerably.

In compliance with the 86th Constitution Amendment Act, the Right to Education (RTE) Act was enacted in 2009, to deal with elementary education issues and became operational as a fundamental right in 2010. It provides for the right of children between the ages of 6 and 14 to free and (what is termed as) compulsory education, in a neighbourhood school till the completion of elementary education.

- RTE makes provisions for a non-admitted child to be admitted to an age appropriate class.
- It specifies the duties and responsibilities of appropriate Governments, local authority and parents in providing free and compulsory education, and sharing of financial and other responsibilities between the Central and State Governments.
- It provides for rational deployment of teachers by ensuring that the specified pupil teacher ratio is maintained for each school, rather than just as an average for the State or District or Block, thus ensuring that there is no urban-rural imbalance in teacher postings. It also provides for prohibition of deployment of teachers for non-educational work, other than decennial census, elections to local authority, state legislatures and parliament, and disaster relief.
- It provides for appointment of appropriately trained teachers, i.e., teachers with the requisite entry and academic qualifications.
- It prohibits (a) physical punishment and mental harassment; (b) screening procedures for admission of children; (c) capitation fee; (d) private tuition by teachers and (e) running of schools without recognition.
- It provides for development of curriculum in consonance with the values enshrined in the Constitution, and which would ensure the all-round development of the child, building on the child's knowledge, potentiality and talent and making the child free of fear, trauma and anxiety through a system of child friendly and child centred learning.

As far back as the 1960s, the Kothari Commission had acknowledged the role of the private sector in education. The RTE Act envisages the participation of the private sector in attaining the goal of providing free and compulsory education to all children in the 6 to 14 age group. Private sector participants include NGOs, civil society groups, international NGOs, corporate foundations, and other private entities. However, certain private entities such as minority religious institutions are exempted from this law. In 2012, the RTE Act was amended and made subject to the provisions of Articles 29 and 30 of the Constitution (which protect the rights of minority institutions to operate without interference). [1] Thus, *madrasas*, seminaries, and other such minority institutions do not fall under the ambit of the RTE Act.

2. Free and Compulsory:

The term 'free' implies that no child (his/her parents/guardians) shall be liable to pay any kind of fee or charges or expenses that prevent him/her from pursuing and completing elementary education. Education is listed as a concurrent subject in the Constitution of India which means that both the state and the centre are responsible for effective implementation of this Act. Since the enactment of the RTE Act, states have been requesting funds from the Centre for its implementation.

The term 'compulsory education' implies the obligation of the appropriate government body to provide free elementary education and ensure admission, attendance, and completion of elementary education to every child in the 6 to 14 age group. However, parents and guardians are not liable for any penalty when their children/wards are not sent to school. This essentially renders the term "compulsory" meaningless. The compulsory aspect of RTE is thus a supply-side feature, wherein schools are obligated to provide the service. However, without local government bodies and parents/guardians being held accountable for enrolling children in schools, the guarantee of providing access to education to all is little significance. Basic education is not truly compulsory or mandatory.

II. TEACHER AND INFRASTRUCTURE RELATED NORMS AND OUTCOMES

1. Teacher and Infrastructure Related Norms:

The following norms mandated under the RTE apply to government as well as aided, partially aided, and unaided private schools. Schools were mandated to comply with the following norms by March 31, 2013.

- Norms and standards relating to Pupil Teacher Ratios (PTRs), school-working days, teacher-working hours:
 - teacher pupil ratio for lower primary classes should be 1:31
 - teacher pupil ratio for upper primary classes should be 1:36
 - there must be teacher recruitment to fill in vacancies according to the above norms
 - 200 teaching days and 800 teaching hours for lower primary classes
 - 220 teaching days and 1000 teaching hours for upper primary classes
- School Management Committees (SMCs) to be created
- Each teacher to teach 45 hours a week including preparation time
- Norms and standards relating to buildings and infrastructure:
 - All-weather building
 - At least one classroom per teacher
 - An office plus store plus head teacher's room
 - Separate toilets for boys and girls
 - Safe and adequate drinking water for all children
 - A kitchen for cooking the mid-day meal
 - A playground and arrangements to secure the building with a fence or wall

Electricity has not been listed as a requisite aspect of infrastructure and this may perhaps need to be remedied. Also, in urban areas where space is limited, the norm pertaining to a playground may be hard to comply with.

2. RTE Compliance by State Governments:

The RTE Act has been in operation for five years. In 2013, 19 Indian states had notified the RTE rules. These include Rajasthan, Tamil Nadu, Madhya Pradesh, *Karnataka*, Himachal Pradesh, Andhra Pradesh, and Maharashtra. In the following two years, a few more states such as Meghalaya notified the RTE rules.

The strict norms imposed were expected to positively impact quality of education, enrolment, and learning outcomes. However, state governments want the centre to provide them with additional funding for fulfilling stipulated norms. Thus, compliance with RTE norms has been very low. According to a survey conducted by the national Right to Education (RTE) forum, about 38% of the schools do not have a girls' toilet and 40% lack a boys' toilet. 54% of the schools do not have boundary walls, and 14% do not have a drinking water facility for students. According to the survey, only 10% of the schools in country meet the norms of the RTE Act. [6]

Thus, with respect to government schools, owing to scarcity of resources, norms pertaining to minimum infrastructure, teacher-pupil ratio, and teaching hours are far from being attained. Teacher training and teacher recruitment are essential for overcoming the human resource constraints to attain norms on teacher-pupil ratio. A performance appraisal mechanism is needed for enforcing the teaching-hours norm. For creating the necessary physical infrastructure, funds will need to be allotted or sought. Fulfilling all the norms thus needs a massive deployment of funds.

3. Closure of Private Schools:

One objective of RTE is making more schools **available** to people, another is making schools **accessible to the poor**, while a third is making the **educational sector (system) adaptable to requirements**. Hence, seeking private participation in education is a welcome move as private participation can help further these objectives. **However, the imposition of rigid norms on private schools has been counterproductive to all these objectives as it has led to the closing down of schools.** This is an undesirable outcome for the Indian educational system which is already plagued by inadequacy in the number of schools vis-a-vis the requirements. Schools with limited resources catering to children from lower income families can face and as we shall see, have faced the negative impact of such a policy.

For example, seasonal schools run by NGOs for children of migrant workers are often makeshift, but they fulfil the function of providing functional numeracy and literacy to the children who attend. Thus, norms on infrastructure and teacher-pupil ratio in fact discourage makeshift and innovative approaches like seasonal schools for children of migrant workers. Clearly, the imposition of strict norms under RTE is counterproductive to the principles of **availability, improving access, and adaptability**.

In fact, in 2013, in 17 states, the government had served notices to private schools and in some cases, closed schools down for non-compliance with stipulated norms. As noted by Prof John Kurrien:

Attempts by education authorities to close down non-compliant private schools can be defended if all, or at least most government schools within their jurisdiction had become compliant with the mandated norms by March 31, 2013. Yet according to official statistics reported in the DISE School Report Cards for 2012-13, a mere 7 percent of state and local government schools provided just seven of the ten stipulated infrastructure facilities — school building, drinking water, separate toilet for girls, boundary wall, etc — and the mandated teacher-pupil ratios. [5]

Further, Prof Kurrien writes:

Shockingly, despite full support and funding from the Central, State and local governments, the great majority of government schools in almost every state are not even partially RTE-compliant. Indeed, it can safely be asserted that only a fraction of the government schools in the country are at present fully RTE-compliant, and aspirations of reaching this goal even by 2030 are fanciful. Against this dismal condition of government schools, it's ironical that state and local governments are threatening to close, or have already closed down non-compliant private schools. Although there's no reliable evidence of how widespread school closures are, one report indicates that 2,500 schools have been closed down and that an additional 4,500-15,000 schools face threat of closure. Since non-compliant, private unaided schools enrol millions of poor and rich students, the Centre and state governments need to issue official guidelines to clarify this issue. [5]

Apart from private schools, schools run by NGOs using “alternative and innovative (A&I)” schooling also faced closure under the RTE Act. A Center for Civil Society (CCS) study conducted in 2014 [7] noted that several such NGO operated schools catering to the urban poor also faced closure under the RTE. The study was Delhi focused and hence selected one of the larger NGOs of Delhi providing alternative education, namely Deepalaya. CCS conducted case studies of three such Deepalaya schools that were closed down to study impact on the children attending these schools. While some of these children were now attending government schools, others had dropped out. Problems faced by both categories included obtaining admission. Parents of children who had moved to government schools reported issues like problems due to change in medium of instruction from English to vernacular, teacher absenteeism in government schools, and obstacles to obtaining admission in government schools. Another problem reported was obtaining admission in government schools which were far away from where they lived as compared to the private schools children previously attended, thus leading to steep increases in transportation costs. This indicates that the RTE Act fails to distinguish between profit making entities and those players “that contribute to innovate and design new forms of learning.”

Thus, there is a case for in fact promoting rather than shutting down what some call “private budget schools”.

*The socio-economic value addition of private budget schools has been rigorously demonstrated by Dr. James Tooley, professor of education at Newcastle-Upon-Tyne University in his revealing book *The Beautiful Tree — A Personal Journey into how the World’s Poorest People are Educating Themselves* (2009). To research and gather material for this extraordinary work of scholarship which makes a strong case for special funding and microfinance being made available to private budget school promoters to enable them to upgrade their infrastructure, teacher-pupil ratios, pedagogies and facilities, Tooley visited slum schools around the world. [8]*

Another point to be noted is that under the country’s law, making profits through running an educational institution is not permitted, although “reasonable returns” are allowed. The term “reasonable returns” is not defined, thus leading to ambiguity and scope for varying interpretations. Moreover, not allowing profits by the private sector raises an important question about the sustainability of such institutions. Some petitioners have filed PILs against the Act on the basis that it violates the rights of private educational institutions. In the well-known TMA Pai and Ors v/s the State of Karnataka case, the Supreme Court had ruled that private educational institutions be given the maximum autonomy. Petitioners have cited this judgement. For details on this judgement, please see [12].

III. THE 25% QUOTA CONDITION: LACUNAE AND PROBLEMS

The RTE Act mandates that aided, partially aided, as well as unaided private schools must reserve 25% of the seats for children with an underprivileged background. A certain amount per student from the reserved quota would be reimbursed by the government. The 25% quota clause attempts to address the issue of making schools more **accessible** to the poor.

1. Inadequate Reimbursement Complaint by Private Schools:

The RTE Act states **that the amount to be reimbursed will be estimated by dividing total recurring cost on government schools in the state divided by the total number of students enrolled in these schools.** Many private schools have pointed out that this amount to be reimbursed per student is inadequate. A contrarian point of view states that schools which received land from the government at concessional rates should admit underprivileged children without expecting the government to reimburse the cost. However, even if this is brought about, treating different private schools differently would add to difficulties in implementation.

2. Problems Faced by School Management due to Absence of Clarity on Modalities:

The RTE Act does not specify whether the reimbursement should be done as a lump sum covering all years of education or be made annually. Due to this lack of clarity, delays in reimbursement tend to occur and such delays are likely to adversely affect the functioning of private schools. **Secondly, the RTE Act does not specify what criteria aided schools should use to determine the category of students eligible for free education.** Educationists have suggested that those belonging to weaker sections and disadvantaged groups be considered for the 25% quota. In order to circumvent the problem of lack of clarity, the Center for Civil Society has laid out a model whereby the 25% quota condition can be implemented smoothly (see [10]).

There is absence on clarity on what a school must do when it is unable to fill all seats from the reserved quota. Can the school admit non-quota students? Will it be penalized for doing so? If it does not fill in the unfilled non-quota seats, the school will lose out as it will neither receive reimbursement nor obtain fees from students belonging to the non-reserved category. In such a scenario, the school will make losses when working at sub-optimal capacity.

3. The 25% Quota and Teaching-Related Issues:

Other than problems of implementation due to absence of clarity on the above-mentioned modalities, other issues arise due to the imposition of the 25% quota. These include difficulties of teaching non-homogeneous academic groups of children for teachers and the possible effect of the mixed environment on the psyche of students belonging to reserved and non-reserved categories. A healthy teaching environment, if accomplished would ensure that in fact such a mixed environment helps all categories of students grow and thrive, but if teachers are unable to cope with students at varying learning capacities, children from all categories may suffer the consequences.

Some parents of children from better off backgrounds worry about the consequences of their children co-learning with those from differing (i.e. less privileged) backgrounds. Some teachers express the concern of teaching and handling a non-homogenous group of students in terms of academic credentials, home environment, and cultural context. For example, knowledge of English being a constraint for most children from non-privileged backgrounds, teachers are concerned that bringing these children up to the mark would slow down learning for rest of the class.

Another criticism of the 25% quota condition is that after completion of the elementary education, most of the underprivileged children except for the exceptionally bright ones may have to return to institutions of questionable standard. Moving back and forth between elite schools and sub-standard ones may adversely affect the psyche of such students. While this is not an argument in favour of keeping underprivileged children segregated from children who are better off, the question is: is an enforced quota system the best possible mechanism for bringing this about?

IV. RTE AND LEARNING OUTCOMES

1. Learning Outcomes:

A critique of RTE is that it is input focused while neglecting the outcomes. **In fact, RTE in its current form has no provision for evaluating student learning.** One of the objectives of RTE is providing education that is of **acceptable quality**. However, without evaluating student learning, how can one ensure that education provided is that of acceptable quality?

On-the-ground studies show that after the onset of RTE, learning outcomes declined rather than improved. This calls into question the approach of RTE which aims at improving literacy levels on paper while many counted as literate are in fact unable to read or qualify as literate in the real sense of the word. This suggests that RTE does not contribute to providing education of acceptable quality and rather, that the converse is true.

Some studies have found that RTE has positively impacted enrolment but learning outcomes have suffered. Even the quantum of enrolment is contested. Thus, while the government estimates of out-of-school children is 1 million, according to a survey conducted by the national RTE forum, as many as 8 million children are out of the school system.

With respect to learning outcomes, almost all studies conducted after the introduction of RTE conclude that learning outcomes have declined substantially. For example, to study the impact of RTE and investigate determining factors that influence learning outcomes, a comparative analysis of the ASER-PAISA surveys for 2009 and 2012 were carried out [3].

The ASER-PAISA survey for investigating learning outcomes used the following indicators:

Standard I and II children who can read letters, words, and more,

Standard I and II children who can recognize numbers 1 to 9 and more,

Standard III and IV children who can read a Standard I text or more, and

Standard III and IV children who can do subtraction or more

The survey included all categories of children, those who had never been to school, as well as those attending private as well as public schools. It was found that in 2009, 79% of the children in Standard I and II could read and the same percentage of children could recognize single digit numbers, but in 2012, these percentages had declined to 68% for children who could read, and 71% for children who could recognize single digit numbers. In 2009, 64% of Standard III and IV children could read a Standard I text or more and 56% of Standard III and IV children could subtract. In 2012, these percentages had declined to 54% and 41%, respectively.

2. Causal Links in Learning Outcomes:

As mentioned above, the findings of the ASER-PAISA survey were investigated in detail in [3] to determine the causal links that led to poor learning outcomes. The study found that learning outcomes were correlated with

- Student Attendance
- Teacher education
- Availability of supplementary learning material

It was further found that student attendance was mainly correlated with

- Teacher attendance
- Mid-day meal provision
- Student-teacher ratios

Further it was found that teacher attendance was correlated with

- Headmaster presence
- Availability of supplementary teaching material
- Some accountability mechanisms like presence of teacher display boards and redressal mechanisms.

Through ensuring better teacher attendance and student attendance, supplementary learning materials were seen to play an important role.

While the RTE emphasized the School Management Committees (SMCs) as a means of accountability, the above study found that these were largely ineffective as an accountability mechanism. In fact, the broad consensus from several studies is that SMCs have failed to take off and even when they are created, they are not equipped with sufficient information and powers to ensure accountability. The RTE Act has no mechanism to make equip SMCs with information and empower them.

3. The “No holding back till Standard VIII” Policy and Learning Outcomes:

The “No holding back till Standard VIII” policy also called the “No fail” or “No detention” policy mandates that no child from Standard I to VIII will fail irrespective of how poorly he or she fares in exams. Those supporting this policy felt that it would enthuse students, especially those from deprived backgrounds to study further. In an educational system where teaching quality has already been established such a paradigm shift would perhaps be workable, but in the Indian context where the educational system faces an ongoing struggle to attain a minimum quality standard, the workability of such a policy seems doubtful. In fact, some cynics expressed the view that the “No holding back till Standard VIII” policy was introduced to cover up the issue of drop-outs. It was felt that the policy will delay but not prevent the process of students dropping out because at some stage students must take the examination and many students are likely to fail and therefore drop out after examinations. Critics of this policy think that instead of not holding back children, it is important **to eliminate the root cause of stagnation in learning**. This can be accomplished through the use of mechanisms for comprehensive and continuous evaluation, training of teachers, a proper teacher-pupil ratio, and other such pre-requisites being put in place. Without these inputs, the no-detention policy reduces the quality of education.

Results on the ground have indeed indicated a decline in quality of education in private schools. The Programme for International Students Assessment (PISA) which carries out a ranking of countries based on reading, maths, and science scores of 15 year olds, despite conducting its 2009 study in the high literacy states of Tamil Nadu and Himachal Pradesh,

ranked India 73rd among 74 countries, just above Kyrgyzstan. That India did not sign up for the study in 2012 and 2015 is telling of its confidence relating to quality of education and learning outcomes. A study of learning outcomes by Wipro and Education Initiatives carried out in 2011 covered 89 “top schools” [11] and found that learning standards for standards, 4, 5, and 8 had fallen when compared with a similar study conducted five years previously in 2006, although the study attributes this to the system of rote learning rather than to the “No holding back till Standard VIII” policy.

V. CONCLUSIONS

1. Applying the 4A principles of **Availability, Adaptability, Acceptability** and **Access**, we have noted that **imposing strict norms pertaining to student teacher ratios and infrastructure** has led to closure of private schools including private budget schools and schools using innovative approaches. Thus these norms have proved counterproductive to three out of four principles of making education more widely available (**Availability**), accessible to the poor (**Access**), and allowing schools to be adaptable to prevailing conditions (**Adaptability**).
2. On the other hand, the **condition of 25% quota** in private schools aims at improving access of the underprivileged but the Act does not specify criteria for those to be admitted nor does it specify the timing of reimbursement and poses difficulties for management and operation of private schools. The 25% quota leads to a situation where teachers must teach non-homogeneous groups, and this brings down the standard of learning and hence is counterproductive to the principle of providing education of acceptable quality (**Acceptability**) as teachers struggle with bringing the underprivileged students up to the mark. Private schools also complain that reimbursement amount is insufficient. Thus, the 25% quota condition, if it threatens the bottom lines of schools, can lead to closure of schools and be counterproductive to the principles of **Availability, Adaptability, and Access**.
3. Some critics believe that the RTE approach is that of putting the cart before the horse. It is felt that improving living conditions of the poor is a pre-requisite to providing them access to education. This approach believes that the government must first address issues of poverty alleviation which will empower families to send their children/wards to school. Children from households without access to adequate water, sanitation and hygienic surroundings are at an intrinsic disadvantage and would rarely be able to fare well at schools even if they are able to, and do attend the school. Often, children may come from families where they have lost an earning member and in such cases the question of survival precedes that of enrolling in schools.
4. Looking at the RTE from the impact side, studies on **learning outcomes** show that these have declined. Thus, it is clear that RTE does not help meet the objective of providing education of acceptable quality (the **Acceptability** principle). As seen, RTE’s clause of no holding back (no detention) till class VIII significantly contributes to lowered standards and poor outcomes.
5. Specifically, the no holding back till Standard VIII clause of the RTE Act is identified as one of the major causes for declined standards and poor learning outcomes. Numerous NGOs working in the education sector and civil society organizations have petitioned for this clause to be done away with.
6. Overall, if one looks at how the operation of the RTE Act has panned out, it appears that the focus of the RTE Act has been on controlling private schools rather than on strengthening government schools. This has deepened the crisis in the education sector by adversely affecting the functioning and existing of private schools, many of these “private budget schools” and those using alternative and innovative teaching techniques to cater to children from the disadvantaged groups.

VI. POLICY IMPLICATIONS

Based on our conclusions, there is a case for amending or modifying certain aspects of RTE.

- The contentious clause imposing strict norms on private schools needs to be relooked at and leeway must be given to private budget schools and those using alternate and innovative approaches to education to cater to children from disadvantaged and low-income groups.
- The 25% quota condition needs to be suitably modified to clarify modalities of functioning and help make implementation easy for the government as well as private schools. Lacunae and missing links need to be addressed.

- For better implementation of RTE, there is a need to orient local government bodies and to provide additional inputs like teacher training, incentivizing teachers according to performance, and training for out-of-school children about to enter the education system.
- For better accountability, it is essential to enforce rules like teacher display boards and to create mechanisms for orienting community members for effectively participating in school management committees (SMCs). Clear channels of information flows for empowering SMCs need to be established and enforced.
- For tackling the issue of declined learning outcomes, mechanisms need to be devised to enforce quality education. One mechanism is the use of standardized tests for evaluation to ensure quality and competitiveness. Another mechanism to have a widespread awareness campaign among schools to inculcate notions about quality education and to orient schools in enhancing student learning through use of creative teaching techniques and use of student learning aids. How well students understand what they learn will be important for building individuals who are capable thinkers. A framework needs to be created on a nation-wide scale for periodic benchmarking on all aspects of educational quality. Systems that carry out self-assessment and self-correction can attain and maintain quality standards.
- Certain alternative approaches may be tried on a trial basis. For example, very recently the Rajasthan government initiated Public Private Partnership by bringing the private sector into state run schools [9]. Other alternate mechanisms that are being tried and tested in some Indian states include the school voucher system wherein funding (parents/guardians of) students rather than funding schools is done. Countries such as Chile, UK, USA, Sweden have effectively used the school voucher system instead. School vouchers are issued by the government and these can be used by parents to meet expenses relating to tuition fees, books, uniforms and other related expenses in private schools rather than government ones.

REFERENCES

- [1] Dhar “Madrasas exempted from RTE Act: Center” in Hindustan Times Jul. 31, 2011: URL: <http://www.thehindu.com/news/national/madrasas-exempted-from-rte-act-centre/article2306261.ece>
- [2] Ernst and Young, Right to Education: Role of the Private Sector, Tech. Rep. Mar. 2012.
- [3] Woodrow Wilson School of International and Public Affairs, Lessons in Learning: An Analysis of Outcomes in India’s Implementation of the RTE Act Rep. Feb. 2013.
- [4] M. Kaushal “Implementation of Right to Education in India: Issues and Concerns” Journal of Management and Public Policy, vol.4 (1), pp. 42-48, Dec. 2012.
- [5] J. Kurrien “RTE Act: Time to revisit non-compliance,” Education World, Jan, 2015: URL: <http://www.educationworldonline.net/index.php/page-article-choice-more-id-4365>
- [6] RTE Forum Website: URL: <http://www.RTEforum.org>
- [7] J. Singh “Closure of NGO-run schools in Delhi under RTE” Center for Civil Society Rep., Jun.-Jul. 2014.
- [8] H. Raghupathi et al, “RTE ACT: Confusion confounded,” Education World, May, 2013: URL: <http://www.educationworldonline.net/index.php/page-article-choice-more-id-3617>
- [9] FF A. GOPALKRISHNAN “RAJASTHAN BRINGS PRIVATE SECTOR IN STATE-RUN PRIMARY SCHOOLS, TRIGGERS FIERCE DEBATE” IN TIMES OF INDIA, AUG 12, 2015: FROM [HTTP://TIMESOFINDIA.INDIATIMES.COM/INDIA/RAJASTHAN-BRINGS-PRIVATE-SECTOR-IN-STATE-RUN-PRIMARY-SCHOOLS-TRIGGERS-FIERCE-DEBATE/ARTICLESHOW/48446591.CMS](http://TIMESOFINDIA.INDIATIMES.COM/INDIA/RAJASTHAN-BRINGS-PRIVATE-SECTOR-IN-STATE-RUN-PRIMARY-SCHOOLS-TRIGGERS-FIERCE-DEBATE/ARTICLESHOW/48446591.CMS)
- [10] S. Mittal and P.J. Shah “Reservation In Private Schools Under The Right To Education Act: Model For Implementation” Center for Civil Society Rep. 2010.
- [11] Educational Initiatives Private Limited Quality Education Study: Student Learning Outcomes, Rep. Working Series 14 2011.
- [12] “Summary of the Supreme Court's judgment freeing unaided institutions from the State's reservation policies” Education In India, Aug. 2015: URL: http://prayatna.typepad.com/education/2005/08/summary_of_the_.html