



CIVIL

No Right to Reschedule Exams: Chhattisgarh HC Clarifies Scope of UGC's Dual Degree Flexibility

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Introduction

In a recent decision in the case of *Satyendra Prakash Suryawanshi v. State of Chhattisgarh & Ors.*, WPC No. 3068 of 2025, the Chhattisgarh High Court has clarified the limits of the flexibility offered by the University Grants Commission (UGC) for pursuing two degrees simultaneously. The Court held that while the National Education Policy (NEP) 2020 and UGC guidelines permit dual enrolment in two academic programmes, students cannot demand judicial intervention to reschedule examination timetables to suit individual conflicts.

Factual Background

The petitioner, Mr. Satyendra Prakash Suryawanshi, was simultaneously enrolled in a Master of Social Work programme at Pt. Sundarlal Sharma Open University and an LL.B. programme at Atal Bihari Vajpayee Vishwavidyalaya in Bilaspur, Chhattisgarh. A conflict arose when the final examination schedules for both courses overlapped, making it impossible for him to appear for all papers. He approached the High Court seeking directions to the universities to modify their respective examination timetables to accommodate his dual enrolment.

Legal Arguments

The petitioner argued that the overlapping examination dates infringed his fundamental right to education under Article 21 of the Constitution. Relying on the UGC's guidelines issued under the NEP 2020, he contended that the universities were obliged to ensure that the right to pursue two degrees simultaneously was not rendered illusory by rigid scheduling.

The State and the respondent universities opposed the petition, asserting that the UGC's dual degree policy imposes a clear obligation on students to ensure that the class timings and examination schedules do not clash. The respondents argued that no statutory or constitutional right entitles a student to seek judicial directions to reschedule examinations for personal convenience.

UGC's Dual Degree Guidelines

The UGC guidelines dated 13.04.2022, issued under the NEP 2020, permit students to pursue:

- Two full-time physical mode degrees provided the class timings and schedules do not overlap.
- One full-time physical mode degree and one programme in Open and Distance Learning (ODL) or online mode.
- Two ODL or online programmes simultaneously.

A key aspect of the policy is that the burden of ensuring compliance with non-overlapping conditions rests with the student. No provision obliges universities to modify their academic calendars or examination schedules to resolve individual conflicts.

Court's Reasoning

The High Court rejected the petitioner's plea, reiterating that the right to education under Article 21, though fundamental, does not extend to compelling universities to adjust their administrative functions for individual benefit. The Court emphasised that day-to-day academic administration falls within the exclusive domain of educational institutions and is not subject to judicial micromanagement.

In its order, the Court stated:

"Taking into consideration the fact that the relief which has been sought by the petitioner cannot be granted in exercise of writ jurisdiction and the petitioner has no locus to direct the respondent authorities to make modifications in the final examination timetable for the two academic programmes... in view of the considered opinion of this Court, no case is made out for any interference."

Implications

This ruling reaffirms that while the UGC's dual degree framework significantly expands opportunities for students, it does not guarantee administrative adjustments to eliminate every practical hurdle. Universities retain their administrative autonomy and are under no legal obligation to align examination schedules for individual circumstances.

The judgment is a caution to students to exercise due diligence when planning multiple academic commitments. The responsibility to ensure that schedules are compatible lies squarely with students who choose to benefit from the dual degree option.

Conclusion

The Chhattisgarh High Court’s decision underscores the balance that must be maintained between policy-level flexibility and institutional autonomy. The freedom to pursue dual degrees under the NEP 2020 is a progressive step forward but is subject to practical limitations. Students must be proactive and realistic in managing overlapping commitments, recognising that the courts will not intervene to alter academic schedules to suit personal convenience.

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