

EVALUATION OF SOCIETY FOR SOCIAL AUDIT ACCOUNTABILITY AND TRANSPARENCY (SSAAT), TELANGANA



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CENTRE FOR SOCIAL AUDIT

National Institute of Rural Development and Panchayati Raj

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NATIONAL INSTITUTE OF RURAL DEVELOPMENT AND PANCHAYATI RAJ

**(An Autonomous Organisation under the Ministry of Rural Development,
Govt. of India)**

Rajendranagar, Hyderabad, India

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31st March, 2022

LIST OF ABBREVIATIONS

AABY	Aam Admi Bima Yojana
AG	Accountant General
AP	Andhra Pradesh
APSAPCPA	Andhra Pradesh Promotion of Social Audit and Prevention of Corrupt Practices Act
APNA	Andhra Pradesh NGO Alliance
APO	Assistant Programme Officer
APREGS	Andhra Pradesh Rural Employment Guarantee Scheme
ARC	Administrative Reforms Commission
ATR	Action Taken Report
AVO	Assistant Vigilance Officer
BC	Backward Caste
BRP	Block Resource Person
C&AG	Comptroller and Auditor General
CBO	Community-Based Organisation
CB&T	Capacity Building and Training
CCA Rules	Classification, Control and Appeal Rules
CIB	Citizen Information Board
CM	Chief Minister
CPI	Consumer Price Index
CO	Computer Operator
COVID	Corona Virus Disease
CRD	Commissioner, Rural Development
CSA	Centre for Social Audit
CSA	Concurrent Social Audit
CSO	Civil Society Organisation
CVO	Chief Vigilance Officer
DA	Daily Allowance
DDO	Drawing and Disbursing Officer
DDU-GKY	Deen Dayal Upadhyaya Grameen Kaushalya Yojana
DFID	Department of International Development
DPC	District Programme Coordinator
DRDO	District Rural Development Officer
DRP	District Resource Person
DTF	Decision Taken Format
DVO	District Vigilance Officer
DWMA	District Water Management Agency
EC	Executive Committee
EPF	Employees' Provident Fund
ER	Elected Representative
ESI	Employees' State Insurance
FA	Field Assistant

Contd...

FD	Financial Deviation
FGD	Focused Group Discussion
FM	Financial Misappropriation
FTE	Fixed Term Employees
FY	Financial Year
GB	Governing Body
GO	Government Order
GoI	Government of India
GP	Gram Panchayat
GRO	Grievance Redressal Officer
GS	Gram Sabha
GV	Grievances
HR	Human Resources
HRMS	Human Resources Management System
IBP	International Budget Partnership
ICDS	Integrated Child Development Services
IT	Information Technology
IWMP	Integrated Watershed Management Programme
JC	Job Card
JE	Junior Engineer
MB	Measurement Book
MDM	Mid-Day Meal
M&E	Monitoring and Evaluation
MGNREGA	Mahatma Gandhi National Rural Employment Guarantee Act
MGNREGS	Mahatma Gandhi National Rural Employment Guarantee Scheme
MIS	Management Information System
MKSS	Mazdoor Kisan Shakti Sanghatan
MoRD	Ministry of Rural Development
MoSJE	Ministry of Social Justice and Empowerment
MoU	Memorandum of Understanding
MPDO	Mandal Parishad Development Officer
MPTC	Mandal Parishad Territorial Constituency
MR	Muster Roll
NFFW	National Food for Work Programme
NFSA	National Food Security Act
NGO	Non-Government Organisation
NIC	National Informatics Centre
NIRDPR	National Institute of Rural Development and Panchayati Raj
NMR	Nominal Muster Roll
NSAP	National Social Assistance Programme

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ODF	Open Defecation Free
PAG	Principal Accountant General
PE	Programme Executive
PF	Provident Fund
PFMS	Public Financial Management System
PM	Programme Manager
PMAY-G	Pradhan Mantri Awaas Yojana-Grameen
PRI	Panchayati Raj Institution
PR & RD	Panchayati Raj and Rural Development
PV	Process Violation
QC	Quality Control
RTI	Right to Information
SAU	Social Audit Unit
SBM-G	Swachh Bharat Mission-Grameen
SC	Scheduled Caste
SDC	Social Development Specialist
SEGC	State Employment Guarantee Council
SHG	Self Help Group
SPIU-RD	Strategic Performance Innovation Unit
SPMNRM	Shyama Prasad Mukherjee National Rurban Mission
SRDS	Society for Rural Development Services
SSA	Samagra Shiksha Abhiyan
SSAAT	Society for Social Audit, Accountability and Transparency
SSP	Social Security Pensions
SSS	Shram Shakti Sangha
SRP	State Resource Person
ST	Scheduled Tribe
STM	State Team Monitor
TA	Travelling Allowance
TA	Technical Assistant
TISS	Tata Institute of Social Sciences
ToT	Training of Trainers
TSNA	Telangana State NGO Alliance
UC	Utilisation Certificate
USAID	United States Agency for International Development
VEC	Village Employment Council
VMC	Vigilance and Monitoring Committee
VRP	Village Resource Person
VSA	Village Social Auditor
XVFC	Fifteenth Finance Commission Grant

EXECUTIVE SUMMARY

Background and Objectives

Mahatma Gandhi National Rural Employment Guarantee (MGNREG) Audit of Scheme Rules, 2011 mandate that an independent Social Audit Unit (SAU) should be created in each State to facilitate social audit. Auditing Standards for Social Audit, 2016 mandate that there should be periodic internal and external assessments of social audit and these should be done once in two years. At the request of the Society for Social Audit, Accountability and Transparency (SSAAT), the National Institute of Rural Development and Panchayati Raj (NIRDPR) has undertaken an evaluation of SSAAT and the social audit process in the State of Telangana.

Methodology

Participatory research approach has been adopted for this study in which SSAAT has been involved right from the designing of the evaluation to development of questionnaires to collection of data. Qualitative as well as quantitative data have been gathered from primary and secondary sources available at SSAAT, Mandal and GP levels. Questionnaires have been administered to randomly selected MGNREGA wage-seekers (workers), and aggrieved MGNREGA workers who have registered grievances. Interviews with senior officials of SSAAT have also been done. Focused Group Discussions (FGDs) have been conducted with elected representatives, implementation agency officials, social audit resource persons and villagers. The actual social audit process has also been observed in one GP.

Primary data has been collected from a total of nine GPs. These GPs have been selected through stratified purposive sampling. From each of these sample nine GPs, a minimum of 20 MGNREGA wage-seekers (workers), including five wage-seekers with grievances, were identified randomly. A total of 188 MGNREGA wage-seekers including 47 wage-seekers who had registered any grievances in the last three rounds of social audit, were administered questionnaires. Two FGDs with

villagers (mostly wage-seekers) have been conducted in each of the nine selected GPs. One FGD has been conducted with Mandal and GP level MGNREGA officials in six Mandals where these nine GPs are located. Botlavanaparathi GP of Dharmaram Mandal in Peddapalli district was selected for non-participant observation of the social audit process. This GP was selected keeping in mind factors such as high expenditure, a fairly large number of MGNREGA workers and a number of works as well as diversity of works/assets, including material/non-material & individual/community, experience level of Block Resource Person (BRP). The list of sample GPs and the number of respondents are as follows:

Name of District	Name of Mandal	GPs	No. of MGNREG Workers	No. of MGNREGA Workers with Grievances
Bhadradi Kothagudam	Dummugudem	Pedanhallabali	16	5
		Arlagudem	14	6
		Pathamaredubaka	15	5
Nalgonda	Munugode	Munugode	15	5
	Marriguda	Anthampet	15	6
	Thipparthi	Jangamreddi Gudem	17	5
Nirmal	Nirmal	Mujgi	18	5
		Nilaipet	16	5
	Pembi	Pembi	15	5
Total			141	47

The primary and secondary data collected has been analysed and interpreted against the legal and executive frameworks for the social audit of MGNREGS as enshrined in the MGNREG Act, MGNREG Audit of Scheme Rules, 2011, Auditing Standards for Social Audits 2016 and most recent Annual Master Circular 2020-21.

Findings

1. Achievements of SSAAT

- SSAAT is the first SAU to be set up in the country, with a legal mandate through rules passed by the State Assembly to facilitate social audits and functional independence with a dedicated budget of 0.5 per cent of the previous year's expenditure by the State on the MGNREGS.

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- SSAAT has a Governing Body of eminent people since its inception. The GB has 13 members, including the PAG and the Principal Secretary, PR & RD and has equal representation of both government and non-government members. Several senior serving and retired Indian Administrative Service officers, and eminent CSO leaders have been associated with SSAAT
 - The Society has a robust organisational structure with seven verticals- Admin, Accounts, HR, Programs, IT, CB and Field, with Section heads and is well staffed. SAU is governed by a set of comprehensive rules and a Memorandum of Society (compliant with the Auditing Standards issued by the MoRD in consultation with the C&AG), approved by the GB.
 - From the beginning, SSAAT has also engaged with CSOs and Workers Unions.
 - SSAAT is the first SAU to build a dedicated cadre of social audit facilitators from VSA (now called VRPs), BRPs, DRPs, STMs and PMs to ensure seamless facilitation of social audits at the field level.
 - For facilitation of in-house training, SSAAT established the social audit training cell way back in 2010 and keeps organising induction and refresher training for social audit resource persons.
 - By being associated with SSAAT, resource persons, most of whom are from humble backgrounds, enjoy improved social and economic status, have bettered their knowledge and skills and feel confident to interact with officials and community.
 - A protocol for social audits was developed in the very first two years of the establishment of SSAAT and one full round of social audits in every GP of the State has been facilitated since the year 2010.
 - Steps have been taken to maintain the integrity of the social audit process and ensure that there is no corruption in the social audit process. Among them, test audits, constant monitoring, immediate response to any complaint or call received from any complainant about the social audit process, and periodic performance reviews of the social audit personnel are important.
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- SSAAT covers more than 90 per cent of wage-seekers households during the social audit process and 100 per cent verification of works.
 - Social audit has helped create awareness among wage-seekers. Three-fourths (75 per cent) of wage-seekers said that the social audit team gave information about rights & entitlements under the MGNREGA.
 - In 2020-21 and also in 2021-22, during the peak of COVID-19-related restrictions, SSAAT has been among the leading States which started facilitating concurrent social audit (CSA) of MGNREGS.
 - A Vigilance wing has been set up in the year 2011 both at the State and the district levels to ensure seamless follow-up actions are taken on the social audit paras. A protocol for follow-up action in the form of SRDS Rules for FTE has also been put in place.
 - APSAPCPA, 2012 has been adopted by the Telangana government post-bifurcation, ensuring the setting up of mobile courts in Medak and Karimnagar, with the support of the High Court, for the trial of cases in the villages brought out by social audit, by a First Class Judicial Magistrate.
 - SSAAT has initiated measures such as training for independent observers identified by the government; preparing guidelines for performance and attendance, and performance review of the observers in the monthly review meetings.
 - SSAAT has established a synergy with the CAG/PAG on social audit.
 - SSAAT created its website in the year 2010, (www.socialaudit.telangana.gov.in) compliant with the Section 4 of the RTI promoting suo-moto disclosure. The website hosts all the circulars, GOs, budgetary and expenditure details pertaining to the society, including the original social audit reports.
 - SSAAT is audited by the AG's office every three years. SSAAT has also been audited by CAG as part of its Compliance Audit of implementation of MGNREG Audit of Scheme Rules 2011.

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- The Department of Rural Development has also benefitted from the inputs provided by the social audit teams and this has led to policy changes in the implementation of various schemes such as MGNREGS, SSP, AABY and IWMP.
 - SSAAT has also facilitated social audit/verification of various other schemes of other departments. Important among them are ICDS, Streenidhi, MDM, verification of ODF status of GPs under SBM-G, etc.
 - SSAAT has made important contributions to the evolution of the legal framework of social audit at the national level such as the drafting of MGNREG Audit of Scheme Rules, 2011 and Auditing Standards for Social Audit, 2016.
 - SSAAT has assisted other States in setting up SAUs and has also provided training to their key officials and resource persons.
 - SSAAT has contributed significantly to knowledge creation on social audit. Papers related to the social audit process have also been published in leading national and international journals.
 - SSAAT has also hosted international training for Governments/CSOs/ International Supreme Audit Institutions of other countries to learn about social audits.
 - Wage-seekers perceive community assets under MGNREGS as of good quality and useful. A very high per cent (95 per cent) of the respondents said that the public assets created under MGNREGA are useful to the village community.
 - Social audit has emerged as an accessible and no-threatening platform for registering grievances. Forty-four per cent of the wage-seekers who were facing any issue said that they raised their issues with the social audit team.
 - Despite some procedural weaknesses, delayed and inadequate actions, 78 per cent of wage-seekers said that social audit had a positive impact in terms of grievance redressal, reduction in corruption, improved quality of works, etc. As a result, 62 per cent of wage-seekers are willing to participate in social audits in future.
-

2. Issues and Challenges of SSAAT

- Inadequate deployment of staff and social audit resource persons mainly due to paucity of funds is resulting in field-based resource persons suffering from tremendous workload. This coupled with a requirement to stay in the GP and not enough rest days is causing unrest among resource persons besides a high attrition rate.
- Currently, SSAAT receives 0.5 per cent of the previous year's MGNREGS expenditure for its establishment and programme costs which is insufficient due to an increase in the number of GPs and Mandals after reorganisation and increased establishment costs with Consumer Price Index (CPI) linked increment in remuneration of staff. Further, the release of this fund is not made directly and gets delayed from MoRD as well as from CRD.
- Despite all its efforts, SSAAT has not been able to facilitate two social audits in a year in all GPs. Instead of having six monthly social audits in half of the GPs as suggested by the MoRD's Annual Master Circular, it has decided to facilitate one social audit in every GP per year.
- MoRD has mandated social audits of PMAY-G and NSAP, and MoPR has issued guidelines for the social audit of 15th Finance Commission Grants, but these have not been taken up by SSAAT so far.
- Frequent postponement of social audits due to lack of funds, MGNREGS peak season, not holding public hearings on public holidays, etc., is a challenge too.
- Poor maintenance of records and delay in making them available to the social audit team is another challenge in the facilitation of social audit by SSAAT. Non-availability of records throws the schedule of social audit action plan off balance.
- Identification of VRPs has become a challenge due to low resource fees, strenuous work, requirement to stay in the village away from their home and fear of COVID-19.
- Training of VRPs, before the start of the verification exercise in the GP, is not systematic, and training modules and training aids are not properly used.

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- The social audit team is making inadequate community mobilisation efforts for the participation of stakeholders in the social audit Gram Sabha. Even the purpose of the visit is not properly explained by the social audit team to wage-seeker families. Although 47 per cent of wage-seekers said that the social audit team conducted public rally/ward sabha/FGD before the start of social audit process in their village/GP, during the observation of social audit in one GP by the research team, no such awareness or mobilisation efforts could be seen.
 - Due to lack of community awareness and mobilisation efforts, there is low attendance and voice of wage-seekers in the Gram Sabha. There is almost no participation of wage-seekers in Mandal-level public hearings.
 - The term 'social audit' or its Telugu translation 'samajik taniki' has not been popularised. Only when after the explanation of activities, wage-seekers were able to recognise the term.
 - Seventy-one per cent of the wage-seekers responded that they don't know about the labour budget and they haven't attended Gram Sabha for the labour budget planning or identification of shelf of the project.
 - There is not enough transparency at the GP level activities. Although a chart with the list of beneficiaries is pasted at the GP office during the social audit, summary of findings is not displayed there.
 - Around a quarter (25 per cent) of wage-seekers were either unaware or said that the social audit team does not facilitate Gram Sabha. Although Gram Sabha is facilitated by the social audit team, 62 per cent of wage-seekers said that they did not attend the social audit Gram Sabha.
 - Most of the social audit Gram Sabhas are held without an independent observer.
 - In public hearings, findings and decisions are discussed among officials and others, including wage-seekers and people with grievances, present are not communicated about the decisions made and the rationale.
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- There is negligible participation of wage-seekers in Mandal-level public hearings. Eighty-two per cent of wage-seekers said that they had never participated in a Mandal-level public hearing.
 - There are some errors in data entered in the MIS such as multiple entries, wrong entries, etc.
 - In recent years, the SAU has not conducted test audits to verify the quality of audits.
 - Despite regular conduct of social audits, the number of issues reported in the State of Telangana is not decreasing. MIS data reveals that even though the number of audits conducted has decreased to 34 per cent in the year 2019-20 and 70 per cent in the year 2020-21 due to COVID-19-related restrictions as compared to social audits conducted in the year 2018-19, there is not much difference in the total number of issues reported in these three years. In these three years, 25 per cent of issues are related to financial misappropriation, which is the most serious category of issues. Thirty-two per cent of wage-seekers shared that they are facing issues in MGNREGS.
 - Primary data collected from wage-seekers also shows that wage-seekers are facing various process violations and denial of rights and entitlements under MGNREGS.
 - Even after more than a decade of social audit, MIS data for FY 2018-19 to 2020-21 shows that the number of process violation issues has increased. This trend shows that the implementing agency has not learnt from its mistakes and administrative monitoring of the implementation of MGNREGS in Telangana continues to be weak.
 - There is insufficient staff with the Vigilance wing at the district and Mandal levels due to reorganisations of districts. This coupled with the assignment of additional responsibility of monitoring other government programmes such as Palle Pragathi to Vigilance staff has affected the follow-up action on decisions of public hearings on social audit findings.

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- DVOs and AVOs work under the control of DRDOs and their salary is also released by DRDOs which may affect their independence and autonomy.
 - There is no effort towards strengthening Vigilance and Monitoring Committees (VMCs) at the village level.
 - SRDS Rules have been framed long back and there are some gaps. For example, these rules have not been amended after the categorisation of issues by MoRD and after FAs have been removed in the State.
 - The actions of social audit findings are not satisfactory. As per MIS, only six per cent of issues identified by social audit during FYs 2018-19 to 2020-21 have been closed. The percentage of recovery of misappropriated amounts is less than two per cent.
 - Reviews of action taken on decisions of public hearings are not done at the district level. The practice of joint review at the State level has also become irregular.
 - SSAAT is not receiving ATRs of previous social audits from the Vigilance wing. Due to this, the social audit team is unable to verify and present ATRs of previous social audits in the Gram Sabha while facilitating social audits for the current year. As a result, 81 per cent of the wage-seekers were not aware of the action taken on the findings of the social audit.

3. Recommendations

- MoRD may consider raising the amount to at least one per cent for smaller States and States that are performing well. Telangana being a small State and also a high-performance State in terms of social audit, MoRD may consider allocating one per cent of MGNREGS expenditure to SSAAT.
 - The ministry should calculate the amount to be sanctioned to SSAAT (and other SAUs too) based on the previous year's expenditure, including the amount due to the State in that year by deducting administrative expenditure to specify the value on which 0.5 per cent is calculated.
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- Till the time MoRD enhances the quantum of funding, SSAAT may prepare the budget for conducting social audits in all GPs twice a year and the gap in the funding (current and projected in future) may be covered by the State government. The state government may also consider providing one-time funding to SSAAT to build its corpus fund and interest earned from that corpus fund may be utilised for filling the gap in funding.
 - Fund releases from MoRD need to be streamlined to make it timely. The first instalment of funds may be released in April and the second instalment in October of every financial year so that SSAAT can ensure timely implementation of the annual social audit action plan and also make timely payment of salaries of the social audit resource persons and other staff.
 - The Ministry should simplify the fund release requirements and transfer funds for social audit on time without any delay.
 - The funds may be transferred directly to the SSAAT rather than through the State government as this causes further delay.
 - MoRD may provide separate funds for capacity building (especially the 30-day training for all resource persons) either directly to SSAAT or through NIRDPR.
 - SSAAT has office infrastructure only at the State level. With additional funds from MoRD and CRD, SSAAT may create regional infrastructure and also provide laptops with internet facilities to DRPs.
 - SSAAT may continue facilitating social audits of other schemes on demand. Such facilitation not only widens and popularises social audit but also reduces the monotony of resource persons and staff of SSAAT. The budget proposed should target 25 per cent savings which can be put into the corpus fund of SSAAT for financial sustainability.
 - A legal framework may be created for the social audit of schemes of other departments so that a broader culture of social audit can be inculcated in the State administration.

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- Success stories of social audit as well as MGNREGS need to be identified, documented and given wide publicity to popularise social audit and take it to ground level.
 - Periodic interaction between Governing Body members, SSAAT staff and resource persons may be organised. Further, in training programmes, workshops or any such get-together of SSAAT staff and resource persons, available GB members may be invited to interact with them.
 - Decisions on genuine demands of social audit resource persons which are under the consideration of various committees and GB of SSAAT may be taken on a priority basis to reduce attrition and enhance the morale of resource persons.
 - Accountability and performance of resource persons need to be ensured through an Employee Report Card method, and regular monitoring of the report card on a monthly, quarterly or yearly basis. Further, the best-performing employees may be felicitated on the occasion of Independence Day or Republic Day and given rewards.
 - The process of designating a Grievance Redressal Officer may be completed and rules with regard to the disposal of complaints/grievances be notified.
 - Disciplinary cases against field-level employees should be disposed of as early as possible. Further, most repeated disciplinary cases may be identified and resource persons be sensitised on those issues so that they do not repeat it.
 - Vigilance and Monitoring Committee (VMC) at the GP level need to be activated for concurrent social audit and timely grievance redressal. This VMC may further be involved in the mobilisation of wage-seekers prior to and during the social audit process for their active participation in the social audit exercise.
 - It has been observed that due to inadequate number of resource persons, it is difficult to facilitate the conduct of social audits in all the GPs even once a year. Hence, more personnel need to be hired by SSAAT. The vacant SDS post needs to be filled as soon as possible.
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- The ideal team for a Mandal is 10-12 BRPs and one DRP. But in several Mandals, more resource persons were used. Effective utilisation of the resource persons may help increase social audit coverage by SSAAT.
 - APO needs to be made responsible and stringent action needs to be taken in the case of poor maintenance and non-provisioning of records. Further, all MRs, MBs, bills and vouchers may be scanned and uploaded on to the MIS.
 - DRDO and Additional DRDO need to make a GP-wise quarterly inspection to check availability and update the status of seven mandatory registers and other related records at the MPDO office.
 - The backlog of social audits poses a challenge in the collection and verification of records in time, and further verification of earthen works becomes difficult. Hence, implementing agencies and SSAAT need to scrupulously follow the action plan prepared at the beginning of the year.
 - Resource fees for VRPs may be enhanced and they may be allowed to work in adjoining GPs so that they can travel from their homes, like what happened during the COVID-19 pandemic. Further, the identification of VRPs may be assigned to local CSOs who can create a pool of interested youth from which hiring can be finalised during the social audit round.
 - Training of new VRPs is not done systematically. BRPs may undergo training of trainer courses where they are exposed to using direct trainers' skills in a participatory manner. Further, DRPs must monitor the training of VRPs and see that training is carried out as per the module. Training aids can be used and some learning material in the local language/dialect can be given to participants.
 - It is felt that after the completion of the social audit round in a Mandal, there is a disconnect between the SSAAT and VRPs. It is suggested to identify one Sr. VRP at the Mandal level to coordinate with other VRPs in the GPs and stay in touch with SSAAT.
 - Although the social audit team gives information on rights and entitlements, it is not being absorbed and retained by wage-seekers. Hence, multiple mechanisms
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may be adopted to make wage-seekers aware of their rights and entitlements under MGNREGA. Citizen information boards (CIBs), wall writings and job cards should become the prime medium for information dissemination. Further, SSAAT may work on effective IEC strategies for awareness generation.

- People's participation in social audit Gram Sabha and Mandal public hearings needs to be enhanced through the mobilisation of wage-seekers. It has been found that wage-seekers are unaware of their issues being reported through the social audit process. Communicating this message helps in developing people's trust in the social audit process and increasing their participation.
- DRP must ensure that all BRPs carry along with them grievance register, and register and issue receipts against complaints even though the grievances may seem to be generic/minor in nature. The social audit team needs to have updated information on actions on grievances of the last two rounds of audits.
- If required, the duration of social audit process may be increased with half-a day dedicated to community mobilisation through rallies, sloganeering, wall writings, pasting posters and cultural programmes for awareness and mobilisation of the community.
- For standardisation of verification of technical aspects of works, a standard pictorial technical manual with a detailed methodology of verification for social audit resource persons may be brought out. Regular updating of this manual and refresher training to resource persons may be done whenever new works are included in the list of permitted works under MGNREGS.
- During the verification of works, JE or TA must remain present. This not only helps in seeking their explanation but also leads to lesser contestation of facts emerging out of verification by the social audit team. Similarly, in case of re-verification of works, along with the government team, the social audit team and Vigilance wing representative may be present so that the Social audit team can clarify doubts if required. Such an arrangement is likely to build mutual trust and confidence.

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- An official from a Mandal other than where the GP is located may be deputed as an independent observer to the social audit Gram Sabha. Stringent disciplinary action may be ensured for independent observers not attending the Gram Sabha. As many of these Gram Sabha are held on Sundays or public holidays, the provision of a compensatory leave may be considered by administration to incentivise independent observers' attendance.
 - To strengthen the vigilance system, a civil engineer and an auditor at the State and district levels may be inducted and Vigilance staff may be trained on social audit and its MIS.
 - Retired officials like DVO/AVO may be brought out of the control of DRDO and their salary may be released directly by the CVO and not by DRDO.
 - SRDS Rules need to be reviewed and updated to address recent changes, including MoRD categorisation of issues and removal of Field Assistants (FA).
 - SA resource persons are unaware of the reasons for dropping social audit paras. The earlier practice of joint reviews of action taken at the State level with the participation of CRD, Vigilance wing and SSAAT needs to be reinstated and made regular. Further, such periodic joint reviews may also be organised at the district and mandal levels. ATR Review Committee model of Jharkhand may be studied for adaptation and adoption if that suits.
 - Stringent follow-up mechanisms need to be ensured so that the social audit process does not become redundant.
 - There is a need for enhanced and more frequent interaction between SSAAT and senior officials of the State government enabling sharing of information and findings of the social audit so that changes can be made at the policy and implementation levels.
 - The practice of DRDO or Additional DRDO presiding over the social audit public hearings at the Mandal level needs to be revisited. Instead, district-level officials from another department, not junior to the DRDO, may be trained in SRDS Rules and social audit, and may be deputed to preside over public hearings.

DRDO/Additional DRDO may attend and sign the ATR after public hearings. The adoption of Jury System of Jharkhand may also be examined.

- Implementing agency officials and ERs of GPs may be oriented on the social audit process and sensitised about their roles and responsibilities. Further, they also need to be oriented on the punitive actions in case of non-cooperation such as not making records available to the social audit team, not showing worksites, not providing logistics support, etc.
- Apart from punishing officials who are found to be violating procedures or misappropriating funds, well- performing officials of GPs and mandals and those adopting innovative good practices, as reported by the social audit team, may be rewarded through appreciation letters or recognition at the State level.
- Participation of wage-seekers in the preparation of labour budget and identification of the shelf of the project under MGNREGA need to be encouraged. Currently, almost three-fourths of wage-seekers are not participating in planning Gram Sabha. Active involvement at the planning stage may inculcate ownership and is also likely to enhance wage-seekers' participation in the social audit of these works.
- Non-payment of wages and delayed payment of wages still remain to be the major grievance of wage-seekers. Satisfactory redressal of these grievances is necessary to sustain their interest in this scheme. The social audit team should not shy away from registering these grievances and facilitating timely redressal.

CHAPTER-1

INTRODUCTION

1.1 Implementation of MGNREGA in Telangana at a Glance

Although SSAAT had also responded to the demands for social audit of other schemes, it was set up for the social audit of MGNREGA. Hence, it is relevant to understand how MGNREGA is being implemented in Telangana to understand the scope of work of SSAAT. The following table derived from the MIS gives an overview of MGNREGA implementation in Telangana.

Table 1: Overview of Implementation of MGNREGS in Telangana

Total No. of Districts under EGS		32	
Total No. of Mandals		540	
Total No. of Gram Panchayats		12769	
Total No. of Habitations		21491	
Total No. of Job Cards Issued		5552793	
No. of Wage-seekers		11774448	
Total No. of Labour (SSS) Groups Registered		428886	
Total No. of Labour in Labour Groups		6917574	
		Financial Year of 2021-2022	Cumulative Since Inception
Works in-progress	Number	752906	-
	Estimated Value-(Rs. in Lakhs)	2072859.57	-
Total No. of Works Completed	Number	512430	5357733
	Estimated Value-(Rs. in Lakhs)	971945.82	12155647.05
Total Expenditure	Wages (Rs. in Lakhs)	233347.25	2250339.72
	Material and Skilled Wages (Rs. in Lakhs)	106633.06	1053268.71
	District Contingent Exp (Rs. in Lakhs)	10251.56	153724.96
	State Contingent Exp (Rs. in Lakhs)	2137.21	13645.83
	Total Contingent Exp (Rs. in Lakhs)	12388.77	167370.79
	Total (Rs. in Lakhs)	352369.08	3470979.22
	Admin Exp %	3.64	-

Contd...

Wage Employment Provided	Household (Nos)	2825607	19945774		
	Individual (Nos)	4725643	35965457		
	Men (Nos)	2083376	15721310		
	Women (Nos)	2639972	20221273		
	SC Individual(Nos)	1015505	8068520		
	ST Individual(Nos)	968982	6769609		
	BC Individual(Nos)	2442232	18778685		
	Minority Individual (Nos)	65284	445089		
	Others Individual (Nos)	233640	1899780		
	Persons with Disability (PWDs Nos)	58012	445244		
	No. of SSS (Nos)	428886	1597185		
	No. of SSST (Nos)	103111	417054		
	No. of VSSS (Nos)	6555	39362		
	No. of ST Individual in SSS (Nos)	960694	6620340		
Total No. of Person days generated		135998051		1847831787	
No. of Person days generated for SC	Percentage (%)	29967793	22.04	416739752	24.17
No. of Person days generated for ST	Percentage (%)	28476037	20.94	319640887	18.84
No. of Person days generated for BC	Percentage (%)	69050575	50.77	872447859	50.95
No. of Person days generated for Minorities	Percentage (%)	1967150	1.45	20834706	1.23
No. of Person days generated for Others	Percentage (%)	6536496	4.81	81266627	4.75
Average Wage rate per day per person (Rs.)		172.9		121.78	
Average No. of days of employment provided per Household		48.13		-	
Total No. of Households Completed 100 Days of Wage Employment		324520		3097591	
% payments generated within 3 days		94.61		-	
Labour Vs Material (%)		68.64	31.36	-	-
% of Payments Disbursed within fortnight(bio-metric) (based on disbursement data)		3.82		-	

(Source: MIS of MGNREGA)

1.2 Evolution and History of Social Audit in India

Social audit has emerged as an important accountability tool in India. The first use of the term 'social audit' is generally attributed to George Goyder in the 1950s. Its origin is rooted in the idea of making businesses more accountable to the community and is a reaction to conventional auditing principles (Social Audit Network, 2018). Social audit is an audit conducted by the people, especially those who are affected by or are the intended beneficiaries of the scheme being audited and facilitated by the government. Social audit is the verification of the implementation of a scheme/programme and its results by the community with the active involvement of the primary stakeholder. Social audit is done by comparing official records with actual ground realities, with the participation of the community in the verification exercise and reading out the findings aloud is a public platform. Social audit also examines whether the money was spent properly and has made a difference in people's lives. Woller (2008), in the United States Agency for International Development (USAID) Social Audit Tool Handbook, described Social audit as "an examination of the records, statements, internal processes, and procedures of an organisation related to its social performance. It is undertaken with a view to providing assurance to the quality and meaningfulness of the organisation's claimed social performance." The World Bank Institute (2007) observed that "a social audit aims to make organisations more accountable for the social objectives they declare. Characterising an audit as social does not mean that it does not examine costs and finances: its central concern is how resources are used to achieve social objectives, including how resources can be better mobilised to meet those objectives. Social audits involve more than just examining internal records, but include the experience of the people the organisation or service is intended to serve. In addition, social audits strengthen a community's voice, not only by allowing people to express their views through surveys but also through formal mechanisms of participation in interpreting evidence and developing solutions. The entire process builds capacities at national and local levels, both in community organisations and among service providers. Sinha (2013) observed that "social audit is a process in which, details of the resources, financial and non-

financial, used by public agencies for development initiatives are shared with the people, often through a public platform such as the Gram Sabha in rural India.” The process of social audit involves the following three components: (a) availability of information (b) organising the beneficiaries/ people, and (c) scrutiny of the information by the beneficiaries/ people. Social audit is seen as a means of promoting (i) transparency, (ii) participation, (iii) consultation and consent, (iv) downward accountability, and (v) redressal of grievances in public matters.

The Government of India (GoI) has recognised social audit as an important tool to enforce accountability in public programmes. The social audit is mentioned in the recommendations of Ashok Mehta Committee (1977) constituted to give recommendations to revive Panchayati Raj Institutions (PRIs) with new vigour and a greater developmental role at the grassroots level. The Committee recommended the establishment of a ‘Social Audit Cell’ at the district level as a watchdog agency to monitor the utilisation of funds earmarked for the socio-economic development of weaker sections. In 1993, with the enactment of the 73rd Constitutional Amendment by the government, it became compulsory to take a review of all the development programmes executed which itself is a social audit although the word social audit has not been used. The 2nd Administrative Reforms Commission (ARC), in its 4th Report on “Ethics in Governance”, Chapter 5 para 5.4.2, recommended that, “operational guidelines of all developmental schemes and citizen-centric programmes should provide for a social audit mechanism.” In India, the social audit was popularised by civil society such as Mazdoor Kisan Shakti Sangathan (MKSS) in response to the widespread corruption in public programmes such as National Food for Work (NFFW) Programmes, particularly in rural areas of Rajasthan. Mahatma Gandhi National Employment Guarantee Act (MGNREGA), 2005, for the first time, formally introduced social audits to public programmes in India. After one-and-a-half decades, the social audit has now been institutionalised in the implementation of MGNREGA. Seeing its usefulness in enhancing people’s awareness and participation and curbing leakages, the GoI has been making efforts to bring other development programmes under the ambit of social audit. National Food Security Act (NFSA), 2013 and the Rights of Persons with Disabilities Act, 2016 already

mandate the conduct of social audits. The Supreme Court of India has mandated social audit in the implementation of the Juvenile Justice (Care and Protection of Children) Act, 2015 and The Building and Other Construction Workers Act, 1996. Further, the Ministry of Rural Development (MoRD) has issued guidelines for conducting social audit of Pradhan Mantri Awaas Yojana- Grameen (PMAY-G) and National Social Assistance Programme (NSAP) in November 2019. Draft social audit guidelines for Shyama Prasad Mukherjee National Rurban Mission (SPMNRM) have been prepared and a pilot social audit in one cluster each in eight States is done. The Ministry of Panchayati Raj (MoPR) has released guidelines for social audit of Fifteenth Finance Commission (XVFC) grant utilisation by Panchayats in June 2021, and in six States, pilot social audits have also been conducted as part of the training of trainers by NIRDPR. The Ministry of Social Justice and Empowerment (MoSJE) has prepared an accountability framework for its schemes and a pilot social audit of a few Grant in Aid (GIA) institutions has been conducted. A resource cell has been set up at NIRDPR for facilitating the social audit of schemes of MoSJE. Ministry of Education has also issued guidelines for the conduct of social audit Samagra Siksha Abhiyan (SSA). Efforts are on to draft guidelines for the social audit of Deen Dayal Upadhyaya Grameen Kaushalya Yojana (DDU-GKY) of the MoRD.

1.3 Genesis of Social Audit and SSAAT Telangana

Mahatma Gandhi National Rural Employment Guarantee (MGNREG) Audit of Scheme Rules, 2011 notified by the Ministry of Rural Development (MoRD), Government of India (GoI) to effectively operationalise social audit provisions of Section 17 of the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA) 2005, mandated that an independent Social Audit Unit (SAU) should be created in each State to facilitate social audit and specified the social audit process and the obligations of different implementation authorities. Further, the Auditing Standards for Social Audit developed jointly by MoRD and the Comptroller and Auditor General (C&AG) of India in 2016 to standardise conduct and facilitation of social audits, mandated that there should be periodic internal and external assessments of social audits and these should be done once in two years. Society

for Social Audit, Accountability and Transparency (SSAAT) was formed in the year 2009 as SAU to facilitate social audit in the State of Andhra Pradesh. After the bifurcation of Andhra Pradesh and the formation of Telangana as a separate State, the Society for Social Audit, Accountability and Transparency (SSAAT) Telangana was formed in the year 2014. The structure of SSAAT and also social audit process of Telangana has largely been State-driven and has evolved in the united Andhra Pradesh. MGNREGA came into force in February 2006. However, no clear mechanism of how to conduct a social audit was indicated in the Act or the first operational guidelines. The Department of Rural Development, Govt. of Andhra Pradesh initiated work on Social Audits under the NREGS-AP under its reform action plan in the year 2006 as a project of the Strategic Performance Innovation Unit (SPIU-RD). SPIU-RD was set up through a Department of International Development (DFID) funded reform action plan aimed at institutionalising 'good governance reforms' in the State. Since united Andhra Pradesh didn't have a previous history or understanding of social audits prior to 2006, it initiated a partnership with Action Aid India International and MKSS to help conduct the first training to understand the process. The SPIU-RD trained 35 persons drawn from Unions and Non-Government Organisations (NGOs), having 10-15 years grassroots-level experience of working on rights-based issues, as State Resource Persons in the process of social audit. The pilot social audit was conducted in Nakrekal Mandal of Nalgonda District in three Panchayats (Tatikal, Chendupatla and Kadaparty) in July 2006, where the Food for Work Programme had been implemented. The results of the pilot social audits were a huge revelation to the senior officials working in the Department of Rural Development, who were at that point formulating the operational guidelines for the MGNREGS-AP. More than 90 per cent deviation was found at the last point of delivery, despite the documents and records pertaining to them having been cleared during the financial audit. The insights gained from this pilot social audit led to the Department of Rural Development accepting whole-heartedly the process of Social Audit of the MGNREGS and a decision was made to make social audits an integral part of the implementation of the Scheme. The strategy and planning adopted post the pilot social audit to take forward the social audit began with building a pool of resource

persons/ facilitators at the State, district and village levels on one hand, and by creating a knowledge base (through training, workshops, films and other communication material) across the various stakeholders such as Non-Government Organisations (NGOs), Civil Society Organisations (CSOs), Panchayati Raj Institutions (PRIs), Community-Based Organisations (CBOs) and most importantly the wage-seekers (workers) for whom the MGNREGS was meant on the other.

Based on the varied experiences of the mass social audits in other States, a *padayatra* (march on foot) cum mass social audit was conducted in a phased manner from 30th August to 8th September 2006 in Anantapur district. The current structure of the SSAAT is based on the analysis of experiences of the mass social audit model conducted in Anantapur district and the Village Social Auditor (VSA) model piloted earlier in Nalgonda district. It was realised that the second model seemed to be more feasible considering the need to scale up the process and take it to all MGNREGS districts in undivided AP. The task of creating institutional space for developing a team and managing social audits in the State was entrusted initially to the earlier mentioned SPIU-RD. Later in the year 2009, the Department of Rural Development, Govt. of AP decided to set up a separate society for the facilitation of social audit in the State.

1.4 Rationale and Scope of the Evaluation Study of TSSAAT

Although the National Institute of Rural Development and Panchayati Raj (NIRDPR), as part of its annual assessment of the status of social audit in India, has looked at some aspects of the functioning of SAUs, these assessments have largely been based on information provided by SAUs themselves and these are not a comprehensive evaluation as envisaged by the Auditing Standards for Social Audit. Hence, NIRDPR undertook an independent evaluation of SAUs comprehensively and systematically. SSAAT Telangana, being the pioneering SAU in many senses, decided to get SSAAT evaluated by NIRDPR and accordingly, SSAAT formally requested NIRDPR in this regard. Methodology and research tools applied for the evaluation of SSAAT Telangana may be applied for the evaluation of SAUs of other States in future with necessary adaptation to the local context.

Evaluation of SSAAT Telangana has covered two major aspects: first, assessment of the structure and function of the SAU and second, assessment of the process of social audit in the State within the framework prescribed by MGNREG Audit of Scheme Rules, 2011, Auditing Standards for Social Audit 2016 and Annual Master Circular 2020-21. Qualitative as well as quantitative data have been gathered from primary and secondary sources available at SSAAT, and mandal and GP levels. Questionnaires have been administered to randomly selected MGNREGA wage-seekers (workers), including aggrieved MGNREGA workers who have registered grievances. Interviews with senior officials of SSAAT have also been done. Focused Group Discussions (FGDs) have been conducted with elected representatives, implementation agency officials, social audit resource persons and villagers. The actual social audit process has also been observed in a GP.

The present study has taken into account following aspects while evaluating SSAAT and the social audit process in Telangana State: (i) independence and autonomy of SSAAT by looking at its structure, management of human resources and financial resources, the composition and functioning of the Governing Body (GB), etc.; (ii) integrity of the social audit process by looking at coverage of social audits (geographically and across schemes), utilisation of resource persons in the process, compliance of auditing standards, participation in social audits (including at the Gram Sabha/public hearing), transparency and accountability of process, etc.; (iii) action taken on social audit findings by examining vigilance process, the Management Information System (MIS) data such as recovery of misappropriated amount, action taken against other deviations and grievances dealt with in last three financial years; (iv) relationship with different stakeholders such as civil society organisations (CSOs), the office of Principal Accountant General (PAG); (v) contributions beyond State, including development of national frameworks and establishment of SAUs in other States; (vi) perception of primary stakeholders on effectiveness of social audit on improvement in physical and financial achievements of programmes, reduction in corruption, improved access to entitlements, people's participation in Gram Sabha, awareness of entitlements and procedure to access those entitlements, transparency, etc.

CHAPTER-2

LITERATURE REVIEW

There is a rich body of scholarship around social audit as a tool for participatory monitoring and accountability in the delivery of welfare programmes, particularly the MGNREGA, into which social audit has been integrated from its very conception. Much of this literature looks at the experience of erstwhile Andhra Pradesh (AP), since the social audit process began in this State in 2006, even before MGNREGA was extended to every district across the country in 2008, and of Telangana which has continued with the legacy after its formation in 2014. Over the years, the process has gone through several changes, while becoming more institutionalised and has adopted various governance innovations which other States have learned from while building their own social audit structure and process.

A lot of this history can be found in a study of the records of the SSAAT. Other scholars have also written about the origins of SSAAT and traced the history raising questions about the successes and challenges in building on and growing the social audit process. Mukherjee and Jha (2017), for example, write that the State of undivided AP had a committed cadre in rural development, pushing for pro-poor programmes in rural areas and that the Chief Minister (CM) of the time supported this effort in understanding the electoral gains from this process. The CM helped to insulate the bureaucracy from the farmer and construction lobbies which is one factor which allowed AP to make huge strides in strengthening the improvement of MGNREGA implementation in the State. One step was the introduction of social audit as early as 2006. While initially, the process was internal, the bureaucracy realised the value in having a unit headed independently by someone from civil society working together in alliance with the bureaucracy to allow for a mix of a top-down and bottom-up approach.

Pande and Dubbudu (2017), in their study based on a web survey of over three hundred lower mid-level staff involved in facilitating social audits in Telangana, found that social audits contributed to an overall reduction of the problem of corruption via deterrence. Social audits also appear to have indirect accountability

effects via local electoral politics in the form of a significant contribution of social audits in corrupt politicians not being re-elected. However, they also found that follow-up to social audit findings of corruption and abuse is limited because the responsibility falls to a different government office that lacks the necessary autonomy and capacity. Dutta (2015) compared the performance of MGNREGA in Andhra Pradesh and Uttar Pradesh. He found that the Act has been implemented relatively well in Andhra Pradesh, despite the State's dismal performance in the implementation of most welfare programmes. The political class in Andhra Pradesh has taken a keen interest in the Act, rather than using it to amass wealth for their political activities. Social audits have been institutionalised with the help of civil society organisations (CSOs), providing a platform for the beneficiaries to voice their concerns and negotiate their entitlements with the State machinery. But implementation has lagged in a politically vibrant State like Uttar Pradesh where local leadership is accountable neither to citizens nor to elected representatives, misappropriating resources from developmental funds and nurturing factional politics.

Aiyer and Kapoor (2015) have studied the nature of participation by the community in social audit in undivided AP, as well as the level of State responsiveness to the social audit process. The focus of their study is on perceptions with regard to the social audit and follow-up on issues raised/identified in the social audit. They found that awareness amongst wage workers is high, more about the door-to-door process and document verification than about the Gram Sabha and Block (mandal) level public hearing. Of those who are aware, many do participate in the Gram Sabha and feel they have an opportunity to speak out and question public officials. In this way, the authors noted that social audit allowed for a shift in engagement with the State from passive to active, with social auditors as conduits through whom people can access the State. Whether that temporary change in engagement would lead to longer-term empowerment of marginalised communities was a question the authors highlighted for further research. Afridi and Vegard (2014) studied a panel dataset of social audits of MGNREGA in undivided AP and found a positive but insignificant impact of social audits on employment

generation and a modest decline in the leakage (misappropriated) amount in the wage component, the outcomes with high beneficiary stakes. The latter had occurred alongside an increase in harder-to-detect material-related irregularities with lower beneficiary stakes. Although the study found evidence suggestive of beneficiary 'learning' from audit participation and of audit effectiveness in detecting irregularities, repeated audits did not deter irregularities. They found a changing anatomy of corruption, where transgressors kept one step ahead of auditors and responded to more intense scrutiny by locating new avenues for rent extraction, to which they recommended adopting a time-bound process where transgressors were punished and responsibilities for follow-up of social audit findings were laid out and credibly enforced.

Aiyar, Mehta, and Samji (2013) suggested that while social audits in Andhra Pradesh had been effective in ensuring answerability, they had been less effective in ensuring enforcement – despite a well-defined institutional structure for grievance redressal. Only 15 per cent of the misappropriated amount had been recovered till date they studied, enabling officials to consistently indulge in malpractice despite being caught regularly through the audit process. The study highlighted the need for administrative reforms so that the government's delivery institutions respond to a system of rewards and sanctions. Aiyar and Samji (2009) conducted a study on transparency and accountability in MGNREGA in undivided AP and found that social audit had a significant and lasting effect on citizen's awareness levels regarding their rights and entitlements. It resulted in improvements in official record-keeping, greater belief in the ability to influence government officials, and as an effective medium for grievance redressal. The study demonstrated that social audit had some effects on the implementation processes of MGNREGA and in the process, social audit significantly enhanced wage-seekers' confidence, self-respect and ability to engage with local officials. Further, the study highlighted that social audits were most effective when they were conducted regularly, had inbuilt feedback mechanisms and when undertaken in partnership with the State to ensure immediate and perceivable grievance redressal. Shankar (2010) assessed the performance of MGNREGA social audits in three States, namely

Andhra Pradesh, Rajasthan, and Madhya Pradesh. The study found that since the auditors included were government and elected officials who were also responsible for implementing the MGNREGA, the process, particularly in Madhya Pradesh and Rajasthan, was a self-auditing exercise rather than an external one. Also, the auditors focused on the books and accounts of village functionaries while ignoring the social aspect. Andhra Pradesh had lower levels of leakages at least in the wages component, as compared to Rajasthan and Madhya Pradesh, and in all three States, the pilferage was higher in the materials component. The study discusses the conceptual and operational problems associated with the social audit of a government scheme and argues that social audits have not performed well in the MGNREG scheme because of three problems. First, conceptually, it had been unable to resolve the question of hierarchy. In a social audit, the relationship between the auditors who include villagers and Non-Government Organisations (NGOs) and the bureaucrats was weakly hierarchical; the NGOs and villagers were part of the citizenry who elected political representatives, and these politicians, in turn, oversaw the bureaucracy implementing the scheme. Second, operationally, the feeble hierarchical relationship weakened the enforceability of sanctions against errant officials and produced a disconnect between the substantive goals of the scheme and the procedural standards followed by bureaucrats. Third, the assumption underlying the social audit that given a chance, the community would monitor such schemes is also problematic.

Afridi (2008) conducted a study on the impact of community monitoring of MGNREGS on the improvement of the accountability of public officials in the States of Rajasthan and undivided AP. The study discusses the nature and characteristics of monitoring the implementation of MGNREGS with a focus on the community control mechanisms existing in the States. The study examined the social audit process, challenges involved, findings, its impact on programme implementation and the role of NGOs, activists and civil society in meeting the primary challenge of the smooth conduct of audits at the village level. Aakella and Kidambi (2007), in their study on the effectiveness of social audit in curbing corruption in MGNREGS implementation in undivided AP, regarded social audit as a transparent,

participatory, active evaluative process which attacked the corruption that plagued most anti-poverty missions and was beginning to change the rural landscape in AP, especially in the context of the Andhra Pradesh Rural Employment Guarantee Scheme (APREGS). In Andhra Pradesh, despite safeguards like a well-designed delivery system, a committed top-level bureaucracy, and extensive use of information technology being in place before the social audits began, there was no hint regarding the nature of leakages that were taking place. The social audits pointed out these gaps and leakages and brought out those issues that did not appear in a regular monitoring and evaluation process or review meeting. In the absence of effective social audits, there was a strong possibility that the good intentions of decentralisation would not have been fully translated into the desired outcomes. In addition, they argued that the audit process revealed the extent to which the basic concept and requirements of the scheme must be detailed and it had exposed the often unscrupulous relationship between the village-level government functionaries and local politicians. The social audit resulted in a quantum leap in the awareness levels of the wage-seekers regarding the programme. They also highlighted several challenges in the process of institutionalising social audit. To begin with, the administrative machinery which had till date functioned under the Official Secrets Act and in turn, used that as a cover for the inefficiencies and misuse of the system would have to learn to work under the new Right to Information (RTI) Act where the public had full access to information. The administrative machinery would also have to learn to be accountable to the public instead of just to the higher-ups within the administration.

As social audits expanded to other States after the operationalisation of MGNREG Audit of Scheme Rules 2011, studies were conducted on social audits of other States too. Sandeep *et al.* (2016) studied the effectiveness of social audits in Sikkim by analysing panel data of social audits under MGNREGA from 2013 to 2015. They found that the quantum of the irregularities detected had declined from 1.74 per cent to 0.40 per cent of the expenditure for completed works over three rounds of social audit from 2013 to 2015. During this period, the average participation of

job card holders in the *Jan Sunwai* increased from 97 to 130 due to stronger mobilisation and publicity measures such as public announcements, posters, and door-to-door visits by the District Resource Persons (DRPs). The recovery of the misappropriated funds which was hovering at six per cent was picking up and disciplinary action was taken against only a handful of functionaries. The authors concluded that the absolute level of corruption had actually declined and that the sharpness of social audit had been sustained across multiple rounds.

The authors also studied the Sikkim model of social audit and found that having more qualified, trained, and experienced DRPs resulted in more effective social audits, as compared to a large pool of fresh and inexperienced Village Resource Persons (VRPs), who needed to be trained every year. They observed that SAU's scope was restricted to the identification of the irregularities and the enforcement was done by the State government. For this, they recommended that the effectiveness of social audit needed to be measured both in punitive terms as well as in preventive vigilance, and for the social audit to have a preventive vigilance role, the SAU needed to maintain an efficient feedback mechanism with the programme division. This potential future role of social audits to provide insights to prevent future leakages by tightening the implementation framework needs to be explored and holds a lot of promise. The sharpness of social audits could be sustained by addressing the vulnerable areas with dynamic policy reform and coupling it with a higher degree of audit alertness in the next round. Sumarbin (2014) analysed the findings of social audits undertaken in 55 villages of Meghalaya. He found that in the majority of cases, social audits seemed to have been conducted just to satisfy the norms. Entries made in the format were perfunctory and there was no evidence to suggest a proper scrutiny of records pertaining to the scheme. However, social audit reports of some of the Village Employment Councils (VECs) did give some information on the irregularities and malpractices in the implementation of the scheme. Prominent among those was the non-functioning of the local Vigilance and Monitoring Committee (VMC), irregularities in job card entries and allotment of work, late payment of wages, no proper measurement of work and non-availability of display of work-related

information on the worksite. Rajasekhar, Lakha, and Manjula (2013) conducted a study on the effectiveness of social audits under MGNREGS in Karnataka. With the help of the primary data collected from five Gram Panchayats (GPs) in Chitradurga district, the authors argued that although the documentary evidence showed that social audits were conducted, they did not fulfil the main objective of engaging the beneficiaries of the scheme and making the scheme effective. The social audit process was compromised by the influence wielded by village elites which results in the exclusion of poor labourers for whom the scheme is primarily meant. The social audit process could be made more participatory by ensuring that it is conducted impartially.

Lakha (2011), in a study on accountability in MGNREGA in Rajasthan, argued that for the social audit model to succeed, some measure of support from the State governments is needed in the form of a commitment to enforce penalties for breaches of the law and ensure that audits are conducted without interference from vested interests. He also found that the involvement of civil society actors like MKSS and others was critical to the success of social audits. In the case of Rajasthan, social audits conducted without significant hindrance had been effective in uncovering the misappropriation of funds and ensuring transparency in the implementation of MGNREGA and greater awareness among the beneficiaries about their entitlements under the scheme. Under those circumstances, social audits have been effective in promoting accountability and restraining the influence and power of vested interests. Vij (2011), in his study on empowerment through social audits of MGNREGA, argued that social audit was a unique collaborative governance mechanism which was not only a participatory programme evaluation exercise but also led to the empowerment of the poor. It was a platform for the vulnerable to raise their voice and assert their rights, and to hold the administration accountable and assume collective responsibility, thereby potentially transforming social protection to social justice. Vij argued that social audit was the strongest tenet of the MGNREGA programme as it infused and stirred life into the Panchayati Raj and invigorated community activism with a sense of collective accountability and responsibility. Social audit has been a significant vehicle for strengthening decentralisation and deepening processes of democracy.

CHAPTER-3

METHODOLOGY

3.1 Data Collection Method

Participatory research approach has been adopted for this study in which SSAAT has been involved right from the designing of the evaluation to development of questionnaires to collection of data. However, objective criteria as envisaged under MGNREG Audit of Schemes Rules and Auditing Standards have been used to evaluate the SSAAT and social audit process in Telangana.

Mixed methods (both quantitative and qualitative) have been used to collect data from primary and secondary sources. For assessment of the SSAAT Telangana, information with regard to the structure and functioning of SSAAT has been gathered from official documents by observing the social audit process, interviewing key officials of SSAAT and focus group discussions (FGDs) with selected social audit resource persons (DRPs/BRPs/VRPs) as well as implementing agency officials. Official documents such as establishment-related Government Orders (GOs), memorandum of the Society, Governing Body (GB) meeting minutes, annual reports, audit reports, organogram, code of conduct, HR policy, recruitment rules, welfare measures, employee profile, expenditure norms for social audit, financial guidelines, social audit findings and action taken reports have been accessed and analysed. Qualitative interview method was used to gather information from senior officials of SSSAT Telangana on the evolution, achievements and challenges of the organisation.

To study the social audit process, the non-participant observation method was used. The research team from NIRDPR joined a social audit team in one Mandal for the entire duration of the social audit and observed the process minutely to examine compliance with auditing standards in the social audit process. Focused Group Discussion (FGD) method was used to gather information from social audit resources persons, officials of implementation agencies at GP and Mandal levels to understand their role in the social audit process, their perceptions of the efficacy of

social audit and what challenges and difficulties they are facing during the facilitation of social audit. FGDs were also conducted with villagers of sample GPs to study their recall of social audit, participation in social audit, and perceptions of the efficacy of social audit process.

To evaluate the effectiveness of the social audit facilitated by the SSAAT Telangana as seen by the primary stakeholders (MGNREGA wage-seekers), questionnaire method was used to gather perceptions of sample MGNREGA workers, wage-seekers with grievances and non-MGNREGA workers. For developing this questionnaire, a one-day workshop with different levels of social audit resource persons was held. Draft questionnaires developed were pilot-tested in three GPs in Manchala Mandal of Rangareddy district of Telangana. Based on the experience of pilot testing, these questionnaires were modified and finalised. The final questionnaires were entered into the Kobo Collect software. The questionnaire used for MGNREGA workers is given in Appendix I. Guide for FGD with Villagers is given in Appendix II and Guide for FGD with Officials is given in Appendix III.

Data collection was done by a joint team of researchers from NIRDPR and field investigators from SSAAT who had earlier worked as Village Resource Persons (VRPs). Before the start of data collection, a one-day online orientation was given to NIRDPR researchers and field investigators on these questionnaires and on Kobo Collect software which was used for data collection. Further, on the first day in the field, teams involved in data collection were given an opportunity to practice filling out two dummy questionnaires. Responses to these questionnaires were collected and entered in Kobo Collect with the help of Android mobile phones.

Two FGDs with villagers were conducted in the sample GPs. One Mandal-level FGD was conducted with the implementing agency officials.

Social audit findings and action taken reports from the last three years have been collected from the MIS of MoRD and analysed to understand the nature of grievances and the action taken on them, nature of misappropriation issues, amount misappropriated (and percentage of misappropriation against MGNREGS expenditure) amount recovered (and percentage of misappropriated amount recovered), nature of financial deviations and process violations, etc.

3.2 Sampling

Primary data has been collected from nine GPs. These GPs have been selected through stratified purposive sampling. Telangana has a total of 33 districts, of which 32 have wage-seekers under the MGNREGS. These districts are divided into three zones within the State - North, South and Central.

From these zones, one district with high expenditure and high issues, one district with high expenditure and low issues, and one district with high issues and low expenditure were selected. The average expenditure, MGNREGA workers and issues identified during the social audit from FY 2018-19 to FY 2020-21 are given in Table 2:

Table 2: Zone-wise Expenditure, Workers and Reported Issues under MGNREGA

Zone	Cumulative Expenditure incurred (In Lakhs)	No. of Active MGNREGA Workers	No. of Issues reported
2	4	5	6
North Zone	112162	1812253	20926
South Zone	89241	1648108	18587
Central Zone	132611	2247949	30147

(Source: MIS of MGNREGA)

Again three GPs were identified from each district (a total of nine GPs) based on the high expenditure and high issues, high expenditure and low issues, and high issues and low expenditure in the last three financial years (2018-19, 2019-20 and 2020-21).

From each of these nine sample GPs, a minimum of 20 MGNREGA wage-seekers (workers), including five wage-seekers with grievances (as mentioned in the Decision-Taken Formats) were identified randomly. MGNREGA workers are the primary stakeholders and are most affected by the social audit process; hence, the study has included them as respondents. It is also necessary to know the actions and satisfaction on the actions on the grievances registered during the social audit

process. In total, 188 MGNREGA wage-seekers, including 47 wage-seekers who had registered any grievances in the last three rounds of the social audit, were administered questionnaires.

Two FGDs with villagers (mostly wage-seekers) have been conducted in each of the nine selected GPs. One FGD has been conducted with Mandal and GP level MGNREGA officials in six Mandals where these nine GPs are located.

One GP, namely Botlavanaparathi of Dharmaram Mandal in Peddapalli district, was selected for non-participant observation of the social audit process. This GP was selected keeping in mind the factors such as high expenditure, fairly large number of MGNREGA workers and number of works as well as a diversity of works/assets, including material/non-material & individual/community, and experience level of Block Resource Person (BRP). The list of sample Mandal, GPs and no. of respondents are given in Table 3.

Table 3: List of Sample Mandals and GPs with No. of Respondents

District	Mandal	GPs	No. of MGNREG Workers	No. of MGNREGA Workers with Grievances
Bhadradi Kothagudam	Dummugudem	Pedanhallabali	16	5
		Arlagudem	14	6
		Pathamaredubaka	15	5
Nalgonda	Munugode	Munugode	15	5
	Marriguda	Anthampet	15	6
	Thipparthi	Jangamreddi Gudem	17	5
Nirmal	Nirmal	Mujgi	18	5
		Nilaipet	16	5
	Pembi	Pembi	15	5
Total			141	47

The location of these districts and mandals can be seen in the following maps.

Figure 1: Location of Sample Districts on Map of Telangana

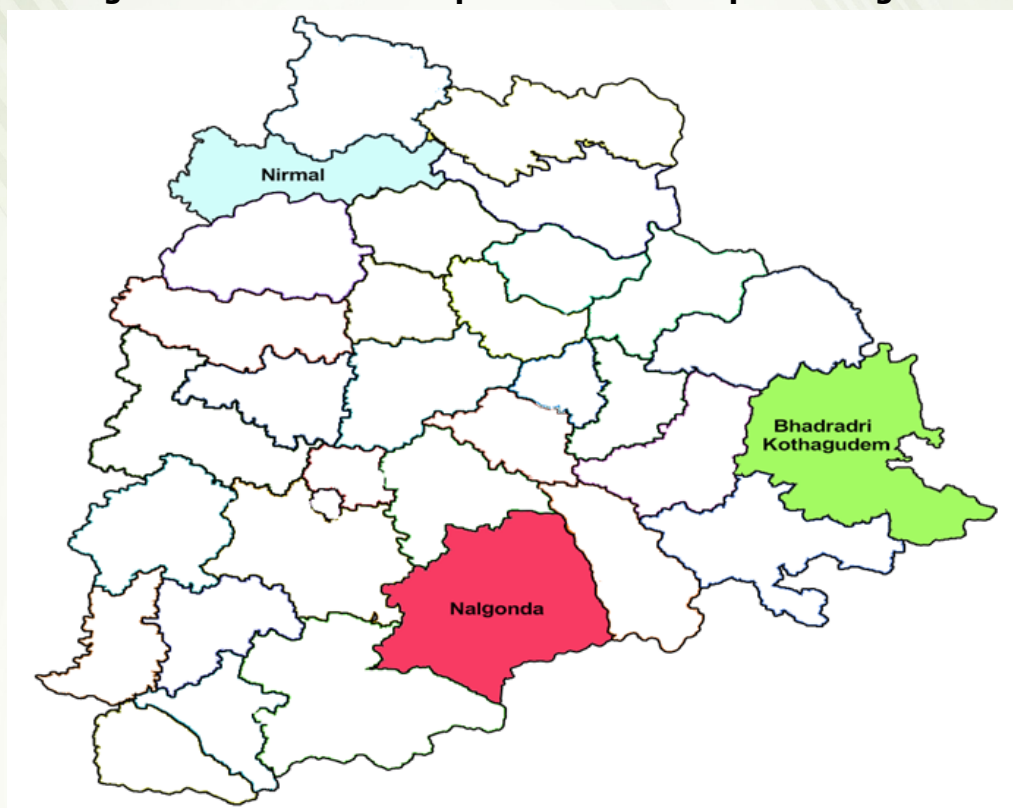


Figure 2: Location of Sample Mandal in Bhadradi Kothagudem District



Figure 3: Location of Sample Mandals in Nalgonda District**Figure 4: Location of Sample Mandals in Nirmal District**

3.3 Period of Data Collection

Primary data collection from nine sample GPs and observation of social audit exercise in one Mandal has been done from July to September 2021. FGDs with social audit resource persons have been conducted in September 2021 and interviews of senior officials of SSAAT Telangana have been conducted in October and November 2021. The gathering of secondary data has been a continuous process. Data analysis and report preparation was done from November 2021 to March 2022.

3.4 Analytical Framework

Collected primary and secondary data has been analysed and interpreted against the legal and executive frameworks for the social audit of MGNREGS as enshrined in the MGNREG Act, MGNREG Audit of Scheme Rules, 2011, Auditing Standards for Social Audits 2016 and most recent Annual Master Circular for FY 2020-21. These Acts, Rules and executive instructions prescribe certain standards with regard to the structure and functions of SAUs and also the social audit process.

3.4.1 Provisions in the MGNREG Act, 2005: MGNREGA officially introduced social audit in rural development programmes. Section 17 of the MGNREGA says that the Gram Sabha would monitor the execution of works within the Gram Panchayat and conduct social audits of all the projects under the scheme taken up within the Gram Panchayat twice a year. It further mandates that Gram Panchayat shall make available all relevant records to the Gram Sabha to conduct the social audit.

3.4.2 MGNREG Audit of Scheme Rules, 2011: To ensure social audits are done well, the Ministry of Rural Development (MoRD) in consultation with the Comptroller and Auditor General (C&AG) of India, notified the Mahatma Gandhi

National Rural Employment Audit of Scheme Rules in 2011. These rules clearly specify the responsibilities of the facilitating organisation (Social Audit Unit), the Social Audit pre-requisites, the social audit process to be followed, the roles and responsibilities of the officials at different levels, the responsibility of the State government to take follow-up action and the State Employment Guarantee Council to monitor the action taken and place it before the State Legislature. These rules prescribe that the State government shall identify or establish an independent Social Audit Unit (SAU) to facilitate the conduct of social audit Gram Sabhas. This SAU, among other things, has been made responsible for (i) building capacities of Gram Sabha through resource persons drawn from primary stakeholders and CSOs; (ii) preparing social audit reporting formats, resource material, guidelines and manuals for social audit process; (iii) create awareness amongst the labourers about their rights and entitlements under the Act; (iv) facilitate verification of records with primary stakeholders and worksites; (v) facilitate smooth conduct of social audit Gram Sabha for reading out and finalising decisions after due discussions; and (vi) host the social audit reports, including the action taken report in the public domain. These rules also prescribe four prerequisites for the conduct of social audit: (i) it shall be independent of the implementation process; (ii) the implementing agency shall not interfere with the conduct of social audit; (iii) the implementing agency shall provide requisite information to SAU at least 15 days prior to the commencement of social audit; and (iv) social audit resource persons shall not be residents of the same Panchayat.

The Audit of Scheme Rules also prescribed the process for conducting social audits. Resource persons along with primary stakeholders shall verify the muster rolls by contacting wage-seekers, the worksites to assess quantity and quality of work, financial records to verify correctness of financial reporting, records used for procurement of materials, and any other payments made from MGNREGS fund. After informing villagers, a Gram Sabha shall be convened to discuss the findings of the verification exercise and fulfilment of the rights and entitlements of labourers and proper utilisation of funds. These rules have made the District Programme Coordinator (DPC) responsible for ensuring the availability of records to SAU and

ensuring corrective action is taken. Rules also make the State government responsible for taking follow-up action on the findings of the social audit and State Employment Guarantee Council (SEGC) to monitor action taken by the State government. As per the rules, the costs of establishing SAU and conducting social audits have to be met by the Central government.

3.4.3 Auditing Standards for Social Audit, 2016: In June 2015, MoRD in consultation with the C&AG constituted a Task Force to look into all aspects of social audit and advise the Ministry on making the social audit exercise more effective. The recommendations of the four working groups which included 'Auditing Standards for Social Audit' were examined and duly accepted. MoRD forwarded the Auditing Standards to all States for necessary action and compliance in December 2016. These Auditing Standards prescribed the following minimum principles for social audit: (i) Access to Information (*Jaankari*); (ii) involvement and participation of citizens in the process of decision-making and arriving at the justifiable output (*Bhagidari*); (iii) protection of citizens for free and fair discussion (*Suraksha*); (iv) citizens right to be heard (*Sunwai*); (v) presence of collective platform to strengthen and substantiate the citizens' voice (*Janta ka Manch*); and (vi) dissemination of report with social audit findings (*Prasar*). To ensure the independence of social audit, the auditing standards for social audit prescribed that the Governing Body of SAU should be chaired by an individual chosen by the State government from a list of eminent persons as identified and communicated by the Ministry of Rural Development, Government of India. The Governing Body shall approve the annual budget and annual calendar, and discuss and adopt the annual report of the SAU. It prescribed qualifications and composition of the selection committee for selection of the Director, SAU and prescribed a minimum tenure of three years and that SAU shall pay salaries/honoraria to its resource persons at the State, district, block and village level directly. For objectivity and impartiality, the auditing standards prescribed that conclusions in opinions and reports should be based exclusively on evidence obtained and replies received from the functionaries and assembled in accordance with the auditing standards. To infuse professionalism

among resource persons, it prescribed that they must possess characteristics/qualities of professionals during the audit which are knowledge, competency, accountability, honesty and integrity. A quality assurance and improvement programme should be developed and maintained covering all aspects of the social audit activities. There should be periodic internal and external assessments of the social audit. On the audit process, the auditing standard prescribed that (i) resource persons should obtain an understanding of the entity/programme to be audited, (ii) SAU shall frame an annual calendar which includes coverage of all the Gram Panchayats within a specific period, and (iii) the audit assignment should be planned to reduce audit risk. For access to information and records for the purpose of social audit, the auditing standards prescribed that State governments should frame appropriate rules for fixing accountability for the provision of records to the social audit teams within a stipulated time frame. The nature of punitive action that shall be taken on the violation of the same should also be defined. The audit findings, conclusions and recommendations must be based on physical, oral, documentary, analytical evidence, verification and *jansunwai*. SAU resource persons should document what they do in a sufficiently detailed manner to provide a clear understanding of the procedures performed, evidence obtained and conclusions reached. The social audit report should be presented to the larger collective methodically by the SAU resource persons and the participation of beneficiaries in the collective platform must be ensured. To ensure follow-up action on the findings of the social audit, the auditing standards prescribed that a follow-up mechanism should be established to monitor and ensure that action has been taken on the findings of the social audit. Responsibilities and timelines should be assigned for corrective actions in a time-bound manner and a collective platform should be established for sharing and reflecting on the follow-up (Ministry of Rural Development, 2016).

The auditing standards also prescribed for setting up an IT system to facilitate the uploading of social audit reports and key indicators identifying deviations found in the social audit process. The NREGASoft MIS was extended to support social audit in early 2018 and States were asked to enter the social audit findings in it.

3.5 Limitations of the Study

For primary data collection, Villager Resource Persons (VRPs) were hired to work as field investigators along with the research team of NIRDPR. It was done as they had a better understanding of the MGNREGA social audit and could comprehend and explain different items of the questionnaire more efficiently. By making teams comprising a VRP and a NIRDPR researcher, efforts were made to reduce the bias. However, there may likely be some bias, particularly in recording opinion-based questions.

The size of the universe of MGNREGA wage-seekers in Telangana is very large. The sample size of the present study is small. To make it representative, this sample has been spread to three different zones as well as three categories of districts based on MGNREGS expenditure and issues identified in previous social audits. Further, samples have been drawn from all social and gender groups. However, the small sample size puts a limit on the generalisation of the findings from primary data.

Similarly, due to paucity of time and resources, observation of the social audit process in only one GP and Mandal has been done by the NIRDPR research team, which puts a limit to the generalisation of findings of this observation. Further, due to COVID-19-related restrictions, social audits of two financial years were being facilitated in the GP, leading to double the work and compromise on some activities such as community mobilisation which cannot be generalised. However, efforts have been made to validate those findings with social audit resource persons, MGNREGS officials and SSAAT.

CHAPTER- 4

INDEPENDENCE AND AUTONOMY OF SSAAT TELANGANA

Rule 4 (1) of the MGNREG Audit of Scheme Rules mandates State governments to identify or establish an independent organisation (Social Audit Unit) to facilitate the conduct of social audit by Gram Sabhas. Such an independent Social Audit Unit (SAU) is responsible for building the capacities of Gram Sabhas for conducting social audits and towards this purpose, identifying, training and deploying suitable Resource Persons at the village, block, and district levels, drawing from primary stakeholders and other civil society organisations (CSOs) having knowledge and experience of working for the rights of people. Rule 5 of the MGNREG Audit of Scheme Rules says that the social audit process shall be independent of any process undertaken by the implementing agency and that apart from making requisite information available 15 days in advance, the implementing agency shall at no time interfere with the conduct of social audit. Section 2.1 of Auditing Standard for Social Audit 2016 and Section 10.1.1 of MGNREGA Annual Master Circular 2020-21 further mandate that such SAU shall be registered as a Society under the Societies Registration Act.

4.1 Establishment of SSAAT

The Society for Social Audit, Accountability and Transparency (SSAAT) was registered under the Societies Registration Act on 15th of May 2009 exclusively for the facilitation of social audit in the State. The Government Order [GO Ms.No.155, PR&RD (RDII) Dept.] for the formation of the Society was issued on 13th of May 2009. To ensure that the Society continues to have unhindered financial support, another Government Order [GO Ms. No. 153, PR&RD (RDII) Dept.] was issued on 12th of May 2009, allocating 0.5 per cent of the total MGNREGS funds to the Society for social audits and other transparency and accountability initiatives, which is booked under the 6 per cent administrative costs permissible under MGNREGA.

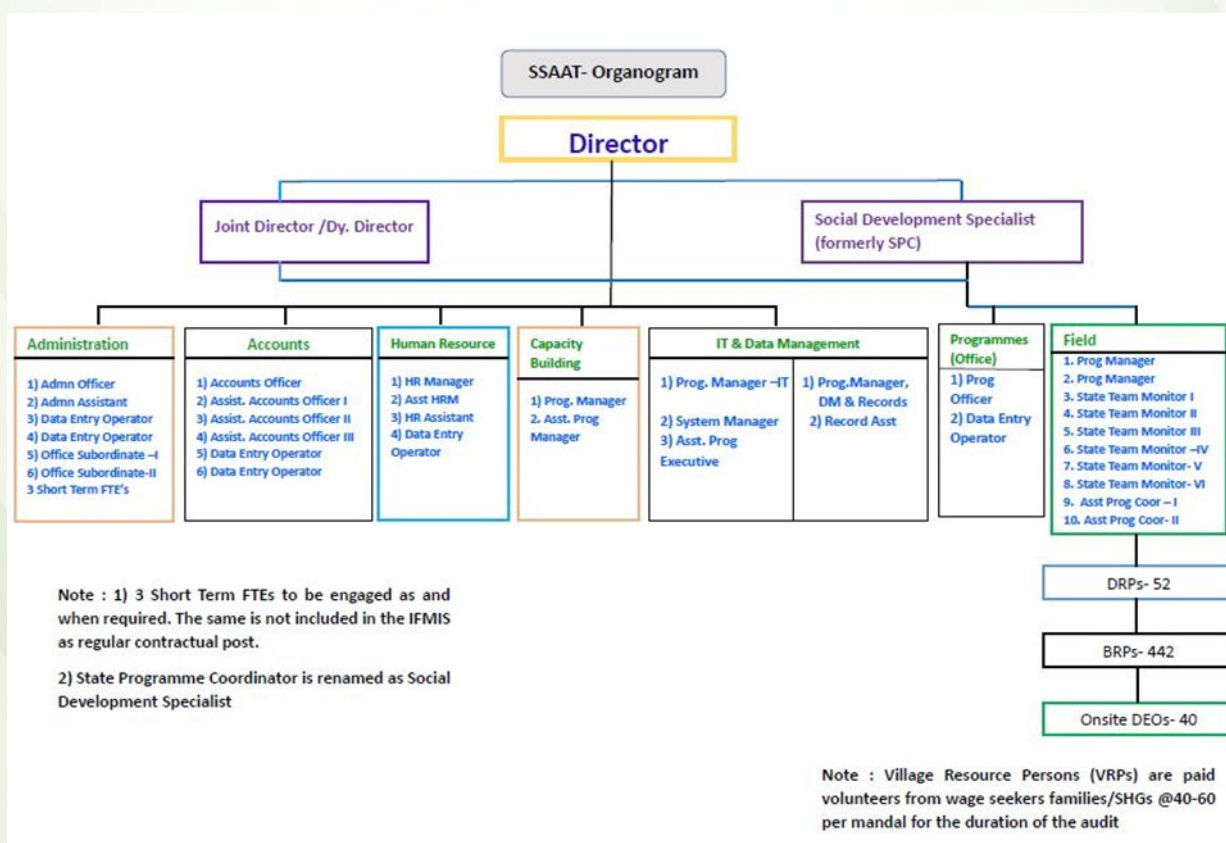
In the year 2014, the erstwhile State of AP was bifurcated and the new State

of Telangana was formed. The existing Society was devolved to the State of Telangana, while a new Society was registered for the AP through the G.O. [G.O.Ms.No.106, PR&RD (RD. II) Dept.] issued on 1st of June 2014. The staff, property and funds were apportioned on a 58-42 ratio between the two Societies, based on the orders issued by the Government at the time of bifurcation. The Social Audits of the MGNREGS in the State of Telangana have continued unhindered since the bifurcation of the State.

4.2 Structure of SSAAT

4.2.1 Organogram of SSAAT

Figure 5: Organogram of SSAAT Telangana



(Source: Website of SSAAT)

The Society has a robust Organisational Structure with seven verticals - Administration, Accounts, Human Resources (HR), Information Technology (IT) and Data Management, Capacity Building (CB), Programs and Field, with Section heads and is well staffed. SAU is governed by a set of comprehensive Rules and a Memorandum of Society (compliant with the Auditing Standards issued by the MoRD in consultation with the C&AG), approved by the GB. Rules include Financial Rules, Recruitment Rules, Disciplinary Rules, Code of Conduct, TA&DA Rules, etc.

SSAAT is headed by an independent Director who is not a regular government employee and has with CSO background. The Director is supported by a Deputy Director, who looks after Administration, Accounts, HR, CB, IT and Data Management, and a Social Development Specialist (SDC), who looks after Programmes and Field operations. The structure of SSAAT can be understood with the help of its organogram given (Figure 5).

4.2.2 Composition of the Governing Body

Section 10.1.2 of the Annual Master Circular 2020-21 prescribes the minimum composition of the Governing Body (GB). It should have PAG, Pr. Secretary (RD&PR), Director SAU, three CSO representatives, including a woman, and other special invitees of department social audited. It further mandates that Pr. Secretary (RD&PR) shall not chair the GB and officials of the implementing agency shall not be members of the GB or Executive Committee (EC). The chairperson shall be a senior officer or eminent persons identified by the State government. Director, SAU shall be the Member Convener of GB.

The Governing Body (GB) of SSAAT Telangana has a total of 13 members and follows the mandate of auditing standards and annual master circulars of MoRD. The current composition of the Governing Board of SSAAT Telangana is given in Appendix V. The GB of SSAAT is functioning autonomously and provides overall policy and operational guidance to the Society. The Current Chairperson, who is a retired civil servant, has been selected by the Members of the GB from amongst themselves and has been appointed by the State Govt. through a G.O. Against

having a minimum of three CSO representatives in the GB, SSAAT is having four CSO representatives in its GB, namely Smt. Aruna Roy, Shri Nikhil Dey, Shri Jeevan Kumar and Dr Mihir Shah. In addition, three Members, including the Chairperson, are former IAS officers. There are only three serving government officers in the GB. PAG has been a Member of the GB since the year 2015. Neither the Commissioner of the PR & RD department nor any other officer from the implementing agency is part of the GB or Executive Committee.

Auditing Standards mandate that the annual budget, annual social audit calendar and annual report shall be discussed and approved by GB of SAU. GB of SSAAT approves the annual budget, annual social audit calendar and annual report of SSAAT. Seven out of total 13 members form the quorum, and Auditing Standards prescribes quarterly meetings of GB. However, the bylaws of SSAAT provide for only two meetings in a year. Although SSAAT has been making efforts in this regard, two mandatory meetings of GB have not been organised in the past, mainly due to the busy schedules of GB members. All policy decisions relating to the SSAAT, including approving positions, recruitment policy, procurement policy, etc., are taken or ratified by the GB.

Former and present members of the Governing Board have actively contributed to the growth of SSAAT. Serving and retired IAS officials such as Shri K. Raju, Shri R. Subrahmaniyam, Shri T. Vijay Kumar and Late Shri B. N. Yugandhar have significantly contributed to guiding SSAAT in framing various rules and policies not only strengthening the effective functioning of SSAAT but also creating enabling legal framework for transparency and social audit in the State. Late Shri Charles Wesley Meesa, as a member of the GB, had contributed significantly to capacity building and ensuring smooth convergence with CSOs. GB members have also played constructive roles in negotiating with social audit resource persons on strike and deliberating on their demands.

4.2.3 Composition of the Executive Committee

The GB has appointed an Executive Committee which consists of five members

to carry out the mandate of the GB. The Executive Committee meets more frequently and takes operational decisions. Policy decisions of the Executive Committee are later put up for the consideration and ratification of the GB. The current composition of the Executive Committee of SSAAT Telangana is provided in Appendix VI.

4.3 Management of Human Resources

Adequate deployment of capable and motivated human resources plays a key role in the success of any organisation. Section 4 (2) of the MGNREG Audit of Scheme Rules mandates that to build the capacities of Gram Sabha to conduct social audits, SAU shall identify, train and deploy resource persons at State, district, block and village levels drawing from primary stakeholders and CSOs. In Section 10.1.4, the Annual Master Circular 2020-21 says that the SAU should be equipped with sufficient staff to ensure smooth functioning. These shall include but not be limited to a full-time Director, an Accounts in-charge, and staff dedicated to various functions like the conduct of social audit, monitoring, IT, capacity building and documentation. To ensure the quality and maintenance of ethical standards in the social audit process and to follow up on the social audit findings, every Social Audit Unit shall appoint adequate number of State, district and block resource persons. The staffing pattern, qualification, etc., of personnel to be recruited for SAU at the State, district and block levels will be decided by the State government in consultation with the Governing Body of the SAU.

Human resources, particularly social audit resource persons from the village to State levels, have contributed significantly to the growth and functioning of SSAAT.

4.3.1 Status of Deployment of Human Resources

The current deployment of full-time personnel in SSAAT is given the Table 4.

Table 4: Status of Deployment of Full-Time Personnel with SSAAT

Positions	No. of Sanctioned Staff	No. of Deployed Staff		
		Men	Women	Total
Staff at State office (Director, Deputy Director, Accounts Officer, etc.)	23	15	10	25
Social Audit Experts	8	8	0	8
District Resource Persons	52	23	3	26
Block Resource Persons	442	160	20	180
Total	525	206	33	239

(Source: SSAAT Official Records)

Strenuous field work and difficult living spaces during audit rounds are the main reasons why there are fewer women in field positions as compared to SSAAT's State office.

Apart from the above full-time personnel, approximately 17,530 (two each for 8765 GPs) VRPs are sanctioned to be hired during the social audit rounds in a year and are paid on a daily basis. As per the social category, the distribution of full-time personnel is given in Table 5.

Table 5: Social Category of Full-Time Personnel with SSAAT

	SC	ST	OBC	Others	Total
Staff at State office (Director, Deputy Director, Accounts Officer, etc.)	4	0	8	13	25
Social Audit Experts	1	0	4	3	8
District Resource Persons	12	3	9	2	26
Block Resource Persons	91	22	63	4	180
Total	108	25	84	22	239

(Source: SSAAT Official Records)

4.3.2 Human Resources Policies and Rules

With a large cadre of social audit resource persons associated with SSAAT from the beginning, it was felt necessary by SSAAT leadership early on to have HR policies, rules and procedures in place to reduce the role of individual discretion and to maintain integrity and efficiency. SSAAT has been a pioneer in formulating HR policies and rules which many other SAUs have adopted and adapted according to their local contexts.

4.3.2.1 Recruitment Rules and Processes

(a) Recruitment of the Director, SSAAT: There is a full-time Director in SSAAT from civil society background and with vast experience in the field of social accountability and social audit. The Auditing Standards prescribe the selection of the Director by a Selection Committee consisting of Chief Secretary/Nominee, Pr. AG/AG in charge of Local Bodies Audit, Principal Secretary, DoRD, Eminent CSO representative nominated by MoRD, and a representative of MoRD. The state government shall appoint the person selected by this committee. However, the Director of SSAAT was selected prior to the issuance of these Standards in the year 2010 through a Selection Committee constituted by the State government consisting of eminent social activists and civil servants such as Smt. Aruna Roy, Shri B. N. Yugandhar, Dr. Mihir Shah, and Shri B.D.A. Sathya Babu Bose (as per GO Ms.No.139 PR&RD (RD-II) Dept dated 19.04.2010).

Regarding tenure, the Annual Master Circular 2020-21 (Section 10.1.4.1) says the minimum tenure of the Director shall be three years and GB can extend that to a maximum of five years. Further, the incumbent will not be eligible for the post of Director in the same State. However, SSAAT Telangana has not adhered to this provision as the Director has continued since 2010.

(b) Recruitment of Other Staff of SSAAT: As per the Annual Master Circular, the SRPs and DRPs have to be drawn from people with experience in the conduct of social audits and have been working in the social sector and the

selection of candidates from shortlisted eligible candidates prepared by the SAU, shall be done by a selection committee consisting of the Chief Secretary or Nominee, Principal Secretary of Nodal Dept., Director SAU, Representative of CSA, NIRDPR or CSO or Dept. of Social Justice/WCD/Law. The selection of BRPs is to be done as per the guidelines prepared by the State government.

The staff of SSAAT are hired through open advertisements posted on the organisation's website and devnetjobsindia.org (a web portal for posting job advertisements free of cost). SSAAT has Recruitment Rules (last revised in 2013) for all Fixed Tenure Employees (FTE)/ Consultants (Social Development Specialist/ State Programme Coordinator, Programme Manager, Programme Coordinator, Additional Programme Manager, State Team Monitor, Assistant Programme Coordinators, State Resource Persons, District Resource Persons and Onsite Data Entry Operators) who are recruited on contract basis. Recruitment Rules specify eligibility criteria, including educational qualification, age, work experience, etc. Further, these Rules also mention what kind of induction, field training, and probation these selected FTEs will undergo, how their performance will be appraised and allowances on deputation of field staff to the State office. Village Resource Persons (VRPs) are selected from among wage-seekers families who have job cards and have worked in MGNREGS. Block Resource Persons (BRPs) visit GPs at the beginning of the social audit round to select VRPs from interested 12th passed persons from wage-seekers families. The Annual Master Circular says the VRPs can be drawn from women members of SHGs. However, due to the arduous nature of social audit work and the requirement of staying in villages other than their own, not many SHG members are interested in taking up assignments.

4.3.2.2 Code of Conduct and Discipline: Section 2.1 of Auditing Standards prescribes that SAU lay down a detailed code of ethics and conduct for social audit resource persons. There is a code of conduct and discipline for Fixed Tenure Employees (FTE), including Programme Managers, STMs, SRPs, DRPs and VRPs working with SSAAT Telangana. This code of conduct and discipline describes in detail the dos and don'ts to maintain absolute impartiality, integrity, discipline,

sense of ownership and no compromise to non-negotiables of SSAAT. For example, it says “no FTE shall accept or permit any member of his/her family to accept, from any person any gift, the receipt of which, or any service the performance of which, will place the FTE under any kind of official obligation or embarrassment in performing his/her duties in relation to any person.” The code of conduct and discipline also details out procedure for investigating any allegations of violation of this code by any FTE. Disciplinary and conduct-related issues pertaining to regular government employees deputed with SSAAT are dealt with according to the extant CCA Rules.

4.3.2.3 Leave Rules: As per SSAAT Leave Rules 2013, FTEs have paid 2.5 days of casual leaves (CLs) per month which can be utilised cumulatively. In addition, 30 days of leave in a year with loss of pay can be availed by FTEs for genuine reasons with the authorisation of the recommendation of the reporting authority and approval of the Director. Women FTEs are entitled to avail 180 days of maternity leave with pay for up to two deliveries and male FTEs are entitled to 15 days of paternity leave with pay for up to two deliveries. Women FTEs are entitled to six days of miscarriage leave with pay in case of a miscarriage or medical termination of pregnancy for a maximum of two times. FTEs who fall seriously ill are eligible for special leave on medical grounds with pay, provided a certificate by an authorised medical practitioner is submitted to the office in case of hospitalisation or bed rest for a maximum period of 30 days during the contract. If resource persons meet with an accident and are injured, she/he shall be eligible for leave with pay during the period of hospitalisation or bed rest as per the medical certificate issued by the doctor with MBBS or higher degree, up to a maximum of 90 days.

For 12 audit days and below, resource persons are eligible to get three days of rest, and for 13 or more audit days, they are eligible to get four days of rest. If the journey time before and after is more than six hours and the distance is more than 200 km., then the journey day is considered a working day.

FTEs also get reimbursement for medical expenses and can also draw up to

two months of their resource fee as an advance in case of any medical emergency. In case of death on duty, total disability and partial disability, an ex-gratia of Rs. 3 lakh, Rs. 2 lakh and Rs. 1 lakh, respectively, is given.

4.3.2.4 Travel Allowance (TA) and Daily Allowance (DA) Rules: As per the revised TA Rules of 2019 of SSAAT, all field staff are eligible for TA and DA during the audit period. Programme Managers (PM)/STMs are reimbursed TA as per actuals and are entitled to AC vehicles during April-June and non-AC during other months to tour districts at the rate of three trips a month. DRPs get Rs.650 fixed TA for each spell of social audit. BRPs and VRPs are reimbursed as per the actual claim at the mandal level. PM and STMs get a DA of Rs.250 per day, DRPs get a DA of Rs.175 per day while BRPs as well as VRPs get a DA of Rs.150 per day.

4.3.2.4 Performance Assessment: Performance assessment of FTEs is done on predefined parameters. These parameters have been identified through a workshop held in 2019 with the participation of BRPs, DRPs/STMs/PMs, HR and Programme staff. Based on these parameters, marks are assigned and decisions are taken with regard to fresh contracts of FTEs. In case of performance below the acceptable standard, the contract is put on temporary hold and a show- cause notice is given. Based on the reply and remarks of the supervisor, a hearing occurs and a decision is taken by the Director.

4.3.3 Capacity Building and Training of Human Resources

Auditing Standards for Social Audit directs SAUs to adopt procedures and policies to recruit personnel with suitable qualifications and train them professionally. Section 10.1.5 of Annual Master Circular 2020-21 says a 30-day Certificate Course on Social Accountability and Social Audits is mandatory for all SRPs, DRPs and BRPs. In compliance with MoRD norms, SSAAT has ensured that all its resource persons have undergone a 30-day Certificate Course. In collaboration with MoRD-NIRDPR, the SSAAT trained 2415 Self-Help Group (SHG) members in 76

batches using the NIRDPR-TISS training manual. As a result, there has been an increase in the number of women VRPs. Apart from these Govt. of India initiatives, SSAAT Telangana has been regularly organising in-house training for its SRPs, DRPs and VRPs by conducting various programmes such as induction, refresher, training of trainers (ToT) and other need-based training programmes. Major types of training programmes organised by SSAAT Telangana over the years include (i) induction training to the newly recruited DRPs & SRPs for 11 days, (ii) refresher training (after six months) to the existing DRPs & SRPs for five days, (iii) training of trainers (ToT) to the existing DRPs & SRPs for three days on technical and thematic aspects, (iv) special/need-based training to Sr. VRPs for three days, and (v) demand-based training to officials of government organisations & NGOs as per client requirement. For the facilitation of in-house training, SSAAT established the Social Audit Training Cell in August 2010. Through its continuous training, SSAAT aims to build the capacity of its resource personnel and, in turn, the institution to conduct more meaningful social audits. The capacity building and training programme conducted for resource personnel particularly focuses on:

- Government welfare schemes and its origin in the context of eliminating poverty.
- Provisions of MGNREGA, Right to Information (RTI) Act and the social audit process.
- Record consolidation, door-to-door verification, special social audit Gram Sabha and report writing.
- Technical knowledge of works under MGNREGS, measurements and Quality Control (QC) processes.
- Sensitisation on gender issues.
- Leadership qualities and soft skills.
- Computer and technical skills and making entries into social audit MIS.
- Developing their ability to spot the signs of social change and resistance to social change in a rural community.
- Understanding of the role and limitation of the State in bringing about social change.

As mentioned earlier, VRPs are hired only for social audit rounds and SSAAT trains them on an ongoing basis. They are trained by BRPs and DRPs at the mandal level. Year-wise achievements in capacity building of human resources by SSAAT from 2014-15 are given in Table 6.

Table 6: Yearly Achievements of SSAAT in Capacity Building of Staff

Sl. No.	Financial Year	No. of DRPs Trained	No. of BRPs Trained	No. of VRPs Trained	No. of Other Staff Trained	Total
1	2015-16	65	1065	0	103	1233
2	2016-17	34	442	0	730	1206
3	2017-18	38	870	2333	516	3757
4	2018-19	90	995	199	155	1439
5	2019-20	46	42	171	90	349
6	2020-21	113	671	0	557	1341

(Source: SSAAT Official Records)

4.3.4 Issues and Challenges in Human Resource Management

4.3.4.1 Inadequate Deployment of Staff: Deployment of officials and resource persons with SSAAT has a direct influence on its performance. The annual report for the year 2013-16 of SSAAT shared that it had been operating without a Deputy Director for almost two years. Against the sanctioned strength of 52 DRPs, only 26 DRPs are currently deployed. Similarly against the sanctioned strength of 442 BRPs, currently only 180 BRPs are deployed. As a result, against the 12 BRPs and one DRP required for one round of social audit in one Mandal, presently SSAAT is managing with seven BRPs and one DRP. SSAAT identifies low cadre strength as one of the reasons for the facilitation of social audit becoming mechanical apart from the exhaustive and repetitive nature of the work. Resource persons also think that due to inadequate number of resource persons, they are under tremendous work pressure and do not get adequate number of rest days in between two rounds of social audit. Bifurcation had posed challenges to SSAAT as it had lost a few key posts because of the division of staff on a 58:42 ratio and had to operate without

Administrative Officer, PM-IT, etc. Post-bifurcation, the Deputy Director of SSAAT allotted to Andhra was also looking into the issues of Telangana's SSAAT since both offices were being run from Hyderabad and the Director of SSAAT Telangana was also Director for Andhra SSAAT.

Due to low resource fees, strenuous work and the need to stay in the village away from their home have resulted in recruitment of VRPs less than what is needed. The COVID pandemic has further made it difficult to hire VRPs. With the limited human resources available, SSAAT could not facilitate social audits in all the GPs of Telangana twice a year as mandated by the MGNREGA. Hence, after a few years of its formation, it was decided by SSAAT Telangana to have only one full round of audit in a year in all the MGNREGS Mandals as two rounds of social audit will require funds to the tune of at least one per cent of the total MGNREGS expenditure in the State. On the other hand, Govt. of India as well as various other departments of the State government has increasingly demanded SSAAT to facilitate social audit of other schemes/programmes which increases work pressure on resource persons as well as administrative officials.

4.3.4.2 High Attrition Rate among Resource Persons: The nature of the job of a resource person is very strenuous and it demands their stay in the place of audit continuously for 12 to 15 days, forcing them to stay away from their families. This causes health issues like gastritis, jaundice, etc., and also has an impact on their family life. This coupled with rising aspirations among young resource persons is leading to an attrition rate as high as around 30 per cent every year. The high attrition rate of social audit resource persons because of the nature of work makes it imperative to continuously keep on recruiting replacements. The HR wing of SSAAT is forced to take up recruitments twice a year and provide necessary training to meet the human resources requirement for timely implementation of the social audit action plan (calendar).

4.3.4.3 Capacity Gaps among Resource Persons: Social audit resource persons of SSAAT have good knowledge and skills to facilitate social audit.

However, new types of works get added to MGNREGS and, at times, these resource persons are found lacking the knowledge and skills to do proper physical verifications and assess the quality of new works. During interviews with resource persons, they shared that they would need training on physical verification of works newly added to the list of permissible works under MGNREGS. Although the Quality Control (QC) teams are supposed to accompany social audit teams, most of the time QC team and social audit team verify and inspect works separately. The QC team is also not present in the public hearings. Further, social audit teams, due to paucity of time, do not invest enough time to mobilise wage-seekers and other villagers to participate enthusiastically in social audit Gram Sabha and public hearings. During the observation of social audit process, NIRDPR research team found that the social audit team was neither creating awareness among the community nor mobilising them to Gram Sabha and public hearings. As every year new social audit resource persons join SSAAT, approximately 70 resource persons (SRP/DRP/BRPs) have not undergone the 30-day certificate course on social audit which has been designed by NIRDPR and Tata Institute of Social Sciences (TISS). Data provided by SSAAT shows that in the last three financial years, only 370 VRPs have been trained.

4.3.4.4 Discontent among Resource Persons with Working Conditions: Majority of field-based resource persons are not satisfied with the working conditions and their HR benefits. In one-to-one interviews and FGDs, resource persons have expressed that their resource fee, TA/DA need to be enhanced and that they are not getting enough rest days due to work pressure. Several BRPs and DRPs went on strike and staged a dharna in 2019 demanding hike in salary and regular increments, benefits of EPF and ESI schemes, more leaves and rest days, health cards for them and their family members, longer-term contracts, timely payment of salary, permission to work in native district/mandals or those within 100 km, etc. Resource persons returned to work after some time on the assurance that their genuine demands would be considered by the GB and would be addressed accordingly. A few committees were constituted to examine

those demands and suggest ways to address them. However, some dissatisfaction is still there among resource persons, which affects their morale.

It has been reported by the SSAAT that resource fees and other allowances to resource persons and other staff in the field and the State Office have been enhanced, which will be payable from September 2021. For example, Programme Managers and State Team Monitors are now getting monthly resource fees of Rs. 42,025. DRPs are getting monthly RF of Rs. 25,215 and BRPs are getting Rs. 16,810. Details of resource fees, allowances and other benefits to resource persons and other staff of SSAAT are given in Appendix VIII.

4.4 Management of Financial Resources

4.4.1 Status of Financial Resources

Rule 10 of the MGNREG Audit of Scheme Rules 2011 specifies that the costs of establishing and running a Social Audit Cell and conducting social audits shall be met from the administrative costs earmarked for MGNREGS. Section 10.1.6 of Annual Master Circular 2020-21 says that from the States' entitlement of 6 per cent towards administrative expenditure, up to 0.5 per cent shall be earmarked for the State's social audit. The funds for the Social Audit Unit will be released from the Ministry to the SAU's independent bank account through the respective State government. The State government shall ensure the transfer of funds to the bank account of SAU within 15 working days of the receipt of funds. The SAU has to maintain a separate bank account in the nationalised bank exclusively for MGNREGS.

Pre-2018-19, the Department of Rural Development met the social audit costs from the 6 per cent admin costs of the scheme by funding SSAAT directly. Subsequently, MoRD started releasing the funds directly to SSAAT and the 0.5 per cent was calculated at the Ministry level. The Commissioner, Rural Development releases to the SSAAT requisite funds from the social audit fund every quarter to ensure the smooth conduct of social auditing of MGNREGS in all the GPs. However, this 0.5 per cent allocation to SSAAT is not fixed and is dependent on the

MGNREGS expenditure of the previous year. Funds received and spent by SSAAT from MoRD for the social audit of MGNREGS for the last few years are given in Table 7.

Table 7: Year-wise Receipt and Expenditure of Funds from MoRD and CRD

Sl. No.	Financial Year	Fund Received from MoRD & CRD for Social Audit of MGNREGS (In Rs.)	Actual Expenditure (In Rs.)	Percentage of Expenditure (In Rs.)	Remarks
1	2015-16	15,51,56,084	15,51,56,084	100	Expenditure directly met from CRD
2	2016-17	13,84,30,402	13,84,30,402	100	Expenditure directly met from CRD
3	2017-18	13,26,00,209	13,05,15,451	98	Expenditure amount has been adjusted from the previous year's CB balance and the loan amounts have been taken from State Government on reimbursement basis; subsequently, loan has been paid to State government after receipt of MoRD funds to SAU (2 nd instalment for the FY 2020-21 amounts to Rs. 6.99 crore credited in SAU Bank Account on 25.05.2021 for FY 2021-22)
4	2018-19	16,85,34,000	12,90,29,883	77	
5	2019-20	7,62,17,328	10,05,03,129	132	
6	2020-21	8,00,25,660	8,43,55,294	105	

SSAAT has also been conducting monitoring and social audits of various other schemes and respective departments provide funds for that. Receipt and expenditure of funds for social audit of other schemes in the last few years are given in Table 8.

Table 8: Year-wise Receipt and Expenditure of Funds from Other Departments

Sl. No.	Financial Year	Fund Received from other depts for social audit of other schemes (In Rs.)	Actual Expenditure (In Rs.)	Percentage of Expenditure (In Rs.)	Remarks
1	2014-15	42,39,991	30,60,767	72	
2	2015-16	51,55,002	42,97,954	83	
3	2016-17	27,19,980	7,14,418	26	
4	2017-18	3,07,54,403	1,99,84,645	65	
5	2018-19	5,11,54,295	2,50,03,597	49	
6	2019-20	50,00,386	2,98,04,360		The previous closing balance of FY 2018-19 was Rs. 4,09,62,290. Major funds include ICDS & SBM funds and expenditure was met in FY 2019-20 and 2020-21.
7	2020-21	1,70,60,454	1,80,07,856		

This fund is utilised by SSAAT for meeting establishment costs such as salary, TA, DA and operational costs, including the cost of facilitating social audits in mandals.

SSAAT has its own independent bank account. The Director and Accounts Officer (who is on deputation from the Treasuries Department) are jointly operating the bank accounts. The Accounts Officer is the Drawing and Disbursing Officer (DDO). The Director, SSAAT is empowered to sanction the amount up to Rs. 2 lakh only and for above Rs.2 lakh, prior approval of the Principal Secretary (RD) is needed. Within that financial power, SSAAT does not require approval of implementing authority to make payments to resource persons or to spend money on the facilitation of social audit. SSAAT has adopted an Electronic Financial Management System (EFMS) for managing its finances. In future, it may need to migrate to the Public Financial Management System (PFMS).

Financial allocation for the process of social audit is made at the State and mandal levels. SSAAT has been getting statutory audits of its accounts done every year through chartered accountant firms, empanelled by the Department of Rural Development and has also gone through audits by the Office of the Principal AG. By getting the accounts audited regularly, SSAAT has demonstrated that it is functioning in an accountable and transparent manner.

4.4.2 Financial Rules and Procedures

4.4.2.1 Procurement Rules: SSAAT follows the procurement norms as prescribed in the GO.Ms.489 Finance (TFR) Department dated 8th December 2008 issued by the Government of Andhra Pradesh for procurement of materials, adopted by the Telangana State after bifurcation. It prescribes open tender for purchases of more than Rs. 5 lakh. An internal Procurement Committee has been constituted by the Director of SSAAT to finalise the tender process for procurement of materials below the cost worth Rs. 5 lakh, which is chaired by the Accounts Officer of SSAAT.

4.4.2.2 Advance to Resource Persons for Social Audit and Training: SSAAT follows a protocol in giving advances for expenses to resource persons for social audit or training. Advances given to resource persons are limited to his/her resource fee payable every month and there is a cap of three advances has been fixed. All the advances given to the resource persons have to necessarily be adjusted within 90 days.

4.4.3 Financial Issues and Challenges

4.4.3.1 Insufficient Fund and Delayed Release of Fund: Post-bifurcation, the fund amounting to 0.5 per cent of total MGNREGS expenditure to carry out the social audit in all GPs of Telangana is insufficient since the expenditure has been reduced. With the reorganisation of mandals and GPs in

Telangana, the number of GPs has increased from 8712 to 12776 (31.89 per cent increase) and mandals from 435 to 541 (19.6 per cent increase), but SSAAT has to manage with the same quantum of fund. Approximately, 70 per cent of the expenditure of SSAAT is being incurred on remuneration of staff. Keeping in view the present wages, mandatory provisions and welfare measures, the current allocation of 0.5 per cent is highly insufficient. SSAAT has been demanding that allocation be raised to one per cent by Govt. of India. Further, there is no clarity on how the 0.5 per cent is calculated. On several occasions, fund release by Govt. of India has been delayed, which has affected the social audit process. Further, due to the procedural requirements in the present mode of release, the fund transfer into the SSAAT's account from the State government is taking 40 to 70 days. Such delays also affect the regular payment of salary to SSAAT staff. Paucity of funds and inordinate delays in fund release to the SSAAT are hampering the social audit schedule, thereby affecting the facilitation of social audits as per the norms prescribed in Auditing Standards despite the best efforts being made by the SAU to comply with the orders issued by the MoRD. The conditions for fund release are frequently changed or new requirements are being added after the submission of the proposal requesting fund release, leading to confusion. Despite making every effort to comply with the norms issued by the Ministry, the fund release is still inordinately delayed. Details of fund release status from MoRD to SSAAT in three FYs from 2019-20 to 2021-22 are given in Appendix IX. The SSAAT has no option but to take a loan from the Department of Rural Development to ensure that the social audit schedules are not hampered or stalled due to paucity of funds. Borrowing funds from the RD Department as a loan could further lead to questions about the independence of the SAU as prescribed in the Auditing Standards and the Annual Master Circular.

4.5 Transparency and Accountability

Section 2.1 (v) of Auditing Standards mandates SAU to abide by procedural guidance on the RTI Act, 2005. Although the copy of social audit report is not displayed on the GP notice board as it is voluminous and there is no photocopying

facility in most of the GPs, overall SSAAT Telangana is functioning in a transparent and accountable manner. It sends copies of its annual reports as well as a summary of social audit reports to PAG of the State and also to the State Employment Guarantee Council (SEGC). SSAAT has an independent and functional website (<http://socialaudit.telangana.gov.in>) which hosts all important documents such as social audit action plan, annual reports, G.O., Rules, Governing Body meeting minutes, etc. After completion of the social audit public hearing at the mandal level, SSAAT uploads the social audit reports of all the GPs of that particular mandal along with the decision taken on the issues reported in those GPs in the form of a single PDF file. SSAAT is uploading these reports to its website, i.e. <http://www.socialaudit.telangana.gov.in/SocialAudit/>. Social audit reports can be assessed by following the below-mentioned pathway on the website: [http://www.socialaudit.telangana.gov.in/SocialAudit/ReportsSocial Audit Scanned ReportsSelect Financial Year, District, Mandal, Round, SA From Date & SA To Date & Click on Get DataDownload ".rar" file of the block and unzip it to get the scanned pdf report](http://www.socialaudit.telangana.gov.in/SocialAudit/ReportsSocialAuditScannedReportsSelectFinancialYearDistrictMandalRoundSAFromDate&SAToDate&ClickonGetDataDownload.rarfileoftheblockandunzipittogetthescannedpdfreport). From 2018 onwards, SSAAT is uploading social audit paras/findings on the social audit module of the MIS of MGNREGA developed by MoRD-NIC which can be accessed by following the below-mentioned pathway on the website: <https://nregade.nic.in/netnrega/statepage.aspx?check=SocialAudit>.

To ensure the accountable functioning of SAUs, Section 2.1(v) of Auditing Standards for Social Audit says that SAUs should designate a Grievance Redressal Officer (GRO) to accept complaints from citizens about the staff and practices of SAU and adds that the officer should report to the Governing Body. SSAAT has formed an Ombudsman Committee with some of the GB members to work out the modalities of identification, appointment of GRO and his/her functioning. The Committee held two meetings to finalise the process of appointment; duration of tenure; pay structure, etc., and the proposal is under examination.

4.6 Autonomy and Independence

Despite some dependence with regard to accessing records, logistic facilities and data entry on implementation agencies, SSAAT Telangana is functioning fairly

independently at the GP, mandal and district levels. Social audit resource persons of SSAAT function independently and none of the implementation officials or any other officials reporting to the DPC oversee the functioning of SAU resource persons, certify attendance of social audit resource persons or release payments to them. However, at the State level, SSAAT functions under the overall directions of the Principal Secretary (RD). One of the reasons, as explained by SSAAT, is that MoRD has consistently asked the SAU to get financial-related documents, social audit-related documents, etc., signed by the Principal Secretary (RD), as the concerned is seen as the Administrative Head. Although many policy and operational decisions are taken by its GB, the Principal Secretary, who is the chairperson of the EC and a Member of the GB, has a lot of influence over such decisions, including the composition of Governing Body, funding to SSAAT, and approval of annual action plan.

CHAPTER-5

INTEGRITY OF SOCIAL AUDIT PROCESS

MGNREG Audit of Scheme Rules 2011, Auditing Standards for Social Audit 2016 and Annual Master Circular 2020-21 prescribe certain norms and standards for the social audit process, including coverage of GPs, access and availability of records, proactive disclosure of information, physical verification of works, verification of entitlements of beneficiaries, gathering of evidence, sharing of findings on a collective platform, decision taking in a public hearing, reporting, etc. We have tried to analyse how SSAAT has fared on these parameters based on secondary information supplied by SSAAT and primary data collected through observation of social audit exercise in one GP as well as interactions with wage-seekers, implementing agency officials and social audit resource persons.

5.1 Coverage of Social Audit

SSAAT, while ensuring geographical coverage mandated by the Act, Rules and executive instructions, has also responded positively to the demands from other State government departments to cover their programmes and schemes.

5.1.1 Geographical Coverage:

Rule 6 (1) of MGNREG Audit of Scheme Rules, 2011 prescribes SAUs to prepare an annual calendar to conduct at least one social audit in each GP every six months. The Auditing Standards for Social Audit, 2016 says that if there is a need for adjustments in coverage, the SAU Director shall undertake a risk assessment for judicious selection of GPs, ensuring full coverage of all GPs within a specific period. The Annual Master Circular 2020-21 prescribes framing an annual calendar at the beginning of the year to conduct social audit of all the GPs in consultation with the State Rural Development Department. SSAAT has been facilitating social audits of all the GPs in the State once a year. For this, SSAAT prepares an annual action plan at the beginning of the year and communicates it to districts, mandals and GPs. As

communicated by SSAAT, the geographical coverage of the social audit of MGNREGS by SSAAT since the FY 2015-16, is given in Table 9.

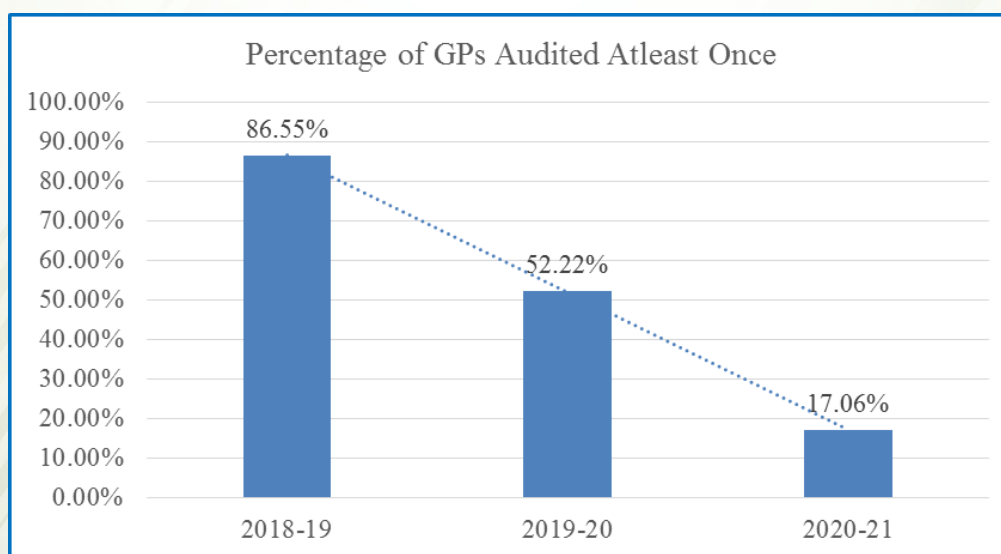
Table 9: Yearly Coverage of GPs by Social Audit from 2015-16 to 2020-21

Sl. No.	Year	Total No. of MGNREGS GPs	No. of GPs Covered by Social Audit	Percentage of GPs Covered
1	2015-16	8582	8582	100%
2	2016-17	8582	8217	95%
3	2017-18	8707	8707	100%
4	2018-19	8728	8728	100%
5	2019-20	8763	8530	97%
6	2020-21	12770	2330	18%

(Source: SSAAT Records)

The shortfall of GPs covered in the FY 2020-21 is because SSAAT Telangana has conducted Concurrent Social Audits (CSA) from April to November and covered 6460 GPs due to the circumstances that have been prevailing since the COVID-19 pandemic. Regular social audits could be resumed from December 2020 for FY 2020-21. There is a difference in data provided by SSAAT and those entered in the MIS. As per the data entered into MIS, the following is the coverage of GPs by SSAAT from FY 2018-19 to 2020-21 (The social audit module in MGNREGA's MIS was created and operationalised in FY 2018-19).

Graph 1: Percentage Coverage of GPs from FY 2018-19 to 2020-21



(Source: MIS of MGNREGA)

In 2018-19, social audits were carried out in 7,584 GPs at least once. This is 86.5 per cent of the total panchayats in the State. As per the MGNREGA MIS, in FY 2019-20, the total coverage of GP was 52 per cent, which came down to 17 per cent in FY 2020-21. The lower coverage could be attributed to fund-related issues and COVID-19-related restrictions. As explained earlier, SSAAT could not facilitate regular audits in most of the GPs in the FY 2020-21 due to COVID-19.

5.1.2 Coverage of Schemes

As the utility of social audit in improving implementation, and curbing procedural and financial violations has been recognised, many Central as well as State government departments have come forward to get their schemes social audited using the expertise of social audit units set up under MGNREGS across India. SSAAT being the pioneering SAU too has received such requests in the past.

SSAAT, although set up for the facilitation of social audits of MGNREGS, has conducted social audits of various other schemes in the past. As per the GO Ms No.155, dated 13th May 2009, of the PR & RD department, SSAAT should enter into a Memorandum of Understanding (MoU) with any department of the State government for the conduct of social audits covering the programmes of the department concerned, subject to acceptance to adhere to the non-negotiable aspects of the social audits. As demands for social audit from other departments increased, SSAAT has also prepared a standard cost sheet, including 10 per cent administrative cost for social audit of other schemes, and got it approved by the GB.

SSAAT has facilitated social audits/verifications of various other schemes such as Integrated Child Development Services (ICDS), Streenidhi VOs, Mid-Day Meals (MDM), verification of Open Defecation Free (ODF) status of GPs under Swachh Bharat Mission (SBM-G), Distribution of milch animals on subsidy, verification of distribution of soyabean and groundnut seeds to farmers of Mahbubnagar, Nalgonda, Nizamabad and Adilabad districts, verification of Brahmin youth who have been provided skill development and placements by Telangana

Brahmin Samkshema Parishad, social audit of assets/beneficiaries of Telangana Scheduled Castes Services Cooperative Society Ltd. in Mahbubnagar district, SVEPs, NHCs and Kalyana Laxmi/Shadi Mubarak Scheme during FYs 2017-18 to 2020-21. Detailed year-wise coverage of other schemes by the social audit is given in Appendix VII.

5.2 Issues and Challenges Related to Coverage of Social Audit

5.2.1 Unable to Facilitate Social Audit of All GPs Six Monthly: Despite its best efforts, SSAAT has not been able to facilitate social audit twice a year in all the GPs (as mandated by MGNREG Act, Audit of Scheme Rules and Auditing Standards) mainly due to two reasons: first, the time taken for facilitation of a detailed social audit, and second, the paucity of funds to hire more social audit resource persons. Although MoRD had modified its instruction by making six monthly social audits mandatory only in 50 per cent of the GP, SSAAT has continued with 100 per cent coverage with yearly social audits. In 2019, GB of SSAAT also decided to continue with one social audit per year.

5.2.2 Uncertainty on Social Audit of Other Schemes: There is lack of clarity in terms of the continuation of schemes and also the extension of social audit of those schemes. There is a delay in finalising MoUs and budget for social audits/verifications that are being continued every year, due to which there is uncertainty in terms of whether or not to retain resource persons or let them go. It has been the experience of SSAAT that most of these departments do not sign MoUs for the next financial year towards the end of the previous financial year, leaving SSAAT in a quandary as to whether to continue with the staff who have been hired for social audit of that scheme, where to source their resource fees from and where to deploy them. Most departments come back mid-year to sign the MoUs and then build pressure to complete social audits in a short period which puts undue strain on the institution.

5.3 Social Audit Process:

Social audits in a Mandal (Block) of Telangana are facilitated by a team of one District Resource Person (DRP), 10 Block Resource Persons (BRP), 10 Senior Village Resource Persons (Sr. VRPs) and 20 Village Resource Persons (VRP). Around 25 persons, who are interested in social audits, are identified in a Mandal and then provided 2-3 days of training. Some of these trainees may go back and approximately 20 are finally selected to work as VRPs. After a VRP has participated in three audits, he/she is provided additional training of 4-5 days and is further designated as a Sr. VRP. The BRP is the team leader and is responsible for the overall facilitation of social audit in a GP. He/she also does the measurements of all material works, the Sr. VRPs interview individual households and measure non-material works and the VRPs assist Sr. VRPs and BRP. Expenditure on facilitating social audit in a GP comes to Rs. 12,128. The social audit expenditure in SAU Telangana is calculated per Mandal. The values given per GP are an approximation arrived at based on the total Mandal expenditure and divided by the number of GPs. The Administration or GP does not bear any of the cost for the conduct of social audits. The social audit process in Telangana includes the following steps.

5.3.1 Preparation of Annual Action Plan and Intimation Letters

SSAAT prepares an annual action plan for the facilitation of social audit and gets it approved by the Executive Committee, Governing Board and Principal Secretary/Secretary of the PR&RD Department of Govt. of Telangana. The approved annual action plan is sent to all District Collectors with a request to instruct field functionaries of implementing agencies to make available records to social audit teams and to take other necessary steps for the smooth conduct of social audit as per the annual action plan. Copy of the letter is also marked to the Chief Vigilance Officer (MGNREGS), Engineer in Chief (Panchayati Raj), Chief Quality Control Officer (MGNREGS), all District Rural Development Officers (DRDOs) and all District Vigilance Officers (MGNREGS) for necessary actions on their part. Mandal and GP level officials are informed through DRDOs. This calendar mentions the number of GPs to be covered Mandal-wise, record period (works/records

pertaining to that period will be audited), period during which social audit will be facilitated in those GPs and the date of Mandal-level public hearing. If there is any change in the annual action plan due to administrative reasons, a modified monthly action plan is communicated to the District Collectors and other authorities concerned.

5.3.2 Entry Meeting at Mandal Level and Accessing Records

Two BRPs go to the office of Mandal Parishad Development Officer (MPDO) 3-4 days in advance to access records such as Measurement Books (MBs), MB distribution register, Muster Rolls (MRs), Payment Orders, seven registers, bills and vouchers related to the material component. Social audit is to be continued only when a minimum of 75 per cent of the total required records are made available (Memo No.2525/RDIIA/2010, PR & RD Dept dated 10th April 2013). Once the entire social audit team arrives at the MPDO office, the entry meeting or coordination meeting is held to make the social audit process smooth. MPDO, Assistant Programme Officer (APO), GP Secretaries, Technical Assistants (TAs), Junior Engineer (JE), Computer Operators (CO) along with DRP/BRPs participate in the meeting. DRP/BRPs share the status of the provision of records with the social audit team. If required, MPDO directs the officials concerned to make records available within the specified time.

5.3.3 Identification of VRPs

BRPs visit MGNREGA wage-seeker families in different GPs of the Mandal and identify interested educated youth who can read and write (preferably 12th pass) and work as VRPs during the social audit rounds.

5.3.4 Capacity Building of VRPs

Training is provided to new VRPs for two days for about six hours each day. The content of the training includes key provisions of MGNREGA, Right to

Information (RTI) Act, social audit process at the GP level and public hearing at the Mandal level, structure of SSAAT, role of VRPs such as door-to-door verification, worksite verification, Gram Sabha mobilisation, social audit report writing, code of conduct and logistical arrangements. Training is given by BRPs at the Mandal level (usually MPDO office premises) where the record verification also happens.

5.3.5 Record Verification

Alongside training of VRPs, all official records pertaining to MGNREGA works (such as Technical, Administrative and Financial Sanctions, MRs, MBs, UCs/Work Completion Certificate, Bills and Vouchers, etc., are meticulously verified, scrutinised, consolidated and converted into manageable and easy to understand formats. This record verification is done by DRPs and BRPs.

5.3.6 Team Formation and Entry Meeting at GP Level

Each BRP is assigned GPs based on expenditure and the number of works under MGNREGS. Experienced BRPs are assigned to GPs with high MGNREGS expenditure or with a large number/variety of work and high issues identified in previous rounds. VRPs and Sr. VRPs are divided into teams with 10 BRPs. VRPs are so distributed into teams that they do not go to their GPs, while BRPs belong to a different Mandal. Stationery such as pens, sketch pens, pencils, chart papers, blank sheets of paper and also measuring tapes are distributed to different teams. After this, social audit teams go to their respective GPs and hold an entry-level meeting involving GP President, GP Secretary, and Ward Members. Sometimes, MPTC member also participate. The time plan of social audit exercise, convening of Gram Sabha meeting and logistics arrangements for the stay of social audit team are discussed. BRPs make plans to cover all works and households within the stipulated time. The help of Mates, GP President and Secretary is taken to understand the geographic spread of assets and habitations and visits are planned accordingly.

5.3.7 Door-to-door Verification with Wage-Seekers

The social audit team conducts door-to-door verification with wage-seekers. Usually, door-to-door verification is done from 6.00 am to 9.00 am and then from 5.00 pm to 6.30 pm as wage-seekers are available at their homes during this time. During the day, the social audit team conducts physical verification of works. During door-to-door visits, the social audit team confirms from wage-seekers regarding payment received. Deviations, if any, are recorded with evidence. The social audit team is also expected to register grievances of wage-seekers, if any and verify the action taken on findings of the previous social audits as reported in the Decision Taken Formats (DTFs).

5.3.8 Physical Verification of Works

Every work that fell under the audit period for which payments have been made is verified by the social audit team. They measure the assets created and verify whether they match the specifications mentioned in technical estimates/sanctions and MBs. Deviation, if any, is noted down along with the reference of relevant records. Besides, the team takes photographs. The social audit team also puts up charts with MGNREGS expenditure audited, list of works audited and list of beneficiaries on the GP notice board/wall at the premises of GP office.

5.3.9 Preparation of Report

Based on the findings of door-to-door verification and physical verification of worksites, the social audit team prepares a DTF containing the identified issues. The social audit team hands over the consolidated booklets, which are used to conduct the social audit to the GP, and a copy of DTF (after the public hearing gets completed) is handed over to Mandal for follow-up actions. GP social audit report is also uploaded on to the website which is in the public domain. Later, social audit resource persons upload the findings on the Management Information System (MIS) of MGNREGA.

5.3.10 Social Audit Gram Sabha

Social audit Gram Sabha is convened by the GP after the social audit team informs them (GP President and GP Secretary) of the completion of verification exercise and requests the GP to organise Gram Sabha. Independent Observer is deputed by the DPC to preside over the Gram Sabha, which is also attended by GP President, GP Secretary, Ward Members and officials of implementing agencies. In Gram Sabha, information on the rights and entitlements of wage-seekers under MGNREGA is shared and then one by one findings of the social audit exercise are presented by the social audit team. Though no decisions are taken here, the findings are shared with the Gram Sabha members and ratified. Panchayat Secretary/Karobar writes the meeting minutes of the Gram Sabha.

5.3.11 Public Hearing at Mandal Level

The social audit process in a Mandal concludes with a public hearing. Before the date of public hearing, the verification exercise and Gram Sabha in all GPs are completed. DRDO or Additional DRDO presides over the public hearing and all Mandal-level administrative and technical officials of implementing agencies attend. BRPs read out GP-wise findings/issues identified during social audits from DTFs. If a wage-seeker with grievances is present, his/her statements are heard and the responsible official responds. The presiding officer takes a decision based on SRDS Rules. These decisions are recorded in the DTF and signatures are taken.

5.3.12 Data Entry into MIS

After completion of Mandal-level public hearing, social audit resource persons enter findings in the social audit module of the MIS of MGNREGA as per the classified categories. This marks the completion of one round of the social audit process in a Mandal.

5.4 Concurrent Social Audit

Section 25 (b) of Schedule-1 of MGNREGA and Annual Master Circular 2020-21 has directed SAUs to facilitate the conduct of concurrent social audits. However, before the COVID-19 pandemic, nowhere it was facilitated by SAUs. With the advent of COVID-19 and the restrictions relating to the conduct of Gram Sabha, SAUs could not conduct regular social audits. However, due to reverse migration, there was increased demand for work under MGNREGA. SSAAT Telangana and SAU of Jharkhand started conducting concurrent social audits with the help of their resource persons. Later, MoRD issued guidelines for the conduct of concurrent social audits in July 2020. The guidelines specified that the resource person from the SAU itself shall do the concurrent social audit. The concurrent audit may be done every month and the resource person shall inspect records, visit worksites to see whether norms are complied with and monitor whether there is any denial of workers' entitlements. After the visit, the resource person shall prepare a report and submit it to the Programme Officer (PO).

SSAAT Telangana started concurrent social audit in April 2020 and a total of 13,601 GPs were covered from April to November 2020. One VRP and one BRP/DRP facilitated the audit in a GP over 3 to 4 days. The main objectives of the concurrent social audit process were to (i) create awareness of rights and entitlements of the wage-seekers, (ii) mobilise labourers to come to work and facilitate demand registration, particularly in low turn-out villages, (iii) facilitate provision of new Job Cards (JC) to returned migrants and others who are interested in working under MGNREGS, (iv) monitor the provision of entitlements to workers as per the MGNREG Act, and (v) grievance registration and redressal.

For concurrent social audit, resource persons visited all the ongoing worksites and checked whether specified processes were being followed and records of works were correctly maintained. The team also imparted awareness on precautions to be taken in the COVID-19 pandemic situation. The team did a door-to-door verification and interacted with stakeholders duly registering grievances like pending payments, work demand, requests for new Job Cards, adding names in existing JC and group, splitting existing JC and forming/adding in worker group,

etc. They also organised grievance redress desks at the GP offices to record grievances duly following COVID-19 protocols. The team provided a grievance receipt on registering a complaint. At the end of the day, in each village, the grievances resolved were communicated to the stakeholders concerned and the follow-up of the pending grievances was done over phone. The APO at the Mandal level and Panchayat Secretary at the GP level were responsible for resolving the pending issues and the social audit teams followed up on each issue with them. The formats duly filled during door-to-door verification and at worksite were shared with the PO, MGNREGS concerned for resolution of the issues and the data was also submitted to the State office through Google Forms. The social audit teams also tracked migrant labourers' details. Once regular social audits started, concurrent social audits were discontinued in the State.

5.5 Issues and Challenges: Findings of Observation of Social Audit Process in Dharmaram Mandal

The research team observed social audit of MGNREGS in Botlavanaparathi GP of the Dharmaram Mandal of the Peddapalli district. Social audit was conducted in the Dharmaram Mandal from 1st August to 16th August 2021 for the record period from 1st April 2019 to 31st May 2021. The BRP, who was heading the social audit team in Botlavanaparathi GP, had been associated with SSAAT for more than eight years.

Poor Maintenance and Provisioning of Records

MGNREG Audit of Scheme Rules as well as Auditing Standards mandate implementing agencies to make available all required records and information to the social audit team 15 days prior to the date of social audit Gram Sabha. However, this is not fully adhered to in Telangana.

Poor maintenance of records and not making them available to the social audit teams in time were the biggest challenges before SSAAT. Non-availability of records within the stipulated time throws the entire schedule of action plan off balance. In the Mandal where the NIRDPR team observed the social audit process,

an intimation letter was sent to District and Mandal officials on 6th April 2021, i.e. approximately 25 days prior to the start date of social audit. Even then, the state of record maintenance was found to be very poor in Dharmaram Mandal of Peddapalli district, which affected the provision of records to the social audit team. Non-availability of records, records without authorised signatures, and dates of entries in the MB records not matching that of the MRs had been observed. Two BRPs were sent ahead on the 31st of July to begin the process of record collection from the MPDO office. When the DRP and other BRPs of the social audit team arrived in the office on the 3rd of August, documents were just starting to arrive. Throughout the day, GP Secretaries, and MPW (Multi-Purpose Workers) put together muster rolls and pay orders for the different works of the different GPs. In the public hearing, each of the 10 social audit teams deployed in the Mandal noted procedural violations with regard to missing records, incorrect entries, and missing signatures. Records at the GP level were also found to be in poor condition, i.e. registers including the work demand register and job cards were not found to be updated, and pay slips were not provided. Bills & Vouchers, MBs and MRs were the three main types of documents which required more follow up by the social audit team. Though printouts of the e-musters can be taken to verify the payment details with wage-seekers, the social audit team relied on physical musters to identify the issues related to the payment of wages by looking for any tinkering of the document and other details. No MBs were provided on the first day and the records were finally provided on 4th of August after a complaint was made to the DRDO. The Assistant Vigilance Officer (AVO) and Assistant DRDO paid a visit to the MPDO office and warned them of reporting the issue of non-provision of records to the CRD which calls for a 'major' penalty as per SRDS rules. Within half an hour of their visit, the MBs and other records were provided to the social audit team.

MIS data also reveals that records related to works worth Rs. 26 crore were not produced for the social audit team over the three financial years from 2018-19 to 2020-21.

Being a recurring issue, the Director of SSAAT had written letters in the past to all District Collectors intimating them about the delay and non-production of

complete records to social audit teams as a serious lapse and requesting them to follow up on the same to ensure timely submission of complete records to the social audit teams. However, they continue to face this challenge.

Non-transparent Selection of VRPs

The VRP selection process is not open and transparent as no announcements or advertisements were put up in this regard. The BRPs are sent to every GP which falls within the Mandal being social audited. The BRPs coordinate with the GP Secretary and MPWs to identify potential families for the recruitment of VRPs. Any interested 12th-passed persons from MGNREGA wage-seekers' families are eligible to be chosen. It seems gender and caste factors are not taken into account during selection because one cannot be very choosy at this point of time. However, the data is recorded in the register. Usually, SC/STs are represented because SC/ST families work in MGNREGS in large numbers. It is becoming difficult to recruit VRPs because of (i) low honorarium amount which is barely higher than that of MGNREGA daily wages, and (ii) the fear of COVID-19.

Unsystematic Training of VRPs

BRPs have no separate orientation on conducting training of VRPs before the commencement of the social audit process in the GP. They train VRPs purely based on their personal experience and knowledge. Although the DRP prepared a rough training schedule, the classes were taken by the BRPs based on their availability as they were simultaneously doing records collection, verification and consolidation at the Mandal level in the same room where the training was being given to VRPs. Only one BRP was referring to some notes, whereas the use of training aids was limited to only a few charts pasted on the wall and a whiteboard & marker. One or two BRPs made use of whiteboard & marker but no scrubber/eraser was available and trainers were struggling with water and waste paper to clean the board. Contents were not visible for VRPs to look at when BRPs tried to write on a dirty board. No printouts of any learning materials/ resources were given to VRPs and a lot of oral delivery of content by the trainers was done. Some of the VRPs who

attended the first day of the training did not return on the next day; instead, some new VRPs attended the 2nd day of training. Lots of back and forth on topics and quite a few gaps were observed. The training could have been structured much better in the limited time. SRP administered a quiz at the end of the two-day training with questions about topics not covered in the two-day training. However, VRPs seemed to have a basic idea of entitlements under MGNREGA. Even during the verification process in the GP, there was no attempt on the part of BRP to teach or explain proactively to build capacities of new VRPs in an active sense. For VRPs, it was learning through observation.

Inadequate Community Mobilisation/Awareness Efforts

Auditing Standards mandate proactive disclosure of all records and information made available to the social audit team to residents of GPs being social audited. It further mandates that participation of the most marginalised (SC, ST, elderly, single women, etc.) must be proactively ensured by SAU teams and administration through wide local publicity (posters, rallies, yatras). However, it was observed that these mandates are not fully complied with. Two charts were put on the first day of the social audit team's visit to the GP on the notice board of the office building. Except that, no other community mobilisation or awareness activity was carried out by the social audit team. Even, the social audit team members did not bother to introduce themselves. When some wage-seekers asked, the resource persons informed them that, "we are here to verify whether an amount has been credited to you or not" or "it is related to 100 days of work." In two cases, the senior VRP was telling wage-seekers that, "to get work under MGNREGA for next year, the wage-seeker has to compulsorily give his/her documents to the team to verify." No efforts were made by the social audit team to create awareness amongst the labourers about their rights & entitlements under the MGNREGA during door-to-door verification. There were neither mobilisation efforts nor provision of information to wage-seekers by the social audit team about social audit Gram Sabha. In a few cases, people with grievances were called to attend the Gram Sabha. The social audit team did not inform people about Mandal-level public hearing either.

5.5.5 No Independent Observer/ Presiding Officer in Most Gram Sabha

To ensure the independence of social audit process, the Auditing Standards mandate that the Gram Sabha for the conduct of social audit shall not be chaired by anyone involved in the implementation of MGNREGA in the GP, including the Sarpanch. Rule 6 (7) of Audit of Scheme Rules says that the DPC shall attend or nominate an official of appropriate level for smooth conduct of social audit Gram Sabha. In Telangana, the District Collector has to depute an independent Observer who is not part of the implementing agency to the social audit Gram Sabha. In the social audit Gram Sabha of the GP under observation, no independent Observer or Presiding Officer was present. In fact, as pointed out by the Office of PAG in its audit inspection report 2019, in most of the GPs, social audit Gram Sabhas are conducted in the absence of an independent Observer and Presiding Officer. The Office of PAG, in its audit inspection report 2015, also pointed out that 89 per cent of the social audit Gram Sabhas were conducted without an independent Observer in the year 2014-15. As per the data accessed from SSAAT, the number and percentage of social audit Gram Sabhas held without an independent Observer against the total Gram Sabha held is given in Table 10. As can be seen in the last four financial years, in more than 90 per cent of GPs, social audit Gram Sabhas were held in the absence of an independent Observer.

Table 10: Number and Percentage of Social Audit Gram Sabha Held without Independent Observer

Sl. No.	Year	Total No. of GS Held	No. of GS Held without Observer	Percentage of GS Held without Observer
1	2015-16	8582	7236	84%
2	2016-17	8121	Not Available	Not Available
3	2017-18	8707	8107	93%
4	2018-19	8728	8290	94%
5	2019-20	8530	8020	94%
6	2020-21	2168	1954	90%

(Source: SSAAT Records)

5.5.6 Low Attendance and Voice of People in Gram Sabha

As there is no requirement for quorum and no effort by the social audit team to mobilise community, attendance in Gram Sabha is low. This is a recurring challenge. In its compliance audit report 2015 on MGNREG Audit of Scheme Rules, the PAG pointed out that public participation in social audit Gram Sabha was poor. There is not much engagement with people who attended the Gram Sabha. Only after prompting by the research team, in one or two cases, people were asked to share their grievances. No one presided over the Gram Sabha as the observer was not present. Only carpet was laid and there was no sound system. GP Secretary shared that there was a sound system available in the GP office, but the social audit team did not convey the requirement to the GP.

5.5.7 Low Transparency and People's Participation in Public Hearing

Since the Presiding Officer was new to public hearings, he had to depend on AVO and Vigilance Manager and was constantly referring to SRDS Rules before taking decisions. ATRs of the last social audit were not read either by AVO or the social audit team. There was no separate announcement of what action had been prescribed by the Presiding Officer on the issue in the DTF. Only while seeking response from the GP officials concerned and discussing with Sarpanchs, they were mentioned and discussed in some cases openly. There were a huge number of issues to go through and authorities seemed in a hurry to complete the process. The public hearing started on 16th August and went up to 1.00 AM on 18th August 2021. There is very low participation of wage-seekers in the public hearing, both in terms of attendance and voice.

5.5.8 Postponement of Social Audit Process

The delay in releasing funds from MoRD and the State Treasury to SSAAT's account, peak work season, delay in submission of records by implementing agencies, and requests by district and Mandal level officials to postpone public hearings are creating obstacles for conducting social audits. In 2018-19, public

hearings were postponed in two Mandals and in 2019-20, in 14 Mandals public hearings were postponed due to the election code of conduct and COVID restrictions. However, in the year 2020-21, public hearings were postponed in none of the Mandals. Sometimes, DRDOs and Additional DRDOs do not attend the public hearing. Such postponements impact the schedule of annual action plan and create further work pressure on social audit resource persons to ensure 100 per cent coverage of GPs.

5.5.9 Non-reporting of Some Issues: Some issues are not included in DTF. One reason is no matter how many times they are mentioned in the report, neither change is incorporated nor is action taken. Actionable points are included in the DTF. For example, an issue which beneficiaries mentioned in the FGDs observation study is that they would like to change groups, or because of their group organisation, the payment they are receiving is less despite putting in the work. Other issues are complaints about Mate or Job Card activation and printing of JCs not just the provision of JC number. These are missing from the grievance section of reports.

CHAPTER-6

ACTION TAKEN ON SOCIAL AUDIT FINDINGS

Rule 7 (4) of the Audit of Scheme Rules, 2011 makes the State government responsible for taking follow-up action on the findings of the social audit. The Auditing Standards mandate that DPC shall ensure that corrective action is taken on the social audit reports and issue written orders within a time frame to be specified by the State government. DPC shall ensure that recoveries are made in case of embezzlement or improper utilisation and pay misappropriated wages within seven days of recovery. DPCs shall maintain a separate account for recoveries. DPCs are also responsible for ensuring initiation of appropriate action (including criminal proceedings and termination of services) against individuals who embezzled or misused amounts meant for MGNREGS. Section 10.1.10 of Annual Master Circular 2020-21 says that within one month of the Gram Sabha/Ward Sabha, the PO should submit ATRs to the SAU. In the subsequent section, the Annual Master Circular prescribes a monthly review of social audit by ACS/Pr. Secretary/Secretary of the RD/PR department wherein irregularities are identified and the progress of action taken shall be reviewed. Further Rule 7 (5) says that SEGC shall monitor the action taken by the State government and incorporate the ATR in the annual to be laid before the State legislature by the State government.

To ensure follow-up action on decisions taken on findings of social audit in the Mandal-level public hearings, Telangana State has set a vigilance mechanism in the State.

6.1 Vigilance Mechanism and Process

As per the Andhra Pradesh Social Audit Rules (GO MS No 98, RD&PR Department), the follow-up actions on the social audit findings are the responsibility of the DPC under MGNREGS and the CRD. After completion of social audit public hearings at the Mandal level, a copy of the social audit report, together with all pieces of evidence and DTFs duly containing the decisions of the Presiding Officer,

is handed over by the SSAAT's social audit team to the District Rural Development Officer (DRDO) concerned for taking follow-up action. The responsibility for taking action lies with the Vigilance wing working under the control of the Chief Vigilance Officer (CVO).

The State Government had issued a Circular (no.14139/CRD/960/SPM (DM)/2012 dated 08.01.2013) with modified Disciplinary Rules for FTEs of the Society for Rural Development Services (SRDS) to enforce proper discipline and to induct good conduct among FTEs in order to effectively implement rural development schemes. All possible violations and deviations in the implementation of MGNREGA have been listed in the annexure to these SRDS Rules and categorised into (i) entitlement-related issues, (ii) works-related, (iii) muster-related, (iv) payments-related, and (vi) others. For every possible deviation under these major categories, responsible persons and actions to be taken have been indicated. Based on these Rules, the Vigilance cells at the State and district levels initiate actions on decisions taken on social audit findings in the Mandal-level public hearings.

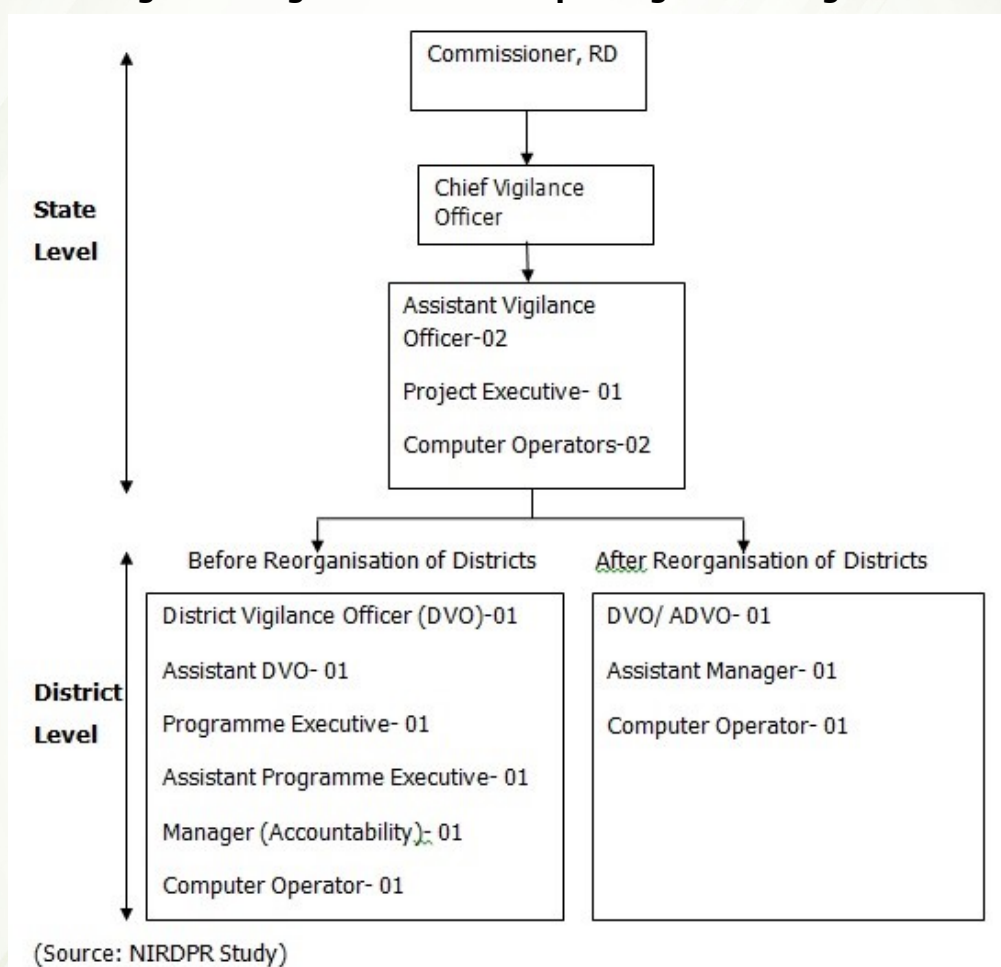
The Government of AP ordered (in the G.O.Ms.No.171, PR & RD (RD.II) Department, dated 29.5.2009) creating a State-level cell at the office of CRD and district-level cell at the office of the Project Director, DWMA to follow up the action on social audit.

The duties and responsibilities of Vigilance Cell at the State and District level, inter-alia, are (i) to deal with vigilance/anti-corruption and disciplinary cases relating to corruption, criminal misconduct and misappropriation of all the staff involved in implementation of Rural Development programmes, including non-gazetted and contractual staff, (ii) to conduct surprise visits and field level inspections to proactively detect cases of irregularities/illegalities that may occur in implementation and also investigate into cases of fraud detected during social audit/Quality Control inspection/inspection by senior officers, (iii) to receive complaints from general public against the implementation of schemes or implementing officers/staff and to conduct preliminary investigation and submit report to the disciplinary authority/Head of Department (HOD), (iv) to suggest

systematic changes for reducing corruption, and (v) to maintain records regarding the vigilance/disciplinary cases pending against the staff and monitor till they reach a logical conclusion and are enforced or complied with.

The Vigilance wing is headed by the Chief Vigilance Officer (CVO) at the State level who reports to the CRD. The organisational set-up of Vigilance wing in Telangana is as follows:

Figure 6: Organisational Set-up of Vigilance Wing



The District Vigilance Officer (DVO) is the overall in charge of the District Vigilance Cell and is entrusted with the responsibility of social audit follow-up action, grievances redressal and the process of disciplinary cases under various rural development programmes, i.e. MGNREGS, Comprehensive Land Development Programme (CLDP), Watersheds, etc., implemented by the Department of RD.

The Mandals in the district are to be allocated among the Assistant Vigilance Officers (AVO) and to the Manager (Accountability) by the DVO in consultation with the DRDO. AVO/Manager (Accountability) and Programme Executive (PE) assist the DRDO and the presiding officer during the conduct of public hearings, compile data after receipt of DTF for the approval of the District Collector on the follow-up action, monitor follow-up action, prepare Article of Charges as per C.C.A Rules, and process disciplinary cases till the final orders are passed and host the same on HRMS online.

During the observation of the social audit process in one Mandal, the research team met with an AVO. As shared by him, the roles and responsibilities of AVOs with respect to social audit include collection of recoveries and initiation of action against the indicted persons according to the DTF. After the endorsement by the Presiding Officer of the social audit public hearing, the Vigilance wing has to take action against those persons. If needed, they also intervene and ensure that GPs make necessary records available to the social audit team. In the case of existing employees who are still on the job, actions such as recovery from their salaries, suspension, etc., are taken whereas in the case of Field Assistants who are no longer in service or other persons who don't work for the department, the action is taken by the Tehsildar concerned under Revenue Recovery Act after getting a communication from CRD.

The DVO/DRDO submits a report of the action taken and the recoveries made to the CVO and the CRD of the State.

Necessary steps have been taken to develop relevant screens in the software for issuing show-cause notices, suspension orders, recovery statements and status of the case and recoveries made. The entire process has been automated to reduce the workload and pressure as the number of social audit paras tends to be quite high. Other features are available in the HRMS module to evaluate an employee's performance based on which the contract for the employee is either terminated or renewed. The same screen is also deployed to the Vigilance wing to make the entire process transparent. The Principal Secretary (RD) regularly reviews the follow-up action to ensure that there is a timely disposal of cases. Feedback is

continuously sought from the social audit teams so as to further improve and streamline the implementation of the scheme.

The misappropriated amounts recovered after the social audit are categorised as recovery or fines. The recovery amounts due to the workers are paid back to them within seven days of recovery. No clear directions are there on the rest of the recoveries, except that it should be remitted back into the MGNREGS account.

The Andhra Pradesh Promotion of Social Audit and Prevention of Corrupt Practices Act (APSA PCP Act), 2012 was adopted by the Telangana government post-bifurcation, ensuring the setting up of mobile courts in Medak and Karimnagar, with the support of the High Court, to try cases in the villages by a First Class Judicial Magistrate. This is an Act to provide for the trial of offences committed by persons indulging in corrupt practices during the implementation of government schemes and programmes, including those as brought out by social audit and related matters. Under this Act, the State government has accorded sanction for the creation/establishment of six (06) Special Mobile Courts covering nine districts.

6.2 Trends of SA Findings: Analysis of MIS Data

Analysis of complete data with regard to findings and action taken on findings available on the NREGA MIS for the financial years 2018-19, 2019-20 and 2020-21 updated by the SSAAT Telangana has been done. The following are the main observations of this analysis.

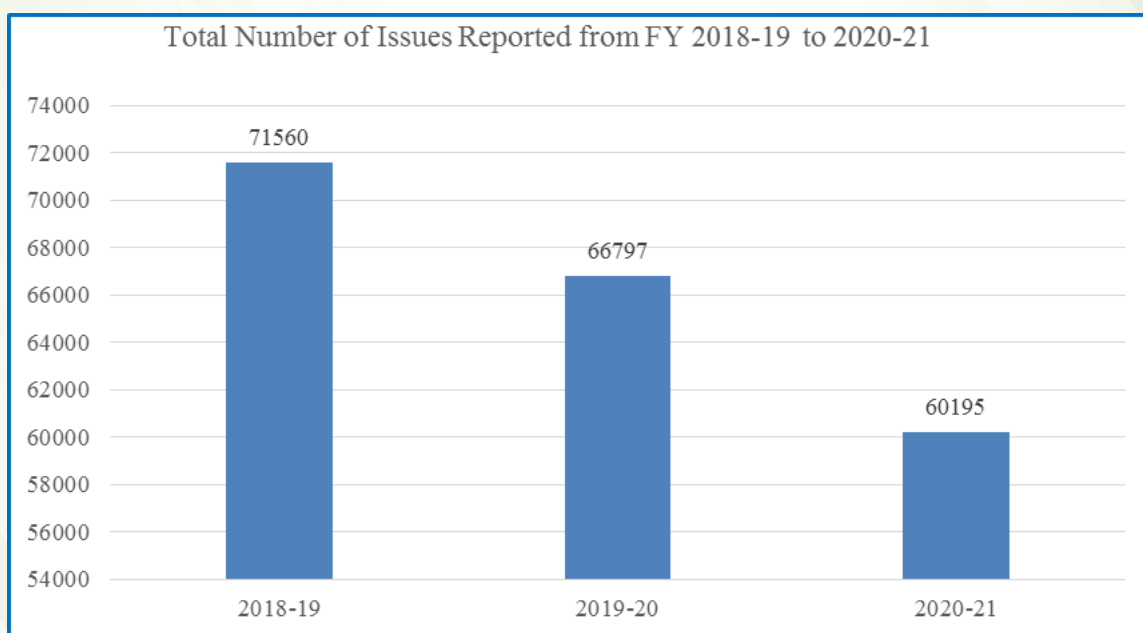
6.2.1 Classification of Issues: The issues identified in the social audit are broadly categorised into the following four main types: (i) Financial Misappropriation (FM), (ii) Financial Deviation (FD), (iii) Process Violation (PV) and (iv) Grievances (GV)

The four main types of issues are further divided into categories and sub-categories (The list of categories and sub-categories of issues is in Appendix VII.

6.2.2 Issues Reported on the MGNREGA MIS for the FY 2018-19 to 2020-21

Even though the number of audits conducted decreased to 34 per cent in the year 2019-20 and 70 per cent in the year 2020-21 as compared to social audits conducted in the year 2018-19 due to COVID-19 pandemic-related restrictions, there is not much difference in the number of issues reported in these three years.

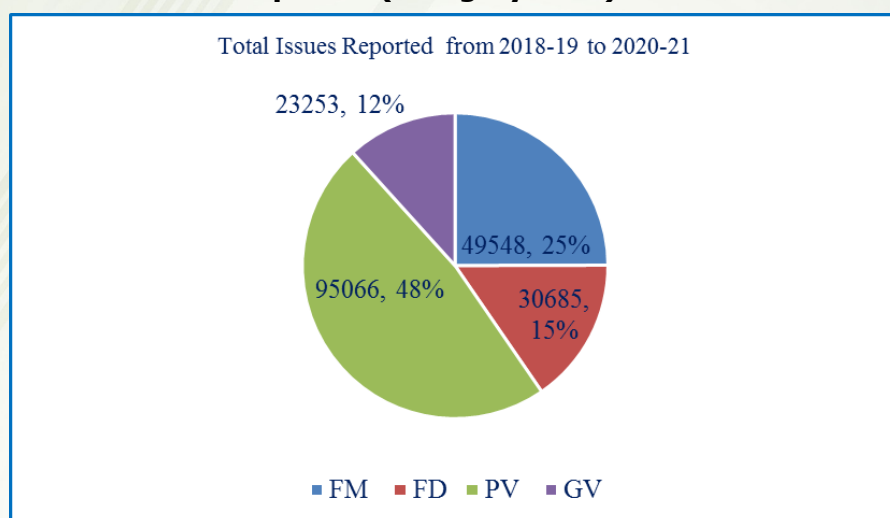
Graph 2: Total Number of Issues Reported from FY 2018-19 to 2020-21



(Source: MIS of MGNREGA)

Total Number of Issues Reported (Category-Wise) in FYs 2018-19 to 2020-21

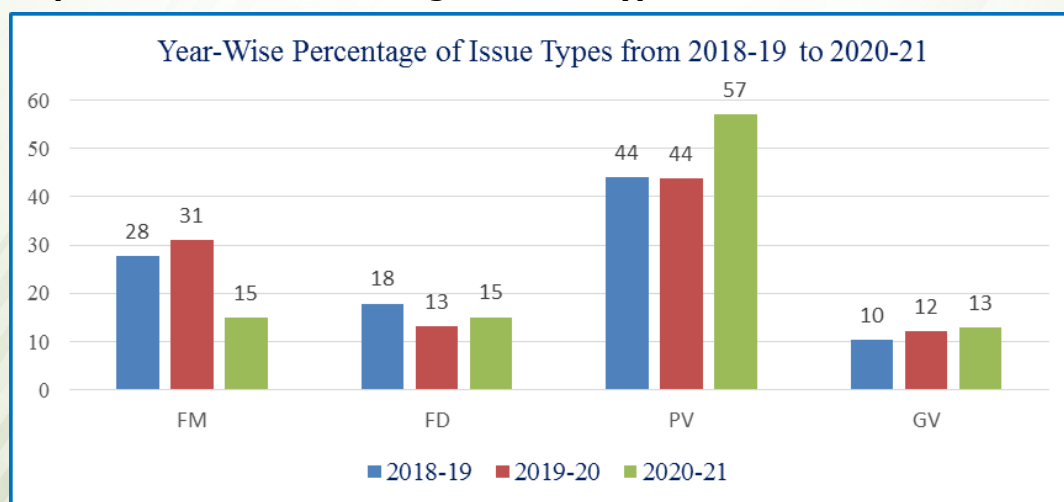
Of the total 1,98,552 issues reported in FYs 18-19, 19-20 and 20-21, 25 per cent were related to financial misappropriation, 15 per cent were related to financial deviation, 48 per cent were related to process violation, and 12 per cent were related to grievances. A total of 49,548 financial misappropriation issues have been identified in the social audit amounting to a total of Rs. 92.45 crore for the FYs 18-19, 19-20 and 20-21.

Graph 3: Total Issues Reported (Category-wise) in FYs 2018-19 to 2020-21

(Source: MIS of MGNREGA)

6.2.3 Year-Wise Percentage of Issues Reported under Each Issue Types from 2018-19 to 2020-21

The percentage of the number of issues reported related to financial misappropriation has increased in the year 2019-20 and decreased in the year 20-21. Financial deviation also decreased in the year 2019-20 and again increased in the year 2020-21 whereas process violations and grievances have increased over the years. Financial misappropriation had gone down from 28 per cent in FY 18-19 to 15 per cent in FY 20-21. Financial deviation also had gone down from 18 per cent in FY 18-19 to 15 per cent in FY 20-21. Process violations had gone up from 44 per cent in FY 18-19 to 57 per cent in FY 20-21 and grievances had gone up from 10 per cent to 13 per cent in FY 20-21.

Graph 4: Year-Wise Percentage of Issue Types from 2018-19 to 2020-21

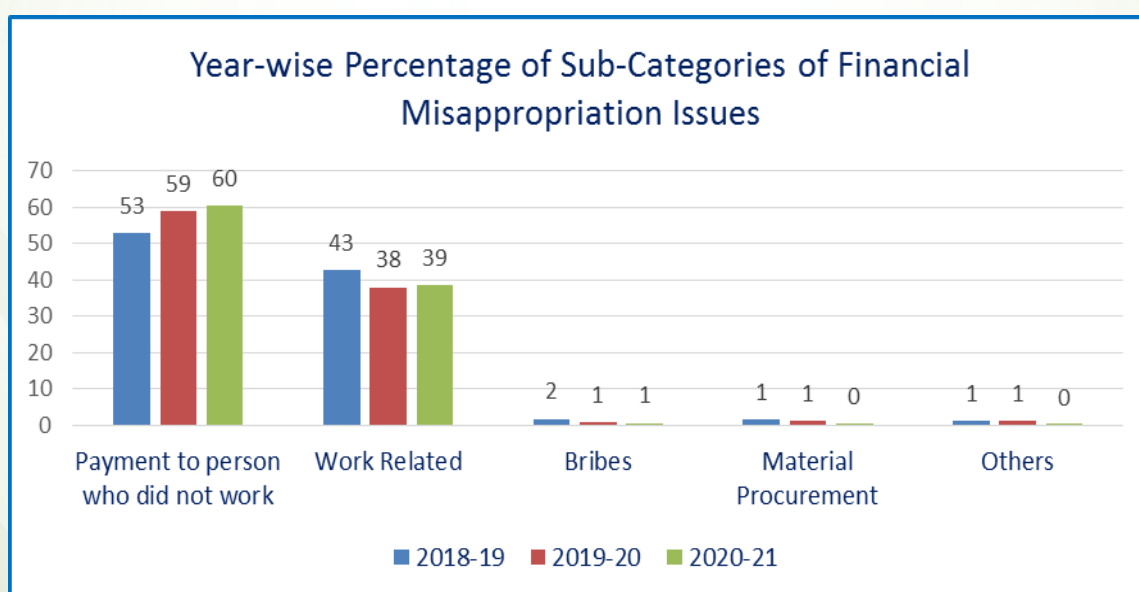
(Source: MIS of MGNREGA)

6.2.4 Year-wise Financial Misappropriation Issues from FY 2018-19 to 2020-21

There are five different categories under financial misappropriation. The highest number of issues reported were related to payment to persons who did not work followed by work-related issues.

Payment to persons who did not work was the major issue over the three financial years. It went up 07 per cent from FY 18-19 to FY 20-21. The second biggest issue was work-related which decreased from 04 per cent from FY 18-19 to FY 20-21. On average, 57 per cent of the financial misappropriation paras pertains to the "payment to person who did not work", 40 per cent pertains to the "work-related" and the remaining 03 per cent pertains to the "Bribes, Material procurement and others".

Graph 5: Year-wise Percentage of Sub-Categories of Financial Misappropriation Issues



(Source: MIS of MGNREGA)

The top ten sub-categories which are frequently repeated under each category of financial misappropriation are given in Table 11. SAUs may need to focus more on these issues.

Table 11: Year-wise Top 10 Issue Sub Category from FY 2018-19 to 2020-21

Sl. No.	Issue Sub-category	Rank in 2018-19	Rank in 2019-20	Rank in 2020-21
1	Payment to person who did not work	1	1	1
2	No trace of planted saplings	2	2	6
3	Work was not done	3	4	2
4	No trace of work now	4	3	11
5	Payment made but no work was done	5	5	3
6	Amount misappropriated by individuals through fake entries	6	6	12
7	Saplings were not planted in plantation work	7	8	4
8	Inappropriate work was executed	8	11	14
9	Payment to person who did not work but work was done	9	7	5
10	Payment to non-existent person	10	10	8

(Source: MIS of MGNREGA)

In FY 2020-21, some of the new issues came under the top 10 which are “Person A wages gone to Person B”, “Payment made to dead person”, “Work was allotted to ineligible beneficiary” and “Payment to person employed full-time elsewhere (government; school; private firm etc.)”

6.2.5 Top 10 Districts with Highest Number of Financial Misappropriation Issues during 2018-19 to 2020-21

Table 12 gives the details of the top 10 districts where highest number of financial misappropriation issues were reported for three FYs from 2018-19 to 2020-21. Khammam and Nalgonda districts are in the top 10 over the three FYs whereas Mahabubabad, Warangal, Jayashankar, Kamareddy, Suryapet and Nirmal districts are in the top 10 over the two FYs. Nizamabad and Jangon districts are in the top 10 in 2018-19 FYs.

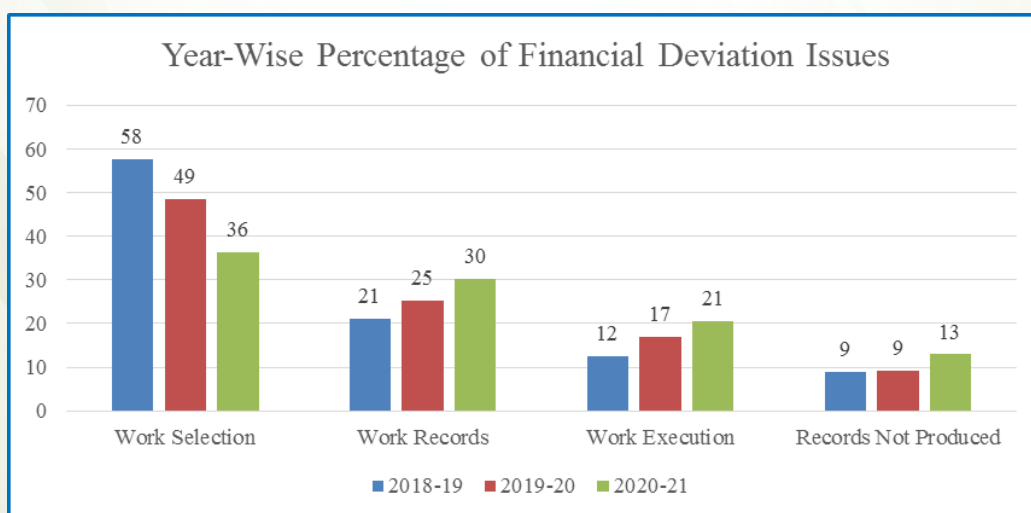
Table 12: Top 10 Districts with Highest Number of Financial Misappropriation Issues during FY 2018-19 to 2020-21

Sl. No.	District Name	FM Issues reported 18-19	FM Issues reported 19-20	FM Issues reported 20-21	Total
1	Khammam	873	1164	577	2614
2	Jayashanker	1088	1237	142	2467
3	Warangal	1090	565	810	2465
4	Mahabubabad	1303	884	248	2435
5	Nalgonda	983	840	594	2417
6	Kamareddy	956	838	497	2291
7	Nagarkurnool	645	1105	446	2196
8	Jagtial	644	1115	327	2086
9	Nirmal	791	794	451	2036
10	Mahbubnagar	651	1340	0	1991

(Source: MIS of MGNREGA)

6.2.6 Year-wise Financial Deviation Issues Reported from FY 2018-19 to 2020-21

The work selection category declined 22 per cent from FY 2018-19 to FY 2020-21 whereas work records, works execution and records not produced categories increased by 9 per cent, 9 per cent and 4 per cent, respectively, from FY 2018-19 to FY 2020-21.

Graph 6: Year-wise Financial Deviation Issues Reported from FY 2018-19 to 2020-21

(Source: MIS of MGNREGA)

6.2.7 Top 10 Sub-categories of Issues under Financial Deviation from FYs 2018-19 to 2020-21

- i) Significant differences between measurements at worksite and recorded values in MB
- ii) Excess payment due to arithmetic errors in MB
- iii) Records not produced for Social Audit
- iv) Sanction of ineligible work
- v) Payment made without MB entries
- vi) Payment made is higher than what was sanctioned in NMR
- vii) Sanction of ineligible work
- viii) Payment made without the Programme officer's order
- ix) Other records not produced
- x) Incomplete technical estimate (no pre-measurements, no FMB sketch, no photos, no site map)

6.2.8 Top 10 Districts where Highest Number of Financial Deviation Issues Reported

The below given (Top 10) districts were reported with the highest number of financial deviation issues for three FYs from 2018-19 to 2020-21.

Table 13: Top 10 Districts with Highest Number of Financial Deviation Issues Reported

Sl. No.	District Name	18-19	19-20	20-21	Total
1	Suryapet	797	378	812	1987
2	Nalgonda	675	467	673	1815
3	Adilabad	712	456	434	1602
4	Kumram Bheem (Asifabad)	553	242	652	1447
5	Khammam	541	357	536	1434
6	Yadadri	328	390	698	1416
7	Jangaon	739	337	305	1381
8	Warangal	708	151	439	1298
9	Siddipet	369	280	558	1207
10	Mahabubabad	632	348	176	1156

(Source: MIS of MGNREGA)

6.2.9 Top 10 Districts Not Producing Records for Social Audit for FY 2018-19 to 2020-21

As per Audit of Scheme Rules, the PO shall ensure that all the required information and records of all implementing agencies such as Job Card register, employment register, work register, Gram Sabha minutes, copies of the sanctions (administrative or technical or financial), work estimates, work commencement order, muster roll issue and receipt register, muster rolls, wage payment acquaintance, materials – bills and vouchers (for each work), measurement books (for each work), asset register, action taken report on previous social audits, grievance or complaints register, any other documents that the Social Audit Unit requires to conduct the social audit are properly collated in the requisite formats, and provided along with photocopies to the Social Audit Unit for facilitating conduct of social audit at least 15 days in advance of the scheduled date of Gram Sabha for social audit. As per the MIS, records related to works worth Rs. 26 crore were not produced before the social audit team over the three years which is a violation of the Act. Following were the top 10 districts that failed to produce records.

Table 14: Top 10 Districts Not Produced Records for Social Audit for FYs 2018-19 to 2020-21

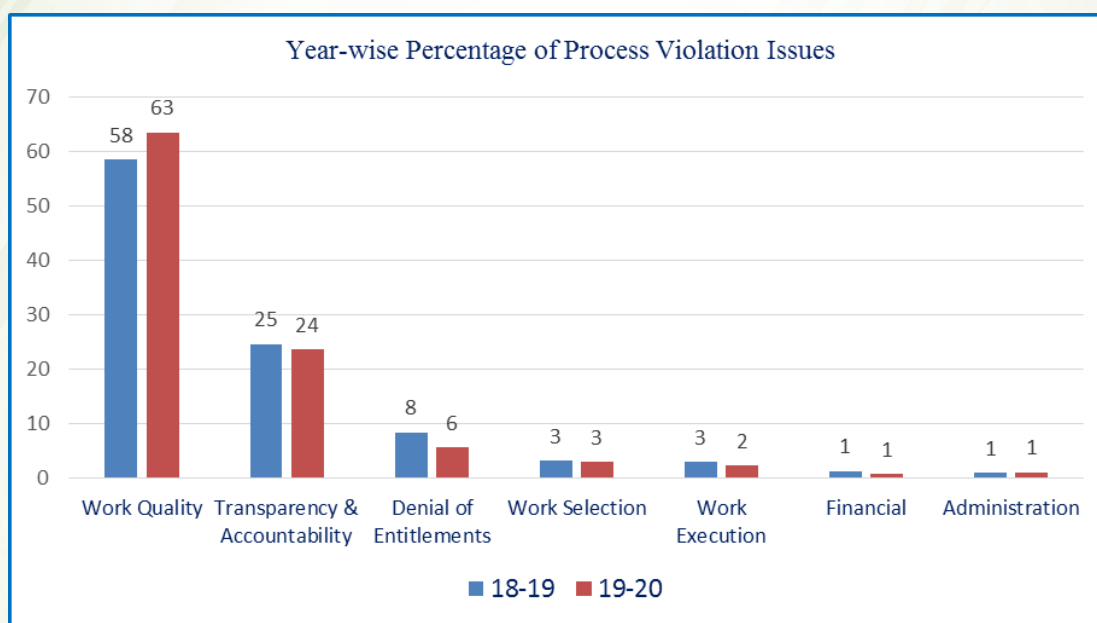
Sl. No.	District Name	18-19	19-20	20-21	Total (Amount in lakhs)
1	Jayashanker	18.59	34.78	1.02	54.39
2	Nizamabad	6.14	3.48	6.38	15.99
3	Mancherial	10.25	4.40	0.86	15.51
4	Jagtial	7.09	1.50	4.88	13.47
5	Sangareddy	5.79	6.96	0.00	12.75
6	Suryapet	3.59	3.06	6.07	12.71
7	Siddipet	0.16	0.55	11.86	12.57
8	Khammam	6.52	4.85	0.79	12.16
9	Nirmal	1.15	5.20	4.48	10.83
10	Mahabubabad	5.98	3.12	0.19	9.29

(Source: MIS of MGNREGA)

6.2.10 Year-wise Percentage of Issues Reported under Process Violation

Work quality issues have increased by 5 per cent in the year 2019-20, while transparency and accountability issues have decreased by 1 per cent in 19-20. Almost 85 per cent of the issues reported under process violation are related to work quality and transparency and accountability categories only. Denial of entitlements was decreased by 2 per cent in 2019-20.

Graph 7: Year-wise Percentage of Issues Reported under Process Violation



(Note: 20-21 report could not be downloaded from NREGA MIS. Hence data for only FY 2018-19 and 19-20 has been considered. Under the Maintenance of Registers and Records category, the report shows that zero issues were reported whereas the Frequency of Issues Reported category is at the top.)

(Source: MIS of MGNREGA)

6.2.11 Top 10 Sub-categories under Process Violations in FYs 2018-19 and 2019-20

- i) Poor maintenance of NMRs
- ii) Missing trees/plantations/farm pond
- iii) Poor maintenance of Mbooks
- iv) Poor quality of work
- v) Non-availability of photos in the 3 stages
- vi) Citizen Information Boards (CIB) are not put up

- vii) Difference in the days worked and wages earned between JC and online entry
- viii) Concurrent Social Audit does not take place
- ix) Variation in signature/thumb-print between NMR and Job Card Application Register
- x) Poor maintenance of Panchayat registers

6.2.12 Top 10 Districts with Reported Highest Number of Process Violation Issues

The below given (Top 10) districts reported the highest number of Process Violation paras for the three FYs. Siddipet district is in the top 10 over the three FYs whereas Mahabubabad, Jayashankar, Rangareddy, Bhadradri Kothagudem, Suryapet, Nalgonda and MahabubNagar districts are in the top 10 over the two FYs. Medak and Hanumakonda districts are in the top 10 in the 2018-19 FYs.

Table 15: Top 10 Districts which Reported Highest Number of Process Violation Issues

Sl. No.	District Name	18-19	19-20	20-21	Total
1	Siddipet	2090	2098	1603	5791
2	Khammam	1275	1730	2362	5367
3	Yadadri	1064	1231	2819	5114
4	Suryapet	1456	907	2518	4881
5	Nalgonda	1450	809	2569	4828
6	Mahabubabad	1797	1081	1273	4151
7	Jayashanker	1557	1704	674	3935
8	Mahbubnagar	1415	2244	0	3659
9	Nagarkurnool	1225	1320	1103	3648
10	Bhadradri Kothagudem	1475	752	1356	3583

(Source: MIS of MGNREGA)

6.2.13 Top 10 Districts which Reported Highest Issues under Grievance Category from FY 2018-19 to 2020-21

Table 16: Top 10 Districts with Reported Highest Issues under Grievance Category from FYs 2018-19 to 2020-21

Sl. No.	District	18-19	19-20	20-21	Total
1	Siddipet	399	528	414	1341
2	Khammam	298	471	446	1215
3	Suryapet	203	182	763	1148
4	Mahbubnagar	357	761	0	1118
5	Jayashanker	421	500	174	1095
6	Nalgonda	194	213	671	1078
7	Nagarkurnool	267	418	324	1009
8	Yadadri	166	289	546	1001
9	Warangal	473	126	392	991
10	Rangareddy	518	377	0	895

(Source: MIS of MGNREGA)

6.2.14 Frequently Reported Issues under Grievance Category

- i) Complaint - application for payment of delayed wages
- ii) Person has worked but has not been paid because his family has already completed 100 days
- iii) Application for new Job Card
- iv) Person has worked but name is not in NMR and has not gotten paid
- v) Complaint application for payment of non-paid wages
- vi) Application to add an additional family member
- vii) Application for work
- viii) Application for minimum wages to be raised
- ix) Complaint application for payment of non-paid wages
- x) Complaint – non-provision of worksite facilities

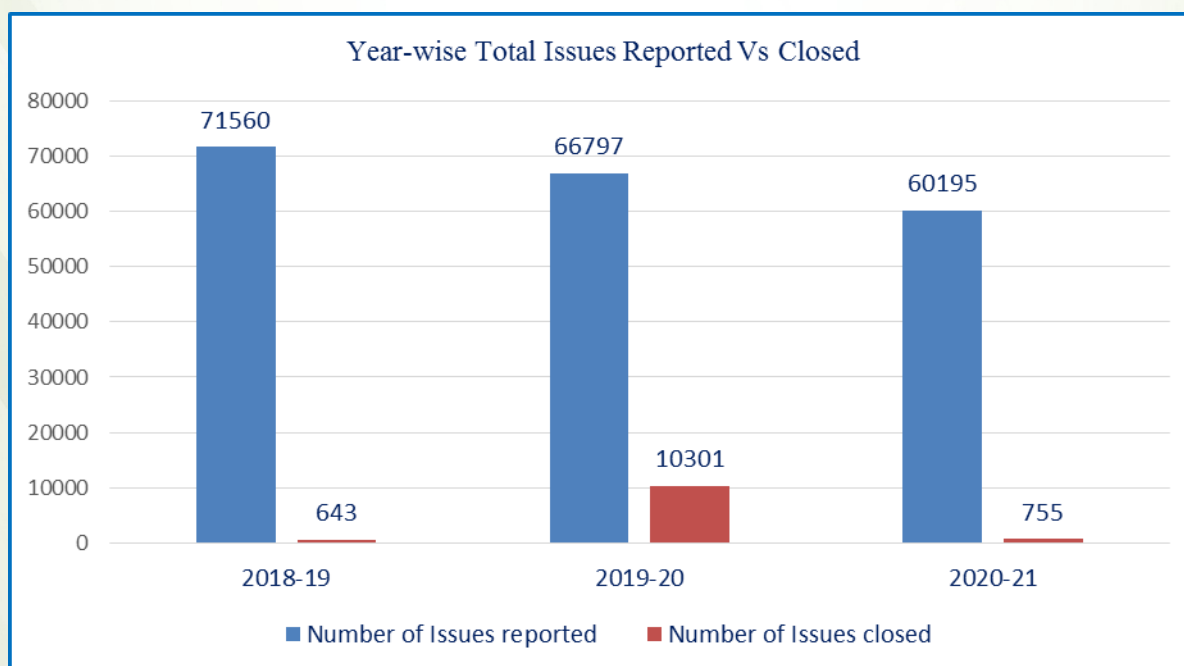
6.3 Status and Trends of Action Taken on SA Findings: Analysis of MIS Data

All the State government MGNREGA implementing officials are mandated to enter action taken on social audit findings in the NREGA Soft. On June 22, 2018, the MoRD sent a letter to all States requesting them to respond with an action taken report for each social audit finding in the MIS itself within 30 days. The social audit resource person who facilitated the audit in the Gram Panchayat is supposed to go through the reported action taken and then decide to either close the issue or escalate it to the higher authority in case the action taken is not according to the guidelines issued by the State government. After closing an issue, the resource person also marks the action taken as either satisfactory or not satisfactory.

6.3.1 Year-wise No. of Issues Reported and Closed

A total of 1, 98,552 issues were reported in the FYs 18-19, 19-20 and 20-21. Of this, 11,699 issues were closed, which accounts for only 06 per cent.

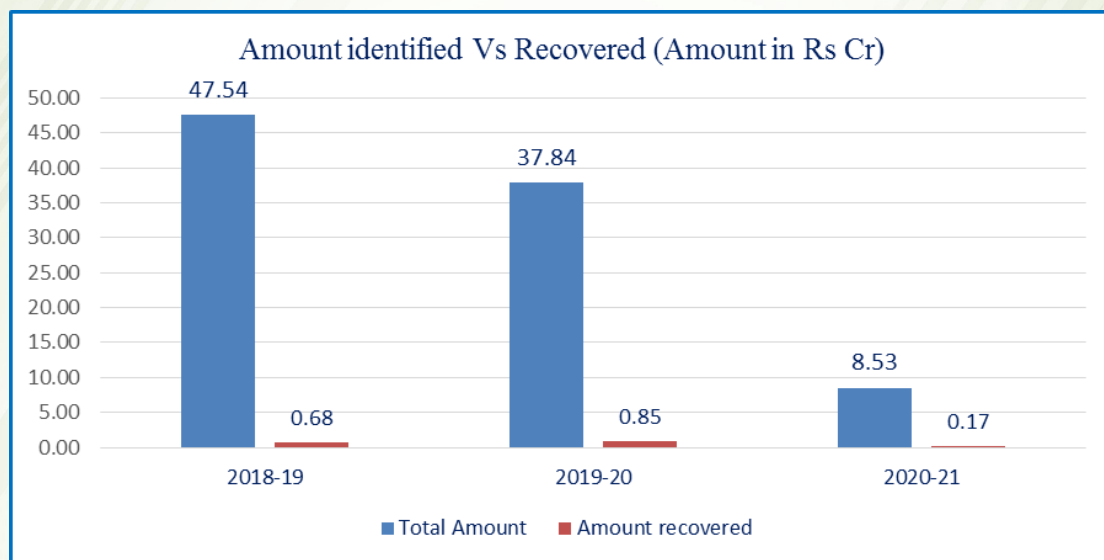
Graph 8: Year-wise No. of Issues Reported and Closed



6.3.2 Year-wise Misappropriated Amount Recovered from FY 2018-19 to 2020-21

As per the MIS, the amount recovered in three FYs is negligible and is just below two per cent only.

Graph 9: Year-wise Misappropriated Amount Recovered from FY 2018-19 to 2020-21



6.3.3 Disciplinary and Criminal Action against Responsible Persons

In total, 10 FIRs were filed, 12,922 employees were levied penalty, 469 employees were suspended and 259 employees were terminated in the FYs 2018-19, 19-20 and 20-21.

Table 17: Disciplinary and Criminal Action against Responsible Persons

FY	No. of FIRs Filed	No. of employees fined/levied penalty	No. of employees suspended	No. of employees terminated
2018-19	7	6200	263	136
2019-20	2	5309	175	86
2020-21	1	1413	31	37
Total	10	12922	469	259

6.4 Issues and Challenges in Ensuring Action on SA Findings

The above-discussed Vigilance mechanism is facing some challenges, which are affecting its efficacy in ensuring adequate and timely actions on findings of social audit. Important among them are as follows.

6.4.1 Inadequate Staff with Vigilance Wing: Regular full-time CVO is not appointed at the State level and in-charge arrangement is made. There are no technical persons (auditing and engineering) in the Vigilance cell both at the State and district levels. Staff at the district level is insufficient and DVO posts are filled with retired employees. Due to the reorganisation of districts, the staff strength has been reduced from the initial five members to three members. On the other hand, The Vigilance wing is now entrusted with other works. The AVOs and Assistant Managers are now also entrusted with monitoring works under the Palle Pragathi Programme in which every alternate day they have to visit two villages and take photographs of dirty roads and drains, and upload the same to the CRD. Due to insufficient staff strength and additional work, actions on social audit findings are getting delayed.

6.4.2 Vigilance Wing under the Control of Implementing Agency: Vigilance officers are under the direct control of the implementing agency officials. For example, DVO and AVO work under DRDOs who are also responsible for the implementation of MGNREGA. The salary of Vigilance Officers is released by the DRDO.

6.4.3 Gaps in Current SRDS Rules: There are some gaps in the current SRDS Rules on action to be taken based on the different types of issues where it does not specify what action needs to be taken on certain issues. SRDS rules were framed long back and need to be updated. For example, no changes have been made after Field Assistants (FA) were removed. As informed by an AVO during the observation in one Mandal, there is a need to call in a group of Vigilance Officers to update the SRDS rules.

6.4.4 Very Low Recovery of Misappropriated Amount: As per the MIS, the per cent of amount recovered against the total misappropriated amount from

the financial years 2018-19 to 2020-21 is negligible, i.e. below two per cent. Such a low recovery rate emboldens functionaries, who indulge in corrupt practices and discourages wage-seekers and social audit resource persons.

6.4.5 No Review of Actions Taken at District Level: Social audit findings are discussed and decisions are taken at Mandal level public hearing. Subsequently, it is the responsibility of the Vigilance wing to take follow up action on the social audit paras. There is no review of actions taken at the district level, and hence there is often delay in initiating actions of decisions taken at the public hearings. However, review takes place at the State level.

6.4.6 Wrong Entries in the MIS by Resource Persons

- i) Social audit issues have to be categorised systematically under the right category. In some of the cases what has been written in the social audit report is not matching with the entry in the MIS.

Social Audit Issue entered by Social Audit Resource Person

Issue Number TS-ISSUE-185278	Issue Type Financial Misappropriation	Issue Amount 76173
Issue Category Work Related	Issue Sub Category No trace of work now	
Issue Description JAMGAM GRAMAM LO AVENUE PLANTESATION LO BAGANGA WID NO03325,03290 LALO 2400 MOKKALU NATADAM JARIGINDI KANI ITTI PLANTS NU FA SAMAKSHAM LO LEKKINCHAGA 875 KALAVU, ANAGA MIGATA 1525 PLANTS CHANIPOVADAM JARIGINDI. DEENIKI GANU 76173 RUPAYALU VRUDA KAVDAM JARIGINDI.		

- ii) Some entries with regard to the amount are wrong. While entering the amount in MIS, resource persons have to cross-check the amount twice.

SR#	District	Block	Panchayat	Gram Shabha Date	Issue Number	Issue Type	Issue Amount	Issue Status	View
1	WARANGAL	Atmakur	ATMAKUR	31/10/2018	TS-ISSUE-40095	Grievance	174109777022	Pending	View

- iii) Some of the resource persons have entered the same issue twice or three times by mistake as there is no check in the MIS to prevent duplicate issues. NIC has to fix these kinds of issues on a priority basis to prevent duplicate entries.

iv) The resource person has entered the work ID number in the amount column. As

result, the issue amount has increased to lakhs from hundreds. Resource persons have to cross-check the amount twice as it impacts implementing agency staff if the amount is related to financial misappropriation. Also, this puts a dent in the credibility of social audit entries.

v) In the below example, the actual amount written in the social audit report was 174 but the resource person entered the JC No. of the wage-seeker along with the work ID's last 4 digits in the amount column resulting in a huge issue amount.

Social Audit Issue entered by Social Audit Resource Person		
Issue Number TS-ISSUE-40095	Issue Type Grievance	Issue Amount 174109777022
Issue Category Wages related	Issue Sub Category Person has worked but has not been paid because his family had already completed 100 days	
Issue Description 		

Several of these errors have occurred due to technical issues that the SSAAT team faces with regard to the social audit MIS of MoRD. While doing data entry in the MoRD MIS, the record period is not accepting dates more than one FY (i.e., from April to March). The report R 9.2.2 Individual is not displaying valid data as per the Report R 9.3.1 Action Taken Report. The Financial Amounts in the reports R 9.3.1 Action Taken Report and 9.2.3 Issues Reported (By Category) do not show the same values. In Report R 9.2.6 Financial Misappropriation Recovery Report, all the columns are displaying the same values. The column no. 7 "No. of decided Cases for which Financial misappropriation amount needs to be recovered" and column no 9 "No. of decided Cases for which Recovery is done" are displaying the same values and similarly column no 8 "Final Recoverable Amount to be recovered (Rs.)" and column no 10 "Total amount recovered, so far (Rs.)" are showing the same values.

SSAAT is aware of some of these errors and is in the process of rectifying them. However, the SSAAT team is facing some issues. For example, as per the MoRD MIS, the Financial Misappropriation amount entered by SARPs in the FY 2018-19 is Rs.47.53 crore and for the FY 2019-20 is Rs.37.31 crore, and the total misappropriation amount for the two FYs is Rs. 85.37 crore. During the process of the quality check, it was found that along with paras being misclassified, there are also errors such as the misappropriation amounts entered being more than the actual misappropriation amount mentioned in the social audit report. Similarly, some of the Social Audit paras were entered multiple times along with the amount. The Ministry has provided editing of the Social Audit paras pertaining to FYs 2018-19 and 2019-20 so that these errors can be rectified by the SAU. The SSAAT, on a

trial basis, has edited five paras, but the amount pertaining to these paras is not being updated and reflected in any of the columns. It is not clear which column gets updated when the revised amounts are entered as per the instructions of MoRD NIC team.

SSAAT has started the process of editing the amounts on a trial basis and the revised FM amounts, after editing, are being reflected in column 8 of the report R 9.2.6 in the "final recoverable amount to be recovered", while the amount identified by the SAU under the column 4 which is the corresponding financial misappropriation amount continues to show the previously entered erroneous amount. The edited amount is reflected in Column 8, which is actually linked to the PO (Programme Officer) login. Actually, it should be reflected in Column No.4, the corresponding financial misappropriation amount column.

Further, the option for moving misclassified SA paras has not been provided, and SSAAT has requested MoRD to guide them as to how they should resolve the issue. In the MIS reports, the Report R 9.2.2 Individual Listing Report is not updating the status of the paras even though the issues are been closed from the SSAAT end. When SSAAT is updating the classification and wrongly entered amounts of the Social Audit paras for which ATR is not completed, then the reclassified and re-entered amounts that are being edited through Admin login are not displayed in any of the MIS reports.

6.3.6 Non-receipt of Action Taken Reports: Implementing authorities and Vigilance wing have to share Action Taken Reports (ATRs) to SSAAT and also upload actions on the social audit MIS of MGNREGS within the stipulated time. However, SSAAT has not received ATRs of previous social audits from the Vigilance wing. Due to this, the social audit team is unable to verify and present ATRs of previous social audits in the Gram Sabha while facilitating social audits for the current year. Further, ATRs are not presented in the public hearing at the Mandal level by the Vigilance wing official.

CHAPTER-7

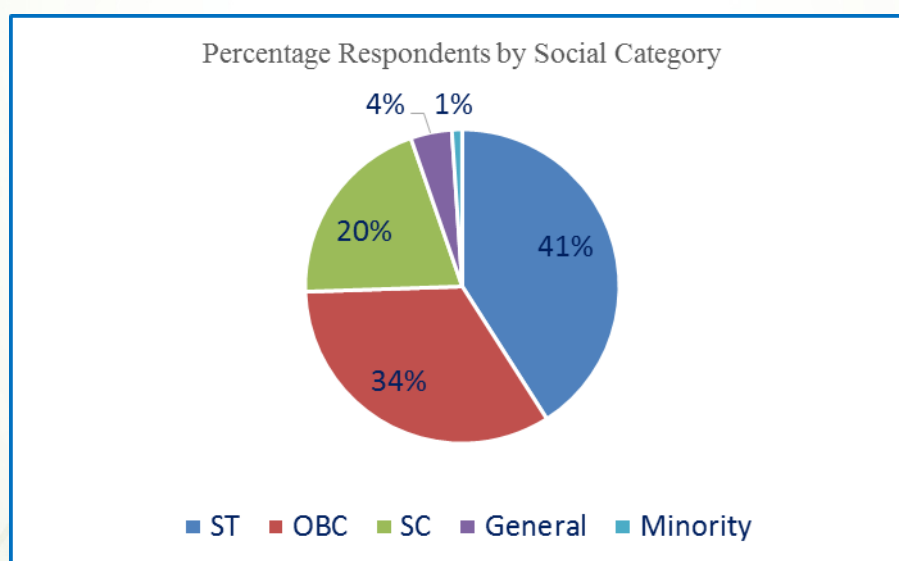
EFFECTIVENESS OF SOCIAL AUDIT IN TELANGANA: PERCEPTIONS OF WAGE-SEEKERS, OFFICIALS AND SOCIAL AUDIT RESOURCE PERSONS

7.1 Perceptions of Wage-seekers

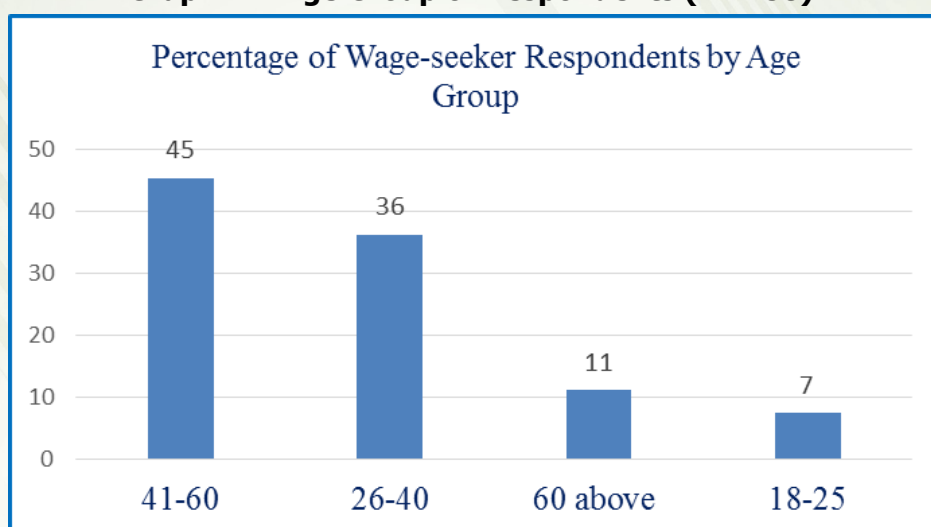
Questionnaires were administered to a total of 188 MGNREGA wage-seekers in all nine selected GPs. Out of these 188 respondents, 45 are wage-seekers who have registered grievances in any of the last three rounds of social audit.

As depicted in Graph 1, of all the respondents, 41 per cent are from ST, 34 per cent from OBC, 20 per cent from SC, 4 per cent from General and 1 per cent are from minority. Two districts out of three are ST-dominant districts and this could be a reason for more ST respondents as compared to those belonging to SCs and OBCs.

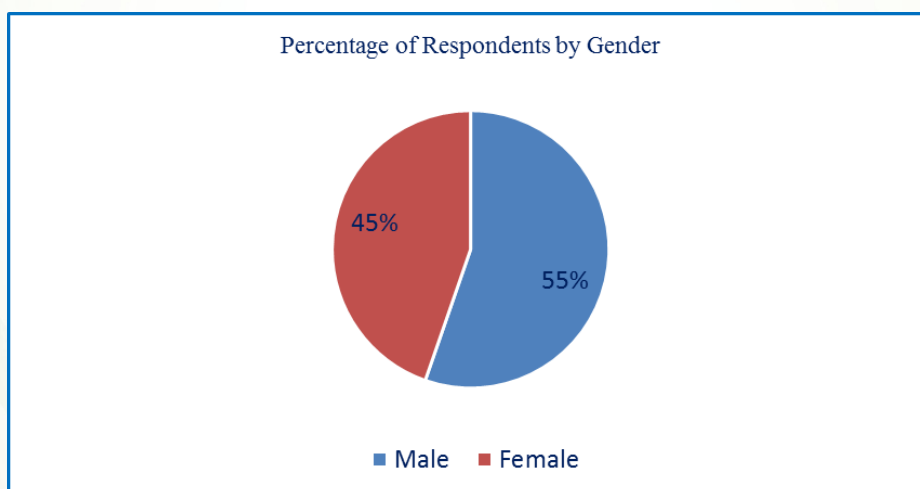
Graph 10: Social Category of Respondents (N=188)



Of all the respondents, more than 40 per cent are in the age group of 41-60 years, while an additional 36 per cent are in the 26-40 age group. In other words, around 80 per cent of the surveyed wage-seekers are in the age group of 26-60. Only 7 per cent of the wage-seekers are between the ages of 18-25 while the remaining 11 per cent are above the age of 60 years.

Graph 11: Age Group of Respondents (N=188)

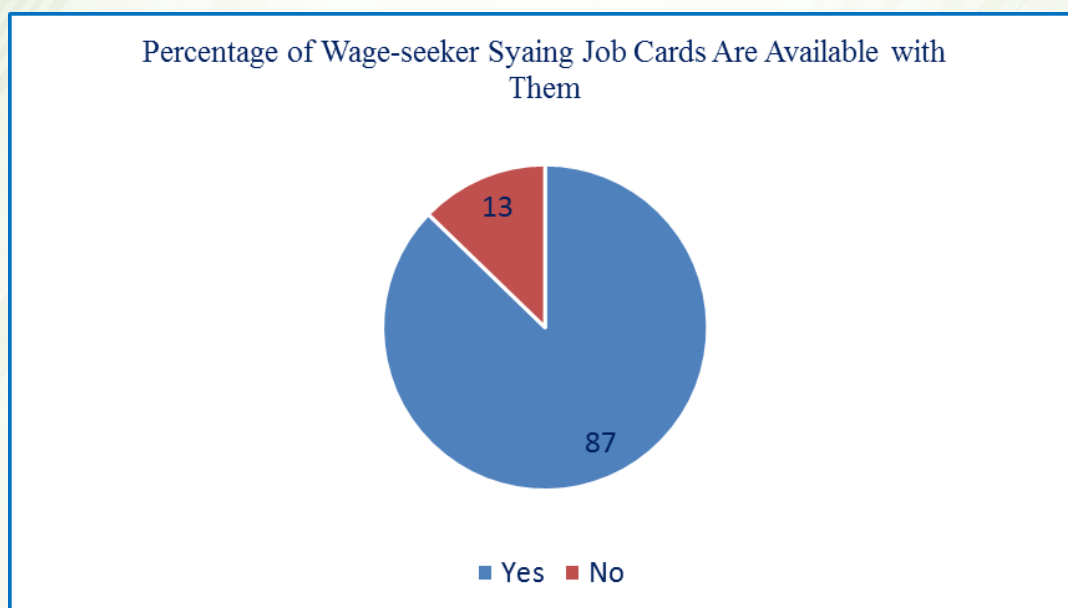
Out of the 180 respondents, 55 per cent are male and 45 per cent are female. In general, female participation is more compared to males in NREGA works.

Graph 12: Gender of Respondents (N=188)

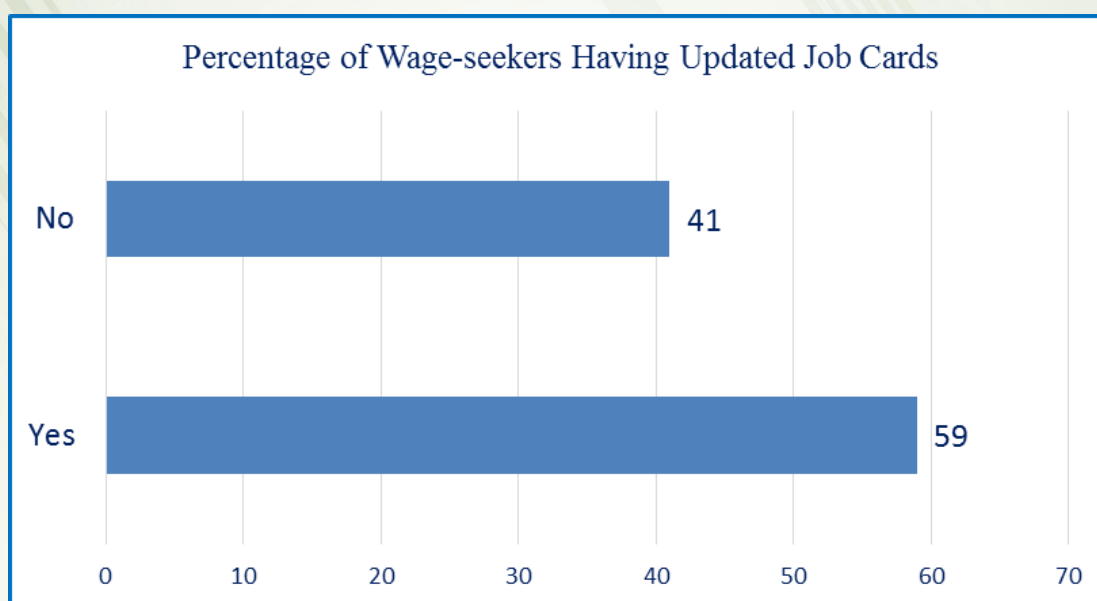
The MGNREGA Job Card (JC) is a key document which contains personal information and information about person days of work provided and wages paid. Section 3.1 of the Annual Master Circular 2020-21 mandates that all the JCs must remain in the custody of households concerned. Possession of the JC by any other person, including MGNREGS functionaries and elected representatives of PRIs is considered a violation of the provisions of MGNREGA Act. While collecting the data, it was observed that 87 per cent of the wage-seeker's JCs are available with them and the remaining 13 per cent of the wage-seeker's JCs are in the possession of

Mate and others. Some of the wage-seekers who did not possess JCs informed that they had the JC number but didn't receive it. Data shows that, though in a limited manner, even after so many rounds of social audits in Telangana, implementing authorities are violating the provisions of the MGNREG Act and executive instructions of the MoRD and some wage-seekers are not empowered enough to demand possession of JC.

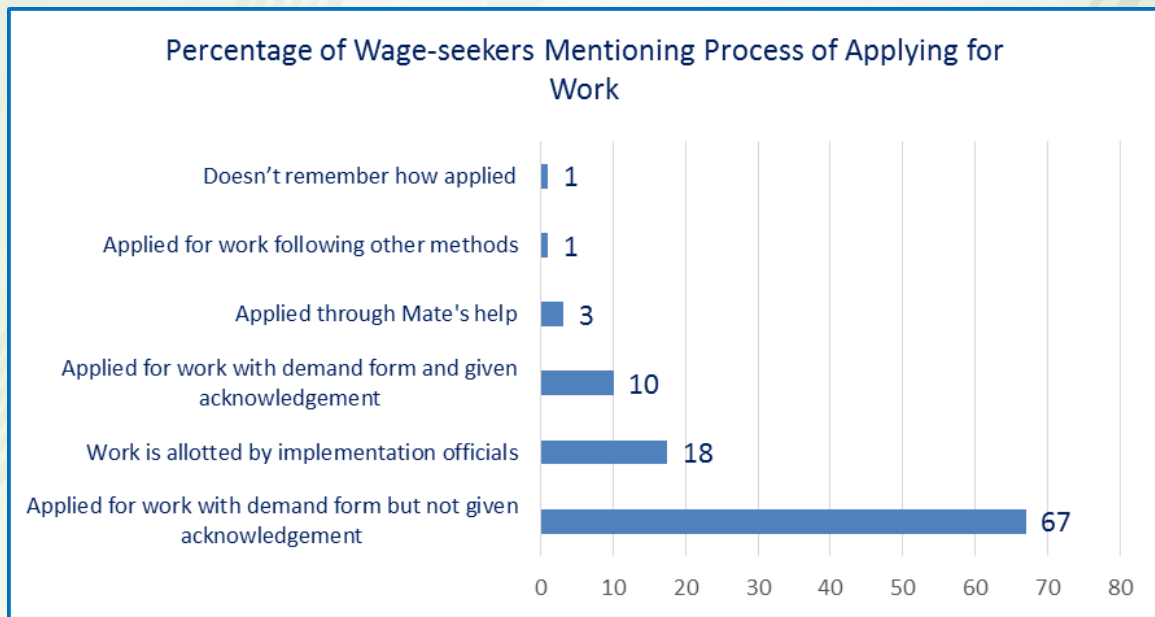
Graph 13: Job Cards (JC) Availability with Wage-seekers (N=188)



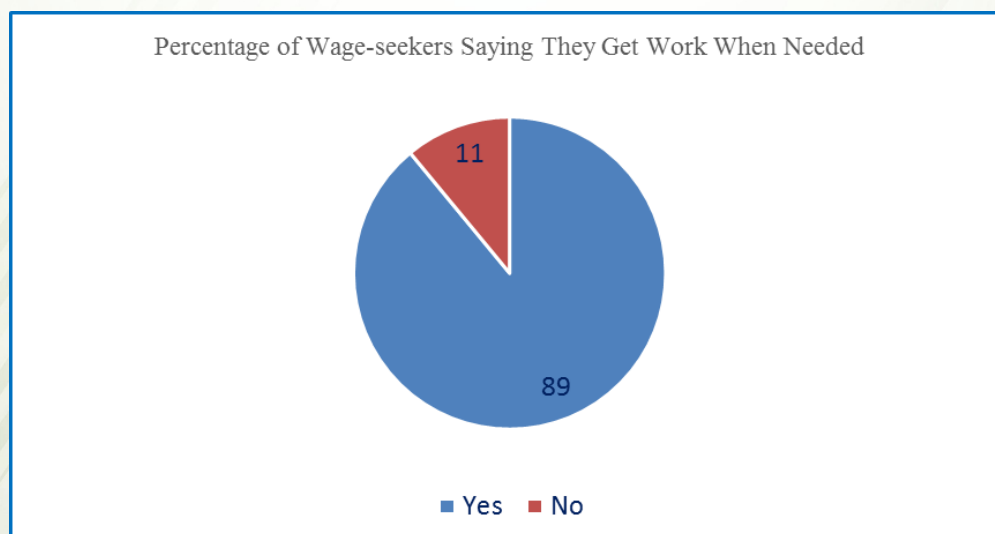
JCs should contain the details of the number of days worked, wages earned, etc., and require to be updated regularly. According to Section 3.2 of the Annual Master Circular, it is the duty of MGNREG functionaries at the GP level to update the JC of all wage-seekers within 15 days from the date of allocation of work. It was found that 59 per cent of the job cards were updated and the remaining 41 per cent of the JCs were not updated. As per Section 3.3 of the Annual Master Circular 2020-21, DPC and State Government have to ensure verification campaigns in a time-bound manner for verification and updating a job card. Such a high number of JCs not being updated not only makes social audit difficult but also puts a question mark on the efficacy of social audit in curbing procedural violations in the implementation of MGNREGA in the State.

Graph 14: Status of Job Cards (JC) Updation (N=164)

MGNREGS is a demand-driven scheme and registering demand for work and issuance of dated receipts is essential to activate the rights given under the MGNREG Act. The implementing agency functionaries must ensure that the process of submission of applications for work is kept open continuously. Para 6, Schedule II of MGNREGA says “every adult member of a registered household whose name appears in the job card shall be entitled to apply for unskilled manual work under the Scheme; and every such application shall be compulsorily registered, and a receipt issued with the date, which shall be entered in the computer system.” It was observed that 77 per cent of the wage-seekers applied for work with a filled-in demand form but only 10 per cent of them had dated receipts of acknowledgement. Non-issuance of dated receipt is a procedural violation punishable under Section 25 of the MGNREGA. Although in most States dated receipts are not issued, such a low percentage of wage-seekers being given dated receipts shows that even in Telangana, after so many rounds of social audits, MGNREGS functionaries are freely indulging in procedural violations.

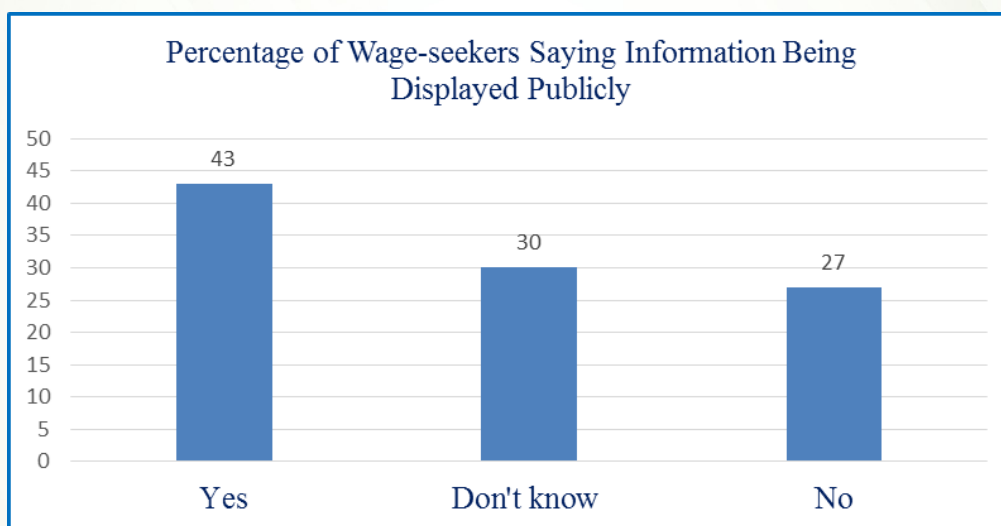
Graph 15: Process of Applying for Work under MGNREGA (N=188)

As per section 4.2.1 of the Annual Master Circular 2020-21, the PO and implementing agencies must ensure that workers in need of employment under Mahatma Gandhi NREGA are provided work within 15 days of the receipt of the application or the date of demand, in case of advance application, whichever is later. A high 89 per cent of the wage-seekers responded that they were getting work under MGNREGA when they need. This is a good indicator that MGNREGS has been responsive to the demands/needs of wage-seekers which may play an important role in reducing distress migration in the State and also that social audit, along with other factors, may have contributed to this.

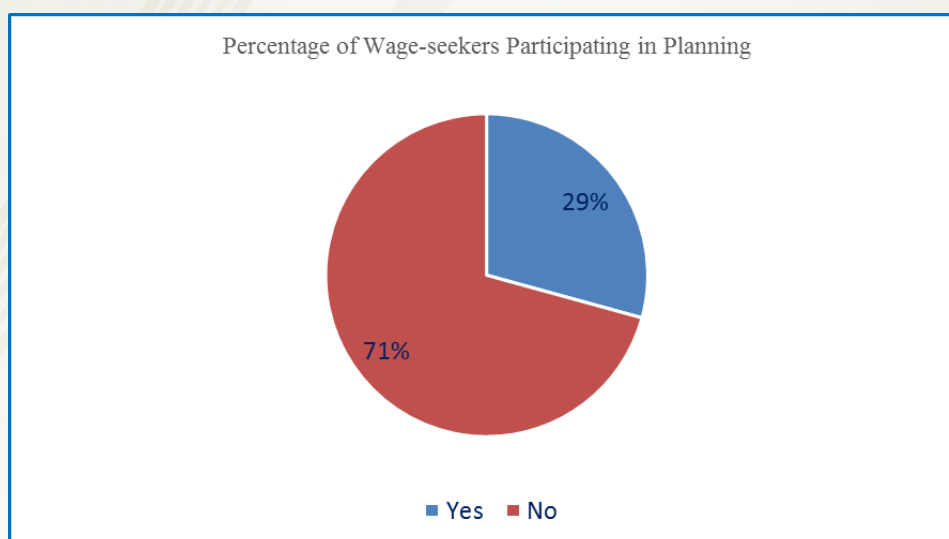
Graph 16: Status of Allocation of Work when Wage-seekers Need (N=188)

Implementing agency is required to ensure proactive disclosure of information and records to all using a 'Janata Information System' consisting of disclosures at the worksites, GP notice boards and the MGNREGA website. Forty-three per cent of the wage-seekers accepted information being displayed publicly in GP through wall paintings, boards etc., whereas 30 per cent said that they don't know about the wall paintings and 27 per cent said that information is not being displayed publicly in GP through wall paintings. Transparency is one of the important prerequisites for social audit, and low proactive disclosure is affecting the regular community monitoring of MGNREGA implementation.

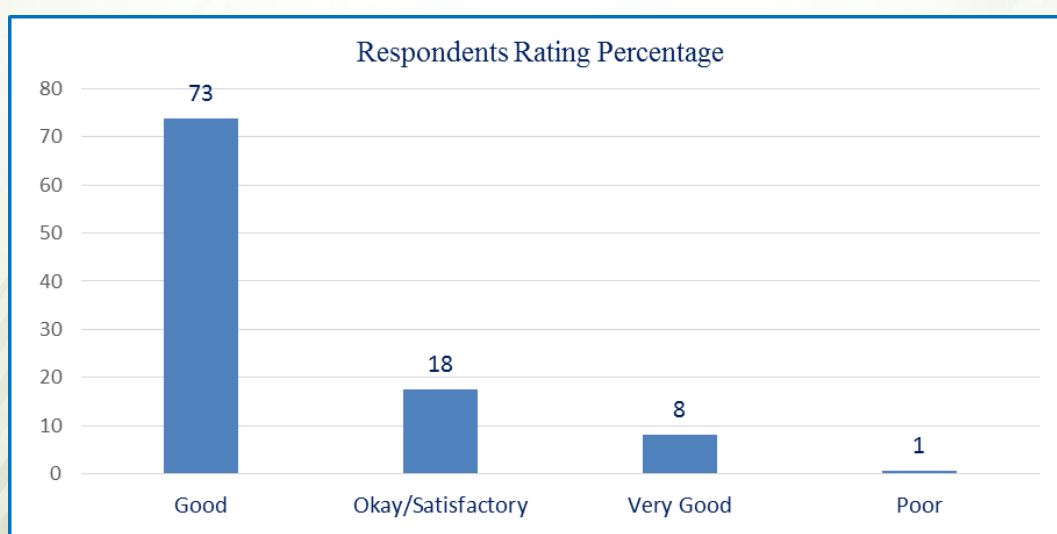
Graph 17: Status of Proactive Disclosure of Information (N=188)



Identification of shelf of works and preparation of labour budget planning is an essential work plan document that contains planning, approval, funding and work execution modalities. Members of Gram Sabha have a right to participate in the Gram Sabha and decide the works and the order of priority to be taken up under MGNREGA. However, 71 per cent of the wage-seekers responded that they don't know about the labour budget and they haven't attended Gram Sabha for the labour budget planning. Community participation in each step of the project cycle, i.e. planning, implementation, monitoring and evaluation is necessary for developing community ownership and ensuring effective implementation of any public scheme. Low community awareness about labour budget planning and participation in planning Gram Sabha may be one of the reasons why there is low mobilisation of wage-seekers in social audit Gram Sabha too.

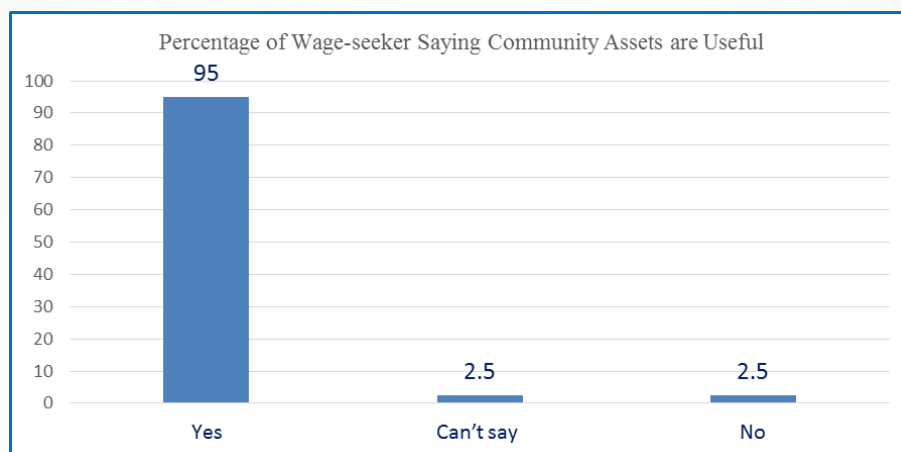
Graph 18: Participation in Labour Budget Planning Gram Sabha (N=188)

Checking and reporting the quality of assets created under MGNREGA is one of the objectives of social audit as well as a quality control mechanism. Eighty-five per cent of the respondents said that community works have been taken up in their village. From among those who are aware of community works, 73 per cent of the respondents rated that the community works taken up in their village are good, 18 per cent found them satisfactory, 08 per cent rated that the works are very good and 01 per cent said that the work quality is poor. A significantly high percentage of respondents finding the quality of community works/assets of good quality can be seen as an indication that quality control and social audit mechanisms are working in Telangana in ensuring the quality and durability of assets.

Graph 19: Quality of Community Works/Assets (N=160)

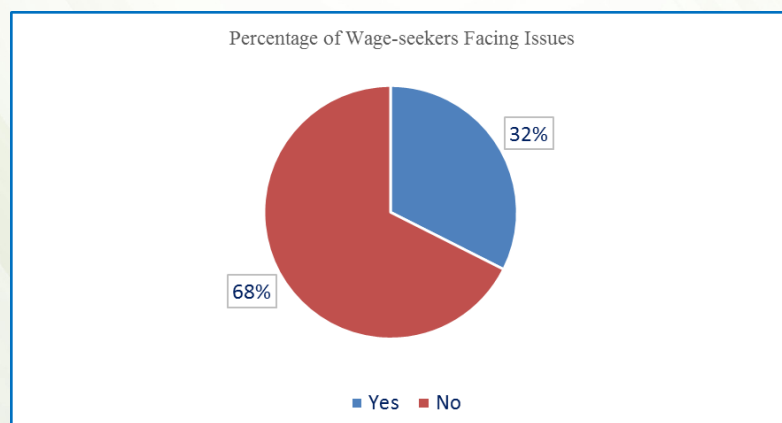
A very high 95 per cent of the respondents said that the public assets created under MGNREGA are useful to the village community. Only 2.5 per cent of the respondents said that the public assets are not useful and 2.5 per cent of the respondents were unable to say anything. Although community participation in labour budget planning and identification of shelf of works is low, still useful assets have been created, which shows that implementing agency functionaries and elected representatives of PRIs are taking up the right kinds of work. As earlier mentioned, perceived high quality of works also has a positive correlation with the usefulness of assets.

Graph 20: Usefulness of the Community Assets (N=160)



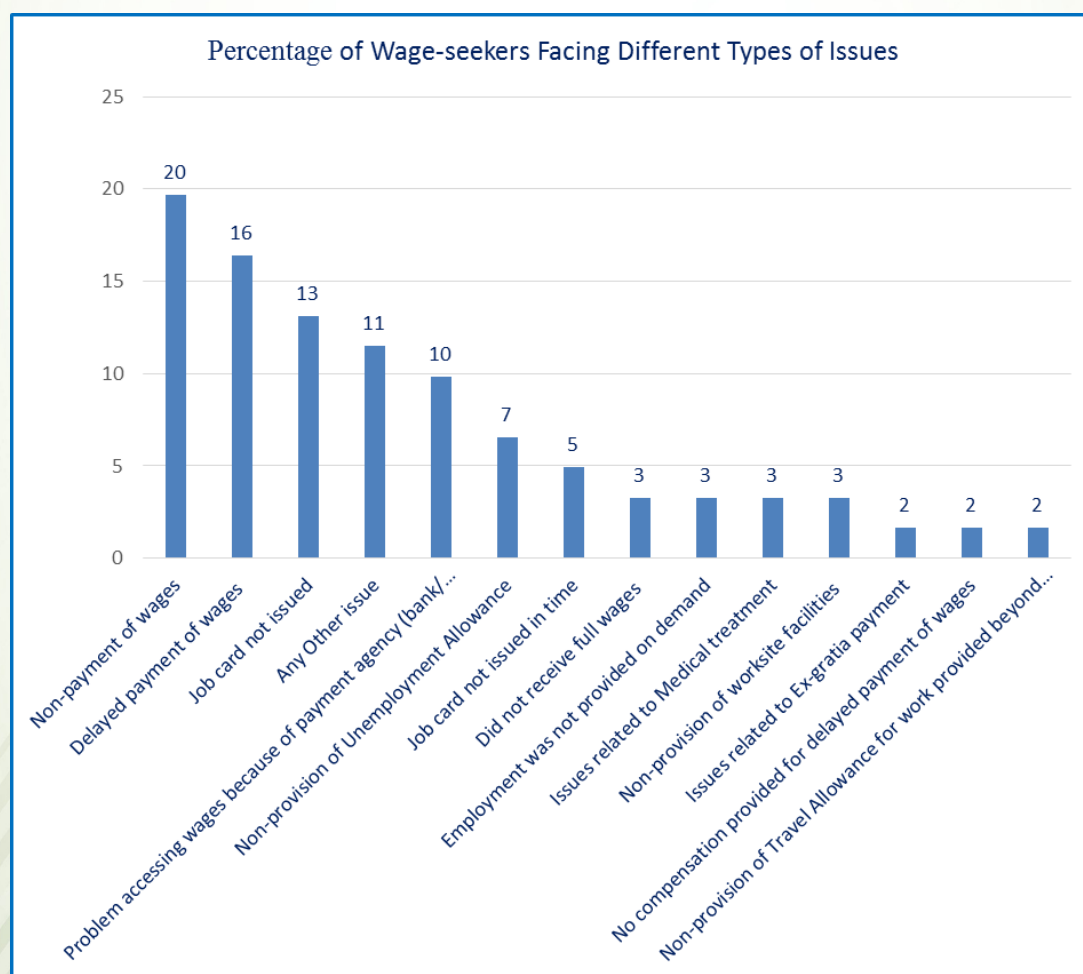
Thirty-two per cent of the respondent wage-seekers said that they have faced various issues in MGNREGA and 68 per cent said they have not faced any issues. Although a majority of wage-seekers are not facing any issues, 32 per cent is also a large proportion and implementing officials and social audits may make more efforts to bring this down.

Graph 21: Percentage of Respondents Facing Issues in MGNREGA (N=188)



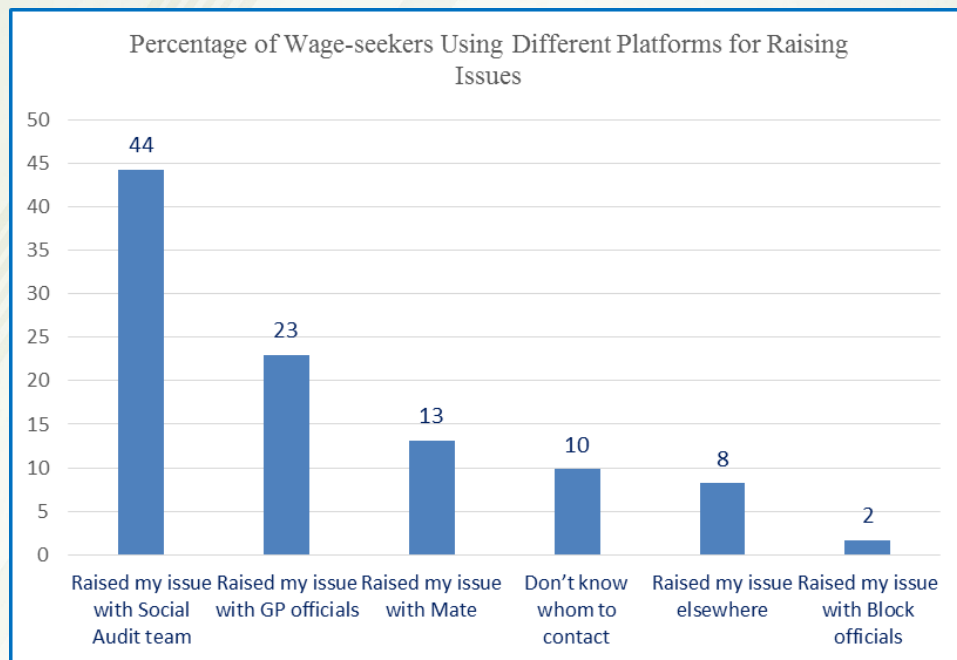
From among those wage-seekers who faced any issues while working under MGNREGA, 20 per cent of respondents said that they have faced issues related to non-payment of wages followed by 16 per cent related to delayed payment of wages, 13 per cent faced issues related to JC not being given, 10 per cent faced issues related to accessing wages from payment agency and 11 per cent faced other issues such as splitting of job card, adding name in JC, etc. A very high percentage of wage-seekers are facing issues related to wage payments. Wage payment-related issues are making MGNREGA unpopular among the poor and marginalised who depend on their daily earnings. It seems key stakeholders have accepted this reality and not making enough efforts to mitigate issues related to wage payments. In observation of the social audit process also, it was found that the social audit team does not consider delay in payment a major/serious issue and worth registering as a grievance.

Graph 22: Types of Issues Faced by Wage-seekers (N=61)

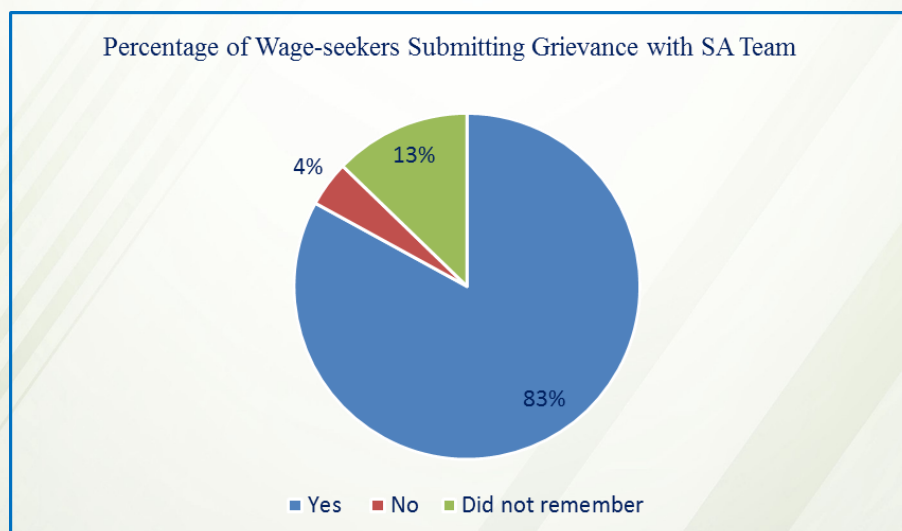


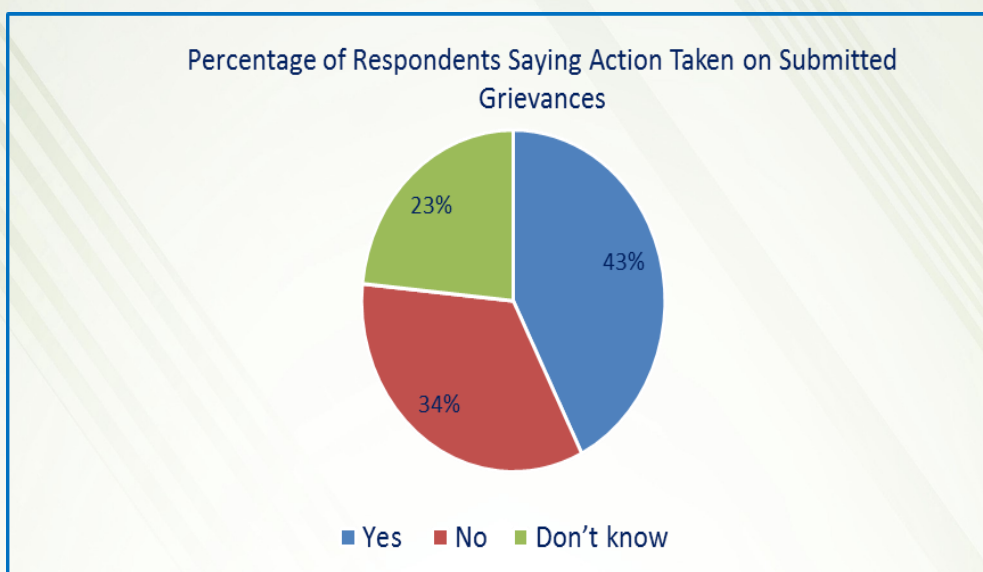
Among the wage-seekers who faced any issues, 44 per cent of the respondents raised their issues with the social audit team. This shows the utility and also efficacy of social audit as a platform for grievance redressal. However, efforts need to be made by social audit teams to reach out to more wage-seekers with grievances. Twenty-three per cent of the respondents raised their issue with GP officials and another 13 per cent raised their issue with Mates. Two per cent of respondents raised their issues with block officials and 8 per cent of respondents raised their issues in other places (officials at various levels). Ten per cent of the respondents did not raise their issues as they didn't know where to raise them and whom to contact. This shows that some wage-seekers are unaware of ways to register grievances. The social audit team may play an important role in creating such awareness among wage-seekers during the social audit verification and Gram Sabha.

Eighty-six per cent of the respondents did not get a dated receipt for their grievance that they raised and only 14 per cent said they got the dated receipt. Grievances of 32 per cent were resolved while grievances of another 32 per cent did not get resolved till the time of data collection. Thirty-six per cent of the respondents did not know the status of their grievances. As per section 19 of the MGNREG Act, the State government is expected to set up a grievance redressal mechanism which allows a worker to lodge their complaint and trace the subsequent response. The timelines for redressal of grievances are to be consistent with the provisions of the "Public Service Delivery Act." However, most respondents shared that it took a minimum of 15 days to one year for the completion of action on their grievances. Some respondents shared that even after completion of one year, their grievances didn't get resolved. All this shows that grievance redressal is quite weak in the State and this may weaken the credibility of social audit as a platform for grievance redressal.

Graph 23: Authority/Platform Where Wage-seekers Raise Issues Faced (N=61)

The social audit team is expected to record the grievances of wage-seekers during the door-to-door verification in the GP and make it part of the social audit report. The research team interviewed 47 wage-seekers randomly whose names appeared in the DTF as having grievances. Eighty-three per cent of these respondent wage-seekers had registered their grievances with the social audit team and 4 per cent did not. The remaining 13 per cent of respondent wage-seekers could not recall. Such a high percentage of wage-seekers registering their grievances with the social audit team shows that wage-seekers have faith in the social audit process.

Graph 24: Grievance Submission to Social Audit Team (N= 47)

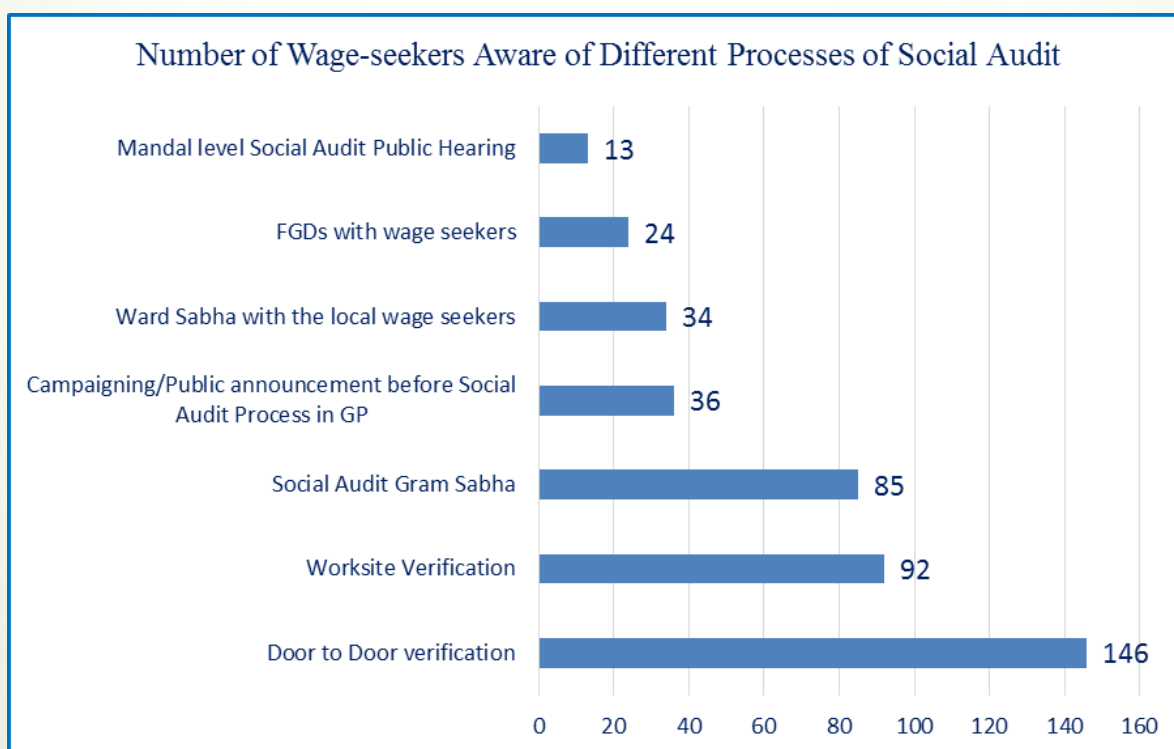
Graph 25: Action taken on the Grievances Submitted to Social Audit Team (N=46)

Most wage-seekers were not aware of the term 'Social Audit'. But, when they were explained about the process of social audit they did recognise it. Some of the wage-seekers recollected that every year a team comes to the GP and verifies their job cards and passbooks. If they have any grievances the team writes those down. After a bit of explanation, 83 per cent of the respondents said that they knew about the social audit while 17 per cent had no clue. A very high 94 per cent recall the social audits being facilitated in their GP but 6 per cent of respondents have not recollected any social audits. That shows social audit is regular and most wage-seeker families are covered, however, the term 'social audit' per se has not been popularised by SSAAT in Telangana.

Graph 26: Wage-seekers Knowledge about the Social Audit (N=188)

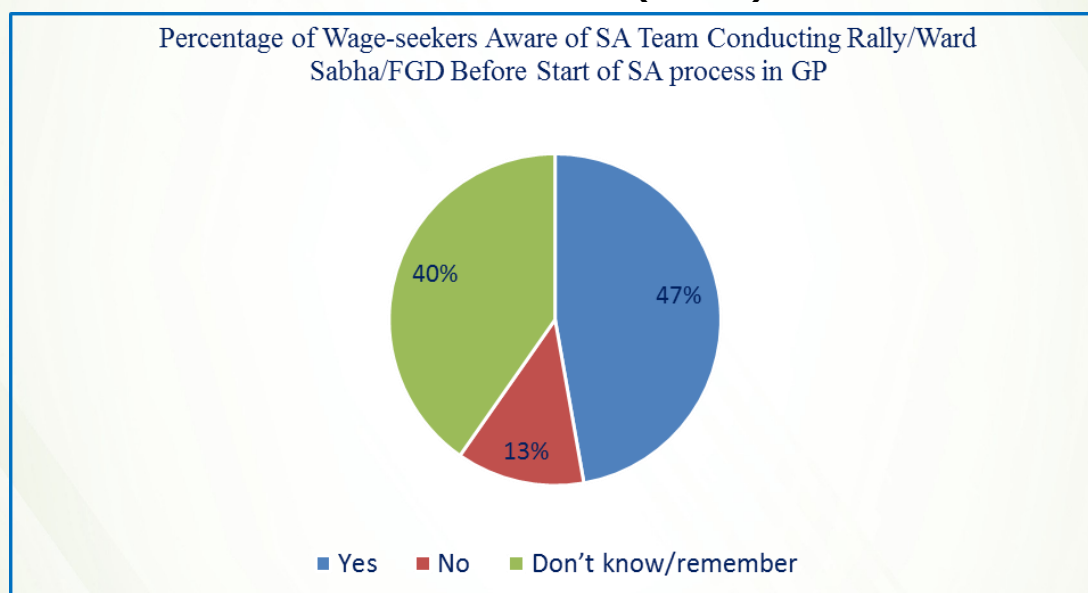
Out of 156 respondents who knew about social audit, 144 were able to recall the social audit conducted in the past. As a follow-up to the question to assess awareness of social audit, a detailed question was asked to these 144 respondent wage-seekers about the different stages of the social audit process. Approximately 94 per cent of these 144 respondents knew about door-to-door verification; 59 per cent knew about the worksite verification; 54 per cent knew about social audit Gram Sabha; 23 per cent knew about campaigning/public announcement before the social audit process in GP; 22 per cent knew about the ward sabha with the wage-seekers. However, in FGDs, wage-seekers said that they did not know about the ward sabha and in resource persons interviews also they said that they did not conduct ward sabha in the GP as part of the social audit. Twenty-four respondents (15 per cent) said that they know about the FGDs with wage-seekers while 8 per cent knew about the Mandal-level social audit public hearing.

Graph 27: Wage-seekers' Knowledge about Different Stages of the Social Audit Process (N=144)



Wage-seekers were also asked about the efforts made by the social audit team in creating awareness and mobilising wage-seekers to participate in the social audit process. Forty-seven per cent of all wage-seeker respondents expressed that the social audit team conducted the public rally/ward sabha/FGD before the start of social audit process in their village/GP and 13 per cent said no such rally/ward sabha/FGD was conducted. The remaining 40 per cent said that they did not know about this and were unable to say anything. In observation of social audit in one GP too, it was found that the social audit team does not make any effort to mobilise wage-seekers to participate in social audit exercise. This is one of the lacunas and SSAAT must work on it in future to strengthen social audit in the State.

Graph 28: Wage-seeker's Awareness of Public Rally/Ward Sabha/ FGD by Social Audit Team (N=144)



For facilitating the conduct of social audit by Gram Sabha, the social audit resource persons, along with primary stakeholders shall verify the MRs, JCs and pay orders to cross-check the correctness and reliability. Door-to-door verification is the key step in the social audit process. A very high section (97 per cent) of the respondent wage-seekers confirmed that the social audit team carried out door-to-door verification in their GP. This data validates the SSAAT's claim of covering more than 90 per cent of wage-seekers' households during the social audit process.

Graph 29: Wage-seekers Awareness of Door-to-door Verification by Social Audit Team (N=144)



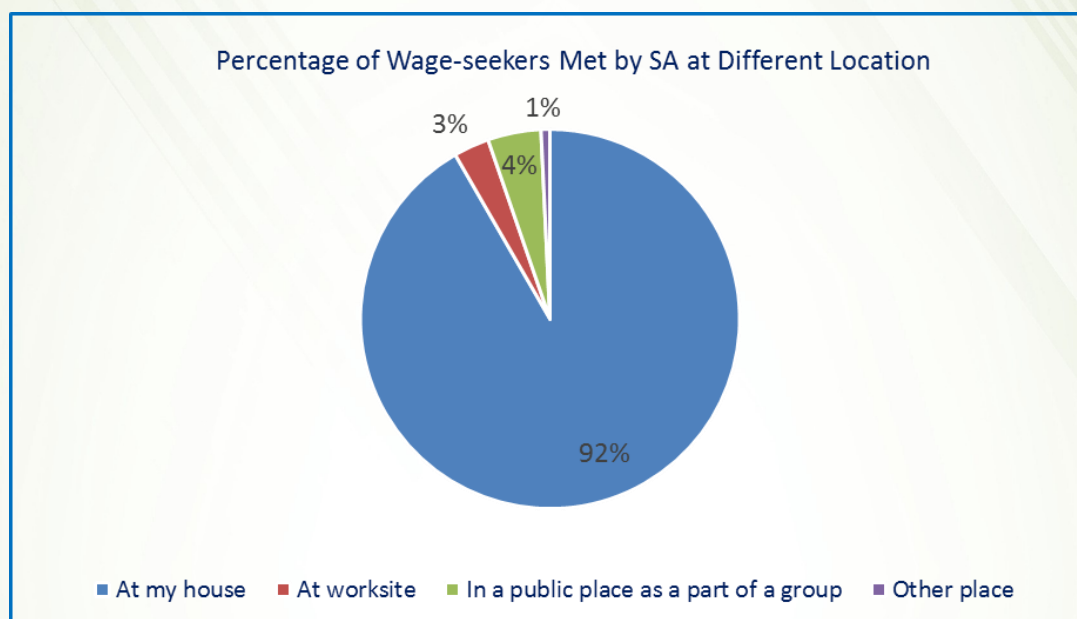
In continuation with the above finding, 92 per cent of the respondent wage-seekers said that the social audit team contacted them during the social audit process and 04 per cent said the social audit team contacted their family members. Only 03 per cent said no one contacted them during the social audit process and the remaining 01 per cent of the respondents were unable to recall and could not answer. This once again validates SSAAT's claim of more than 90 per cent coverage of wage-seekers' households.

Graph 30: Contact of Wage-seeker by Social Audit Team (N=144)



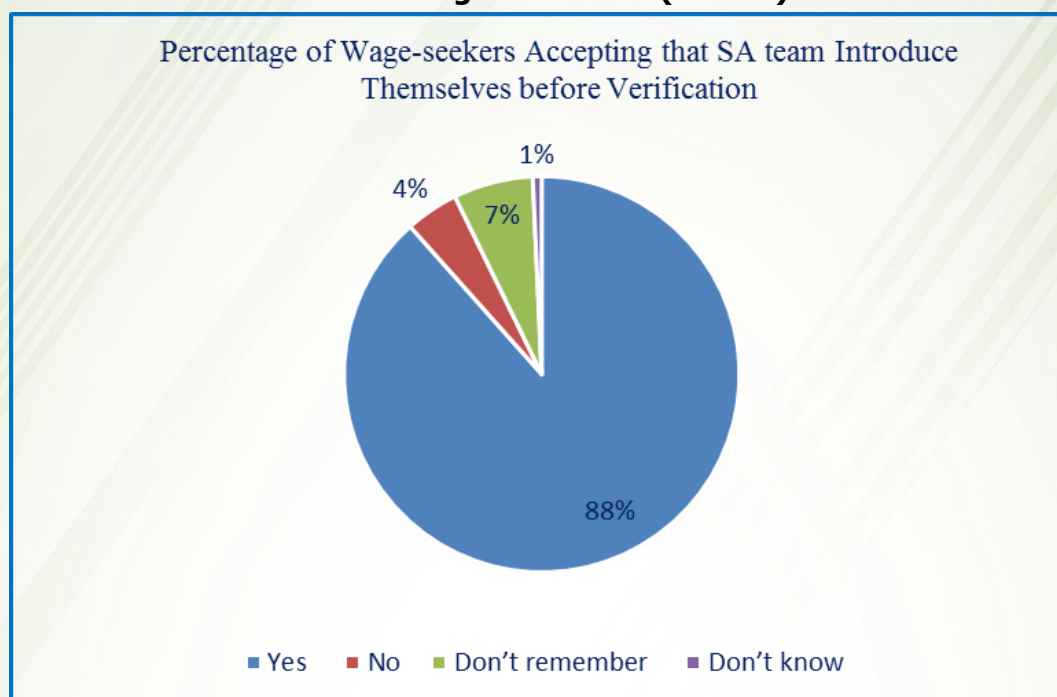
Ninety-two per cent of the respondent wage-seekers said that the social audit team met them at their house, followed by 03 per cent at the worksite, 04 per cent in a public place as part of a group and 01 per cent at any other place. This validates SSAAT's claim of more than 90 per cent coverage of households through door-to-door verification.

Graph 31: Location Where Social Audit Team Met Wage-seekers (N=138)



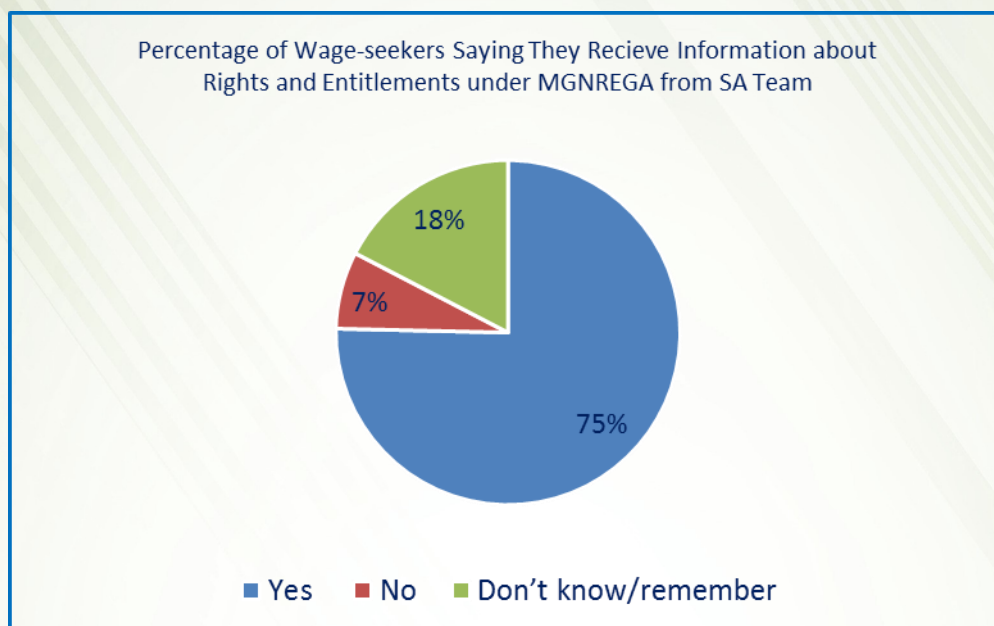
During the door-to-door verification, the social audit team is expected to introduce themselves to wage-seekers in the household and explain the purpose of verification exercise before the start of the actual verification. To assess this, a question was asked to respondent wage-seekers whether the social audit team introduced themselves or not. Eighty-eight per cent of the wage-seekers said that the social audit team introduced themselves while 04 per cent said they did not. Seven per cent of wage-seekers were unable to recall and 01 per cent said they didn't know.

Graph 32: Introduction by Social Audit Team before Conducting Verification (N=138)



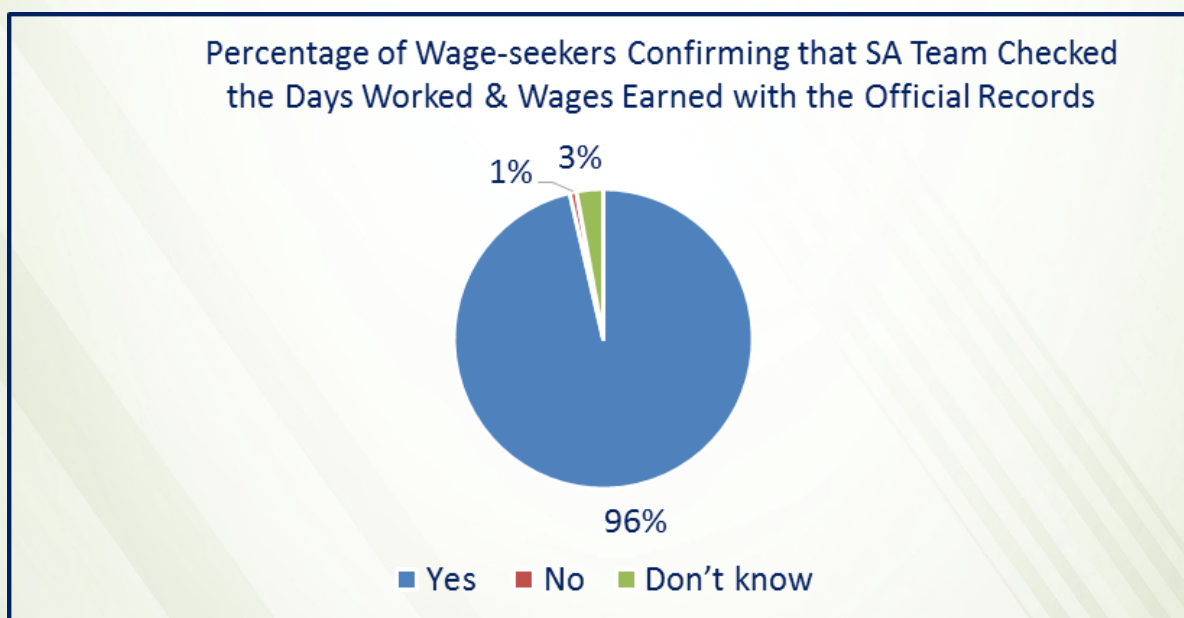
MGNREGS is a rights-based scheme and to claim rights and entitlements, it is necessary to have awareness among wage-seekers about them. It is one of the responsibilities of the social audit team to create awareness about the entitlements of the beneficiaries and mobilise them to claim it. Among respondent wage-seekers, 75 per cent said that the social audit team gave information about rights and entitlements under the MGNREGA and 07 per cent said they did not. The remaining 18 per cent said they did not know or remember. However, it was found during the FGD with villagers that most of the respondents were unaware of the basic rights and entitlements of the scheme. Hence, it may be concluded that although social audit gives information, it is not being observed and retained by wage-seekers. Hence, multiple mechanisms may be adopted to make wage-seekers aware of their rights and entitlements under MGNREGA. Citizen information boards, wall writings and job cards should become the prime medium for information dissemination. Further, SSAAT may work on devising effective IEC strategies for awareness generation by social audit teams.

Graph 33: Sharing of Information about Rights and Entitlements by Social audit team (N=138)



Ninety-six per cent of wage-seekers confirmed that the social audit team verified the number of days worked and wages earned with the official records, bank passbooks, job cards, etc.

Graph 34: Verification by Social Audit Team of Days Worked and Wages Received (N=138)



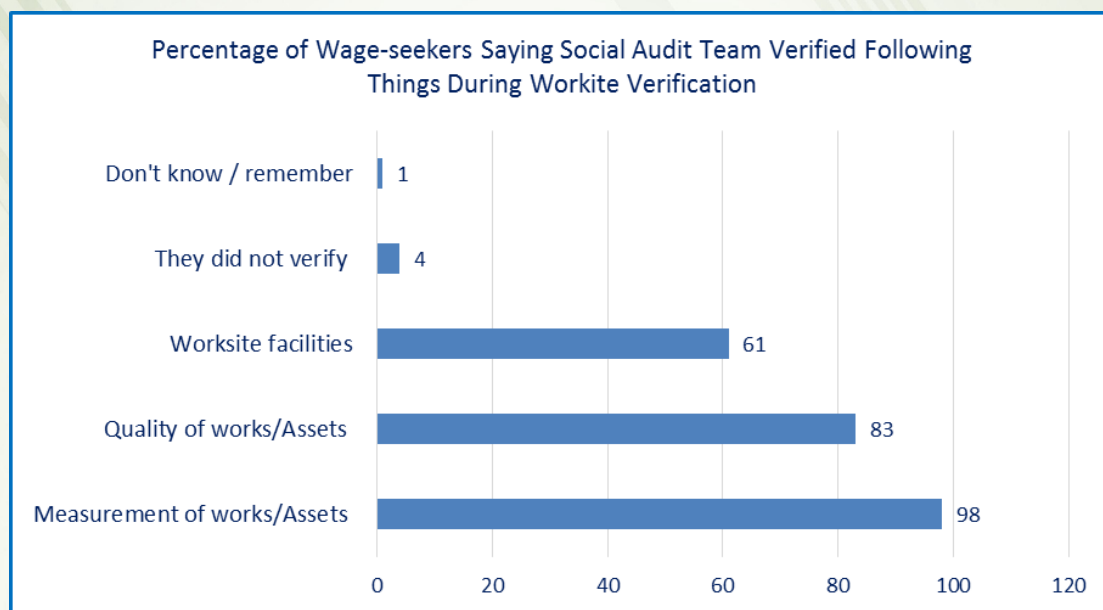
As per section 10.1.8.2 of the Annual Master Circular 2020-21, the Social Auditor shall examine records related to the execution of works available at GP as per Annexure 4 of the Auditing Standards for Social Audit. The social auditors shall also ensure verification of the site of the assets created. The social audit team is expected to visit all the worksites, take the measurements and check the quality of the work as part of social audit. Eighty per cent of the respondent wage-seekers confirmed that the social audit team visited the worksites, 19 per cent of respondents said they don't know/remember and 01 per cent said the social audit team has not visited the worksites.

Graph 35: MGNREGA Worksite Visit for Verification by Social Audit Team (N=144)



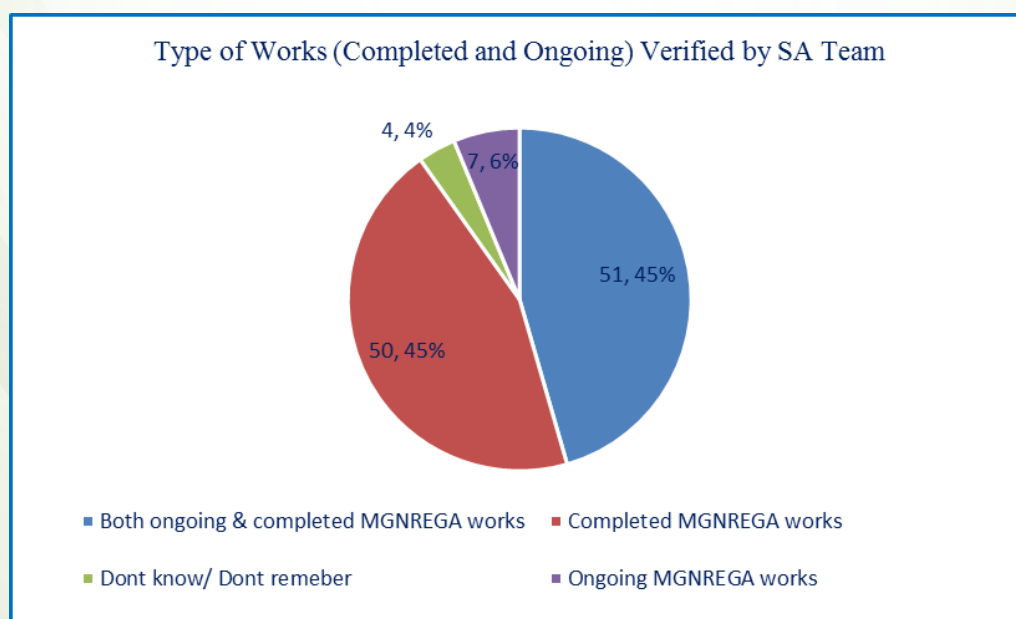
Among wage-seekers who said that the social audit team visited the worksite, 88 per cent confirmed they verified the measurements of works/assets during their visit. Seventy-four per cent of wage-seekers said that the team verified the quality of works/assets and 54 per cent said that the team verified worksite facilities. Four per cent of respondents said that the social audit team did not verify works and 01 per cent neither nor remember.

Graph 36: Verification of Facilities, Quality and Measurements at Worksites by Social Audit Team (N=112)



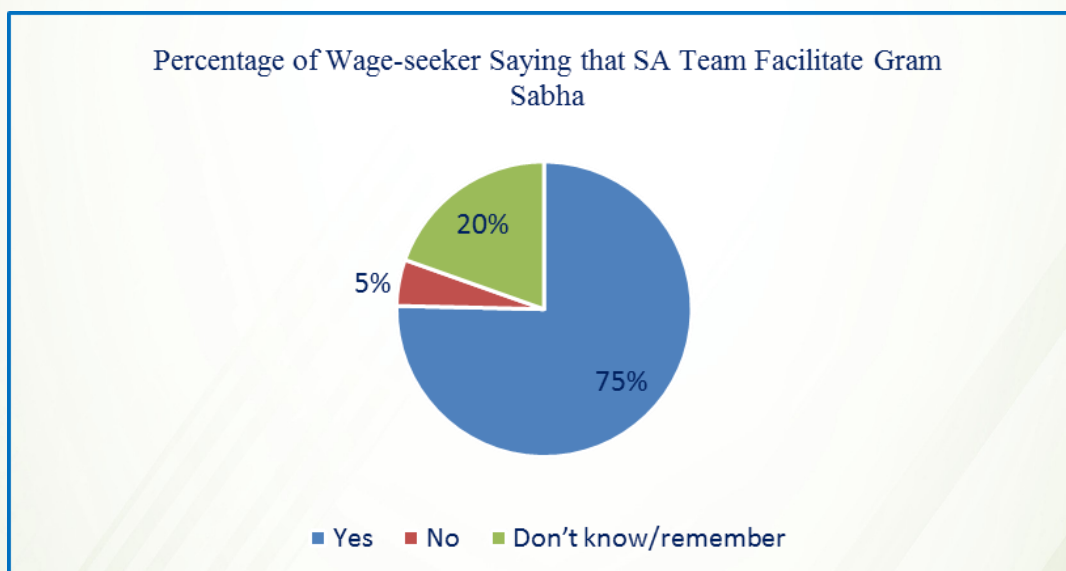
During regular social audits, resource persons verify and measure the completed works, whereas in concurrent social audits (CSA), resource persons verify only ongoing works. Forty-six per cent of respondent wage-seekers said that the social audit team verified both ongoing and completed works of MGNREGA, 45 per cent said that they verified only completed works, 06 per cent said they verified only ongoing works and 04 per cent of respondents did not know or remember.

Graph 37: Type of Works (Completed & Ongoing) Verified by Social Audit Team (N=112)



As per Rule 4 of the MGNREG Audit of Scheme Rules 2011, SAU has to facilitate the conduct of social audit by Gram Sabhas, and for this purpose shall build the capacities of Gram Sabhas. Rule 6 (4) of the Audit of Scheme Rules and Section 10.1.8.4. of the Annual Master Circular 2020-21 mandate that a Social Audit Gram Sabha/Ward Sabha must be convened to discuss the findings of the social audit verification exercise and to review fulfilment of the rights and entitlements of workers and proper utilisation of funds. Seventy-five per cent of the respondents said that the social audit team facilitated the Gram Sabha in their GP, 20 per cent said that they did not know or remember and 5 per cent of respondents said that the social audit team did not facilitate Gram Sabha in the GP. Around a quarter of wage-seekers were unaware of it and said that the social audit team does not facilitate Gram Sabha. This shows that although Gram Sabha is facilitated but the social audit team, there is a need to increase awareness about the social audit Gram Sabha among wage-seekers.

Graph 38: Facilitation of Gram Sabha by Social Audit Team (N=144)

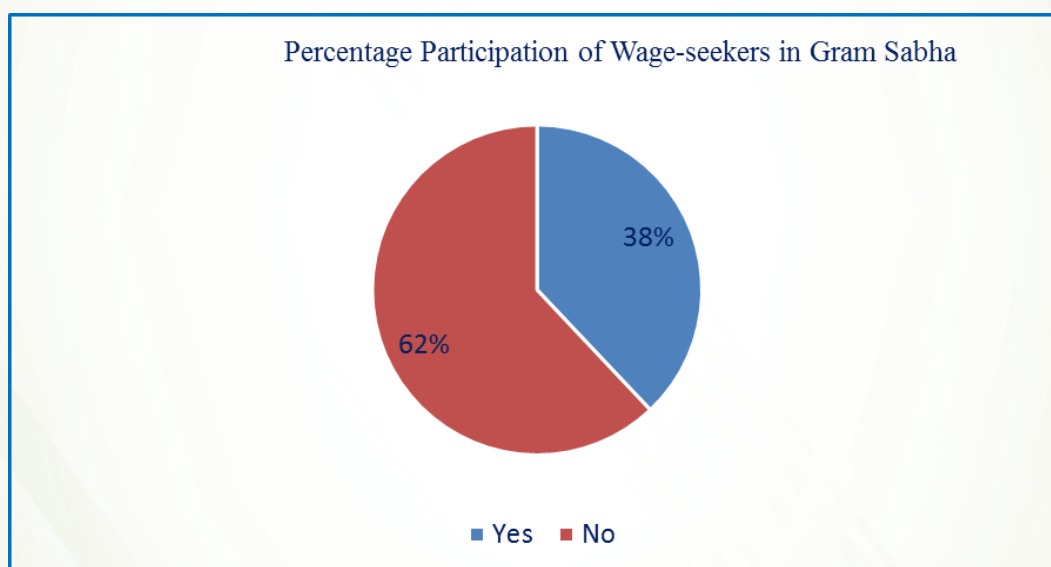


As per Section 17 of MGNREGA and MGNREG Audit of Scheme Rules, the social audit needs to be conducted by Gram Sabha. Hence, wage-seekers' participation in social audit Gram Sabha is very important. Rule 6 (3) of the Audit of Scheme Rules says that labourers and the village community shall be informed about the Gram Sabha conducting social audit by the social audit resource persons as well as the PO to ensure full participation. Thirty-eight per cent of respondent wage-seekers

participated in Gram Sabha while 62 per cent did not attend Gram Sabha. This data once again shows that social audit teams need to increase their efforts to mobilise wage-seekers to participate in Gram Sabha.

Thirty-two per cent of the respondent wage-seekers who have not attended Gram Sabha said that they did not have time to attend the Gram Sabha, 14 per cent said that being a woman she felt constrained to attend the Gram Sabha, 02 per cent said that they did not have information about the Gram Sabha, 09 per cent said that the timing of the Gram Sabha was not convenient for them, 07 per cent said that the distance of the venue was too far and 03 per cent said that Gram Sabha has no use or value. The remaining 31 per cent cited other reasons for not attending Gram Sabha.

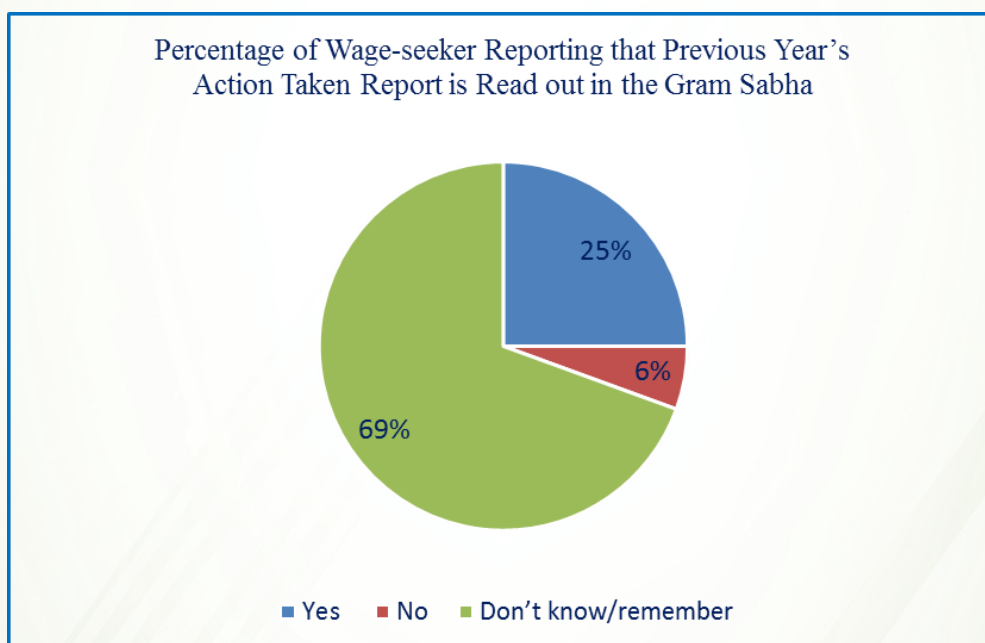
Graph 39: Wage-seekers Participation in Gram Sabha (N=144)



The Gram Sabha shall provide a platform for all wage-seekers to seek and obtain information and responses from all involved in the implementation. After completion of the social audit process in the village, Gram Sabha shall be convened to discuss the findings of the verification process. Fifty-two per cent of the wage-seeker respondents said the social audit team presented issues in the Gram Sabha, while 2 per cent said nothing was presented and 46 per cent said they did not know/remember.

As per Rule 6 (9) of the Audit of Scheme Rules 2011, the Action Taken Report (ATR) relating to the previous social audit shall be read out at the beginning of the meeting of Gram Sabha for social audit. Twenty-five per cent of the respondent wage-seekers said that the previous year's ATR was read out in the Gram Sabha, 06 per cent said the ATR was not read out and the remaining 69 per cent of them did not know or recall about ATR being read. The Vigilance wing does not share ATR with social audit teams in time. It has also been observed in a GP and Mandal that the social audit team did not make proactive efforts to get a copy of ATR or know the progress of redressal of registered grievances. As a result, in many cases, social audit teams are not in possession of ATR and cannot read out the same in Gram Sabha. This situation affects the transparency of the social audit process and also reduces the credibility of social audits as a potent accountability mechanism.

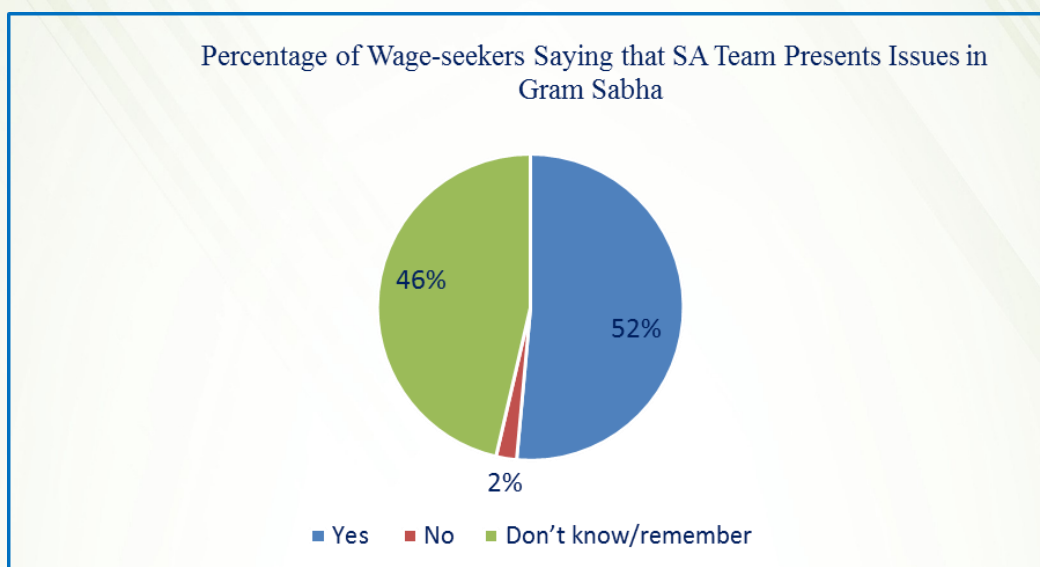
Graph 40: Reading out of Action Taken Report in Gram Sabha (N=144)



After completion of the social audit process in the village, Gram Sabha is convened to discuss the findings of the verification process in which wage-seekers may seek and obtain information and responses from all involved in the implementation. Fifty-two per cent of the respondent wage-seekers said the social audit team presented the issues in the Gram Sabha and 02 per cent of them said that the social audit team did not present. The remaining 46 per cent of the respondents did not know or remember about it. Based on official records,

observation of the social audit process in one GP, and FGDs with officials and villagers, it can be said social audit teams definitely present issues in GS. However, confirmation of this fact by only half of the wage-seekers points to the need to increase efforts for mobilisation and participation of wage-seekers in the social audit Gram Sabha.

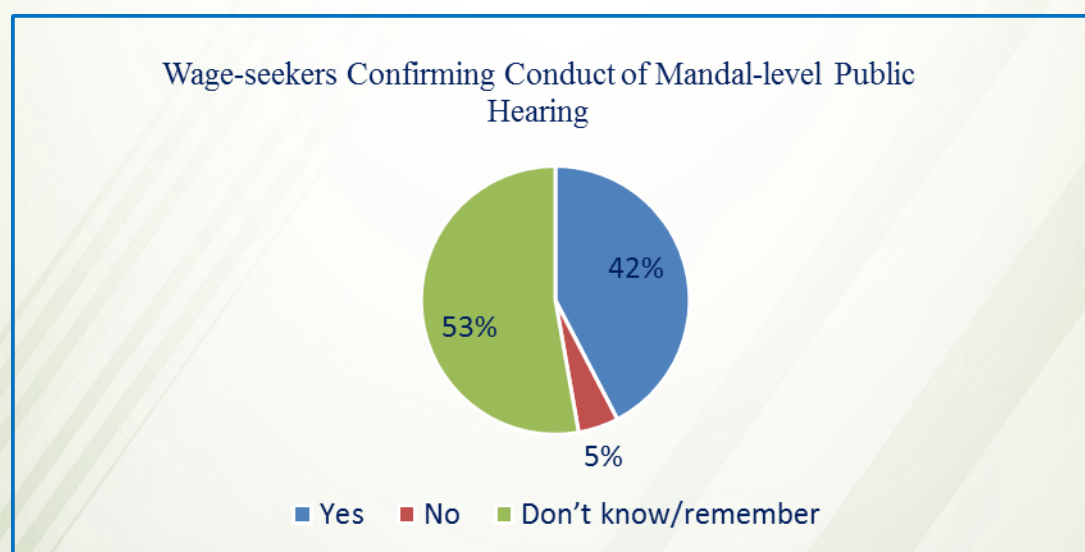
Graph 41: Presentation of Issues by Social Audit Team in Gram Sabha (N=144)



Timely and adequate action on decisions taken on findings of social audit is crucial. If there are no appropriate actions on the social audit findings, people may lose hope in the process. Equally important is informing the aggrieved wage-seekers about the action taken. A question was asked to check whether the wage-seekers were aware of the action taken based on the findings of the social audit. Eighty-one per cent of the respondents were not aware of the action taken and only 19 per cent were aware. This data highlights that the cycle of social audit process is not getting completed. As mentioned earlier in this report, neither the Vigilance wing is sharing ATR with the social audit team, nor are the social audit teams proactively accessing information about actions taken. Hence, sharing of information with wage-seekers is not happening.

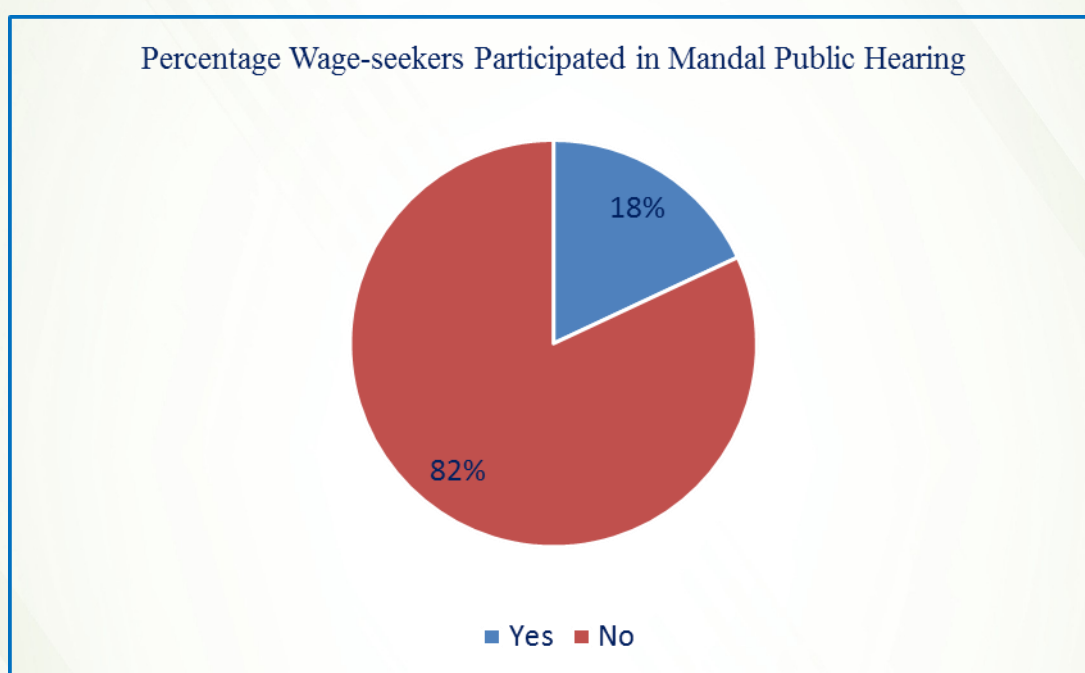
Graph 42: Awareness of the Action Taken on Social Audit Findings (N=144)

After completion of the social audit exercises in all the GPs of a Mandal, the social audit team conducts public hearings at the Mandal level. The DPC (DRDO) attends the meeting or nominates an official of the appropriate level to take the decisions on the social audit findings. Forty-two per cent of respondent wage-seekers confirmed that Mandal-level public hearings happened in their Mandal and 5 per cent said it was not organised. The remaining 53 per cent did not know or remember about the event. This data once again shows that the social audit team is not making efforts to mobilise wage-seekers and inform them about Gram Sabha and public hearings.

Graph 43: Wage-seekers Confirmation of Mandal Level Social Audit Public Hearing (N=144)

Among the wage-seekers who confirmed the conduct of Mandal-level public hearings, only 18 per cent participated in any public hearing ever while 82 per cent never such events. The research team observed that only a few wage-seekers, who have grievances, participate in public hearings. This is also because of a) the long distance between most of the GPs and the venue of public hearings, and b) the hearings get stretched to many hours, and hence it may not be possible for them to wait till decisions on their issues are taken.

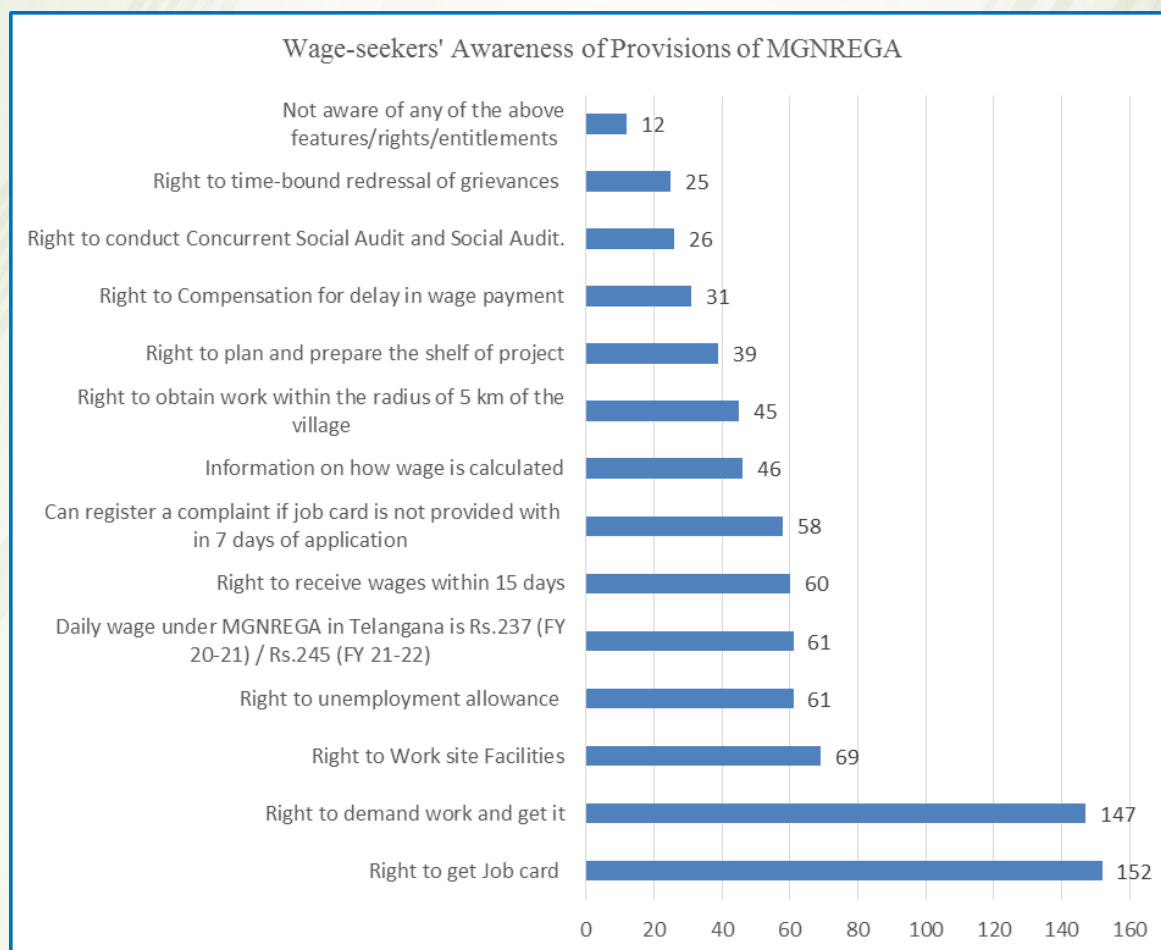
Graph 44: Wage-seekers Participation in Public Hearing (N=61)



To assess the impact of social audit as perceived by wage-seekers, several questions were asked to sample respondents. One of the objectives and processes of social audit is to create awareness among wage-seekers about key features of the Act and the rights, and entitlements of wage-seekers. During door-to-door verification and also social audit Gram Sabha, the social audit team is expected to inform wage-seekers and make them aware of their rights and entitlements. Out of the total 188 wage-seeker respondents, 176 were aware of some provisions or others while 12 of them were unaware of any provisions listed in the questionnaire. The highest awareness is about the right to get job cards issued followed by the right to demand job and get it. The lowest awareness is the right to time-bound redressal of grievance followed by the right to conduct social audit. In observation

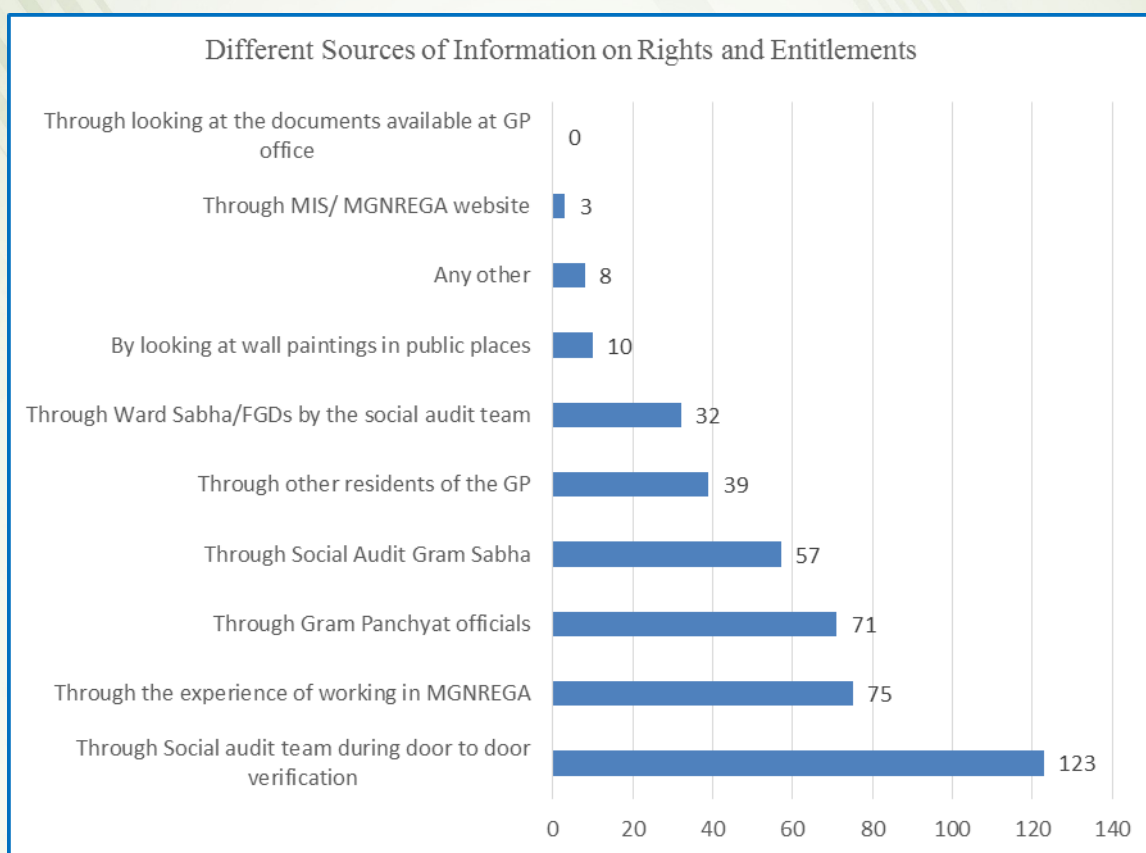
of social audit in one GP too, it was found that social audit teams neither inform wage-seekers of the purpose of their visit nor orient them on social audit.

Graph 45: Wage-seekers' Awareness of Features/ Rights/ Entitlements under MGNREGA (N=188)

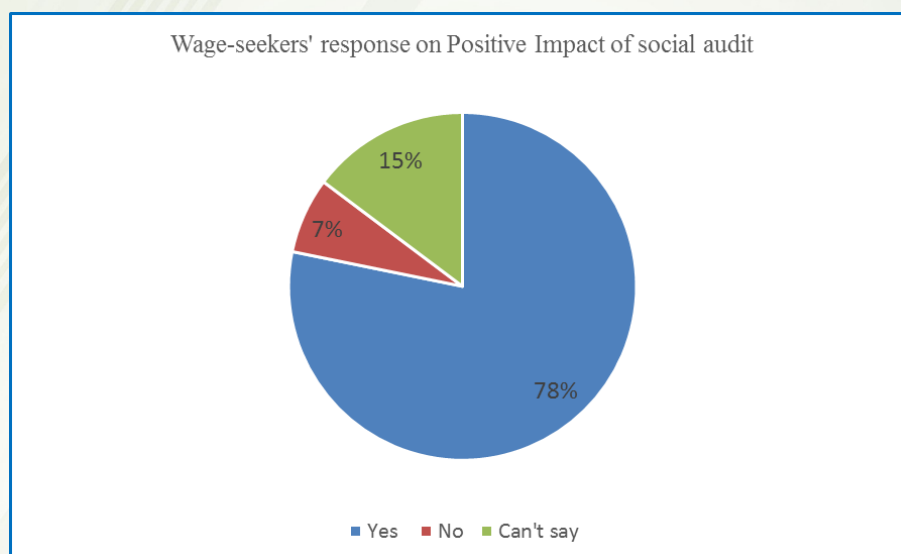


The 176 wage-seekers, who had information about some or other features of MGNREGA and wage-seekers' rights and entitlements, were asked about the source of such information. In response, 123 of them (nearly 70 per cent) said that they received information on MGNREGA from the social audit team during the door-to-door verification. This shows that over the years, social audit teams have shared MGNREGA-related information with a large number of wage-seekers. However, in the GP where the social audit process was observed as part of this study, such proactive disclosure of information by the social audit team could not be seen. Other major sources of information included self-learning by working under MGNREGA, through GP officials and social audit Gram Sabha.

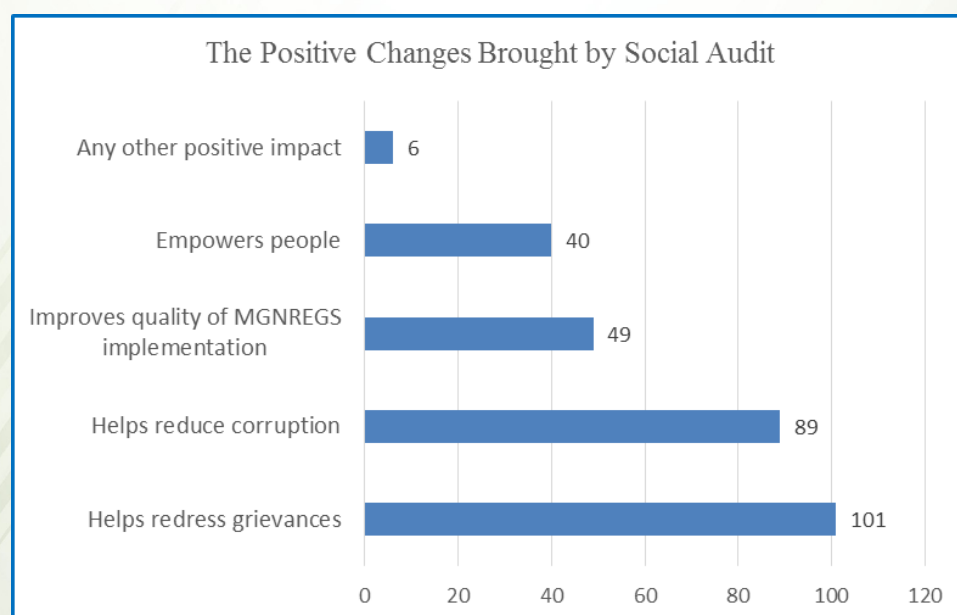
Graph 46: Source of Information about Rights and Entitlements to Wage-seekers (N=176)



Wage-seeker respondents who knew about social audit were asked whether social audit had any positive impact. Seventy-eight per cent of them said that social audit had a positive impact while 07 per cent said did not notice any change and the remaining 15 per cent could not say anything. This data justifies the need and continuation of social audit. Despite some procedural weaknesses, and delayed and inadequate actions, such a huge acceptance of social audit as an effective mechanism for positive change seems quite promising in terms of enhancing wage-seekers' mobilisation in future as they see value in it.

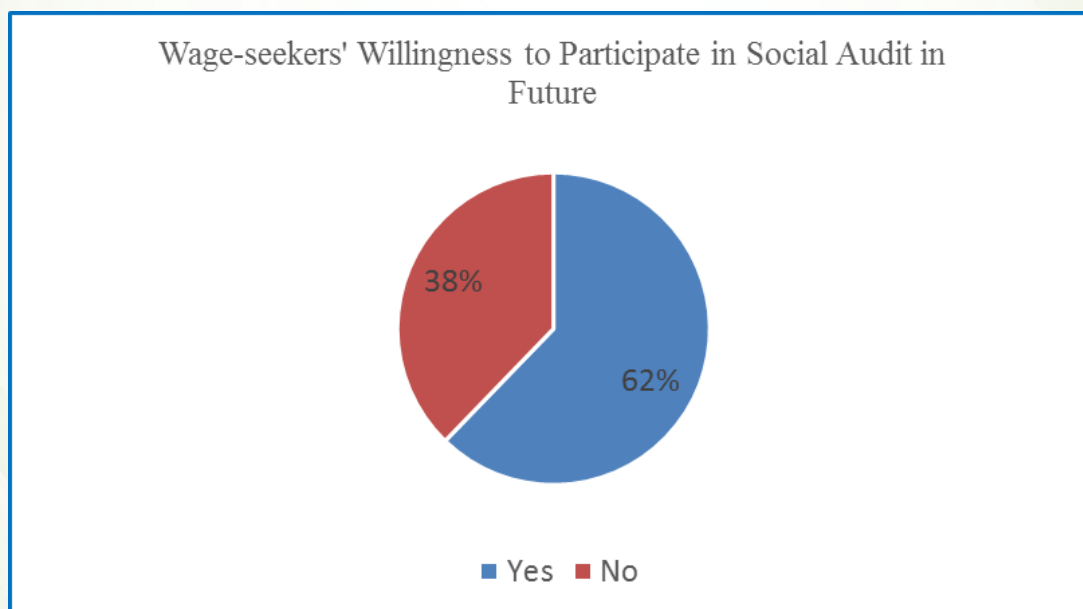
Graph 47: Wage-seekers Perception of Positive Impact of Social Audit (N=144)

The wage-seekers, who accepted that social audit had brought positive change, were further asked to identify those changes and were given the option to give multiple responses. Of the 122 respondents, majority (101) opined that it helped redress grievances, reduced corruption (79), improved the quality of MGNREGS implementation (49), and empowered people (40). Redressal of their grievances and reduction of corrupt practices is one of the key objectives of social audit as it impacts wage-seekers' lives significantly. The high number of wage-seekers offering positive remarks shows that social audit has been effective to a large extent in Telangana.

Graph 48: Types of Positive Changes Brought by Social Audit (N=112)

In the end, all respondents were asked whether they would participate in the social audit process in future too. In reply, 62 per cent of respondents were affirmative while 38 per cent said they would not attend, citing reasons such as busy agricultural and daily wage work schedule, lack of awareness, old age and lack of benefit from the process. The unwillingness of a considerable section of wage-seekers to participate in future is not a good sign for the sustainability of social audit. SSAAT Telangana needs to work on connecting and mobilising wage-seekers while implementing agency and Vigilance wing need to ensure timely and adequate actions to keep all wage-seekers remain interested in participating in the process.

Graph 49: Wage-seeker's Willingness to Participate in Social Audit Process in Future (N=188)



7.2 Perceptions of Implementing Agency Officials

FGDs with officials responsible for implementing MGNREGS (including MPDO, AE/JE, TAs, AOs/GP Secretaries) in six sample Mandals were conducted. Most of the officials have not received any formal orientation or training on social audit and their knowledge of social audit has come through their interaction with social audit teams and participation in social audit Gram Sabha and Mandal-level public hearings. However, officials were aware of their roles and responsibilities in the social audit exercise. They cited the following roles and responsibilities:

- Provision of documents to the social audit team
- Showing works/worksites to the social audit team
- Explain technical aspects of work and respond to any deviations pointed out by the social audit team
- Make logistics arrangements for smooth facilitation of verification, Gram Sabha and Mandal-level public hearing
- Attending Gram Sabha and Mandal-level public hearing

When asked about their general opinion on the implementation of MGNREGS in their respective Mandals, officials made the following observations:

- MGNREGS is still being implemented as a target-oriented scheme rather than a demand-driven one.
- The wage rate under MGNREGS is quite less than the market rate and is unattractive.
- The current staff strength is highly inadequate, especially after the removal of FAs.
- Training to officials and elected representatives of GP on technical aspects and social audit is required.
- The list of permissible works is limiting and new works need to be thought of for some GPs.
- Software changes are needed so that workers get notified immediately after FTO for wage payment is generated.
- The survival rate of plants in plantation works is low due to lack of water, protection, etc. Officials in all the Mandals invariably expressed that social audit is a very useful exercise.
- During the COVID-19-related lockdown, there was a huge demand for work under MGNREGA, increasing work pressure on officials.

Among the use of social audit, they cited many benefits. Important among them are as follows:

- Helps in verification of ground realities
- Enhances transparency and accountability in the implementation of MGNREGS
- Increases awareness of rights and entitlements among wage-seekers
- Helps identify deviations and wrongdoings
- Improves quality of works
- Helps remove pressure/interference/influence of political or external persons in the implementation of MGNREGS
- Decrease in corrupt practices
- Grievances of wage-seekers get redressed
- Knowledge enhancement of functionaries/officials

This data shows that over the years, implementing agency officials have not only accepted social audit but have also internalised its usefulness. This perception is likely to increase the cooperation of officials to social audit teams in facilitating social audit and also faster follow-up actions.

When asked about the participation of officials in social audit Gram Sabha and public hearings, officials claimed that they always participate and only when there are extenuating circumstances do they miss these meetings. However, Technical Assistants expressed that sometimes Gram Sabhas being facilitated by different social audit teams might coincide and 2-3 Gram Sabhas may be scheduled on a single day while in other GPs worksite verifications may still be ongoing and TAs are called to show the works. In such situations, it becomes difficult for them to attend all Gram Sabhas in their jurisdiction as they are in-charge of multiple GPs.

Regarding the participation of wage-seekers in Gram Sabha and public hearings, the officials shared that wage-seeker's participation in Gram Sabha was poor and only people with any grievances participated. However, it is more in

comparison to Mandal-level public hearings where mostly Sarpanchs, ward members, implementing agency officials and journalists attend. A few officials shared that wage-seekers' participation in Gram Sabha and public hearings was more 4-5 years back as wage-seekers wanted to know about the scheme. This trend has come down subsequently. Wage-seekers' participation in Gram Sabha also depends on the agricultural season.

During interactions with the social audit team, most officials shared that they were friendly. However, they pointed out that a few social audit team members have displayed negative attitude and behaviour. Further, they expressed that the social audit team points out minor issues, and at times, the implementing agency officials felt being cornered and targeted.

Regarding the fairness of the social audit process, implementing officials expressed mixed views. Some officials said that it is a fair and transparent process and added that the social audit team backs up their findings with factual evidence, whereas others perceive it is a fault-finding exercise and the social audit team reports only negative issues and never reports the positive side of scheme implementation.

Regarding Concurrent Social Audit (CSA), officials and ERs opined that CSA is an effective method and it is easier for them to show works to the social audit team and hand over records related to ongoing works. They suggested that both CSA and regular social audits may be continued.

The following are the issues and challenges of the social audit process highlighted by officials:

- When data for two or more years is sought, it becomes difficult to consolidate data and provide records in time.
- Implementing agency officials are working under tremendous pressure to achieve targets, and hence minor procedural deviations occur.
- Earlier, social audit teams used to create awareness, but now they focus only on verification exercise.

- The social audit team is only verifying works for which payment has been made and not the ongoing works for which payments have not been made, especially in cases where individual works were not being carried out as per the estimates.
- Social audit exercise is time-bound and due to lack of sufficient time, social audit teams end up making wrong observations which results in punitive actions on officials.
- Wrong categorisation of issues makes it difficult for not-so-experienced Presiding Officers to take appropriate decisions and it sometimes results in punitive actions.
- Recoveries are recommended even in QC-certified works.

To improve the effectiveness of social audits, officials have made the following suggestions:

- Social audits must be conducted regularly, preferably once in six months and not later than once a year, as many deviations, particularly those related to earthworks, get reported due to lapse of time. Further, following the transfer of functionaries over time, newly joined hardly have any idea of work.
 - The presence of Independent Observers needs to be ensured. Observers, if present, used to listen to functionaries as well as the social audit team and then used to go into details of issues and decide whether to drop it or not. At Mandal-level public hearings, Presiding Officers do not find time to listen and discuss the issue.
 - Presiding Officers, implementing agency officials and the social audit team should have a common orientation on categorisation of issues so that all are on the same page.
 - Verification of ongoing works where payments have not been made also needs to be done.
 - In case of individual works not being carried out as per specifications of estimates, the social audit team may create awareness among wage-seekers.
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- The social audit team may highlight good works done by implementing agencies so that others can also get inspired.
- Social audit process involves a lot of photo copying and printing works. Hence, administrative budget may include the cost of paper and cartridge which is currently not covered.
- The social audit team may help implementing agencies in identification of works under MGNREGS apart from verification.
- Responsibility should be fixed on social audit resource persons if the issues get dropped.

7.3 Perceptions of Social Audit Resource Persons

A cross-cadre FGD was conducted with randomly identified social audit resource persons. The participants included five each STMs & PMS, DRPs and BRPs.

Social audit resource persons were asked about the issues and challenges they faced during each of the steps and the possible solutions.

- When there is a backlog of records (as is the case during & post-COVID), it becomes difficult to complete the audit on time because records collection takes a very long time. This throws the entire calendar off balance.
- Insufficient human resources to carry out an audit of every GP once a year. The solution suggested was to increase manpower.
- A longer period between rounds of audit in a GP leads to problems because of the nature of work. The solution suggested was to carry out regular social audits on schedule.
- In the selection of VRPs, honorarium is a big issue. VRPs do not want to stay in the villages for the duration of the audit, and they prefer to move between their native village and the village where the audit is taking place. For VRPs, women in particular, the facilities available at the accommodation can be a problem. As a result, it is difficult to find VRPs from MGNREGA families, who are also SHG members. One of the possible solutions is to stick to having VRPs from

neighbouring villages who could travel up and down as in the case of COVID pandemic. However, meeting the transportation cost may be an issue.

- Mobilisation of wage-seekers to participate in social audit Gram Sabha and other processes is a challenge. Currently, making charts and announcements are the main activities for mobilisation. The vigour of mobilisation efforts differs from place to place.
 - In Mandal-level public hearings, Presiding Officers are recovering the amount but not paying out to workers.
 - No action is seen as being taken on social audit findings, so people are demotivated.
 - The guidelines mandate 100 per cent work and beneficiary verification and this takes so much time that mobilisation gets neglected.
 - The social audit team may spread the action taken based on issues raised during the last round of audits. Displaying the audit report on the wall of the GP office is insufficient and it does not attract participation.
 - Most often, it is observed that actions are not taken on the previous round of social audit during the current round of social audit. Hence, the social audit team is unable to inform wage-seekers about the actions taken.
 - At present, some information is provided at the stage of door-to-door verification and during meetings held at the worksites, and ward sabhas. For more proactive disclosure of information to community/wage-seekers, social audits need more time and resources. Consolidated social audit reports can be put up at the GS-level Gram Sabha.
 - Records collection is tougher and more time-consuming these days. One can get the basic information necessary for an audit from the MIS. However, the collection of original copies of muster and MBs takes time and effort. There is no incentive to maintain records and punishment for not doing so. Each time violations of maintaining work files are raised as procedural violations, and functionaries are let off with warnings. All MBs, bills and vouchers should be uploaded/scanned to the MIS.
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- Verification of some works, such as Staggered Trenches (STs), is difficult. High expenditure works also need time to verify. MI tanks, when full of water, cannot be measured. The EGS manual is used during training. However, TSSAAT is coming out with their own technical manual which includes the methodology used in the field, which includes the technique used to measure 91 different works. The process of re-verification currently happens without the participation of the social audit team. It should be done jointly between the government, Vigilance wing and social audit team.
- For verification of community works and technical works, the presence of JE/TA is required. A local team is required to identify the location of works; moreover, geotagging is not accurate. If JE/TA is not present, they do not trust the findings recorded by the social audit team.
- BRP participants said they are familiar/comfortable with the categorisation of issues in the report. However, some errors in MIS entries are noticed. STMs carry out quality checks of the reports before uploading, and sometimes they need to make corrections because of language errors.
- The usefulness of assets created is assessed by the social audit team upon verification of work, and sometimes the team raises objections. For example, in the event of plantations being planned in the middle of forests, the standard government reaction is to cite lack of public land, and therefore no other option.
- Independent observers do not come to social audit Gram Sabha. There is no honorarium for fulfilling the role and Gram Sabhas are most often held on Sundays. So, there is very little incentive for independent observers to participate. The presence of independent observers would be useful because their signature is perceived as legitimising the findings of the social audit team.
- The public hesitated to participate in the public hearings as travelling to far-off Mandal costs money and time. Only those who need solutions for unresolved issues attend the public hearing. Initiatives such as announcing the date of public hearing during verification and in the Gram Sabha, and putting up a notice about the date and agenda may increase public participation.

- DRPs have to depend on government officials to access computers for data entry. The records are also stored in government offices for the duration of social audit. TSSAAT has only State-level infrastructure and there is a requirement for regional infrastructure.
 - The social audit team does not have access to Vigilance wing data to understand the pending and closed issues. When the Vigilance wing changes the recovery amount, there is no review process together with SSAAT. A systematic review/follow-up process with the government involving EGS, Vigilance and social audit team is needed. However, all these features have been added to National MIS.
 - Shortage of funds is impacting the quality of the social audit, starting from the process of VRP selection. Instead of compromising on quality (100 per cent verification for example), SSAAT can revisit the social audit schedule and the quantity of GPs being covered.
 - The government does not always follow SRDS rules. The rules need to be reviewed/revisited/updated. The SRDS rules need to be changed to match the MoRD categorisation of issues. Also, the rules have not been changed since the removal of the Field Assistants.
 - After the bifurcation of the State, the number of Vigilance officers significantly came down. Now, either AVO or DVO is the decision-making authority in the district, and the Vigilance team is not independent. The District Vigilance Office is very much under the control of the DRDO instead of the CVO. The salary of Vigilance officers is released by the DRDO, whereas it should come from the CVO.
 - No test audits have been carried out in the last few years. Special audits do happen when there are specific circumstances like high deviation. However, STMs visit the villages during the social audit, interact with VRPs and BRPs, check the measurement against measurement sheet and check DTF.
 - The convergence with other departments under MGNREGA - in the case of works where there is overlap with Sanitation or Forest departments - causes complications mainly in terms of records collection.
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- Taking up the social audit of other schemes would be good not only from a financial standpoint but also in terms of reducing the monotony of auditing MGNREGA.
- Resource persons would like to have more exposure towards social audits in other States, and interact with resource persons. Only one or two participants have some understanding of the social audit process in other States.
- SSAAT functions independently in terms of funds and functionaries. It is 90 per cent independent in terms of function, and there is some dependence with regard to data entry as discussed earlier. Also, the social audit calendar is not followed because records are not provided on time. Action taken on findings also has an effect on the impact social audit has and its perception. SSAAT functions fairly independently from the government at the block and district levels. It is more dependent at the state level under the direction of Principal Secretary in terms of GB constitution, funding, etc.
- There is too much uncertainty with regard to the contract to resource persons which is now given for four months. Resource persons think that contract be given for at least one year together.
- Salary is linked to CPI points and has been revised after three years. The basic salary for those hired now and long-term employees is the same and some resource persons are unhappy with this. They are not getting PF because of the new contract every year instead of a renewal. They want the contract to be renewed so that they will get PF.
- There are 30 leaves for a period of 12 months. However, resource persons can only take 3-4 leaves if taken in one go, after the passing of two months. If not availed, the leaves will be lapsed. Resource persons want either leaves to be carried forward or leave encashment.
- The DA, which is Rs.150 for BRPs and Rs. 175 for DRPs at present, needs to be revised/enhanced by taking into account the actual costs at the Mandal level.
- After every audit, a resource person is allowed four rest days. Since an RP completes 1.5 - 2 audits every month, some get a total of four days of rest,

while others have eight days depending on the audit schedule. The resource persons expressed dissatisfaction over this issue only and demanded a minimum of seven rest days per month.

- There are no designated GR officers but there is a committee. However, they raise any issues with immediate supervisors.
- Decisions about employees taken by DD, Director. STMs report directly to the DD, Director, and PMs support them where required. Most PMs are also in the field except for a couple who are primarily in the office.
- Relationship with CSOs weakened when the NGOs started expecting to be financially compensated for their contributions. Alliances are diluted mostly at the state level.
- Capacity building is sufficient. Most resource persons have received one-month training, refresher training, and thematic training.
- Regarding work environment/relationships, they shared that BRPs and DRPs are very close and get along like family. Other than these cadres, the cross-cadre interaction is limited. In 2010, there was a get-together (*sammelan*) of resource persons across 23 districts comprising cultural events and experience sharing, but no such events were organised later. The resource persons expressed their keenness to attend such events.
- There is lack of familiarity of State staff (specifically in some verticals) with the social audit process. For instance, Accounts, and HR do not understand the challenges of the field or the social audit process. It was suggested that they should participate in the audit process to familiarise themselves.
- There are no employee representatives in the GB. Even State level staff felt that they did not interact with governing body members.
- Paper usage and physical storage of paper is increasingly becoming a challenge. There is a need to think about tablet/app-based operations and applications.

CHAPTER-8

ENGAGEMENT WITH OTHER STAKEHOLDERS

SSAAT primarily engages with wage-seekers and officials involved in the implementation of MGNREGS, as can be seen in the previous sections of this report. However, SSAAT has also engaged with other stakeholders to strengthen the ecosystem within which it operates. Such engagement is important to create a larger support base for social audit and elicit genuine feedback for making positive changes to strengthen social audit in the State.

8.1 Engagement with Civil Society Organisations and Unions

As mentioned in the section dealing with the genesis of the SSAAT Telangana, CSOs and Unions had instrumental roles in piloting social audit and setting up of SSAAT. In the first Governing Body meeting held in the year 2009, continued engagement with CSOs and unions was discussed in detail. Further, in 2009, the AP NGO Alliance (APNA) with 189 CSOs was set up in collaboration with PR & RD Department. After the bifurcation, the Telangana State NGOs Alliance (TSNA) was formed. However, a lack of convergence between SSAAT Telangana and CSOs at the ground level was observed. An independent study also found that one out of ten social audit resource persons perceives that lack of engagement with CSOs acts as a bottleneck for social audit in the State as strong allies are needed (Pande and Dubbudu, 2017). Engagement with CSOs has weakened as compared to what it used to be till the year 2015-16. This is mainly because NGOs started expecting financial compensation for their contributions.

To strengthen this convergence at the ground level, an organised effort was made in the year 2017 when a State-level planning meeting was held with the participation of 32 NGOs. It was, inter-alia, suggested that (i) one copy of the social audit report be given to the local CSOs for necessary follow-up, and similarly, social audit action plan and intimation letters be also shared with CSOs, (ii) Social audit teams should involve local level associations like Raithu Sanghas (Farmers

Associations), youth clubs, etc., for making social audit process more effective. It was decided, inter-alia, that 15 days prior to the commencement of audit, information would be shared with CSOs to facilitate their participation. VRPs and CSOs would participate in the monthly meeting at the mandal level for follow-ups. As a follow-up to the State-level planning meeting, district-level planning meetings with CSOs were also conducted in 2017 in which a total of 209 CSOs participated. Further, in the year 2018, two workshops for CSO participants were organised to educate them on MGNREGA, RTI Act, Minimum Wages Act and other entitlements of the poor and working classes. CSOs were demanding proper implementation of the Minimum Wages Act, 1948. It was decided that CSOs would dedicate their commitment to the social audit process in one Mandal. Later, SSAAT conducted review and re-planning meetings five times to ensure smooth convergence between CSOs and social audit teams. CSOs have also been associated with training programmes of SSAAT. Six NGO representatives participated in 72 batches of SHG-VRP training as External Evaluators and SSAAT involved NGOs as facilitators in regular training programmes for VRPs at the mandal and district levels.

8.2 Engagement with Principal Accountant General (PAG)

A good synergy has been established between SSAAT and the PAG's office. The representative of PAG had been invited to GB meetings earlier and later PAG was inducted as a member of the GB. Annual social audit action plan (calendar) and quarterly reports of social audit are regularly shared with the PAG office. Social audit reports of schemes audited by SSAAT are sought by the PAG office for planning the audits to be carried out by the AG's office. Resource persons of SSAAT are requested by the PAG office to impart training and orientation to the officers of the AG on the social audit process and SSAAT has organised field exposure visits for AG officials to participate in the social audit process. The Director of SSAAT is a member of the State Audit Advisory Board of Telangana.

SSAAT supported the C&AG's Performance Audit of the MGNREGS by involving some of the DRPs and SRPs in the field verification process, along with the auditors from the AG's office. SSAAT's work at the field level has also been audited during

the C&AG's Performance Audit. At the request of SSAAT, the PAG's office has conducted a financial audit of the SSAAT's account.

SSAAT has also collaborated with Local Fund Audit wherein resource persons from SSAAT imparted training to Local Fund Audit staff on social audit, and the Local Fund Audit has inspected accounts of SSAAT in the past.

CHAPTER-9

CONTRIBUTIONS BEYOND STATE

9.1 Contributions to Strengthening Social Audit Framework at National Level

Although SSAAT was formed as a separate entity in the year 2009, a social audit unit was functioning in the SPIU of PR & RD Dept. of Govt. of undivided AP. Several memos and executive instructions have been issued since then on the ways and means of facilitating and conducting social audits of MGNREGS in the State. In the year 2010, a Government Order (G.O. Ms. 98) with NREGS-AP Conducting of Social Audit Rules was issued. AP was the first State to formulate such rules and till then Government of India also had not notified any rules. AP Social Audit Rules described in detail the social audit resource base such as the setting up of social audit unit and resource persons at State, district and village levels, periodicity of social audit, provisioning of records and use of RTI Act, information on the social audit, social audit process in the village, social audit Gram Sabha, Mandal-level social audit public hearing, role of administration in the social audit process such as Project Director, Additional Project Director, Programme Officer and Assistant Programme Officer, code of conduct for social audit personnel, monitoring of social audit, and budget for social audit process. Learning from the AP experience, the Ministry of Rural Development (MoRD) collaborated with the Comptroller and Auditor General (C&AG) of India in formulating MGNREG Audit of Scheme Rules for the entire country. During the deliberations to formulate these Rules, then Chairperson and Director of SSAAT made valuable contributions. Notification of MGNREG Audit of Scheme Rules and subsequent push from MoRD have led to the setting up of SAUs and creation of a pool of trained social audit resource persons in almost all the States in India.

However, the independence and autonomy of SAUs and integrity, objectivity and quality of social audits varied across States. Compliance audit by CAG in 2015 on the implementation of Audit of Scheme Rules also highlighted many gaps in most of the States. Then working groups were constituted by MoRD to formulate

Auditing Standards for Social Audit in collaboration with C&AG. The Director of SSAAT, with her immense experience, contributed significantly to the formulation of Auditing Standards for Social Audit, which was circulated by MoRD to all States in 2016.

From the beginning, SSAAT has used information technology to enter social audit findings and actions taken, and also analyse the trends to take policy decisions. When a need was felt to introduce a social audit module in the MIS of MGNREGA, SSAAT's experience came in handy. The Director and senior officials of SSAAT contributed to the development of social audit module in the MIS of MGNREGA along with SAUs of Andhra Pradesh, Jharkhand, Sikkim, and West Bengal. Further, SSAAT also tested the application (social audit module in MIS) with live data and provided feedback to the NIC team.

9.2 Contributions to Strengthening Social Audit in Other States

Since SSAAT was the first Social Audit Society to be set up in India and had a prescribed process of conducting social audits (through Rules/prescribed formats/Guidelines and Memos), it had received continuous requests from other States to provide technical assistance by way of conducting training for the resource persons and sharing information related to setting up of a Society, Rules and Regulations, etc. The Government of India had also requested SSAAT to extend support to various States that were setting up similar Societies in compliance with the MGNREGS Audit of Schemes Rules, 2011. Even today, many SAUs look up to SSAAT for guidance on organisational and social audit process-related issues.

SSAAT had hosted visits for State government officials from Rajasthan, Bihar, Chhattisgarh, Odisha, Karnataka, Tamil Nadu, Gujarat, Himachal Pradesh, Uttar Pradesh, Kerala, West Bengal, Meghalaya and Sikkim in the past. Further, the Director of SSAAT also visited several States to support organisational development and capacity building of SAUs. As NIRDPR, a leading capacity-building institution on social audit of rural development programmes, is based in Hyderabad, SSAAT has coordinated field visits for participants of training programmes of NIRDPR in addition to providing resource persons for those training programmes.

9.3 International Contributions

Social Audit of MGNREGS has been recognised internationally as a successful model for enforcing accountability and promoting transparency and participation in the delivery of public programmes. SSAAT had received requests from international agencies and governments in the past for exposure visits to learn about social audit and in-situ technical assistance. For example, in one such visit hosted by the International Budget Partnership (IBP) in April 2011, 18 participants from five countries, namely Indonesia, Cambodia, Mozambique, Kenya, and the US visited SSAAT and observed the social audit process in Telangana for five days. SSAAT had also been requested by the World Bank and the Government of Yemen to host learning events. Further, several journalists and filmmakers have visited SSAAT and also the field areas. The Ministry of External Affairs (MEA), Government of India had commissioned an independent filmmaker to document social audit as a part of a film on MGNREGA.

9.4 Academic Contributions

SSAAT has made direct and indirect contributions to the creation and dissemination of academic knowledge and perspective at both national and global levels. Former Director Ms. Karuna Aekella and current Director Ms. Sowmya Kidambi have contributed to reputed national and international journals. Further, SSAAT has facilitated visits of several national and international researchers and academicians besides providing them with necessary data for writing research papers and reports. Most of the academic work on social audit in India refers to the work of SSAAT and the social audit experience of undivided AP and Telangana.

CHAPTER-10

CONCLUSIONS AND RECOMMENDATIONS

10.1 Summary of Achievements of SSAAT Telangana

1. SSAAT is the first SAU to be set up in the country, with a legal mandate through Rules passed by the State Assembly to facilitate social audits, and functional independence and with a dedicated budget of 0.5 per cent of the previous year's expenditure by the State on the MGNREGS.
2. SSAAT has also been governed by a Governing Body of eminent people since its inception. The GB has 13 members, including the PAG and the Principal Secretary, PR & RD and has equal representation of both government and non-government members. Several senior serving and retired Indian Administrative Service officers like Shri B. N. Yugandhar, and eminent CSO leaders such as Smt. Aruna Roy and Shri Nikhil Dey, academicians and governance experts such as Dr. Trilochan Shashtry, and Dr. Mihir Shah have been associated with SSAAT and have been actively contributing to its growth. Now, SSAAT has more representatives from CSOs than the prescribed strength. The Chairperson of the Society is not from the government.
3. The Society has a robust organisational structure with seven verticals- Admin, Accounts, HR, Programs, IT, CB and Field, with Section heads and is well staffed. SAU is governed by a set of comprehensive Rules and a Memorandum of Society (compliant with the Auditing Standards issued by the MoRD in consultation with the C&AG), approved by the GB. Rules include Financial Rules such as Procurement Rules and Rules for Advances to Resource Persons for social audit and training, Recruitment Rules, Disciplinary Rules, Code of Conduct, Leave Rules, TA&DA Rules, etc.
4. From the beginning, only SSAAT has also engaged with CSOs and Workers Unions. In recent times, also it has organised workshops with CSOs at State and district levels to re-energise this engagement.
5. SSAAT is the first SAU to build a dedicated cadre of social audit facilitators from

VSA (now called VRPs), BRPs, DRPs, STMs and PMs to ensure seamless facilitation of social audits at the field level and ensure that the quality of the audits is monitored continuously. These social audit resource persons have high capacity and experience in facilitating the social audit of MGNREGS.

6. For facilitation of in-house training, SSAAT established the social audit training cell way back in 2010 and keeps organising induction and refresher training for social audit resource persons.
 7. Due to their association with SSAAT, resource persons, most of whom are from humble backgrounds, enjoy improved social and economic status, have improved their knowledge and skills, and feel confident in interacting with officials and community.
 8. A protocol for social audits has been developed in the very first two years of the establishment of SSAAT and one full round of social audits in every GP of the State has been facilitated since the year 2010.
 9. Steps have been taken to maintain the integrity of the social audit process and ensure that there is no corruption in the social audit process. Among them, test audits, constant monitoring, widespread awareness regarding the contact number of SSAAT and the Director where any complaint regarding the social audit process can be registered, immediate response to any complaint or call received from any complainant about the social audit process, periodic performance review of the social audit personnel, and cross-verification on the random sample basis of the social audit reports, are important.
 10. SSAAT covers more than 90 per cent of wage-seekers households during the social audit process and 100 per cent verification of works. Ninety-seven per cent of the respondent wage-seekers confirmed that the social audit team carried out door-to-door verification in their GP while 92 per cent recalled the social audit team contacting them. Ninety-six per cent of wage-seekers confirmed that the social audit team verified the number of days worked and wages earned with the official records, bank passbooks, job cards, etc.
 11. Social audit has helped in creating awareness among wage-seekers. Three-
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fourths (75 per cent) of wage-seekers said that the social audit team gave information about rights & entitlements under the MGNREGA. Out of the total 188 wage-seeker respondents, 176 are aware of some provisions or others under MGNREGA. Approximately 70 per cent of respondents said that they received information on MGNREGA from the social audit team during door-to-door verification.

12. In 2020-21 and also in 2021-22, during the peak of COVID-19-related restrictions, SSAAT has been among the leading States which started facilitating concurrent social audits (CSA) of MGNREGS which focused on awareness generation, facilitating the issuance of new job cards, monitoring of provision of entitlements to workers, and grievance registration and redressal. Later, MoRD issued guidelines and other States also started conducting concurrent social audits.
13. A Vigilance wing was set up in the year 2011 both at the State and district levels to ensure that seamless follow-up actions are taken on the social audit paras. A protocol for follow-up action in the form of SRDS Rules for FTE, along the lines of the CCA Rules for regular employees, has also been put in place to ensure disciplinary/criminal action against deviant officials of implementing agencies.
14. APSAPCPA, 2012 has been adopted by the Telangana government post-bifurcation, ensuring the setting up of mobile courts in Medak and Karimnagar, with the support of the High Court, to try cases in the villages brought out by social audit by a First Class Judicial Magistrate.
15. SSAAT has initiated measures such as training for independent observers identified by the government, preparing guidelines for performance, attendance and performance review of the observers in the monthly review meetings, and proposal to have independent observers from civil society, to improve the Observer system which is currently not functioning as desired.
16. SSAAT has established a synergy with the CAG/PAG on social audit. The PAG was a special invitee to all the GB Meetings since 2010 even before being

inducted as a member of the GB. SSAAT has also conducted many training programmes with field immersion for the AG Office staff on social audit. The AG staff is also regularly called to train social audit teams during the induction/ refresher training programmes. SSAAT regularly sends its annual reports to PAG.

17. SSAAT created its website in the year 2010, (www.socialaudit.telangana.gov.in) compliant with Section 4 of the RTI promoting suo-moto disclosure. The website hosts all the circulars, GOs, budgetary and expenditure details pertaining to the society, including the original social audit reports (in the local language Telugu) which are scanned and uploaded on the public domain and can be downloaded by anybody who wants to read it.
 18. SSAAT is audited by the AG's office every three years. The first comprehensive inspection audit of the SAU (including the accounts) was taken up in the year 2015, and the second in the year 2019 covering the period from 2015 to 2019. In both audit reports, the AG has found no major deviations. SSAAT has also been audited by CAG as part of its Compliance Audit of implementation of MGNREG Audit of Scheme Rules 2011.
 19. The Department of Rural Development has also benefitted from the inputs provided by the social audit teams and this has led to policy changes in the implementation of various schemes such as MGNREGS, SSP, AABY and IWMP.
 20. SSAAT has also facilitated social audit/verification of various other schemes of other departments. Important among them are ICDS, Streenidhi, MDM, verification of ODF status of GPs under SBM-G, etc.
 21. SSAAT has made important contributions to the evolution of legal framework of social audit at the national level such as drafting the MGNREG Audit of Scheme Rules, 2011 and Auditing Standards for Social Audit, 2016. Further, inputs from SSAAT have also been useful in the development of social audit guidelines and accountability framework of various other programmes/schemes of Govt. of India.
 22. SSAAT has assisted other States in setting up SAUs and has also provided
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training to their key officials and resource persons. In the past, SSAAT had been nominated as the nodal agency for training on social audits for all the States, where the process of setting up SAU was going on. Further, it has facilitated exposure visits and field visits in Telangana to social audit resource persons of other States.

23. SSAAT has contributed significantly to knowledge creation on social audit. Multiple independent research agencies, universities, researchers, and governments visited SSAAT to study the social audit process in Telangana. Papers related to the social audit process have also been published in leading national and international journals. SSAAT Director too has contributed to academic journals.
24. Many organisations, and universities both national and international, have sent their employees/students for internship at SSAAT to help them understand the social audit process at the field level and the institutional structure that has managed to create widespread awareness of rights and entitlements.
25. SSAAT has also hosted international training for Governments/CSOs/ International Supreme Audit Institutions of other countries to help participants learn about social audits based on their interests and convenience.
26. A high proportion of the wage-seekers (89 per cent) said that they were getting work under MGNREGA when they need. This is a good sign of the implementing agency being responsive to the needs of wage-seekers.
27. Wage-seekers perceive community assets under MGNREGS as of good quality and useful. Seventy-three per cent of the wage-seekers have rated MGNREGS community works taken up in their village as good and 18 per cent found them satisfactory. A very high section of the respondents (95 per cent) said that the public assets created under MGNREGA are useful to the village community.
28. Social audit has emerged as an accessible and non-threatening platform for registering grievances. Forty-four per cent of the wage-seekers said that they raised their issues with the social audit team.

29. Despite some procedural weaknesses, delayed and inadequate actions, 78 per cent of wage-seekers said that social audit had a positive impact in terms of grievance redress, reduction in corruption, improved quality of works, etc. As a result, 62 per cent of wage-seekers are willing to participate in social audits in future.

10.2 Summary of Issues and Challenges

1. Inadequate deployment of staff and social audit resource persons mainly due to paucity of funds are causing tremendous workload on field-based resource persons. This coupled with the requirement to stay in the GP and not enough rest days is leading to unrest among resource persons besides a high attrition rate.
2. Currently, SSAAT receives 0.5 per cent of the previous year's MGNREGS expenditure for its establishment and programme costs, which is insufficient due to an increase in the number of GPs and mandals after reorganisation and increased establishment costs with Consumer Price Index (CPI) linked increment in remuneration of staff. Further, the release of this fund is not made directly and gets delayed from MoRD as well as from CRD.
3. Despite all its efforts, SSAAT has not been able to facilitate two social audits in a year in all GPs and instead of having six monthly social audits in half of the GPs as suggested by the MoRD's Annual Master Circular, it has decided to facilitate one social audit in every GP per year.
4. MoRD has mandated social audits of PMAY-G and NSAP, and MoPR has issued guidelines for social audit of 15th Finance Commission Grants, but these have not been taken up by SSAAT.
5. Frequent postponement of social audits due to lack of funds, MGNREGS peak season, not holding public hearings on public holidays, etc., is also a challenge.
6. Poor maintenance of records and delay in making them available to the social audit team are other challenges in the facilitation of social audit by SSAAT. Non-availability of records throws the schedule of social audit action plan off balance.

7. Identification of VRPs has become a challenge due to low resource fees, strenuous work, and the requirement to stay in the village away from their home. Fear of COVID-19 in the last two years has added fuel to the fire. Not many youth from wage-seekers' families are interested, and hence BRPs do not have a choice but to select from among those available.
8. The training of VRPs before the start of the verification exercise in the GP is not systematic, and training modules and training aids are not properly used. Further, it has been observed that BRPs do not explain the social audit process properly to VRPs even during the verification exercise.
9. The community mobilisation efforts taken up by the social audit team to ensure their participation in social audit Gram Sabha are inadequate. Even the social audit team failed to aptly explain the purpose of the visit to wage-seeker families. Although 47 per cent of wage-seekers said that the social audit team conducted public rally/ward sabha/FGD before the start of social audit process in their village/GP, the research team, during the observation of social audit in a GP, found that no such awareness or mobilisation efforts were undertaken. This is mainly because of the pressure on the social audit team to finish the verification exercise and prepare report in time as per the pre-fixed schedule. The team complained that the time allocated was insufficient.
10. The lack of community awareness and mobilisation efforts have resulted in low attendance and voice of wage-seekers in the Gram Sabha. The participation of wage-seekers in Mandal-level public hearings is almost nil. The main reasons are lack of mobilisation, distance to the venue of the public hearing and the loss of a day's wage.
11. The term 'social audit' or its Telugu term 'samajik taniki' has not been popularised. The wage-seekers are able to recognise the term only when the activities are explained. This is mainly because of the resource persons' failure to explain the purpose of their visit properly during the door-to-door verification. Although 88 per cent of wage-seekers accepted that social audit teams introduce themselves, it was observed by the research team that social audit

- teams do not introduce themselves as facilitating social audit and explain what social audit is all about.
12. Approximately 71 per cent of the wage-seekers responded that they hardly have any idea of the labour budget and none of them have attended Gram Sabha for the labour budget planning or identification of shelf of the project. Community participation in each step of the project cycle, i.e. planning, implementation, monitoring and evaluation is necessary for developing community ownership.
 13. The social audit team shows reluctance to register common grievances such as delay in payment of wages. The social audit team is also not equipped with enough information to inform wage-seekers about actions on previously registered grievances.
 14. The social audit team also shows reluctance in issuing acknowledgement receipts of grievances raised to them. Only 14 per cent of wage-seekers, who raised their issues with the social audit team, reported having received any acknowledgement.
 15. There is not enough transparency at the GP level activities. Although a chart with the list of beneficiaries is pasted at the GP Office during the social audit, the summary of findings is not displayed.
 16. Around a quarter (25 per cent) of wage-seekers were either unaware or said that the social audit team does not facilitate Gram Sabha. Although Gram Sabha is facilitated by the social audit team, more effort is needed to mobilise wage-seekers to participate in it. Majority of the wage-seekers (62 per cent) said that they did not attend the social audit Gram Sabha.
 17. Most of the social audit Gram Sabhas are held without an independent Observer. This shows the non-commitment of administration, which results in more contestations of social audit findings by implementing agency officials during the Mandal-level hearing.
 18. In public hearings, findings and decisions are discussed only among officials and others (wage-seekers, people with grievances) present are clueless about the
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decisions made and the rationale behind such choices. As the number of findings is huge, there is pressure on the presiding officer to complete the process as fast as possible.

19. There is negligible participation of wage-seekers in Mandal-level public hearings. Eighty-two per cent of wage-seekers said that they had never participated in a Mandal-level public hearing.
20. The quality of data entered in the MIS is poor. There are cases of multiple entries, wrong entries, etc.
21. In recent years, the SAU has not conducted test audits to verify the quality of audits.
22. Despite regular conduct of social audits, the number of issues reported in the State of Telangana is not declining. MIS data reveals that even though the number of audits conducted has come down to 34 per cent in the year 2019-20 and 70 per cent in the year 2020-21 as compared to social audits conducted in the year 2018-19, there is not much difference in the total number of issues reported in these three years. In these three years, 25 per cent of issues reported are related to financial misappropriation, which is the most serious category of issues. Thirty-two per cent of wage-seekers shared that they are facing issues in MGNREGS.
23. Primary data collected from wage-seekers also shows that wage-seekers are facing various process violations and denial of rights and entitlements under MGNREGS.
24. Even after more than a decade of social audit, MIS data for FYs 2018-19 to 2020-21 shows that process violation issues have increased. This trend shows that the implementing agency has not learnt from its mistakes and the administrative monitoring of the implementation of MGNREGS in Telangana continues to be weak.
25. The Vigilance wings at the district and mandal levels face a staff crunch due to the reorganisation of districts. This coupled with the additional responsibility of Vigilance staff to monitor other government programmes such as *Palle Pragathi*

has affected the follow-up action on decisions of public hearings on social audit findings.

26. DVOs and AVOs work under the control of DRDOs and their salary is also released by DRDOs which may affect their independence and autonomy.
27. There is no effort towards strengthening Vigilance and Monitoring Committees (VMCs) at the village level.
28. SRDS Rules have been framed long back and there are some gaps. For example, these Rules have not been amended after the categorisation of issues by MoRD and after the removal of FAs in the State.
29. The actions on social audit findings are not satisfactory. As per MIS, only 06 per cent of issues identified by social audit during the FYs 2018-19 to 2020-21 have been closed. The percentage of recovery of misappropriated amount is less than 02 per cent.
30. Reviews of action taken on decisions of public hearings are not done at the district level. The practice of joint review at the State level has also become irregular.
31. SSAAT is not receiving ATRs of previous social audits from the Vigilance wing. Due to this, the social audit team is unable to verify and present ATRs of previous social audits in the Gram Sabha while facilitating social audit for the current year. Further, Vigilance wing officials are not presenting the ATRs in the public hearing at the Mandal level. As a result, 81 per cent of the wage-seekers were unaware of the action taken on the findings of social audit.

10.3 Recommendations

10.3.1 Recommendations for Strengthening SSAAT

1. Currently, SSAAT is receiving (though delayed and irregular) 0.5 per cent of the previous year's expenditure under MGNREGS in the State, which is not sufficient to meet establishment and programme costs. MoRD may consider raising the amount to 01 per cent at least for smaller and well-performing States (an

independent unit has been set up; the social audit facilitation is led by a fixed tenure employee who has completed the 30-day certification course and where the number of GPs audited in the previous year is more than 50 per cent of the GPs in the State). Telangana being a small and a high-performance State in terms of social audit, MoRD may consider allocating one per cent of MGNREGS expenditure to SSAAT.

2. Ministry should calculate the amount to be sanctioned to SSAAT (other SAUs too) based on the previous year's expenditure, including the amount due to the State in that year by deducting administrative expenditure, to specify the value on which 0.5 per cent is calculated.
3. Till then, a budget for conducting social audits in all GPs twice a year may be prepared. The gap in the funding (current and projected in future) may be covered by the State government. The State government may also consider providing one-time funding to SSAAT to build its corpus fund and interest earned from that corpus fund may be utilised for filling the gap in funding.
4. Fund releases from MoRD need to be streamlined to make it timely. The first instalment of funds may be released in April and the second instalment in October every financial year so that SSAAT can ensure timely implementation of the annual social audit action plan and also make timely payment of salaries of the social audit resource persons and other staff.
5. The Ministry should simplify the fund release requirements and transfer funds for social audit on time without any delay. The Ministry may add additional staff to ensure the timely transfer of funds.
6. The funds may be transferred directly to SSAAT rather than through the State government as this causes additional delay.
7. MoRD may provide separate funds for capacity building (especially the 30-day training for all resource persons) either directly to SSAAT or through NIRDPR.
8. From the inadmissible list, repairs and purchase of ACs, and internship/research studies by other individuals and organisations have to be removed as SSAAT and other SAUs too have no other source of funds for these purposes.

9. SSAAT has office infrastructure only at the State level. DRPs have to depend on the implementing agency officials for access to the computer to enter data into MIS which dilutes the independence of SSAAT. Similarly, records are also stored in government offices for the duration of social audit. With additional funds from MoRD and CRD, SSAAT may create regional infrastructure and also provide laptops with internet facilities to DRPs.
10. SSAAT may continue facilitating social audits of other schemes on demand. Such facilitation not only widens and popularises social audit but also reduces the monotony of resource persons and staff. However, SSAAT may insist on signing the MoUs prior to the beginning of financial year when the social audit is to be facilitated. Further budget proposed should target 25 per cent savings, which can be put into the corpus fund of SSAAT for financial sustainability.
11. A legal framework may be created for the social audit of schemes of other departments so that a broader culture of social audit can be inculcated in the State administration. Provisions of the Meghalaya Community Participation and Public Services Social Audit Act, 2017 may be looked at for this purpose.
12. Success stories of social audit as well as MGNREGS need to be identified, documented and given wide publicity to popularise social audit and take it to ground level.
13. Meetings of the Governing Board need to be held on time and regularly.
14. Resource persons have been demanding of their representation in the Governing Body. Periodic interaction between Governing Body members and SSAAT staff and resource persons may be organised. In some organisations, it is a practice of facilitating such informal/formal interactions before or after the GB meeting. Further, in training programmes, workshops or any such get-togethers of SSAAT staff and resource persons, available GB members may be invited to interact with them.
15. Decisions on genuine demands of social audit resource persons, which are under the consideration of various committees and GB of SSAAT, may be taken on a priority basis to reduce attrition and enhance their morale.

16. Accountability and performance of resource persons need to be ensured through an Employee Report Card method. This will motivate the resource persons to work with more integrity. If someone monitors these report cards and reviews it on a monthly, quarterly or yearly basis and provides feedback to resource persons, the quality of the audit will improve. A suggestive format of the report card is given below:

Name of BRP	Emp. Code	Working District	Number of Mandals audited (Drill Down Report)	No. of VRPs Selected	No. of VRPs Trained	Total MGNREGS Expenditure Audited	Total FM Amount Identified
Total Amount Ordered for Recovery	Total Amount Dropped	Total No. of Grievances Reported	Total No. of Grievances Redressed as Part of SA	Total No. of FD Issues Identified	Total No. of FD Issues Accepted		

Further, the best-performing employees may be felicitated on the occasion of Independence Day or Republic Day and given the rewards.

17. The process of designating a Grievance Redressal Officer has to be completed and rules with regard to the disposal of complaints/grievances be notified.

18. Disciplinary cases against the field-level employees should be disposed of as early as possible. Further, most repeated disciplinary cases may be identified and resource persons be sensitised on those issues so that they do not repeat it.

19. Vigilance and Monitoring Committee (VMC) at the GP level need to be activated for concurrent social audit and timely grievance redressal. This VMC may further be involved in the mobilisation of wage-seekers prior to and during the social audit process for their active participation in the social audit exercise. Regular vigilance and monitoring is necessary to curb the issue of payment to non-working persons, which constitutes more than half of the financial misappropriation cases.

10.3.2 Recommendations for Strengthening Social Audit Process in Telangana

1. It has been observed that due to inadequate number of resource persons, it is difficult to facilitate the conduct of social audits in all the GPs even once a year. Hence, more human resources need to be hired by SSAAT. The SDS is an important post at the field level which has been vacant for many years. For smooth facilitation of social audits, it is recommended to recruit SDS as soon as possible.
2. Optimal utilisation of the resource persons may also help increase social audit coverage by SSAAT. Out of the total 431 mandals social audited by SSAAT in the FY 2018 -19, 20 or more BRPs were involved in the audit of 37 mandals and 13 to 19 BRPs audited 128 Mandals. In two Mandals, the service of four DRPs was used. Similarly, in 10 Mandals 03 DRPs and in 132 Mandals two DRPs were engaged. The ideal team for a mandal is 10 to 12 BRPs and a DRP. But in the above cases, the number of resource persons used was more.
3. Poor maintenance and non-availability of records led to avoidable delays and the resultant pressure on resource persons to complete verification exercises within the stipulated time. APOs need to be made responsible and stringent action needs to be taken in the case of poor maintenance and non-provisioning of records. Further, all MRs, MBs, bills, and vouchers may be scanned and uploaded onto the MIS.
4. DRDO and Additional DRDO need to make a GP-wise quarterly inspection to check the availability and updation status of seven mandatory registers and other related records at the MPDO office.
5. Backlog of social audits poses a challenge in the collection and verification of records in time. Further verification of earthen works becomes difficult. Hence, implementing agencies and SSAAT need to scrupulously follow the action plan prepared at the beginning of the year.
6. Hiring the required number of VRPs has become a challenge due to low resource fees, insecurity among young women with regard to facilities, and

safety concerns about staying in the GP. Resource fees for VRPs may be enhanced and they may be allowed to work in adjoining GPs so that they can travel from their homes, as done during the COVID-19 pandemic. Further, the identification of VRPs may be assigned to local CSOs who can create a pool of interested youth from which hiring can be finalised during the social audit round. It should be done in a transparent manner and wide publicity of hiring needs to be ensured.

7. Training of new VRPs is not done systematically. VRPs may undergo training of trainer courses where they are exposed to using direct trainer's skills in a participatory manner. Further, VRPs must monitor the training of VRPs and see that training is carried out as per the module, training aids are used and learning material in the local language/dialect is given to participants.
8. It is felt that after the completion of the social audit round in a mandal, there is a disconnect between the SSAAT and VRPs. It is suggested to identify one Sr. VRP at the mandal level to coordinate with other VRPs in the GPs and stay in touch with SSAAT. Such regular contact with at least a VRP in each GP may enable SSAAT to continuously monitor MGNREGS works.
9. Only 43 per cent of the wage-seekers accepted public display of information in GP through wall paintings, boards, etc. The social audit team must proactively disclose information related to the implementation of MGNREGS in the GP through multiple means.
10. Although the social audit team gives information on rights and entitlements, it is not being absorbed and retained by wage-seekers. Hence, multiple mechanisms may be adopted to make wage-seekers aware of their rights and entitlements under MGNREGA. Citizen information boards (CIBs), wall writings and job cards should become the prime medium for information dissemination. Further, SSAAT may work on effective IEC strategies for awareness generation.
11. People's participation in social audit Gram Sabha and mandal public hearings needs to be enhanced through the mobilisation of wage-seekers. It has been found that wage-seekers were unaware of their issues being reported through

the social audit process. Communicating this message helps in developing people's trust in the social audit process, thereby increasing their participation. A summary of findings of the current social audit may also be displayed in charts at public places in the GP prior to the Gram Sabha. During door-to-door verification, resource persons must inform wage-seekers' families about the date, time, venue and agenda of the Gram Sabha meeting and Mandal-level public hearing, and request them to participate.

12. DRP must ensure that all BRPs carry along with them grievance register and they register and issue receipts even though the grievances may seem to be generic/minor in nature. A large percentage of wage-seekers, who register their grievances with the social audit team, have little clue of its status. Hence, the social audit team should have updated information on actions on grievances of the last two rounds of audits.
13. If required, the duration of social audit process may be increased with half a day dedicated to community mobilisation through rallies, sloganeering, wall writings, pasting posters and cultural programmes for awareness and mobilisation of the community.
14. For standardisation of verification of technical aspects of works, a standard pictorial technical manual with detailed methodology of verification for social audit resource persons may be brought out. Regular updation of this manual and refresher training to resource persons may be done whenever new works are included in the list of permitted works under MGNREGS.
15. During the verification of works, JE or TA must remain present. This not only helps in seeking their explanation but also leads to lesser contestation of facts emerging out of verification by the social audit team. Similarly, in case of re-verification of works, along with the government team, the social audit team and Vigilance wing representatives may also be present so that the social audit team can seek clarifications, if required. Such an arrangement is likely to build mutual trust and confidence.

16. An official from a mandal other than where the GP is located may be deputed as an independent observer to the social audit Gram Sabha. Stringent disciplinary action may be taken if an independent observer fails to attend the Gram Sabha. As many of these Gram Sabha are held on Sundays or public holidays, the provision of a compensatory leave may be considered by administration to incentivise independent observer's attendance.
17. To strengthen the vigilance system, a civil engineer and an auditor at the State/ district level may be inducted and vigilance staff may be trained on social audit and its MIS.
18. DVO/AVO, who are retired officials, may be brought out of the **control of** DRDO and their salary may be released directly by the CVO and not by DRDO.
19. SRDS Rules need to be reviewed and updated to address recent changes, including MoRD categorisation of issues and removal of Field Assistants (FA).
20. Social audit resource persons are unaware of the reasons for dropping social audit paras. The earlier practice of joint reviews of action taken at the State level with the participation of CRD, Vigilance wing and SSAAT need to be reinstated and made regular. Further, such periodic joint reviews may also be organised at the district and mandal levels. ATR Review Committee model of Jharkhand may be studied for adaptation and adoption if that suits.
21. Stringent follow-up mechanisms need to be ensured so that the social audit process does not become redundant.
22. More frequent and better interactions between SSAAT and senior officials of the State government is needed to enable sharing of information and findings of the social audit so that changes can be made at the policy and implementation levels.
23. The practice of DRDO or Additional DRDO presiding over the social audit public hearings at the mandal level needs to be revisited as implementing agency officials have a soft corner for their subordinates and it is felt even by social audit resource persons that some issues/paras get dropped without giving satisfactory reasons. Instead, district-level officials from another department,

not junior to the DRDO, may be trained in SRDS Rules and social audit, and may be deputed to preside over public hearings. DRDO/Additional DRDO may attend and sign the ATR after public hearings. The jury system of Jharkhand may also be examined for adoption, if it suits.

24. Implementing agency officials and ERs of GPs may be oriented on the social audit process and sensitised about their roles and responsibilities. Further, they also need to be oriented on the punitive actions in the case of non-cooperation such as not making records available to the social audit team, not showing worksites, not providing logistics support, etc.
 25. Apart from punishing officials who are found to be violating procedures or misappropriating funds, well-performing officials of GPs and mandals or those adopting innovative good practices, as reported by the social audit team, may be rewarded through appreciation letters or recognition at the State level. Such appreciation and recognition will motivate those officials and ERs and will have a rub-off effect on their counterparts in other mandals and GPs too. Further, it will also create a positive image of social audit, which is currently perceived by officials and ERs of implementing agencies only as a fault-finding exercise.
 26. Participation of wage-seekers in the preparation of labour budget and identification of shelf of the project under MGNREGA need to be encouraged. Currently, almost three-fourths of wage-seekers are not participating in planning Gram Sabha. Active involvement at the planning stage may inculcate ownership and is also likely to enhance wage-seekers' participation in the execution of works (working and monitoring) and evaluation, i.e. social audit of these works. Hence, the social audit team should also orient and motivate wage-seekers to participate in planning.
 27. Non-payment of wages and delayed payment of wages remain the foremost grievances of wage-seekers. Satisfactory redressal of these grievances is necessary to sustain wage-seeker's attraction to this scheme. The social audit team should not shy away from registering these grievances and facilitating timely redressal.
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APPENDIX-I

QUESTIONNAIRE FOR MGNREGA WORKER

I. Basic Information

1. District Name
2. Mandal Name
3. Gram Panchayat Name
4. Village/Hamlet Name
5. Name of the respondent
6. Name of Father/Husband
7. Age (Yrs.)
8. Education Qualifications
 - *Illiterate*
 - *Primary (1 to 4th Std.)*
 - *Middle School (5 to 7th Std.)*
 - *High School (8 and 10th Std.)*
 - *Pre-University (11 to 12th Std.)*
 - Graduate
 - Post-Graduate and above
9. Social Category
 - *SC*
 - *ST*
 - *OBC*
 - *Minority*
 - *General*

10. Gender

- *Male*
- *Female*
- *Other*

11. Family Size details

11. a) Total Family size (In Numbers)

11. b) Adult Male

11. c) Adult Female

11. d) Children

12. Annual Household Income (Rs.)

(Hint: Investigator has to calculate the income from individual adults in the family per year & add everyone's income to arrive at the Annual Household Income)

13. Primary occupation of household

Farmer-1; Agriculture Labourer -2; Non-Ag. Labour -3; Artisan -4; Business -5; Other-6.

13. (a) If other occupations mention

14. Contact number

II. MGNREGA scheme-related questions

15. Do you have your Job card with you at present?

(hint: if the job card is in their possession but not with them at present, then request them to bring the job card to this interview)

- Yes
 - No
-

15. a) Job card number (Will be shown If “Yes” is selected to Q. 15)

15. b) If No, Please provide a reason why the job card is not in your possession.

(Will be shown If “No” is selected to Q. 15)

(Hint: Choose one)

- Job card not provided to the worker
- Job card is in the possession of Mate
- Job card is in the possession of GP Official (GRS/Secretary) or Sarpanch
- Job card is in the possession of a different member of the household
- Job card is Lost / Misplaced
- Any other Reason

15. b.1) Mention if you have any other reason for not having a job card with you.

15. c) If the Job card is available with the wage-seeker, whether the job card is updated? (Will be shown If “Yes” is selected to Q. 15)

(Hint: Investigators have to look at the job card to see if it is updated by comparing it with data given by IA/MIS)

- Yes
- No

16. Select the year being considered in which the household has worked under MGNREGA.

(Hint: even though the household has worked during different years, select only the year that is being considered for the study)

- Before 2018-19
- 2018-19
- 2019-20
- 2020-21
- Household didn't work in any year

16. a) What is the total number of days the household has worked in the selected year?

(Hint: to be entered based on the details mentioned in the Job card)

16. b) What is the total wages earned by the household in the selected year?

(Hint: to be entered based on the details mentioned in Job card)

17. What is the process through which you apply for or through which you are allocated work under MGNREGA?

Apply for work with demand form and are given a dated receipt

Apply for work with demand form but not given a dated receipt

Work is allotted to us by implementation officials

Applied for work following other methods

17. a) If other methods, describe how you applied for work. (Hint: Briefly how the respondent is going about applying for work)

18. Are you able to get work when you need it?

- Yes
- No

19. Is information related to MGNREGA implementation being displayed publicly in your GP through wall paintings/ boards, etc.?

- Yes
- No
- Don't know

20. Which of the following violations of the scheme guidelines did you notice in your GP?

(Hint: Respondent can choose more than one response)

- Shelf of project prepared without holding Gram Sabha
- Involvement of contractors in the implementation of MGNREGA works.

- Use of machines to carry out MGNREGA works where it is not allowed.
- People receiving wages without working.
- People receiving wages for more days than what they worked for.
- Any other violation.

20. a) Mention any other violations of the scheme guidelines you have noticed in your GP.

21. Have you participated in the Labor budget planning by attending Gram Sabha to decide the Shelf of projects?

- Yes
- No

21. a) If No, mention the reason for not participating in the labour budget planning (Gram Sabha).

22. Whether any community works were done in the GP under MGNREGA?

(Hint: Question not to be asked to the respondent but should be filled in advance based on the list of works undertaken in the GP by investigators)

- Yes
- No

22. a) If community works were done in the GP, How would the respondent rate the quality of these community works undertaken in MGNREGA?

(hint: Read out from the list of recently completed community works as examples)

- Very Poor
- Poor
- Okay/Satisfactory
- Good
- Very Good

22. b) If community works were done in the GP, Does the respondent find the public assets constructed under MGNREGA in her/his GP to be useful?

(Hint: Read out from the list of public assets as examples - to be provided to field investigators to refer to)

- Yes
- No
- Can't say

23. Have you faced any issues in MGNREGA?

- Yes
- No

23. a) Which of the following issues have you faced in MGNREGA? *(Hint: Respondent Can choose multiple options)*

- Job card not issued
 - Job card not issued in time (7 days)
 - Employment was not provided on demand
 - Non-provision of Unemployment Allowance
 - Non-provision of Travel Allowance was for work provided beyond 5km from the village
 - Non-provision of worksite facilities
 - Issues related to Ex-gratia payment
 - Issues related to Medical treatment
 - Non-payment of wages
 - Delayed payment of wages (within 15 days)
 - Did not receive full wages (as per the entitlement)
 - No compensation provided for delayed payment of wages
 - Problem accessing wages because of payment agency (bank/ P.O/etc.)
 - Any Other issue
-

23. a.1) Mention any other issue faced by you in MGNREGA.

23. b) If You had an issue in MGNREGA where did you raise it?

(Hint: The respondent can choose more than one answer except when they select didn't raise my issue anywhere as I was unaware of where to raise or whom to contact)

- Didn't raise my issue anywhere as I was unaware of where to raise it or whom to contact
- Raised my issue with Mate
- Raised my issue with GP officials (GRS/Secretary/President)
- Raised my issue with Sarpanch or other elected representative
- Raised my issue with Block officials
- Raised my issue with District Officials
- Raised my issue with the Social Audit team

The following questions will not be asked to people who mentioned in Q.23.b that either

- They didn't raise their issue anywhere as they were unaware of where to raise or whom to contact
- They have raised their issue with the social audit team and as it will be registered in DTF, these questions will be captured in section III)

23. b.1) Did you get a receipt of acknowledgement for submitting the grievance?

- Yes
- No

23.b.2) Was any action taken on the grievance submitted by you?

- Yes
- No
- Don't know

23. b 2.1) If yes, What action was taken on the grievance submitted by you?

23. b 2.2) If yes, how did you find out about what action was taken on the grievance?

23. b 2.3) If yes, What is the approximate time period (days) in which the action was taken? (Hint: Mention the time period taken in the number of days. For example, a year would be 365 days)

23. b 2.4) If yes, are you satisfied with the action taken on the grievance registered by you?

- Yes
- No

23. b 2.4.1) If not satisfied with the action taken, what is the reason for your dissatisfaction?

23. b.3) Mention if you have any suggestions for effective grievance redressal.

(Hint: Write "No suggestions" or just skip to the next question if the respondent has no suggestion to give)

III. Additional questions for persons who have submitted grievance (w.r.t. DTF)

DTF. According to the Decision Taken Format whether this person has registered a grievance during the social audit process?

(Hint: Investigator has to refer to the DTF & enter the answer by himself/herself. No need to ask this question to the respondent)

- Yes
- No

Follow-up questions if grievance registered as per DTF

DTF.1 Details of the registered grievance

(Hint: Details to be filled up based on the DTF and not to be asked from the respondent)

DTF.2 Details of the action taken on the grievance

(Hint: Details to be filled up based on the DTF and not to be asked from the respondent)

DTF.3 Did you submit this grievance?

- Yes
- No
- I don't remember submitting this grievance

DTF.3. a) If yes, did you get a receipt of acknowledgement for submitting the grievance?

- Yes
- No

DTF.4 Was any action taken on the grievance submitted by you?

- Yes
- No
- Don't know

DTF4. a) If yes, What action was taken?

DTF4. b) If yes, how did you find out about what action was taken on the grievance?

DTF4. c) If yes, within what time period (days) the action was taken? (Hint: Mention the time period taken in the number of days. For example, a year would be 365 days)

DTF4. d) If yes, are you satisfied with the action taken on the grievance registered by you?

- Yes
- No

DTF4. d.1) If not satisfied with the action taken, what is the reason for your dissatisfaction?

DTF5. Mention if you have any suggestions for effective grievance redressal.

(Hint: Write "No suggestions" or just skip to the next question if the respondent has no suggestion to give)

IV. Questions on Social Audit Process

24. Do you know about Social Audits?

(Hint: The investigator has to cross-question the respondent keeping in mind the different steps/ aspects of the Social Audit process to find out that the respondent really knows about social audit & is not confusing the social audit team with other Implementing officers visiting them from time to time)

- Yes
- No

24. (a) If the respondent knows about social audit, which of the following stages is he or she aware of?

(Hint: respondent can choose one or more than one option)

- Campaigning/Public announcement before the social audit process in GP
- Ward Sabha with the local wage-seekers
- FGDs with wage-seekers
- Door-to-door verification
- Worksite Verification
- Social Audit Gram Sabha
- Mandal-level Social Audit Public Hearing
- Social Audit at the GP level

25. If the respondent knows about social audits, whether he/she recalls social audits being facilitated in his/her Gram Panchayat?

(Will be linked to "Yes" response to the question "Do you know about SA" in App)

- Yes, the person recalls social audits taking place in his/her Gram Panchayat.
- No, the person has no memory of social audits taking place in his/her Gram Panchayat ever.

25.1 If the respondent recalls social audits taking place in his/her Gram Panchayat, which social audit period he remembers/recalls? (Hint: Respondent can choose multiple options) (Linked to "Yes" response to Q.25)

- a. May 2021- June 2021 (CSA-No Ward Sabha, No Gram Sabha & No Door-to-door verification was done)
- b. December 2020- April 2021 (RSA)
- c. April 2020-Nov 2020 (CSA -Few ward sabhas here and there, No Gram Sabha but Door-to-door verification was done)
- d. 2019-20 (RSA before lockdown)
- e. Recalls social audit taking place once a year in his/her GP for the past 2-3 years before 19-20 (RSA)
- f. Recalls social audit taking place once a year in his/her GP for the past 3-5 years before 19-20 (RSA)
- g. Recalls social audit taking place once a year in his/her GP for the past more than 5 years before 19-20 (RSA)

The following set of questions will be shown only if the respondent recalls from any RSA period listed as options in Q.25.1 (Linked to response to Q.25.1 (b,d,e,f,g))

Social Audit Process @ GP Level

25.2 Did the Social audit team members conduct any public rally/ward sabha/ FGD before conducting the social audit in your Gram Panchayat?

- Yes
- No
- Don't Remember

26. Did the social audit team members carry out door-to-door verification with MGNREGA workers in your GP?

- Yes
- No
- Don't know

27. Did the social audit team contact you during the social audit process?

- Yes
- No, but Contacted a family member in my absence
- No
- Don't remember

27. a) If Yes, where did the social audit team meet you?

- At my house
- At worksite
- In a public place as a part of a group
- Met me individually but at another place

27. b) If the social audit team did contact you during the social audit process, did they introduce themselves by explaining who they are & why they are contacting you?

(This question will be linked to Q.27 & will be only displayed if they replied with either "Yes" or "No but contacted a family member in my absence")

- Yes
 - No
 - Don't remember
 - Don't know as they contacted a family member in my absence
-

28. Did a social audit resource person check the days worked & wages earned with the official records (document verification)? (will be linked to "Yes" response to Q.27 i.e. if the Social audit team contacted the respondent during the SA process in his/her GP)

- Yes
- No
- Don't remember
- Not Applicable - as the wage-seeker did not have a job card with him/her

29. Did the Social audit team ask you and or other wage-seekers what issues or grievances you have in MGNREGA & recorded it during their visit/social audit process?

- Yes
- No
- Don't know/Don't remember

30. Did the social audit team visit the MGNREGA worksites during the social audit process in your Gram Panchayat?

- Yes
- No
- Don't know

30. a) During the visit to the worksite which of the following things did the social audit team look at /verify? (linked to "Yes" response to Q.30)

(Hint: multiple options can be selected)

- Measurement of works/Assets
- Quality of works/Assets
- Worksite facilities for MGNREGA workers (Drinking water, Shelter, Ayah, Medical kit & Worksite board)
- They did not verify or evaluate any of the above
- Don't remember

30. b) During the visit to the worksite, which type of MGNREGA works the social audit team verified? (linked to "Yes" response to Q.30)

- Ongoing MGNREGA works
- Completed MGNREGA works
- Both ongoing & completed MGNREGA works
- Don't know/ Don't remember

31. After the door-to-door verification & worksite verification, did the Social Audit team facilitate the Social Audit Gram Sabha in your Gram Panchayat?

- Yes
- No
- Don't know/ Don't remember

32. Have you participated in any Social Audit Gram Sabha?

- Yes
- No

32. a) If No, Mention the reasons for not participating in Social Audit Gram Sabha

(Hint: One can choose multiple answers for this question)

- Didn't get any information about Social Audit Gram Sabha.
- I feel they are of no use to me
- Too busy to attend SA gram sabha (interferes with paid/unpaid work)
- I am a woman so only men in my family attend Gram Sabhas
- Venue of the Social Audit Gram Sabha was far away
- Timing of the Social Audit Gram Sabha was not convenient for me
- Other reason

32. a.1) Mention what other reason the respondent has for not attending the social audit gram sabha held in his/her Gram panchayat.

33. Whether the actions taken on the basis of previous year's social audit findings were read out in the social audit gram sabha?

- Yes
- No
- Don't know/Don't remember

34. Did the social audit gram sabha provide you or others with an opportunity to question officials / PRI representatives (accountability)?

- Yes
- No
- Don't know/Don't remember

35. Did the social audit gram sabha provide you or others with an opportunity to sort out your grievances (grievance redressal)?

(Hint: here investigator should be mindful of the difference between grievance registration and redressal)

- Yes
- No
- Don't know/Don't remember

36. Did the social audit team members present the issues/grievances of people related to MGNREGA and other findings in the social audit gram sabha?

- Yes
- No
- Don't know/Don't remember

37. Whether post gram sabha the social audit findings were displayed in a public place in your GP?

- Yes
- No
- Don't know

38. Are you aware of the action taken based on the findings of a previously held social audit in your Gram Panchayat? (Hint: If you are seeing this question after Q.32, the respondent has mentioned that he/she has not participated in SA Gram Sabha)

- Yes
- No

38. a) If Yes, How did you find out about the action taken based on the findings of the social audit previously held in your Gram Panchayat?

38. b) If Yes, How satisfied are you with the action taken based on the findings of the previous social Audit held in your Gram Panchayat?

- Very Satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very Dissatisfied

39. Mention if you have any suggestions to improve the social audit process in your Gram Panchayat.

40. Should social audits be done for other schemes in your village?

(Not linked to if they recall Social Audit taking place in their GP or not but linked to Q.24. do they know about social audits or not)

(Hint: Field investigators may share names of schemes one by one, if respondents are unable to recall schemes. Then ask whether a social audit is needed in those schemes)

- Yes
- No

40. a) If Yes, In what other schemes does the respondent feel social audit should be conducted in his/her Gram panchayat?

Social Audit at Mandal Level

(Will be linked to "Yes" response of Q.24 i.e. if they know about social audit then these questions will be displayed)

41. Whether Mandal level social audit Jan Sunwai happen in your Mandal?

(Hint to Investigators: If you are seeing these questions after Question number 25, don't worry as the respondent has mentioned that "he/she has no memory of social audits taking place in his/her Gram Panchayat ever" hence questions related to social audit process at GP level have been skipped automatically.)

- Yes
- No
- Don't know

42. Have you participated in any Mandal level Social Audit Jan Sunwai?

(linked to "Yes" response to Q.41)

- Yes
- No

42 a. If yes, what kind of cost did you have to incur to participate in the block-level public hearing. *(Hint - investigators should enquire about the cost of travelling to the venue and back. As well as the cost incurred by losing a day's wages plus any other cost; for example, in case more than one person travelled to attend the mandal level public hearing)*

42. b) If No, Mention the reasons for not participating in Mandal level Social Audit Jan Sunwai.

(Hint: One can choose multiple answers for this question)

- Didn't get any information about Mandal-level Social Audit Jan Sunwai.
- I feel they are of no use to me.
- I was busy with my work
- It was held at a distant place.

- The timing was not convenient
- Too expensive (travel to and from, losing a day's work for example)
- I am a woman so only men in my family attend such things.
- Other reason

42. b.1) Mention what other reason the respondent has for not attending the Mandal level jan sunwai.

End of the set of questions which will be shown if the respondent recalls from any RSA period listed as options in Q.25.1

The following set of questions will be shown only if the respondent recalls from the CSA period between May 2021-June 2021 (Linked to response to Q.25.1 (a))

Social Audit Process @ GP Level

(CSA2) 26. Did the social audit team contact you during the social audit process?

- Yes
- No, but Contacted a family member in my absence
- No
- Don't remember

(CSA2) 26. a) If Yes, where did the social audit team meet you?

- At my house
- At worksite
- In a public place as a part of a group
- Met me individually but at another place

(CSA2) 26. b) If the social audit team did contact you during the social audit process, did they introduce themselves by explaining who they are & why they are contacting you?

(This question will be linked to Q.(CSA2) 26 & will be only displayed if they

replied with either “Yes” or “No but contacted a family member in my absence”)

- Yes
- No
- Don’t remember
- Don’t know as they contacted a family member in my absence

(CSA2) 26. c) If the social audit team contacted you during the social audit process, did they give you information about your rights & entitlements under the MGNREGA scheme?

- Yes
- No
- Don’t know/ Don’t remember

(CSA2) 27. Did a social audit resource person check the days worked & wages earned with the official records (document verification)? (will be linked to “Yes” response to (CSA2) Q.26 i.e. if the Social audit team contacted the respondent during the SA process in his/her GP)

- Yes
- No
- Don’t remember
- Not Applicable - as the wage-seeker did not have a job card with him/her

(CSA2) 28. Did the Social audit team ask you and or other wage-seekers what issues or grievances you have in MGNREGA & recorded it during their visit/social audit process?

- Yes
- No
- Don’t know/ Don’t remember

(CSA2) 29. Did the social audit team visit the MGNREGA worksites during the social audit process in your Gram Panchayat?

- Yes
- No
- Don't know

(CSA2) 29. a) During the visit to the worksite which of the following things did the social audit team look at /verify? (linked to "Yes" response to Q.29)

(Hint: multiple options can be selected)

- Measurement of works/Assets
- Quality of works/Assets
- Worksite facilities for MGNREGA workers (Drinking water, Shelter, Ayah, Medical kit & Worksite board)
- They did not verify or evaluate any of the above
- Don't remember

(CSA2) 29. b) During the visit to the worksite, which type of MGNREGA works the social audit team verified? (linked to "Yes" response to Q.29)

- Ongoing MGNREGA works
- Completed MGNREGA works
- Both ongoing & completed MGNREGA works
- Don't know/ Don't remember

(CSA2) 30. Are you aware of the findings that came out of the social audit process held in your GP?

- Yes
- No

(CSA2) 30. a) If yes, how did you find out about these social audit findings?

(CSA2) 31. Are you aware of the action taken based on the findings of previously held social audit in your Gram Panchayat?

- Yes
 - No
-

(CSA2) 31. a) If Yes, How did you find out about the action taken based on the findings of social Audit previously held in your Gram Panchayat?

(CSA2) 31. b) If Yes, How satisfied are you with the action taken based on the findings of the previous social Audit held in your Gram Panchayat?

- Very Satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very Dissatisfied

(CSA2) 32. Mention if you have any suggestions to improve the concurrent social audit process in your Gram Panchayat.

End of a set of questions which will be shown only if the respondent recalls from the CSA period between May 2021-June 2021

The following set of questions will be shown only if the respondent recalls from the CSA period between April 2020-November 2020 (Linked to response to Q.25.1 (c))

Social Audit Process @ GP Level

(CSA1) 26. Did the social audit team members conduct ward sabha meetings with people before facilitating the social audit process in your GP?

- Yes
- No
- Don't know

(CSA1) 27. Did the social audit team members carry out door-to-door verification with MGNREGA workers in your GP?

- Yes
- No
- Don't know

(CSA1) 28. Did the social audit team contact you during the social audit process?

- Yes
- No, but Contacted a family member in my absence
- No
- Don't remember

(CSA1) 28. a) If Yes, where did the social audit team meet you?

- At my house
- At worksite
- In a public place as a part of a group
- Met me individually but at another place

(CSA1) 28. b) If the social audit team did contact you during the social audit process, did they introduce themselves by explaining who they are & why they are contacting you?

(This question will be linked to Q.(CSA1) 28 & will be only displayed if they replied with either "Yes" or "No but contacted a family member in my absence")

- Yes
- No
- Don't remember
- Don't know as they contacted a family member in my absence

(CSA1) 28. c) If the social audit team contacted you during the social audit process, did they give you information about your rights & entitlements under the MGNREGA scheme?

- Yes
- No
- Don't know/ Don't remember

(CSA1) 29. Did a social audit resource person check the days worked & wages earned with the official records (document verification)? (will be linked to "Yes" response to (CSA1) Q.28 i.e. if the Social audit team contacted the respondent during the SA process in his/her GP)

- Yes
- No
- Don't remember
- Not Applicable - as the wage-seeker did not have a job card with him/her

(CSA1) 30. Did the Social audit team ask you and or other wage-seekers what issues or grievances you have in MGNREGA & recorded it during their visit/social audit process?

- Yes
- No
- Don't know/ Don't remember

(CSA1) 31. Did the social audit team visit the MGNREGA worksites during the social audit process in your Gram Panchayat?

- Yes
- No
- Don't know

(CSA1) 31. a) During the visit to the worksite which of the following things did the social audit team look at /verify? (linked to "Yes" response to Q. (CSA1) 31)

(Hint: multiple options can be selected)

- Measurement of works/Assets
- Quality of works/Assets
- Worksite facilities for MGNREGA workers (Drinking water, Shelter, Ayah, Medical kit & Worksite board)
- They did not verify or evaluate any of the above
- Don't remember

(CSA1) 31. b) During the visit to the worksite, which type of MGNREGA works the social audit team verified? (linked to "Yes" response to Q. (CSA1) 31)

- Ongoing MGNREGA works
- Completed MGNREGA works
- Both ongoing & completed MGNREGA works
- Don't know/ Don't remember

(CSA1) 32. Are you aware of the findings that came out of the social audit process held in your GP?

- Yes
- No

(CSA1) 32. a) If yes, how did you find out about these social audit findings?

(CSA1) 33. Are you aware of the action taken based on the findings of previously held social audit in your Gram Panchayat?

- Yes
- No

(CSA1) 33. a) If Yes, How did you find out about the action taken based on the findings of social audit previously held in your Gram Panchayat?

(CSA1) 33. b) If Yes, How satisfied are you with the action taken based on the findings of the previous social audit held in your Gram Panchayat?

- Very Satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very Dissatisfied

(CSA1) 34. Mention if you have any suggestions to improve the concurrent social audit process in your Gram Panchayat.

End of a set of questions which will be shown only if the respondent recalls from the CSA period between April 2020-November 2020

Irrespective of the social audit period the respondent recalls- the following questions will be asked

43. Which social audit format do you prefer?

(Hint: The investigator has to describe the difference between RSA & CSA if the respondent does not know about it)

- Concurrent Social Audit (No SA Gram Sabha, Ongoing works verification)
- Regular Social Audit (SA Gram Sabha, Completed works verification)
- Combination of both RSA & CSA
- Can't Say

43.1 What is the reason for your preference for a particular social audit format?
(will be shown if they choose only one among the RSA or CSA Q.43)

V. Perceived Impact of Social Audit

44. Which of the following features/rights/entitlements under MGNREGA are you aware of?

(Hint - read out every option, multiple options can be selected)

- Anyone above the age of 18 years residing in a rural area & willing to do unskilled work is eligible to get a job card.
- When the job card is not provided within 7 days of application the wage-seeker can register a complaint.
- Every job card is entitled to 100 days of unskilled work per year.
- If demanded employment is not provided within 15 days, the applicant is entitled to an unemployment allowance.
- Gram Sabha plans and prepares the list of work from the permissible works list & it also prioritises the sequence of execution of work from the list.
- If the work is provided beyond 5 km, a travel allowance of 10 per cent of the wage needs to be paid.
- Right to Worksite Facilities.

- Right to receive wages within 15 days.
- Right to Compensation for delay in wage payment (within 15 days of doing work).
- Right to time-bound redressal of grievances (within 7 days of complaining at the Block level & 15 days of complaining at the District level).
- Right to conduct Concurrent Social Audit and Social Audit.
- Daily wage under MGNREGA in Telangana is Rs.237 (FY 20-21) / Rs.245 (FY 21-22).
- Information on how wage is calculated.

44. a) How did you find out about these entitlements/benefits available under MGNREGA?

(Hint - Multiple options can be selected)

- Through the experience of working in MGNREGA
- Through the social audit team during door-to-door verification
- Through Ward Sabha/FGDs by the social audit team
- Through Social Audit Gram Sabha
- Through Gram Panchayat officials
- By looking at wall paintings in public places
- Through other residents of the GP
- Through the MIS/ MGNREGA website
- Through looking at the documents available at the GP office
- Any other

44. a.1) Mention the other source of information through which you found out about the features/rights/entitlement under MGNREGA.

45. Is there a positive impact due to social audit?

(Will be linked to Q.24 i.e. whether they know about social audit or not? Will

show up only if they know about social audit)

- Yes
- No
- Can't Say

45. a) If yes, which of the following positive impacts the social audit has?

(Hint: The respondent can choose multiple answers to this question)

- Helps redress grievances
- Helps reduce corruption
- Improves quality of MGNREGS implementation
- Empowers people
- Any other positive impact

45. a.1) Mention any other positive impact that the respondent thinks the social audit has

46. Are you willing to participate in the social audit process in the future?

(Hint: If the respondent doesn't know about the social audit or has not participated previously in the process, the investigator has to explain about the social audit & ask whether the respondent is willing to participate at least in the future?)

- Yes
- No

46. a) Mention the reason, If the respondent is not willing to participate in the social audit process in the future.

47. The field investigator can mention his/her comments or any observations noticed below.

48. Take a photo of your Interaction with the respondent.

APPENDIX-II**FGD GUIDE FOR FGD WITH GP RESIDENTS****(Participants: Maximum of 12-15 people)**

1. Status of implementation of MGNREGA in the GP?
 2. What are the current MGNREGA implementation challenges and have these existed for more than the past 2 years? If yes, have these issues been raised through the SA process? If not have they been raised through any other platform?
 3. Is there an awareness of the social audit process? How did they find out about it? What do they understand of the SA process i.e. what happened last time there was an SA (record verification/ wall paintings/ ward meetings/mobilisation for gram sabha/ public hearing/ worksite verification, grievance collection – which of these processes do people identify themselves and emphasize)
 4. How many social audits can they recall as having happened in the village over the last several years (get a sense of whether it is seen as a regular, annual occurrence)
 5. When did the social audit last happen? Was there a gram sabha – and did any of them attend? If yes
 6. How does attendance at SA gram sabhas compare with that of regular gram sabhas (are gram sabhas held regularly)? Has anyone attended block-level public hearings as a part of the SA process?
 7. During COVID time, did the Social audit team visit the village? What did they do on this visit? Was it useful (feedback on concurrent audit - whether this would be a useful process were it to happen on a more regular basis)
 8. If there is a clear recall of the last social audit, then feedback on the quality of SA, grievances and expectations from the process?
-

9. Usefulness of social audit? How can the process be improved? Has the social audit had an impact on any of the following – awareness of MGNREGA entitlements, processes/ corruption/ government responsiveness (leave open-ended – don't prompt with answers)
10. What changes would they like to see come about in MGNREGA implementation? Have you seen any of the large issues being raised/ addressed through social audit? Examples of cases?
11. From the SA reports, point out issues which have been flagged and get a sense of people's reactions to these issues - were they significant issues and have they been sorted out? Do they remember when these issues were identified - was there a discussion vis-a-vis these issues in GS meetings? Do they think a different kind of action would have been preferable (we could choose issues/ cases which are relevant for the community as a whole)

APPENDIX-III**FGD GUIDE FOR FGD WITH IMPLEMENTING AGENCY
OFFICIALS**

(Participants: Panchayat President, Panchayat Secretary, MPDO, TA, JE/AE, APO, AO)

1. General impressions of the social audit process - is there a value in it? What do they understand about it? What is the purpose behind it and is this purpose achieved?
 2. Have they undergone some kind of orientation - if so when and who carried this out?
 3. How do they see their roles and responsibilities with regard to MGNREGA implementation and SA facilitation? What is the nature of interaction with the Social audit team, participation in the gram sabhas and block hearings?
 4. Comparison of SA gram sabhas with regular gram sabhas – their opinion on people's participation and other platforms for participation. Is there participation in the planning of works for example?
 5. Do they have any grievances about the SA process or the Social audit teams who have facilitated social audits in the relevant GP?
 6. Is it a fair process? Is it seen as a fault-finding process or does it help to make corrections in the implementation of MGNREGA?
 7. Status of MGNREGA implementation in the GP - what do they identify as key problems and what is the process towards corrective action? Do they see SA playing a role in this?
 8. What do they identify as useful works under MGNREGA?
 9. Should the social audit process continue? Should it be altered - scope changed/ increased or limited?
-

10. Question about concurrent audit - the value of the process, what the focus of concurrent audits should be
11. Take them through issues and DTFs from the last 3-4 rounds of social audit to get a sense of what action has been taken so far

APPENDIX- IV**CURRENT COMPOSITION OF THE GOVERNING BOARD OF
SSAAT TELANGANA**

Sl. No.	Name	Designation
1	Shri VM Manohar Prasad, IAS (Retd.) Director, Centre for Development Research, Hyderabad	Chairperson
2	Sri Sandeep Kumar Sultania, IAS Secretary to Government PR&RD Dept.	Member/Secretary
3	Sri S.M. Vijayanand, IAS (Retd.) Ex-Chief Secretary, Government of Kerala	Member
4	Ms Aruna Roy, Former IAS officer Founder Member, MKSS, Rajasthan	Member
5	Shri Trilochan Sastry Professor, IIM, Bangalore	Member
6	Shri Nikhil Dey Founder Member, MKSS, Rajasthan	Member
7	Shri S. Jeevan Kumar State President of Human Rights Forum, Hyderabad	Member
8	Late Shri Charles Wesley Meesa Telangana Rastra Swachanda Samstah Samakhya, Hyderabad	Member (Vacant)
9	Dr. Mihir Shah Ex-member, Planning Commission	Member
10	Ms. Sudha Ranjan, IA&AS, Principal Accountant General, (G&SSA)	Member
11	Sri Harsh Mander Former member, NAC, New Delhi	Member
12	Karuna Vakati, IAS Commissioner, Public Health and Family Welfare, Telangana	Member
13	Ms. Sowmya Kidambi Director, SSAAT	Member Convener

APPENDIX-V**CURRENT COMPOSITION OF THE EXECUTIVE COMMITTEE OF
SSAAT TELANGANA**

Sl. No.	Name	Designation
1	Principal Secretary to Government, PR&RD	Member
2	Shri VM Manohar Prasad, IAS (Retd.) Director, Centre for Development Research, Hyderabad	Member
3	Sri S.M. Vijayanand, IAS (Retd.) Ex-Chief Secretary, Government of Kerala	Member
4	Late Shri Charles Wesley Meesa Telangana Rastra Swachanda Samstah Samakhya, Hyderabad	Member (Vacant)
5	Ms. Sowmya Kidambi Director, SSAAT	Member Convener

APPENDIX-VI

YEAR-WISE COVERAGE OF OTHER SCHEMES SOCIAL AUDITED BY SSAAT TELANGANA

Social Audit of AWCs in Telangana	1794 AWCs	570 AWCs	
Social audit of selected AWCs in Wanaparthy	178 AWCs		
SA on schemes sanctioned to SC beneficiaries	2391 units		
ODF verification in ODF-declared villages	84081 HHs		
ODF verification in ODF declared villages I-IV; V-VII	1008028 HHs	474638 HHs	
ODF verification in ODF declared villages-VII		279579 target	
SA of MDM in 10 districts of Telangana	60 schools		
Growth monitoring of data validation process in selected AWCs		557 AWCs	
Verification of beneficiaries under milch animals scheme in Mahabubnagar district		3019 beneficiaries	
Sustainability verification (2nd level) in ODF-declared villages of Siddipet district		179812 target HHs	
Sustainability verification (2nd level) in ODF-declared villages of Telangana State		1405965 HHs covering 21 districts of Telangana	
Social Audit of ICPS	2 Pilot audits		
Social Audit of START-UP VILLAGE ENTREPRENEURSHIP PROGRAM (SEVP) entrusted by SERP			1620 SVEPs
Social Audit of Neighbourhood Centers entrusted by SERP			75 NHCs
Concurrent Social Audit of KALYANA LAXMI / SHADI MUBARAK SCHEME, Mahabubabad District			Concurrent Social Audit of Kalyana Laxmi / Shadi Mubarak Scheme verification of 200 beneficiaries

Appendix-VII

Category and Sub-Category-wise List of Issues in Social Audit Module of MGNREGA MIS

Category: FM - Financial Misappropriation		
Sub Type	Specific Issue Description	
Payment to person who did not work	Amount misappropriated by individuals through fake entries	
	Payment was made but no work was done	
	Payment to person who did not work	
	Payment to a non-existent person	
	Payment to migrated person	
	Payment to person (mate; panchayat president; secretary; ward members and other influential persons and their relatives) who did not work	
	Payment to person employed full-time elsewhere (government; school; private firm, etc.)	
	Payment to person under 18 years who did not work	
	Wages paid to a person twice on the same date	
	Worksite Facilitator has paid as worker also on the same date	
	Person not present in NMR has been included in the FTO	
	Person has got more wages than what was due to him	
	Payment made to dead person	
	Payment to person for work done by machine	
	Person A's wages have gone to Person B	
	Payment to person who did not work but work was done	
Bribes	Complaint - money was collected for issuing Job Card	
	Complaint - money was collected for taking photograph	
	Complaint - money was collected for opening bank/post office account	
	Complaint - commission is withheld during wage payment	
	Business Correspondent / Bank / Post Office takes a commission during wage payment	
	Complaint – money was collected for allotting individual work	

Contd...

Work Related	Work was not done	
	Saplings were not planted in plantation work	
	Farm pond was not constructed	
	No trace of work now	
	No trace of planted saplings	
	Work was done through contractors	
	Work was done with machines	
	Work was allotted to ineligible beneficiary	
	Inappropriate work was executed	
	IHHL not constructed but payment has been made	
	Amount paid for already constructed IHHL	
	Payment has been made twice for the same work	
Material Procurement	Materials have been procured at higher rates	
	Poor quality material has been used	
	Fake bills	
	Booked expenses have not been spent	
	Amount of material purchased is less than specified in the bills	
Others	Inappropriate administrative expenses	
	Skilled expenditure has been paid at higher rates	
	Payment to workers without job card	
	Payment to person through someone else's job card	
	Family has more than one job card and has been paid more for more than 100 days	
	Wages have been withdrawn from the worker's account but have not been paid to the worker	

Category: Process Violation		
Sub-type	Specific Issue Description	
Denial of Entitlements	No process for collecting work applications	
	Non-payment of unemployment allowance	
	Non-payment of compensation for delayed wages	
	Non-payment of transportation allowance	
	People eligible to receive job cards are denied job cards	
	People eligible to come to work are denied work	
	People receiving OAP are denied job cards	
	People receiving OAP are denied work	
	Differently abled people are denied job cards	
	Differently abled people are denied work	
	Worksite facilities are not provided	
	No work suitable for particularly vulnerable groups	
	Separate schedule of rates for particularly vulnerable groups has not been fixed	
	Rozgar Diwas is not conducted once every month	
	Awareness of MGNREGS and implementation processes is very poor	
Transparency & Accountability	Citizen Information boards are not put up	
	Job Cards are not with workers	
	Workers do not have passbooks	
	NMRs are not maintained at the worksite	
	Pay slips are not issued to workers	
	Concurrent Social Audit does not take place	
	No process to collect, record and act on grievances	
	NMRs are not publicly read out at the worksite	
	Measurement is not done in the presence of workers	
	Gram Panchayat office has not displayed shelf of projects; works taken up and amount spent	
	Wall writings have not been done	
	Poor cooperation from the implementation team for social audit from the panchayat	
	Poor cooperation from the implementation team for social audit from the block	
	Panchayat registers not produced for Social Audit	
	Block registers not been produced for Social Audit	

Contd...

Financial	Advance received for administrative expenses has not been settled	
	Material Expenses Issue	
	Administrative Expenses Issue	
Work Selection	Systematic and participatory planning exercise to identify works was not conducted	
	Work selection is not done through gram sabha resolutions	
	Shelf of works is not available	
Work Execution	Work has not been completed for a long time	
	Overseer/TA does not visit the worksite regularly	
Work Quality	Quality of work is poor	
	Work is not useful for the community	
	Failure to safeguard and maintain completed work	
	Missing trees/plantations/farm pond	
	An asset has been destroyed	
Maintenance of Registers, records	Difference in the days worked and wages earned between JC and online entry	
	Online details about family (Name; age; caste; relationship, etc.) is wrong	
	Job Card Application Register is poorly maintained	
	Many corrections in Job Card Application Register	
	Mismatch between block and panchayat Job Card registers	
	Mismatch between the block and panchayat NMR registers	
	Variation in signature / thumb-print between NMR and Job Card Application Register	
	Mismatch between NMR and Measurement Book	
	Mismatch between the Measurement Book and Completion Report	
	Many corrections have been made in the NMRs	
	Job cards have been maintained poorly	
	NMRs have been maintained poorly	
	Panchayat registers have been maintained poorly	
	Block registers have been maintained poorly	
	Asset Register is poorly maintained	
	Measurement Books have been maintained poorly	
	Same a/c no credited with more than one person's wage	
	Multiple job cards have been issued to the same family	
	Worker is present in multiple Job Cards	
	Other records irregularity	
	Photos in the 3 stages not available	
	Register 1 not maintained	
	Completion Report has not been prepared even after the final bill has been made	

Contd...

Administration	Staff vacancies have led to poor implementation	
	Mates have not been trained properly	
	No administrative expenses are paid to the panchayat	
	Failure to follow the prescribed procedure in the selection of mate	
	Works are allotted to different hamlets only on specific periods	
	Payment not done through eFMS for non-exempt panchayat	
	Irregularity in the selection of mate	
	Ineligible people have been issued Job Cards	
	Families have been issued more than 1 job card	
Category: Financial Deviation		
Sub-type	Specific Issue Description	
Records not produced	Records not produced for Social Audit	
	NMRs not produced for Social Audit	
	Wage lists not produced for Social Audit	
	FTOs not produced for Social Audit	
	MBooks not produced for Social Audit	
	Bills and vouchers not produced for Social Audit	
	Work Records (Gram Sabha resolutions; Administrative & Technical Sanction; Technical Estimate) not produced for Social Audit	
	Work Records (Completion reports; photos; asset register) not produced for Social Audit	
	Other records not produced	
Work Selection	Work taken up without Gram Sabha approval	
	Work taken up without Administrative Sanction	
	Work taken up without Technical Estimate	
	Work taken up without Technical Sanction	
	Incomplete technical estimate (no pre-measurements; no FMB sketch; no photos; no site map)	
	Sanction of ineligible work	
	Excess values in Technical Estimate	
	Work on private land - beneficiary does not have a Job Card	
	Work on private land - beneficiaries were not selected as per norms	
	The same work was done in some other scheme also	
	The same work has been taken up repeatedly	
	Administrative Sanction was for one work but some other work was done	
	Public work has been done on private land	
	Work on private land - beneficiary did not work in the worksite	

Contd...

Work Records	Expenditure amount is greater than the amount sanctioned	
	Expenditure amount is greater than the revised amount sanctioned	
	Payment has been made without Mbook entries	
	Payment has been made without Programme Officer's order	
	Excess payment due to arithmetic errors in M book	
	Payment made as per NMR is higher than the amount recorded in Mbook	
	Payment made is higher than what was sanctioned in NMR	
	Payment has been booked under some other work in the MIS	
	Payment has been made without check measurement and super check measurement	
	Final payment has been made without super check measurement	
Work Execution	Significant differences between measurements at worksite and recorded values in Mbook	
	Full amount paid for partially constructed IHHL	
Category: Grievances		
Sub-type	Specific Issue Description	
JC Related	Application for new Job Card	
	Application for renewal of Job Card	
	Application for replacement of lost Job Card	
	Application to correct wrong entries in the Job Card (Name; Husband/Father Name; Caste; Age; Address; Work Entries, etc.)	
	Application to add an additional family member	
	Complaint - unable to get a Job Card	
	Complaint - unable to renew Job Card	
	Complaint - unable to get a replacement for lost Job Card	
	Complaint – unable to correct wrong entries in JC	
	Complaint – unable to add an additional family member	
	Complaint - Job Card has been borrowed by someone else	
	Complaint – JC has been borrowed by implementation officials	

Aadhaar/Bank Account related	Application for Aadhaar card	
	Complaint – unable to get Aadhaar card	
	Application for bank account	
	Complaint – unable to open bank account	
	Application for post office account	
	Complaint – unable to open post office account	
	Application for bank passbook	
	Complaint – unable to get bank passbook	
	Application for post office passbook	
	Complaint – unable to get post office passbook	
	Complaint - unable to get bank/post office passbook	
	Unable to link bank account with Aadhaar	
	Aadhaar account linked with wrong bank account	
Work Related	Application for work	
	Complaint - Unable to get work	
	Complaint – work application is not accepted	
	Application for work was not acted upon	
	Application for more than 100 days of work	
	Complaint – discrimination in the allotment of work	
Worksite facilities	Complaint – non-provision of worksite facilities	
	Complaint - non-provision of drinking water at worksite	
	Complaint - non-provision of first-aid kit at worksite	
	Complaint - non-provision of shade at worksite	
	Complaint - non-provision of creche for children at worksite	
	Complaint on non-provision of worksite facilities	
Wages related	Application for minimum wages to be raised	
	Complaint - non-payment of minimum wages	
	Complaint - application for payment of delayed wages	
	Complaint - application for payment of non-paid wages	
	Person has worked but the name is not in NMR and has not gotten paid	
	Person has worked but has not been paid because his family has already completed 100 days	
	Differently abled people have not been paid their entitled wages	
	Complaint - application for payment of skilled work/ material cost in individual work	
	Complaint - application for payment of transportation allowance	

Contd...

Wages related	Complaint - application for payment of compensation for delayed wages	
	Complaint - application for payment of unemployment allowance	
	Complaint - no information is given about wage rate and amount paid	
	Complaint – wage slip is not given	
	Complaint – difficulty in withdrawing wages from bank/post office	
Injury/Death	Complaint - application to pay wage compensation for injury arising out of and in the course of employment	
	Complaint - application to compensate for permanent disability/death by accident arising out of and in the course of employment	
Individual Assets related	Application for provision of IHHL	
	Application for provision of Animal Shelter	
	Application for provision of Farm Pond	
	Application for plantation work on individual land	
	Application for house under IAY scheme	
	Application for house under CMGHS scheme	
	Application for asset in individual land	
Public Works Related	Application for public canal work to be taken up	
	Application for public tank work to be taken up	
	Application for a PDS building to be built	
	Application for an Anganwadi building to be built	
	Application for a Library building to be built	
Gram Sabha related	Gram sabha is not held regularly	
	Adequate information is not given about gram sabha	
	Works are not selected in the gram sabha	
	Mates are not selected in the gram sabha	
Complaints on specific individuals	Complaint on Banking Correspondent	
	Complaint on Post Office / Postman	
	Complaint on Panchayat Secretary	
	Complaint on Worksite Supervisor	
	Complaint on Panchayat President	
	Complaint on Ward Member	
	Complaint on Technical Staff	
	Complaint on other persons	
Others	Complaint - Application to redress grievance was not registered or acted upon	
	Complaint - Application to address discrimination (in the allotment of work; payment of wages; work selection, etc.)	

APPENDIX-VIII

RESOURCE FEE, ALLOWANCES AND OTHER BENEFITS TO FTE OF SSAAT

Designation	RF Amount September 2021 onwards	Field Allowance	Conveyance Allowance	Phone Allowance	Net con	Total Gross	PT	Remarks
Field Staff								
Programme Manager	42025	2000	0	1000	1000	46025	200	DA 275 per day
State Team Monitor	42025	2000	0	1000	1000	46025	200	DA 275 per day
STC/Dist., in charge	31007	2000	0	1000	1000	35007	200	DA 275 per day
District Resource Person	25215	0	0	500	0	25715	200	DA 200 per day
Block Resource Person	16810	0	0	300	0	17110	150	DA 175 per day
State Office								
Programme Manager	42025	2000	0	1000	1000	46025	200	
Asst.Program me Manager	24878	0	1650	0	1000	27528	200	
Asst. Programme Coordinator	24878	0	1650	500	0	27028	200	
System Manager	30673	0	1650	500	0	32823	200	
Asst Programme Excutive	21384	0	1650	500	0	23534	200	
Programme Manager (IT)	22699	0	1650	500	0	24849	200	
Admin Officer	29608	0	1650	500	0	31758	200	
Human Resource Manager	25979	0	1650	500	0	28129	200	
Programme Officer	29608	0	1650	500	0	31758	200	

Other Benefits

The Resource Persons of SSAAT are being provided the following benefits in addition to the Resource Fee:

- 1) Sanction of 30 days leave with pay in contract year ($2^{1/2}$ days per month).
- 2) Sanction of 30 days leave without pay in contract year on personal grounds.
- 3) Sanction of 30 days leave with pay in contract year on medical emergencies.
- 4) Sanction of Special Medical leave with pay in the contract period to the Resource Persons who met the accident while on duty.
- 5) Sanction of 180 days Maternity leave with pay in contract period to the Women Resource Persons.
- 6) Sanction 15 days Paternity leave with pay in contract period to the Male Resource Persons.
- 7) Sanction of 6 weeks leave with pay in contract period to the women resource persons on account of miscarriage (this benefit will be given for 2 times).
- 8) Sanction of advance to the equivalent of 2 months' Resource Fee to meet the medical expenses who fell sick while on duty.
- 9) Reimbursement of medical expenses incurred by the resource persons while on duty.
- 10) Sanction of ex-gratia of Rs. 3,00,000/- to the family members of diseased resource persons while on duty.

Appendix-IX

Funds Release Status from MoRD for the FY 2019-20 to 2021-22							
(Rs. in Lakhs)							
Sl. No.	F. Y	UC Submitted by CRD based on MGNREGS Exp. (Wage+Material+ Admin)	SSAAT Budget @ 0.5% of Total EGS Budget as per UC sent to MoRD from EGS	Funds released from MoRD		Total Amount actually received from MoRD against column No.4	Amount Not released by MoRD
				1 st Tranche	2 nd Tranche		
1	2	3	4	5	6	7 (5+6)	8 (4-7)
1	2019-20	327372.14	1636.86	753.37	0	753.37	883.49
2	2020-21	237661.09	1188.31	385.2	699.6	1084.8	103.51
3	2021-22	450702.13	2253.51	545.05	545.05	1090.1	1163.41



CENTRE FOR SOCIAL AUDIT

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