

Chapter 2: Performance Audit

Urban Development and Environment Department

2.1 Working of Madhya Pradesh Pollution Control Board

Executive Summary

For prevention and control of water and air pollution, the Parliament enacted the Water Act, 1974 and the Air Act, 1981. To regulate management of wastes viz. bio-medical waste, hazardous waste and municipal solid waste, relevant Rules were framed under the Environment (Protection) Act, 1986. Madhya Pradesh Pollution Control Board (MPPCB) was constituted in 1974, which is responsible for implementation of the Environmental Acts and Rules in the State. We observed deficiencies in working of the MPPCB during 2009-14.

- MPPCB prepared a five-year plan for 2012-17 without obtaining inputs from lower level functionaries. Besides, no survey was conducted to identify the polluting industries, health care establishments, rivers, etc.

(Paragraph 2.1.7)

- Significant delays occurred in granting consent/ authorisation to industries and health care establishments. 2190 industries, 280 local bodies and 28 building projects were functioning either without obtaining consent or without renewal of consent under Water Act/Air Act. Out of 625 industries 76 industries were functioning without authorisation under Hazardous Waste Rules. This may impact the environment adversely.

(Paragraphs 2.1.8.1 to 2.1.8.3, 2.1.8.5, 2.1.11.1 and 2.1.11.6)

- Compared to the norms prescribed by MPPCB for collection and testing of waste water samples from industries, there were shortfalls in fixation of targets ranging from 23 to 55 *per cent*. In 32 districts, there was no plant for treatment of domestic effluents/sewage. River water quality deteriorated at 19 monitoring locations and improved at eight monitoring locations.

(Paragraphs 2.1.9.2 to 2.1.9.4)

- Fourteen ambient air quality monitoring stations were not functional. Testing of samples in the functional stations was inadequate; shortfalls ranged between 34 and 95 *per cent*.

(Paragraph 2.1.10.1)

- Cement plants were emitting excess pollutants and were thus causing air pollution.

(Paragraph 2.1.10.5)

- Processing and disposal of municipal solid waste was done by less than two *per cent* of the local bodies.

(Paragraph 2.1.11.7)

- No norm was prescribed for inspection of industries and HCEs by the MPPCB, affecting the monitoring of pollution control. The Apex Committee on BMW constituted in January 2011 never met except once in 2011.

(Paragraphs 2.1.12 and 2.1.11.3)

2.1.1 Introduction

In order to address pollution issues, the Parliament enacted the Water (Prevention and Control of Pollution) Act, 1974 (Water Act) and the Air (Prevention and Control of Pollution) Act, 1981 (Air Act) for prevention and control of water and air pollution. To regulate management of wastes viz. bio-medical waste, hazardous waste and municipal solid waste, relevant rules were framed (1989-2000) under the Environment (Protection) Act, 1986.

The Madhya Pradesh Pollution Control Board (MPPCB) was constituted in September 1974 by Government of Madhya Pradesh (GoMP) under Urban Development and Environment Department¹ (the Department) according to the provisions of the Water Act. The MPPCB has been entrusted with the responsibilities of prevention, control or abatement of water, air and environment pollution, as envisaged in the relevant Acts and Rules. It submits an Annual Report on its activities to GoMP for laying before the State Legislature. In a study² conducted (2009) by Central Pollution Control Board (CPCB), five industrial clusters³ of Madhya Pradesh were found as polluted clusters. Thus, pollution in industrial units is an area of concern in the State.

2.1.2 Organisational set-up

The Principal Secretary, Urban Development & Environment Department (Department) is the administrative head at State level. The MPPCB, headed by a Chairman, a Member Secretary (MS) and 15 other Members⁴, implements its programmes through 13 Regional offices⁵, one central laboratory and 10 regional laboratories. The laboratories are responsible for analysis of water and air samples collected from industrial units and other sites.

2.1.3 Audit objectives

The performance audit (PA) was conducted to examine the working of the MPPCB. The audit objectives were to ascertain whether:

- the planning was effective to prevent, control or abate pollution;
- the grant of consent to industries was efficient and effective;
- the provisions of Water and Air Acts were complied with effectively;
- compliance with the Bio-Medical Waste Rules was effective;
- monitoring mechanism in the MPPCB was in place and effective.

2.1.4 Audit criteria

The audit criteria adopted to arrive at audit conclusions were the rules and procedures prescribed to abate pollution and the norms and standards in:

- the Water Act, 1974, the Air Act, 1981 and the Rules made thereunder;

¹ Earlier named as Housing and Environment Department (prior to July 2014)

² Comprehensive Environment Assessment made in 88 industrial clusters in India

³ Dewas, Indore, Nagda-Ratlam, Pithampur and Singrauli.

⁴ Five members from Government departments, five from local bodies, two from government companies/corporations and three non-official members

⁵ Bhopal, Dhar, Guna, Gwalior, Indore, Jabalpur, Katni (formed in September 2013), Rewa, Sagar, Satna, Shahdol, Singrauli (formed in July 2011) and Ujjain

- the Water (Consent) Madhya Pradesh Rules, 1975, the Environment (Protection) Act, 1986;
- the Bio-Medical Waste Rules, 1998, the Hazardous Waste Rules, 2008, the Municipal Solid Waste Rules, 2000; and
- the instructions issued by the MPPCB and CPCB from time to time.

Specific audit criteria have been mentioned in the relevant paragraphs.

2.1.5 Scope and coverage of audit

The review was conducted (February to July 2014) through test check of records of MPPCB, eight⁶ out of 13 Regional offices (ROs), the central laboratory and eight regional laboratories covering the period 2009-14. The ROs were selected through 'Simple Random Sampling without Replacement'. Information in respect of building projects was obtained from Town and Country Planning Department and Municipal Corporations. An entry conference was held on 24 April 2014 with the Member Secretary, in which objectives, criteria and methodology of audit were discussed. The Principal Secretary did not response to our requests (September-October 2014) to conduct exit conference. Audit findings were discussed in the exit conference held (5 November 2014) with the Chairman, MPPCB; their replies/views have been suitably incorporated in the review.

Audit findings

2.1.6 Financial position

Financial resources of the MPPCB comprised of grants-in-aid/assistance from GoI/CPCB, grants from GoMP, water cess⁷ from industries and local bodies, consent and authorisation fees and renewal fees under various environment Acts and Rules. The financial position of the MPPCB is as given in **Table-1**.

Table-1 : Financial resources of MPPCB and utilisation thereof

(₹ in crore)

Year	Opening balance	Amount of grant		Reimbursement of water cess from GoI	Income from other sources ⁸	Total funds available	Expenditure	Closing balance
		CPCB/GoI	State					
2009-10	5.17	0.98	4.00	6.70	22.12	38.97	17.35	21.62
2010-11	21.62	1.33	4.25	4.17	27.47	58.84	23.94	34.90
2011-12	34.90	0.17	4.47	3.07	27.87	70.48	30.40	40.08
2012-13	40.08	0.17	7.18	5.77	35.21	88.41	36.26	52.15
2013-14	52.15	---	11.45	3.25	38.82	105.67	43.77	61.90
Total		2.65	31.35	22.96	151.49	362.37	151.72	

(Source: Data furnished by the MPPCB)

- The MPPCB finalised the annual Accounts and submitted to GoMP only up to the year 2010-11.
- In March 2013, GoI reimbursed ₹ 5.77 crore as share of water cess. MPPCB was to submit utilisation for the entire amount to GoI. The MPPCB,

Incorrect UC of ₹ 4.80 crore submitted to GoI by MPPCB

⁶ Bhopal, Dhar, Gwalior, Indore, Jabalpur, Sagar, Satna and Ujjain.

⁷ State Board levies and collects water cess and credits to the Consolidated Fund of India. Up to 80 per cent of the cess is remitted back to the State Board.

⁸ Includes consent fee/consent renewal fee, authorisation fee/renewal of authorisation fee, interest on investment etc.

however, furnished (November 2013) UC for ₹ 4.80 crore to GoI against the actual expenditure of ₹ 0.32 lakh during 2012-13.

- We also observed that RO, Jabalpur issued the reports of analysis of water and air samples without receipt of fees. As a result, ₹ 23.47 lakh for the period 1992 to 2013-14 on account of water and air analysis fee remained outstanding from industries and departments/institutions⁹. As of October 2014, ₹ 4.32 lakh has been recovered.

In the exit conference, the Chairman admitted the audit observations. Regarding incorrect UC, he stated that necessary entries would be made after reconciliation and this would be avoided in future. The Chairman also stated that action would be taken to recover outstanding testing fees and a report would be submitted.

2.1.7 Survey and Planning

Under Section 17 of Water Act and Section 17 of Air Act, the MPPCB was required to prepare a comprehensive programme for prevention, control or abatement of water and air pollution and to ensure execution thereof.

In order to plan for control of pollution and effective implementation of the Acts, the MPPCB was to identify and prepare an inventory of all industries, health care establishments (HCEs), rivers, lakes, ponds, etc. in the State.

During test check of records of selected ROs (March-July 2014) we observed that no survey was conducted at RO level to identify the polluting industries, rivers, lakes, HCEs, etc. However, the MPPCB prepared a five-year plan for the period 2012-17, first time in April 2012, which consisted of financial and physical targets for control of pollution and strengthening of organisation. It submitted the Plan proposal (April 2012) to State Government.

Thus, the long term plan was prepared by the MPPCB on its own without obtaining any input from the lower level functionaries. We also observed that only 14 meetings of MPPCB were held during the period 2009-14 as against 20 meetings due to be held, which included planning for abating pollution.

In absence of complete information relating to pollution, the plan for control or abatement of pollution was not comprehensive.

The ROs confirmed the facts and stated that annual monitoring package for sampling of water and air was being prepared and submitted to the MPPCB.

In the exit conference, the Chairman stated that dedicated surveys were not conducted but the MPPCB has information of industries, HCEs from other sources. Though no inputs were taken from the ROs for preparation of five year plan, position was being ascertained in the regular meetings of ROs.

The fact remains that mere information of industries, HCEs etc. does not give the level of pollution in industries. Therefore, conduct of survey was needed for ascertaining the status of polluting and non-polluting industries.

The MPPCB may ensure that the inputs from lower level functionaries are obtained and incorporated in the long term plans to make it comprehensive.

No survey was conducted to identify polluting industries, rivers, lakes, health care establishments, etc.

MPPCB prepared Five Year Plan 2012-17 without obtaining inputs from lower level functionaries

⁹ Few instances: Raymond Ltd., Boregaon (Chhindwara); Everest Industries, Kymore (Katni); ACC Ltd. Kymore (Katni); Nagar Nigam, Jabalpur and PHED Jabalpur, etc.

2.1.8 Grant of consent

Under Section 25 of the Water Act and Section 21 of the Air Act, consent of the State Board was required to establish or take any step to establish any industry, operation or process which was likely to discharge sewage or trade effluent into a stream, well, sewer or on land and to pollute the air by process/emission in the State. Accordingly, the MPPCB issue consents for establishment and operation of industries and renewal of consents.

As per notification issued in 1999, Ministry of Environment and Forests (MoEF) classified 64 types of industries as Red¹⁰, 25 as Orange¹¹ and 55 as Green¹² based on their activities carried out and manufacturing products (few are mentioned in *Appendix-2.1*). As per information furnished by MPPCB, there were 14,396 industries (Red category: 6809, Orange category: 4698 and Green category: 2889) in the State as of February 2014. Consent to large/medium scale industries is granted by the MPPCB Headquarter and for Small Scale Industries (SSIs) by the respective RO.

2.1.8.1 Delay in grant of consent to industries

Section 25 of the Water Act and Section 21 of the Air Act provide that prior consent of State Board was essential to establish any industry, its operation or process. In case the consent is not granted within four months from the date of application, it would be treated as a deemed consent.

Test check of records revealed that in 38 cases¹³, consent orders were issued by MPPCB head office and ROs with delays ranging from 3 to 224 days after the stipulated period of 120 days. Of these, 11 consents were related to large and medium industries, which were issued with delays up to 136 days.

Thus, the industries were free to function on deemed consent after the stipulated time without actual grant of consent by the MPPCB which may have adverse impact on environment.

In the exit conference, the Chairman confirmed the facts and figures and stated that efforts would be made to avoid delay in granting consent.

2.1.8.2 Industries functioning without renewal of consent

Every industry was required to obtain periodical renewal of consent from the MPPCB by paying prescribed consent renewal fee to continue its operation and process.

Test check of records of the MPPCB and ROs revealed that as of March 2014, 177 large/medium water/air polluting industries¹⁴ and 2013 SSIs¹⁵ were functioning without renewal of consent of the MPPCB. An amount of ₹ 1.62

There were delays up to 224 days in granting consent to industries

2190 industries were functioning without renewal of consent

¹⁰ Highly polluting industries

¹¹ Moderately polluting industries

¹² Least polluting industries

¹³ No. of cases:-MPPCB Headquarter: 11 (delays 14-136 days), RO: Bhopal 11 (46-224 days), Dhar 1 (20 days), Gwalior: 7 (7-114 days), Indore: 1 (23 days), Jabalpur: 1 (3 days), Sagar: 5 (5-70 days), Satna: 1 (94 days).

¹⁴ Bhopal (30), Dhar (33), Guna (03), Gwalior (02), Indore (14), Jabalpur (17), Katni (24), Rewa (05), Sagar (12), Satna (01), Shahdol (04), Singrauli (03) and Ujjain (29).

¹⁵ SSI: Bhopal (294), Dhar (193), Gwalior (78), Indore (289), Jabalpur (404), Sagar (281), Satna (05) and Ujjain (469)

crore¹⁶ was chargeable from these SSIs on account of consent renewal fee. Functioning of the industries without renewal of consent may impact the environment adversely.

In the exit conference, the Chairman stated that this could not be done due to shortage of staff and efforts would be made to recover the amount and bring industries under the consent regime. However, no comment was made on impact on environment due to non-renewal of consent.

2.1.8.3 Annual consent renewal fees pending from local bodies

The Water (Consent) Madhya Pradesh Rules, 1975 prescribed consent fee and annual consent renewal fee chargeable from local bodies extracting water from natural sources and discharging effluents into streams.

280 local bodies were functioning without valid consent in test checked ROs

We observed that out of 293 local bodies in the test checked ROs, 171 local bodies had never obtained consent from the MPPCB. Further, 109 local bodies which initially took consent were subsequently functioning¹⁷ without renewal of consent as of March 2014. A total amount of ₹ 13.75 lakh was receivable from these local bodies on account of consent renewal fee as of March 2014 (*Appendix 2.2*).

In the exit conference, the Chairman confirmed the facts and stated that continuous efforts were being made to recover pending fees from local bodies.

2.1.8.4 Maintenance of register of consented conditions

Register of consented conditions was not maintained by the ROs

We observed that the register of consented conditions was not maintained by the ROs of Ujjain, Sagar, Satna, Gwalior, Dhar and Indore during the period 2009-14, though required under Section 25 (6) of the Water Act. The RO, Bhopal maintained such register only from May 2011, while RO, Jabalpur did not maintain such register after May 2011. Thus, the consented conditions were not open for inspection by the persons interested or affected by the outlet, land or premises covered under the consent.

The Chairman stated that the ROs would be directed to maintain the register.

The MPPCB should ensure maintenance of register of consented conditions as prescribed in the Act.

2.1.8.5 Building projects functioning without consent of the MPPCB

As per notifications issued by MoEF, GoI (September 2006) and Department of Urban Administration and Development, GoMP (May 2010), the building and construction projects of prescribed categories¹⁸ were required to take consent/approval from the MPPCB.

¹⁶ Bhopal (₹ 25.78 lakh), Dhar (₹ 30.27 lakh), Gwalior (₹ 3.24 lakh), Indore (₹ 12.36 lakh), Jabalpur (₹ 22.06 lakh), Sagar (₹ 21.94 lakh), Satna (₹ 0.07 lakh) and Ujjain (₹ 46.00 lakh).

¹⁷ 44 local bodies for last five years, 18 local bodies for last 10 years and 47 local bodies for more than 10 years.

¹⁸ Building and construction projects with 20,000 sqm and more but less than 1,50,000 sqm built-up area, Housing complexes with 100 tenements or more, Commercial establishments having built-up area of 2000 sqm or more.

Scrutiny of records of selected ROs¹⁹ and information provided by Municipal Corporations (MCs) revealed that out of 30 projects sanctioned by the MCs during the period 2009-14, only two obtained consent of MPPCB. The position of building projects sanctioned by MCs is in **Appendix 2.3** and status of consent taken by building projects under Water/Air Acts from the MPPCB is given in **Table-2**.

Table-2: Position of Building projects under test checked ROs

Name of MC	Number and description of projects to whom permission was granted by MCs				Number of projects which were granted consent by the MPPCB	Number of projects which did not have consent of the MPPCB
	Building and construction projects ²⁰	Housing complex ²¹	Commercial establishments ²²	Total		
Gwalior	09	--	01	10	02	08
Indore	10	02	03	15	---	15
Bhopal	05	--	--	05	---	05
Total	24	02	04	30	02	28

(Source: Data furnished by MCs and ROs)

28 Building projects were functioning/ under construction without consent of the MPPCB

It would be seen that out of 30 construction projects permitted by MCs under three categories, 28 projects were functioning/under construction without 'consent to establish' (CTE) of the MPPCB. In addition, CTE was granted by the MPPCB to 14 projects (Bhopal 03, Indore 11) before 2009-10. But, even after lapse of more than five years, 'consent to operate' was not obtained by these projects. The MPPCB also did not inspect these projects to check their status. We also observed that there was lack of co-ordination between the MPPCB and the MCs regarding permission granted for building projects, as neither the MC furnished the information to the MPPCB nor did the MPPCB take any effective initiative to obtain the same.

On this being pointed out, the MS stated (August 2014) that under "Grey Water Recycling Model Bye-laws" (notified by GoMP in May 2010) permission was to be given by MC after approval of the MPPCB. Legal action would be taken on the concerned projects after due analysis/inspection.

The reply indicates lack of co-ordination between two Government agencies.

In the exit conference, the Chairman stated that efforts would be made for better co-ordination between MCs, Town and Country Planning Department and MPPCB to bring the Building projects under the consent mechanism. As regards the CTE granted projects, the field inspection would be carried out shortly and appropriate action would be taken.

2.1.9 Water Act

The Water Act, 1974 is designed for prevention and control of water pollution and the maintaining or restoring of wholesomeness of water. The State Board was required to plan a comprehensive programme for prevention, control or abatement of pollution of streams and wells and to secure execution thereof, issue consents to industries subject to such conditions as it deems fit for control of water pollution and to watch compliance with the conditions.

¹⁹ The building projects requiring consent/approval were taken up only in three ROs out of selected eight ROs.

²⁰ Projects having more than 20,000 but less than 1,50,000 square meter built-up area.

²¹ Housing complexes with 100 tenements or more.

²² Commercial establishments having built-up area of 2000 square meter or more.

2.1.9.1 National Water Quality Monitoring Programme

The CPCB, in collaboration with the State Boards, monitors the water quality of aquatic resources in the country under National Water Quality Monitoring Programme (NWMP). We observed that the MPPCB was monitoring water quality at five stations of Global Environment Monitoring System (GEMS) and at 100 stations of Monitoring Indian Aquatic Resource System (MINARS) under NWMP by measuring the parameters pH, biological oxygen demand (BOD), chemical oxygen demand (COD), dissolved oxygen (DO), Total Suspended Solids etc. in the water samples taken from rivers, lakes, ponds and wells. In addition, CPCB sanctioned (December 2011) 50 new stations under MINARS for strengthening of monitoring network. The frequency of the sampling for each identified station was fixed by the CPCB.

Year-wise targets and achievement of sampling under the programme is shown in **Table-3**.

Table-3: Position of targets and achievement of sampling of water under NWMP

Year	GEMS		MINARS		Total		
	Targets	Samples tested	Targets	Samples tested	Targets	Samples tested	Shortfall (per cent)
2009-10	44	40	750	690	794	730	64 (8)
2010-11	44	36	750	752	794	788	06 (1)
2011-12	44	37	750	696	794	733	61 (8)
2012-13	50	48	1490	1059	1540	1107	433 (28)
2013-14	50	48	1490	1284	1540	1332	208 (14)
Total	232	209	5230	4481	5462	4690	772 (14)

(Source: Data furnished by the MPPCB)

There was shortfall of 14 per cent in sampling of water under NWMP

Thus, the shortfall against the targets of sampling was 14 per cent during the period 2009-14.

On this being pointed out, the MS stated (August 2014) that the reasons for shortfalls were drying up of rivers in summer season and difficulties in approaching sampling points in rainy season.

In the exit conference, the Chairman admitted the audit observations.

2.1.9.2 Monitoring of Natural Water Sources

The position of targets and achievement for collection and testing of samples of natural water sources during the years 2009-10 to 2013-14, is given in **Table-4**.

Table-4: Position of targets and achievement of natural water sources

	2009-10	2010-11	2011-12	2012-13	2013-14
Targets	2015	2197	2474	2810	2939
Achievement	2869	3516	3838	3515	4632

(Source: Data furnished by the MPPCB)

Water quality deteriorated at 19 monitoring locations and improved at eight locations in 2012-13, as compared to 2011-12

Above table indicates that achievement was more than the targets during the years 2009-10 to 2013-14.

On the basis of monitoring results of natural water resources, the MPPCB classified the water quality as A, B, C, D and E based on several uses of water. We noticed that river water quality at 19 monitoring locations deteriorated and quality improved at eight locations in 2012-13 compared to the status of 2011-12, as shown in **Appendix 2.4**.

In the exit conference, the Chairman stated that efforts were being made to further improve the water quality at the locations where it deteriorated.

2.1.9.3 Inadequate treatment of domestic effluents

As per provision 17 (1) (f) of the Water Act, 1974, the State Board was required to inspect sewage or trade effluents, works and plants for treatment and to review plans, specifications or other data relating to plants set up for treatment of water, works for purification thereof.

In 32 districts there was no STP for treatment of domestic effluent. Treatment capacity of STPs in six districts was less than the effluent generated

During test check of records (March-July 2014) and analysis of information provided by selected ROs, we observed that 10 sewage treatment plants (STPs) were installed by six local bodies²³. As per information furnished by the test checked ROs, out of 1280.46 million litres daily (MLD) domestic effluents generated in 38 districts, only 260.31 MLD domestic effluent was being treated through 10 STPs in six districts and the remaining 1020.15 MLD was disposed without treatment. Even in the six districts, where STPs were installed, the treatment capacity of STPs was less than sewage generated. The gap between sewage generation and treatment capacity ranged from 16 per cent to 79.57 per cent (*Appendix 2.5*). The MPPCB neither took any effective action in this regard nor fixed any norm for inspection of STPs.

In the exit conference, the Chairman stated that notices would be issued to local bodies and norms would be fixed for inspection of STPs.

2.1.9.4 Monitoring of Industrial Waste Water

Every year MPPCB directed the ROs to propose a programme for monitoring of industrial waste water so as to monitor Red category industries every month, Orange category industries six times in a year and Green industries at least twice in a year. Category-wise number of industries proposed for monitoring of industrial waste water is given in **Table-5**.

Table-5: Category wise number of industries proposed for monitoring

Category of industry	2009-10	2010-11	2011-12	2012-13	2013-14
Red	365	401	410	428	430
Orange	222	151	211	202	160
Green	158	183	185	161	161
Total	745	735	806	791	751

(Source: Data furnished by the MPPCB)

Based on proposals of the ROs, the MPPCB decided the targets for sampling of industrial waste water for each Regional office. The year-wise details of targets fixed and the monitoring to be done as per MPPCB's instructions is given in **Table-6**.

Table-6: Position of test due to be conducted, targets set and achievement

Year	No. of industries	Total number of sampling which was to be done as prescribed	Number of samples targeted	Shortfall in targets vis-à-vis norms (per cent)	Total achievement (as percentage of prescribed number of samples)
2009-10	745	6028	2714	3314 (55)	3464 (57)
2010-11	735	6084	2958	3126 (51)	3645 (60)
2011-12	806	6556	5055	1501 (23)	5542 (85)
2012-13	791	6670	3923	2747 (41)	4681 (70)
2013-14	751	6442	3729	2713 (42)	4141 (64)

(Source: Data furnished by the MPPCB)

Lower targets were fixed for monitoring of industrial waste water

²³

Bhopal (4), Burhanpur (1), Gwalior (1), Indore (2), Ujjain (1) and Vidisha (1).

It would be seen that the targets were fixed lower than that prescribed by MPPCB, ranging from 23 per cent to 55 per cent during 2009-10 to 2013-14.

Further, scrutiny of monitoring reports for 2013-14 in six test checked ROs²⁴ revealed that out of 359 industrial units test checked, in 53 units the treated effluent of the industries had high biological oxygen demand (BOD) and chemical oxygen demand (COD) content compared to the prescribed norms (BOD: 30 mg/l, COD:250 mg/l). The extent to which the BOD, COD exceeded the norms is given in **Table-7**.

Table-7: Position of parameter BOD, COD exceeded by the industries

Sl. No.	BOD		COD	
	Range of BOD level (in mg/L)	Number of industries	Range of COD level (in mg/L)	Number of industries
1	31-100	28	251-500	22
2	101-250	18	501-700	06
3	251-400	04	701-900	06
4	401-500	02	901-1200	04
5	501 and above	01	1201 and above	11
Total		53		49*

* In four industries in RO, Satna, COD was not measured for want of instruments.

In the exit conference, the Chairman confirmed facts and figures and stated that due to shortage of staff and equipment lower targets were fixed and efforts would be made to improve the situation.

The MPPCB may adhere to sample collection and testing norms prescribed.

2.1.10 Air Act

The Air Act, 1981 is designed for prevention, control or abatement of air pollution by preservation of quality of air. The State Board is required to plan and execute programmes for prevention, control or abatement of air pollution, issue consents to industries subject to such conditions as it deems fit for control of air pollution and to watch compliance of the consented conditions.

2.1.10.1 National Ambient Air Monitoring Programme

The MPPCB was conducting air monitoring at 25 stations of 10 cities, out of 26 ambient stations sanctioned by CPCB (before 2009-10). Moreover, CPCB sanctioned (April 2011) 13 new ambient air quality monitoring stations²⁵ under the programme in the State and directed the MPPCB to initiate monitoring. A new parameter PM_{2.5} (fine particles less than 2.5 micrometers in diameter) believed to be of great health risk was started to monitor in ambient air from 2011-12.

Under the programme, the MPPCB was required to monitor ambient air twice in a week at each station i.e. 104 measurements in a year. They were required to take 624 Ambient Air Quality samples each of Sulphur dioxide (SO₂) and Oxides of Nitrogen (NO_x), 312 samples for Respirable Suspended Particulate Matter (RSPM) and 104 samples for PM_{2.5} from each station in a year²⁶.

There was shortfall between 34 per cent and 95 per cent in sampling of ambient air under National Ambient Air Monitoring Programme

²⁴ Bhopal, Dhar, Gwalior, Indore, Jabalpur and Satna.

²⁵ Amlai: 2, Bhopal: 4, Chindwara: 2, Jabalpur: 1, Katni: 2 and Pithampur (Indore): 2

²⁶ (a) SO₂ and NO_x: 104 measurement X 6 (at 4 hourly interval) = 624 observations,
(b) RSPM: 104 measurement X 3 (at 8 hourly interval) = 312 observations,
(c) PM_{2.5} :-104 measurement X 1 (at 24 hourly interval) = 104 observations.

Against the annual target of 15,600 samples for SO₂ and NO_x, 7800 samples for RSPM and 2600 samples of PM_{2.5} for 25 functional stations, the year-wise position of samples taken and tested is detailed in **Table-8**.

Table-8: Position of targets and achievement of NAMP stations in the State

Year	SO ₂		NO _x		RSPM		PM _{2.5}	
	Targets	Samples tested (per cent)	Targets	Samples tested (per cent)	Targets	Samples tested (per cent)	Targets	Samples tested (per cent)
2009-10	15,600	9,919 (64)	15,600	9,919 (64)	7,800	5,108 (65)	--	--
2010-11	15,600	10,064 (65)	15,600	10,100 (65)	7,800	5,418 (69)	--	--
2011-12	15,600	9,706 (62)	15,600	9,859 (63)	7,800	5,207 (67)	2,600	31 (01)
2012-13	15,600	9,527 (61)	15,600	9,529 (61)	7,800	5,067 (65)	2,600	115 (04)
2013-14	15,600	9,039 (58)	15,600	9,274 (59)	7,800	4,839 (62)	2,600	206 (08)
Total	78,000	48,255 (62)	78,000	48,681 (62)	39,000	25,639 (66)	7,800	352 (05)
Shortfall		38 per cent		38 per cent		34 per cent		95 per cent

(Source: Data furnished by the MPPCB)

Thus, the shortfall in sampling of SO₂ and NO_x was 38 *per cent* and shortfall in sampling of RSPM was 34 *per cent* while shortfall in sampling of PM_{2.5} was 95 *per cent*. Moreover, 13 newly sanctioned air quality monitoring stations and one old station (Katra Bazar, Sagar) were non-functional.

Scrutiny of annual average monitoring reports in respect of 25 functional stations revealed that the parameters SO₂ and NO_x were within the prescribed norms. The parameter RSPM exceeded the prescribed norms in 2012 (22 stations) and in 2013 (20 stations). The results of monitoring at three stations for RSPM for 2013 were not available. Details are given in **Appendix 2.6**.

On this being pointed out, the MS attributed (August 2014) shortfall due to non-functioning of the stations during rainy season for safety of instruments and due to non-working of instruments. Excess concentration was due to increase in number of vehicles, construction and commercial activities. Further, MS stated that under the programme, results of monitoring were sent to CPCB so that action plan at national level can be prepared and implemented.

Reply was not acceptable as the MPPCB was required to monitor these parameters for 104 days in a year. Further, MPPCB should ensure that instruments are in working condition during the entire year. However, on remedial action taken, no reply was furnished by the MPPCB.

In the exit conference, the Chairman confirmed facts and stated that information of types of equipment required for monitoring of PM_{2.5} was not received on time. Now tendering process is in progress and after completion of this process MPPCB would start the monitoring of PM_{2.5}. Shortfall would be avoided in future. Out of 13 non-functional stations, five were made operational and remaining would be made functional very soon.

The MPPCB may ensure that instruments are in working condition and adequate sampling is done to enable the CPCB to prepare and implement the action plan at national level.

2.1.10.2 Monitoring of vehicular pollution

Under Section 20 of the Air Act, 1981 the State Board is to inspect the vehicles to ensure that the standards for emission of air pollutants by vehicles were being complied with.

Out of 70,185 vehicles checked by the MPPCB during the years 2009-10 to 2013-14 in the State, 7734 (11 *per cent*) vehicles were found causing air pollution in excess of the limit prescribed. The year-wise details of vehicles to be checked, vehicles actually checked by the MPPCB and the vehicles causing air pollution in excess of the prescribed limits were as given in **Table-9**.

11 *per cent* vehicles were found exceeding emission limits causing air pollution

Table-9: Position of vehicles monitored and found exceeding emission limits

Year	Targeted number of vehicles to be checked	Total number of vehicles monitored	Total number of vehicles exceeded emission limit	Percentage of vehicles exceeded limit
2009-10	12,400	8,376	1,080	13
2010-11	13,080	14,432	2,419	17
2011-12	13,980	14,609	1,699	12
2012-13	14,880	16,528	1,520	09
2013-14	14,880	16,240	1,016	06
Total	69,220	70,185	7,734	11

(Source: Data furnished by the MPPCB)

In the exit conference, the Chairman confirmed the facts and stated that monitoring reports of vehicular pollution were sent to RTOs for necessary action, since they are the authority to take action. Further, Chairman stated that matter would be taken up with RTOs for follow up action.

Fact remains that action taken by the RTOs was not known to the MPPCB/ROs due to lack of follow-up with RTOs.

2.1.10.3 Collection and testing of industrial air samples

The position of targets and achievement of collection and testing of industrial ambient air and stack samples in the State during the years 2009-10 to 2013-14 is given in **Table-10**.

Table-10: Position of targets and achievement of testing of industrial air

Year	Ambient Air			Stack		
	Targets	Achievement	Shortfall (percentage)	Targets	Achievement	Shortfall (percentage)
2009-10	2487	2040	447 (18)	793	661	132 (17)
2010-11	2768	2468	300 (11)	722	760	Nil
2011-12	4234	2650	1584 (37)	843	796	47 (06)
2012-13	3678	2446	1232 (33)	841	883	Nil
2013-14	3601	3648	Nil	814	997	Nil

(Source: Data furnished by the MPPCB)

The MS stated (August 2014) that the shortfall was due to industries found closed at the time of collection of sample and monitoring of ambient air was affected due to rains.

Reply is not acceptable as the sampling schedule was to be planned when industries were working so that adequate sampling could be done and analysed.

Shortfall of 11 to 37 *per cent* noticed in collection and testing of ambient air samples

Further, test-check of monitoring reports of industrial air for the year 2013-14 provided by the six test-checked ROs²⁷ we observed that in 50 industrial units, the parameter RSPM exceeded the permissible limit of 100 µg/M³. The extent to which the RSPM exceeded the norms in these units is shown in **Table-11**.

Table-11: Position of parameter RSPM exceeded by the industries

Sl. No.	Range of parameter RSPM (µg/M ³)	Number of industries exceeded the prescribed limits
1	101-200	22
2	201-300	06
3	301-400	13
4	401-500	03
5	501 and above	06
Total		50

In the exit conference, the Chairman confirmed the facts and audit observations and stated that due to shortage of staff the targeted samples could not be collected and tested. Efforts would be made to achieve the targeted samples. ROs would be directed to achieve the targets.

The MPPCB may adhere to sample collection and testing norms prescribed.

2.1.10.4 Monitoring of noise pollution

Under section 4 (3) of the Noise Pollution (Regulation and Control) Rules, 2000, the State Board was required to collect, compile and publish technical and statistical data relating to noise pollution and measures devised for its effective prevention, control and abatement. The zone-wise standards for noise pollution were notified under the Noise Pollution (Regulation and Control) Rules, 2000.

The position of the tests conducted by the MPPCB at identified areas/zones²⁸ and noise in excess of standards during the years 2009-10 to 2013-14 in the State is as given in **Table-12**.

Table-12: Position of tests conducted and found in excess of prescribed limits

Year	Targeted number of tests	Total number of tests conducted	Number of cases exceeding limit	Percentage of cases exceeding limit
2009-10	3,180	4,249	1,744	41
2010-11	4,320	4,608	2,283	50
2011-12	4,896	6,046	2,837	47
2012-13	5,184	5,822	2,757	47
2013-14	5,184	6,019	2,874	48
Total	22,764	26,744	12,495	47

(Source: Data furnished by the MPPCB)

Above table indicates that the noise in excess of the prescribed standards²⁹ fixed by GoI ranged from 41 *per cent* to 50 *per cent* during the years 2009-10 to 2013-14.

Further, we noticed that noise pollution, in selected ROs, was in excess of norms in 65 *per cent* samples in Commercial zone, 59 *per cent* samples in

Noise pollution was in excess of prescribed standards in 47 *per cent* cases

²⁷ Bhopal, Dhar, Gwalior, Indore, Jabalpur and Satna.

²⁸ Residential zone, Commercial zone, Silence zone and Industrial zone.

²⁹ Industrial area (Day: 75, Night: 70), Commercial area (Day: 65, Night: 55), Residential area (Day: 55, Night: 45), Silence Zone (Day: 50, Night: 40) Limits are in dB (A) Leq

Silence zone, 56 *per cent* samples in Residential zone and 25 *per cent* samples in Industrial zone.

We observed that during the year 2013-14 the total number of tests exceeding the prescribed limit was significantly high in RO Bhopal (87 *per cent*), RO Indore (65 *per cent*) and RO Ujjain (59 *per cent*). The zone-wise position of noise pollution in test checked ROs is shown in **Appendix 2.7**.

Non-publishing of data regarding level of noise pollution resulted in non-compliance with the provisions. The stakeholders and general public also remained unaware about the level of noise pollution in the area.

In the exit conference, the Chairman stated that noise monitoring reports were sent to district Collectors, as district administration is the prescribed authority in cases of noise pollution. Technical data of noise pollution indicating the level of pollution would be published in future.

2.1.10.5 Excess emission of air pollutants in cement plants

Under Section 21 of the Air Act, consent was granted to cement plants by the MPPCB with the condition of maintaining appropriate air pollution control equipment at all points of emission and ensuring that these were always kept running and in working condition. The units were to make efforts to restrict particulate emission as low as possible. At no point of time, the particulate emission from stack should exceed 50 mg/Nm³. Ambient air quality at the boundary of the factory premises was also to conform to the norms prescribed.

Cement plants
were emitting
excess pollutants
and were thus
causing air
pollution

Analysis of the monitoring reports of cement plants revealed that RSPM (PM₁₀), Particulate Matter (PM_{2.5}) and particulate emission from stack emitted in the air beyond the permissible limits in the vicinity of the cement plants. The position of PM₁₀, PM_{2.5} and PM stack monitored in five cement plants for the years 2010-11 to 2013-14 is given in **Appendix 2.8**. In three cement plants³⁰, the percentage of excess emission was up to 110, 120 and 89 respectively.

In the exit conference, the Chairman stated that notices were issued to cement plants, where emission level was in excess of prescribed limit, with the direction to bring down emission level. MPPCB would take corrective action to bring down emission level by improving the efficiency of pollution control devices.

2.1.11 Waste Management

Surface water contamination takes place when wastes reach water bodies while ground water gets contaminated when residues from waste percolate into the ground water. The management and handling of waste is regulated by the Environment (Protection) Act, 1986 and rules made thereunder viz. Bio-Medical Waste (Management and Handling) Rules 1998, Hazardous Wastes (Management, Handling and Transboundary Movement) Rules 2008, the Municipal Solid Waste (Management and Handling) Rules, 2000 etc.

³⁰ Prism Cement Ltd., Satna, Maiher Cement, Satna and K.J.S., Cement Plant, Satna.

Bio-Medical Waste

Bio-Medical Waste (BMW) generated during diagnosis, treatment or immunisation of human beings or animals or in research activities is harmful to human health and management of BMW is an integral part of health care.

2.1.11.1 Authorisation of Health Care Establishments (HCEs)

As per Rule 8 of the BMW Rules every occupier disposing and/or handling BMW in any manner should seek authorisation from the Board for handling and disposal of BMW. Rule 7 (7) of BMW Rules, 1998 provides that every application for authorisation shall be disposed of by the prescribed authority within 90 days from the date of receipt of the application.

Scrutiny of annual reports of BMW submitted by the MPPCB to CPCB revealed that out of 2280 to 2850 HCEs functioning in the State during the calendar years 2009 to 2013, HCEs functioning without authorisation were 808 to 1274 and HCEs not applied for authorisation were 782 to 1217. Year-wise details of total number of HCEs, HCEs applied for authorisation and authorisation granted by MPPCB are shown in **Appendix 2.9**.

Authorisation to HCEs was issued with a delay from 9 to 623 days

During test check of records related to authorisation in selected ROs and MPPCB headquarter, it was noticed that in 47 cases³¹ authorisation orders were issued to the occupiers by the ROs and the MPPCB headquarters, with delays ranging from 9 to 623 days beyond the stipulated time of 90 days.

In the exit conference, the Chairman confirmed the facts and stated that delay would be avoided in future. He also stated that efforts are being made to bring HCEs under authorisation mechanism.

2.1.11.2 HCEs functioning without renewal of authorisation

As per Rule 8 of the BMW Rules, every occupier of an institution generating, collecting, receiving, storing, transporting, treating, disposing and/or handling BMW in any other manner should obtain authorisation from the MPPCB for handling and disposal of BMW.

Section 15 of the Environment (Protection) Act, 1986 provides penalty for contravention of the provisions of the Act and Rules made thereunder.

627 HCEs were functioning without renewal of authorisation

Scrutiny of records relating to HCEs showed that 627 HCEs in selected ROs, which initially took authorisation, were subsequently functioning without renewal of authorisation as of March 2014 (**Appendix 2.10**).

In the exit conference, the Chairman stated that this could not be done due to shortage of staff and efforts would be made to bring HCEs under the authorisation mechanism.

Reply is not acceptable as the MPPCB confined its responsibilities to issuing of notices and penal action was not taken on defaulter HCEs as required under Environment (Protection) Act.

³¹ MPPCB Headquarter: 03 cases (31-339 days), ROs: Bhopal 08 cases (9-240 days), Dhar: 04 cases (19-366 days), Gwalior: 06 cases (16-182 days), Indore: 08 cases (63-208 days), Jabalpur: 02 cases (27-221 days), Satna: 16 cases (9-623 days).

2.1.11.3 Inadequate meetings of Advisory Committee on BMW

In pursuant of recommendations of the Rajya Sabha Committee, State Government constituted an Advisory Committee³² (January 2011) to advise the State Government and the MPPCB on matters related to the implementation of BMW Rules. This Apex Committee was to meet once in every three months to coordinate enforcement of BMW Rules.

Only one meeting of Advisory Committee on BMW held since 2011 against stipulation of one meeting in every three months

We observed that the Advisory Committee met only once in March 2011. The Committee decided to give training to hospital staff regarding management of BMW at RO level and to prepare detailed project report (DPR) to study management of BMW by including status of transportation of waste from rural areas to Common Bio-Medical Waste Treatment Facility (CBWTF). For this, the MPPCB was to coordinate with the Public Health and Family Welfare Department, which would provide financial assistance.

The work of preparation of DPR was awarded (June 2011) to Environmental Planning & Coordination Organisation (EPCO) headed by an Executive Director. But, we observed that DPR had not been prepared by the EPCO. During the period 2011-14, only 11 trainings/workshops³³ were organised in nine ROs in which 1761 trainees were imparted training. No training/workshop were organised in the remaining four ROs³⁴. Thus, recommendation of the Advisory Committee was not implemented fully as of August 2014.

On this being pointed out, the MS stated (August 2014) that due to non-providing of required funds to EPCO, the work was not initiated by them.

In the exit conference, the Chairman stated that efforts would be made to organise regular meetings of the Committee and its recommendations would be implemented. He also intimated that MPPCB constituted State Level Technical Advisory Committee with representative from Indian Council of Medical Research, for periodical review and addressing the issues of BMW.

The Advisory Committee on BMW may meet at prescribed intervals and ensure that its recommendations were implemented.

2.1.11.4 Monitoring of standards for incinerators

According to the emission standards for incinerators prescribed in the BMW Rules, five parameters (Particulate Matter, Nitrogen oxides, HCL, height of stack and volatile organic compounds in ash) were required to be monitored by State Board to ensure that pollution limits were maintained. CPCB guidelines for CBWTFs provide that one CBWTF may be allowed to cater up to 10,000 beds and shall not cater health care units situated beyond a radius of 150 Kms. There were 15 CBWTFs in the State as of March 2014.

Scrutiny of monitoring reports and records related to incinerators in four test checked ROs³⁵ revealed the following:

³² Headed by Principal Secretary of Public Health and Family Welfare Department.

³³ Bhopal (01), Guna (01), Gwalior (02), Indore (01), Jabalpur (01), Rewa (01), Sagar (01), Satna (02) and Ujjain (01).

³⁴ Dhar, Katni, Shahdol and Singrauli.

³⁵ RO: Bhopal, Indore, Jabalpur and Satna.

Prescribed parameters for emission by incinerators were not checked

- Volatile Organic Compounds (VOC) in ash was not checked by any of the four test-checked ROs, while the parameter HCL was not checked by the ROs Satna and Jabalpur,
- The Incinerator situated at Indore was catering the BMW from 12,991 beds under the jurisdiction of RO Indore. The same incinerator was also collecting BMW from Ujjain, Dewas, Shajapur, Nagda, Dhar and Burhanpur. The number of beds in these districts were not known. Besides, Burhanpur is situated about 190 kms from Indore, beyond the prescribed limit of 150 kms.
- The CBWTF at Sehore was authorised to cover Betul and Guna Districts, which are about 200 kms from Sehore.

In the exit conference, the Chairman confirmed the fact and stated that due to shortage of equipment these parameters (VOC and HCL) could not be checked. It would be checked in future. Authorisation to CBWTFs beyond radius of 150 Kms were issued as no other CBWTF was available in that area.

Hazardous waste

Hazardous waste means the waste which by reason of any of its physical, chemical, reactive, toxic, flammable, explosive or corrosive characteristics causes danger or is likely to cause danger to health or environment. Certain industries generate wastes that are toxic in nature and require adequate control.

2.1.11.5 Delayed issue of authorisation to occupiers and non-maintenance of register of conditions of authorisation

Rule 5 of Hazardous Waste Rules provides that every person who is engaged in generation, collection, processing, conversion, transfer or the like of hazardous waste shall require to obtain authorisation from State Board. On receipt of applications completed in all respect for seeking authorisation, the State Board will grant authorisation within 120 days subject to such conditions as may be laid down therein.

There were delays in granting authorisation to occupiers under Hazardous Waste Rules

During test check of records related to authorisation we observed that in 22 cases³⁶ (out of 220 cases test checked) authorisation was delayed ranging up to 347 days. However, authorisation was granted from the date of application. Out of 22 cases, delays were more than 30 days in 13 cases. Thus, delays in issuing authorisation to these occupiers resulted in functioning of the occupiers without authorisation during the period of delay.

Register of conditions of granting authorisation was not maintained

We also noticed that the ROs did not maintain register of conditions imposed during granting authorisation/ renewal, though required under the Rules. Thus, the conditions were not open for the persons affected due to the authorisation.

In the exit conference, the Chairman stated that efforts would be made to avoid delay in issue authorisation and the ROs would be directed to maintain the register of conditions while granting the authorisation.

The MPPCB should ensure maintenance of register of conditions imposed at the time of granting authorisation as prescribed in the Rules.

³⁶ No. of cases:-Bhopal: 02 (32-158 days), Dhar: 05 (1-52 days), Gwalior: 06 (12-227 days), Indore: 03 (1-28 days), Jabalpur: 01 (1 day), Satna: 05 (29-347 days).

2.1.11.6 Industries functioning without renewal of authorisation

As per Rule 5 (4) of Hazardous Waste Rules, 2008 authorisation for functioning of industries given by the State Board is valid for five years and is required to be renewed for continuous functioning of the industry.

Out of 625 industries, 76 industries were functioning without authorisation under Hazardous Waste Rules

Test check of inventory report of hazardous waste in four test-checked ROs revealed that out of 625 industries generating hazardous waste, 76 industries³⁷ were functioning without renewal of authorisation under the Hazardous Waste Rules as of March 2014.

In the exit conference, the Chairman stated that this could not be done due to shortage of staff and efforts would be made to bring industries under the authorisation mechanism.

Municipal Solid Waste

Municipal Solid Waste (MSW) includes commercial and residential wastes generated in a municipal area in either solid or semi-solid form excluding industrial hazardous wastes but including treated BMW.

2.1.11.7 Compliance with standards prescribed under MSW Rules

According to the Municipal Solid Waste Rules, Municipalities are responsible for disposal of MSW and the State Board is responsible for monitoring the compliance of standards as specified in the Rules. The Rules also provide that MSW shall be managed and handled in accordance with the compliance criteria laid down in the Rules (Schedule II) in respect of six parameters viz. collection, segregation, storage, transportation, processing and disposal of MSW.

Processing and disposal of MSW was done by less than two per cent of the local bodies

Scrutiny of annual reports submitted by MPPCB to CPCB revealed that there were 338 to 365 local bodies (LBs) in the State during the years 2009-10 to 2013-14. We observed that during these years, MSW was collected by only 3 to 11 LBs, while processing and disposal of MSW was done by only one to five LBs. Thus, processing and disposal of MSW was done in less than two per cent of the LBs. The status of compliance with standards for the six parameters by the local bodies during 2009-14 is given in **Appendix 2.11**.

In the exit conference, the Chairman stated that notices were being issued to local bodies. Continuous efforts are being made at MPPCB level to improve the situation. As local bodies are Government bodies the issue was also brought to the notice at appropriate level in the Government.

2.1.12 Monitoring for control of pollution in industries and HCEs

The State Board is required to inspect the establishments and monitor compliance with various conditions of consent and authorisation under BMW, Hazardous Waste and Consent Rules. As per Rule 6 of Consent Rules, 1975, the MPPCB is also to make surprise checks and inspections of the agencies in order to keep a constant check of pollution in the State.

No norms fixed for inspection of industries and HCEs

Test-check of records of the MPPCB and the ROs revealed that inspection of industries and HCEs was conducted at the time of issue of consent/

³⁷ Bhopal (06), Dhar (11), Indore (51), Jabalpur (08).

authorisation and renewal thereof. There was no record to show that surprise inspection of the industries was conducted during the period 2009-14.

ROs confirmed the fact and stated that inspections were also carried out in case of complaint, if any.

In the exit conference, the Chairman stated that vigilance team has been constituted for random inspections.

The MPPCB may fix norms for inspection of industries and HCEs on the basis of their pollution potentiality and ensure their compliance.

2.1.13 Non-preparation of working manual

MPPCB did not prepare working manual

The Departmental manual is a permanent directive used for detailed guidance pertaining to the administrative functions of a department and is very important for the smooth functioning of any department.

We observed that MPPCB did not prepare any manual for its functioning and to carry out the responsibilities entrusted to it under various Acts and Rules, despite being set up in 1974.

In the exit conference, the Chairman stated that the Committee has been constituted for preparation of working manual, it would be prepared shortly.

The MPPCB may prepare working manual specifying the duties and responsibilities at each level for effective internal control.

2.1.14 Manpower management

MPPCB has significant shortage of manpower

As on 31 March 2014, the MPPCB had shortage of 303 staff (39 *per cent* of sanctioned posts) in different cadres as shown in **Appendix-2.12**. We observed that the staff shortage in technical services responsible for consent/authorisation and inspections was 45 *per cent*, while staff shortage in scientific services responsible for collection and testing of samples as well as research works was 41 *per cent*. The shortages would adversely affect functioning of the MPPCB particularly collection and testing of samples and conduct of inspections.

In the exit conference, the Chairman admitted the audit observations.

The vacant posts may be filled up for efficient functioning of the MPPCB.

2.1.15 Conclusion

Working of the Madhya Pradesh Pollution Control Board (MPPCB) for prevention, control or abatement of environment pollution was not adequate as reflected from the following:

- Significant delays occurred in granting consent/authorisation to industries and health care establishments. In test checked ROs, 2190 industries, 280 local bodies and 28 building projects were functioning either without obtaining consent or renewal of consent under Water Act/Air Act. Out of 625 industries 76 industries were functioning without renewal of authorisation under Hazardous waste Rules.

- The MPPCB did not adhere to its norms prescribed for collection and testing of samples from industries to monitor pollution level and fixed targets lower than the norms.
- In 32 districts in the selected ROs, there was no sewage treatment plant for treatment of domestic effluents/sewage. River water quality deteriorated at 19 monitoring locations and improved at eight locations.
- Fourteen ambient air quality monitoring stations out of 39 sanctioned, were not functional. Shortfalls in sampling of ambient air quality in the functional stations were ranged between 34 and 95 *per cent*.
- Cement plants were causing excess emission of air pollutants.
- Monitoring for control of pollution marred due to absence of any prescribed norm for inspection of industries and HCEs by the MPPCB. The Apex Committee on BMW constituted in January 2011 never met except once in 2011.

Food, Civil Supplies and Consumer Protection Department

2.2 Public Distribution System in Madhya Pradesh

Executive Summary

Public Distribution System (PDS) is a major instrument of the Government's economic strategy for ensuring availability of foodgrains to the public at affordable prices as well as for enhancing food security to the poor. While overall responsibility of management of foodgrains in the country vested with the Government of India (GoI), the State Government is responsible for their effective distribution in the State through the PDS. In Madhya Pradesh, the PDS was implemented by Food, Civil Supplies and Consumer Protection Department. During the period 2009-14, the State Government incurred an expenditure of ₹ 2055 crore towards subsidy of foodgrains under PDS. A performance audit of the implementation of 'Public Distribution System in Madhya Pradesh' during the period 2009-14 revealed the following:

- Significant under-utilisation of funds during 2013-14 affected the PDS activities like recoupment of losses to fair price shops and lead societies on operation of PDS, construction of godowns/Covered and Plinth Storage and distribution of iodised salt.

(Paragraph 2.2.6.1)

- Number of BPL and AAY ration cards issued were more than the number of such families, indicating circulation of bogus cards. Government took initiatives for detection and elimination of bogus ration cards. But, reconciliation of BPL/AAY ration cards with survey list was not done. Computerisation of PDS was not done within the timeline.

(Paragraphs 2.2.7.1 to 2.2.7.3)

- The Department did not distribute 12.44 lakh MT wheat and 1.61 lakh MT rice during the period 2009-14. APL quota wheat of 6.84 lakh MT was diverted for BPL card holders causing additional financial burden.

(Paragraphs 2.2.8.1 and 2.2.8.2)

- Large quantity of PDS commodities remaining undistributed with FPS may lead to illegal diversion.

(Paragraph 2.2.8.4)

- The distribution of kerosene was done without ensuring the entitlement of cardholders possessing single and double LPG cylinders.

(Paragraph 2.2.8.7)

- There was significant shortage of fair price shops in rural areas.

(Paragraph 2.2.9)

- There was shortfall in conduct of monthly review of lifting and supply of PDS commodities to FPSs by the Collectors. The Vigilance committee meetings for review of allotment, distribution of foodgrains were not held regularly.

(Paragraphs 2.2.10.2 and 2.2.10.3)

2.2.1 Introduction

Public Distribution System (PDS) is meant for distribution of essential commodities to the ration cardholders (consumers) through Fair Price Shops (FPS) for distribution of foodgrains at affordable prices to the poor. The main objective of PDS is to ensure regular supply of essential commodities at reasonable prices, particularly to the weaker sections of the society. In June 1997, Government of India (GoI) introduced Targeted Public Distribution System (TPDS) under which foodgrains was to be issued at subsidised rates to each family living Below Poverty Line (BPL). In order to make TPDS more focused, GoI launched (December 2000) Antyodaya Anna Yojana (AAY) for supply of foodgrains at highly subsidised rates for the poorest of the poor in the country.

In Madhya Pradesh, the Madhya Pradesh State Civil Supplies Corporation Limited (MPSCSC) procures foodgrains as an agency of the State Government for distribution under PDS and other welfare schemes. Procurement in excess of GoI allotment is surrendered to Food Corporation of India (FCI). Under the PDS, wheat, rice, coarsegrains¹, sugar, kerosene and salt are distributed to the BPL, AAY and Above Poverty Line (APL) families.

In Madhya Pradesh, the network of PDS comprised of 22,165 FPS (rural: 18,041 and urban: 4,124). As of March 2014, the total number of families was 161.28 lakh (BPL: 58.20 lakh, APL: 85.49 lakh, AAY: 17.59 lakh). The State started providing PDS commodities as per National Food Security Act, 2013 (NFSA)² from March 2014 to persons belonging to eligible households i.e. Priority Households (PH) and AAY. The total number of verified AAY families was 16.88 lakh and PH families was 74.94 lakh as of March 2014.

2.2.2 Organisational set-up

The overall responsibility for implementation of the PDS is rested with the Food, Civil Supplies and Consumer Protection (FC&CP) Department (the Department) headed by a Principal Secretary. The Commissioner, FC&CP is the nodal officer for assessment of the requirement, allotment of district quota and payment of grants/loans/subsidies to implementing agencies, i.e. Madhya Pradesh State Civil Supplies Corporation Limited and Madhya Pradesh State Co-operative Marketing Federation Limited (MARKFED).

The agencies are responsible for procurement of foodgrains, their storage and distribution to consumers with the assistance of Madhya Pradesh State Warehousing and Logistics Corporation (MPSWLC). The District Central Co-operative Bank (DCCB) finances the lead/link societies for PDS operations.

The District Collectors with the assistance of District Supply Officers/District Supply Controllers (DSOs/DSCs) are responsible for assessing requirement of foodgrains for the districts and make further allocation to FPSs. They are also responsible for monitoring and overall control in implementation of PDS in the District. The Sub-Divisional Officers (SDOs), Revenue and the Tahsildars

¹ Maize and Jowar .

² The Act provides for food and nutritional security by ensuring access to adequate quantity of quality food at affordable prices to the people.

at block level assist the DSOs/DSCs in allotting FPS and issue of ration cards respectively.

2.2.3 Audit objectives

The objectives of the performance audit were to assess whether:

- identification and selection of beneficiaries was as per norms;
- distribution arrangements to ensure accessibility to PDS commodities were effective; and
- effective vigilance was exercised over various functionaries of Scheme operations through suitable monitoring/inspection mechanism.

2.2.4 Audit criteria

The Audit criteria were derived from the following sources:

- Provisions of the Public Distribution System (Control) Order, 2001 (GoI) and Madhya Pradesh Public Distribution System (MPPDS) (Control) Order, 2009 regarding issue of ration cards, operation of FPSs, distribution, allotment and storage of PDS commodities as well as inspection and supervision.
- GoI guidelines relating to identification of beneficiaries.
- Orders/instructions of GoI and State Government for issue of ration cards, weeding out of bogus ration cards and monitoring over functioning of FPS.
- Scale of issue and issue rates of foodgrains prescribed by the GoI and the State Government.
- Prescribed monitoring mechanism as per State Government and GoI control orders and instructions.

2.2.5 Audit coverage and methodology

Implementation of PDS during the period 2009-14 was reviewed between November 2013 and August 2014 through test check of records and analysis of the data collected from the offices of Commissioner (FC&CP), MPSCSC, MARKFED, MPSWLC Headquarters and selected district offices. Out of 51 districts³ in the State, 14 districts⁴ were selected by adopting Simple Random Sampling Without Replacement (SRSWOR) method. Three blocks from each selected districts and four FPS from each block were selected at district level.

The records of District Manager (DM) MPSCSC, District Marketing Officer (DMO) MARKFED in selected districts were also test checked along with records of warehouses/godowns, lead/link societies, wholesale dealers and FPSs in the selected blocks. The entry conference was held on 21 May 2014 with the Principal Secretary of the Department wherein the audit objectives, scope and methodology were discussed. Exit conference was held with

³ One district (Agar-Malwa) created in August 2013.

⁴ Barwani, Bhopal, Dhar, Indore, Katni, Khandwa, Khargone, Raisen, Ratlam, Rewa, Satna, Shahdol, Sidhi and Ujjain.

Principal Secretary on 5 November 2014; the views of the Department have been incorporated suitably at appropriate places in the review.

Audit findings

2.2.6 Financial position

2.2.6.1 Budget provision and expenditure

The budget provisions and expenditure incurred on PDS during the years 2009-10 to 2013-14 are indicated in **Table 1** and the component-wise details are shown in **Appendix 2.13**.

Table 1: Budget Provision vis-à-vis Expenditure

Year	Budget Provision	Expenditure	Savings (percentage)
2009-10	619.45	524.44	95.01 (15.34)
2010-11	718.79	692.44	26.35 (3.67)
2011-12	1,143.52	1,120.66	22.86 (2.00)
2012-13	2,029.47	1,972.74	56.73 (2.80)
2013-14	2,303.69	1,844.60	459.09 (19.93)
Total	6,814.92	6,154.88	660.04 (9.69)

(Source: Detailed Appropriation Accounts)

It would be seen from above table that there were significant savings during 2009-10 (15 *per cent*) and 2013-14 (20 *per cent*). Under-utilisation of funds during 2013-14 was mainly under the components ‘recoupment of losses to co-operative societies for sale of foodgrains under PDS’ (₹ 15 crore), ‘Antyodaya Food Scheme’ (₹ 67.81 crore), ‘computerisation’ (₹ 20.50 crore), ‘compensation of losses in construction of temporary Covered and Plinth (CAP)⁵ storage’ (₹ 45 crore), ‘construction of godowns’ (₹ 67 crore) and ‘distribution of iodised salt’ (₹ 42.22 crore). This indicated lack of budgetary and expenditure controls by the Commissioner (FC&CP).

In the exit conference, the Principal Secretary attributed the savings to restriction of drawals by Finance Department and non-submission of claims by the societies.

2.2.7 Identification of beneficiaries

In September 2002, GoI prescribed an improved methodology for identification of BPL households who could be assisted under various anti-poverty programmes implemented by the Government. For this purpose, 13 scorable indicators have been prescribed by GoI to assess the socio-economic condition of the beneficiaries and the total score for each household. The families which have score of 14 (out of total score of 52 from 13 indicators) are identified as BPL families.

The GoI guidelines also stipulated that the States may identify the BPL households in such a way that the total number of beneficiaries identified does not exceed the number of BPL families as estimated by the Planning Commission for the year 1999-2000 by more than 10 *per cent*. In the State, identification of BPL/AAY beneficiaries was done during 2002-03 at Gram Panchayat and Urban Local Bodies level and the BPL list was displayed at these levels.

⁵ Storage in open by covering with Polythene sheet.

In February 2008, Government of MP intimated GoI the number of BPL families in the State as 44.59 lakh on the basis of 'cut-off point' against 37.13 lakh fixed by the GoI. The inclusion of name in the BPL list is a continuous process and at the end of March 2014, there were 75.79 lakh BPL families in the State as per BPL survey list.

2.2.7.1 Issue of ration cards

As envisaged in Annexure-I of clause 3 of MP PDS (Control) Order 2009, APL ration cards under PDS are to be issued by the Gram Panchayats in rural areas and urban local bodies in urban areas by designated authorities⁶. From April 2013, the Chief Executive Officer (CEO) Janpad Panchayat was authorised to issue the cards for rural areas. As per the provisions of *MP Lok Sewaon ke Pradan ki Guarantee Adhiniyam 2010*, BPL and AAY cards in rural areas are to be issued by Tahsildar and for urban areas by Assistant Supply Officers (ASOs) of DSO/DSC office.

As per the instructions issued (December 2009) by the Department, the DSOs/DSCs were to intimate every month the details of existing ration cards to local bodies who are to ensure that the number of ration cards were not in excess of the number of BPL families shown in the survey list. Thereafter, local bodies would intimate Commissioner (FC&CP) the number of existing BPL/AAY cards each month. Further, the Commissioner directed (October 2012) the District Collectors to ensure holding of monthly meetings of card issuing authorities and local bodies authorities to reconcile their records in order to reduce the bogus cards.

We noticed that the number of ration cards issued was different from the number of BPL families in the State during 2009-14, as shown in **Table 2**.

Table 2: No. of BPL families and BPL and AAY ration cards issued

(figures in lakh)

Year	Number of BPL families	Number of BPL and AAY ration cards issued	Excess(+)/shortage(-)
2009-10	66.57	68.75	(+)2.18
2010-11	66.57	68.78	(+)2.21
2011-12	66.57	70.48	(+)3.91
2012-13	70.90	70.60	(-)0.30
2013-14	70.90	75.79	(+)4.89

(Source: Information furnished by Commissioner (FC&CP), Panchayat and Rural Development Department and Urban Administration and Development Department)

The issuance of ration cards during 2009-10 to 2011-12 and 2013-14 more than the number of BPL and AAY families indicated circulation of bogus cards in the State. The families, to whom cards were not issued during 2012-13 were deprived of getting benefit of PDS.

In the test checked districts, we noticed that the monthly meetings of card issuing authorities and local bodies authorities were not held for reconciliation of the records. Also, information on ration cards was not sent to local bodies authorities by DSOs/DSCs. The monthly reporting on circulation of cards was not sent to Commissioner (FC&CP) by the local bodies authorities. We further noticed that compared to the households mentioned in the Population Census 2011, there were circulation of 6.64 lakh (four *per cent*) excess ration cards of

The number of BPL/ AAY cardholders were more than the number of BPL families in the State

⁶ Panchayat Secretary, Chief Municipal Officer in Municipality and Nagar Panchayat areas and the Municipal Commissioner in Municipal Corporation areas through Chief Municipal Officer/Assistant Commissioner/ Health Officer.

all categories in the State. In five districts⁷ out of 14 selected districts, excess circulation was four to 22 *per cent*. The discrepancy was due to non-observance of Government directions.

As required under MP PDS (Control) Order 2009, the database of ration cards was to be maintained at Directorate level and district level. The physical verification of 20 *per cent* of ration cards issued every year was also to be ensured by the District Collectors. We observed that the database of ration cards was not maintained and physical verification of ration cards was not done by the Collectors.

In the exit conference, the Principal Secretary stated that instructions would be issued to the district authorities for reconciliation of records of ration cards and survey list.

2.2.7.2 Elimination of bogus ration cards

The PDS (Control) Order, 2001 stipulates that eliminating bogus ration cards as well as bogus units in the ration cards should be a continuous exercise by the State Government.

Scrutiny of records of Commissioner (FC&CP) revealed that despite directions issued (June 2008) by GoI to communicate the action taken for deletion of bogus ration cards, the Department did not take any initiative up to August 2009. Only after issue of GoI instructions in August 2009 to carry out an intensive campaign to review the list of BPL and AAY families and ration cards for elimination of the bogus ration cards, the State Government issued directions (September 2009) for conducting campaign to all District Collectors. During the campaign conducted (2009-11), 70,168 bogus ration cards were deleted in the State, as reported (July 2012) by the Commissioner (FC&CP) to the State Government.

Again, in October 2010, the Commissioner (FC&CP) directed all Collectors in pursuance with the GoI directions (September 2010) for issuing advertisement in newspaper for surrender of bogus ration cards within two weeks of advertisement and directed to launch campaign after the expiry of two weeks. After advertisement (October to December 2010), 35,428 bogus ration cards were surrendered and deleted. In the test checked districts, we noticed that further review of ration cards after expiry of two weeks of advertisement was not conducted except in Ujjain District.

Further, in June and October 2012 the Commissioner directed DSOs and District Collectors for checking of one FPS each in 40 districts⁸ on random basis and to trace the bogus cardholders by reconciling the records of BPL/AAY ration cards with BPL survey list and total ration card holders with the number of households projected in population census 2011. Variations noticed, if found, could be traced by door-to-door physical verification of cardholders.

During the random checking, 1,315 bogus ration cards were detected and ₹ 14.62 lakh were recovered during the period 2012-14 from the cardholders for the ration taken by them earlier.

1,06,911 bogus ration cards were eliminated in the State during 2009-14. Door to door physical verification was not done

⁷ Barwani: 54,665 (22 *per cent*), Dhar: 48,495 (11 *per cent*), Khandwa: 50,246 (19 *per cent*), Ratlam : 12,988 (4 *per cent*) and Ujjain: 41,290 (11 *per cent*).

⁸ Excluding ten districts where the checking was conducted earlier.

We observed that only in three selected districts, i.e. Khandwa, Satna and Sidhi, the reconciliation of ration cards was done during the period. However, door-to-door physical verification was not done by them to settle the variation noticed during reconciliation. Thus, possibility of existence of bogus ration cards in the State could not be ruled out. This indicates laxity on the part of district level officials in observing the Government directions and lack of monitoring on the part of Commissioner (FC&CP).

In the exit conference, the Principal Secretary stated that the Government had made sufficient efforts for cancelling the bogus ration cards and periodical checking of ration card to weed out the bogus ration cards would be ensured.

The periodical check of ration cards to weed out ineligible and bogus ration cards should be continued.

2.2.7.3 Delay in computerisation of TPDS

For computerisation of PDS, GoI framed guidelines and directed (October 2011) the State Government to prepare action plan. The first component of the computerisation comprised of digitisation of ration cards/beneficiary and other databases, computerisation of supply-chain management, setting up of transparency portal and grievance redressal mechanisms was to be carried out during the year 2012-13 and the second component (computerisation of operations at the FPS) was to be completed by the year 2013-14.

We observed that against the demand of ₹ 58.51 crore proposed by the State Government in February 2013, GoI sanctioned (March 2013) ₹ 57.80 crore and released ₹ 17.34 crore during the period 2012-14 for the activities under the first component. The State Government, however, spent ₹ 8.55 crore during the years 2012-13 (₹ 3.11 crore) and 2013-14 (₹ 5.44 crore) for digitisation of ration cards and procurement of hardware for supply chain management etc. in the districts. As per the progress report submitted to GoI (July 2014) the work of digitisation of beneficiaries and supply chain management was in progress.

Thus, the activities of even the first component of computerisation was not done as of July 2014 for computerisation of PDS from FPS to State level.

In the exit conference, the Principal Secretary stated that the digitisation of beneficiaries is a continuous process and 116 lakh households have been digitised. Computerisation of supply chain management is under progress.

2.2.8 Distribution of commodities under PDS

Foodgrains procured and lifted from FCI, sugar lifted from sugar factories and salt procured from open market were kept in the warehouses hired by the authorised nominee, MPSCSC. The delivery of PDS commodities from the warehouses was made by MPSCSC through the lead/link societies⁹ to FPSs for distribution. Kerosene was supplied by the oil companies to the wholesale dealers on the basis of allotment orders of the Commissioner (FC&CP). The

⁹ "Lead society" means a co-operative society which has been issued a license by the Collector for lifting and transportation of controlled essential commodities from the issue centre to the designated fair price shop. "Link society" means any primary agricultural co-operative society, *laghu vanopaj sahakari samiti* and marketing or wholesale consumers co-operative society authorized by the Department to run a fair price shop in the rural areas under the public distribution system.

wholesale dealers supplied the kerosene to FPSs through lead societies/semi wholesale dealers. As on March 2014, there were 189 issue centres of MPSCSC located at district and sub district level, 5560 lead societies and link societies and 22,165 FPS for distribution of PDS commodities to cardholders.

The PDS commodities allocated by GoI on quarterly/yearly basis was further re-allocated on monthly basis to DSOs/DSCs of the districts by Commissioner (FC&CP). The DSOs/DSCs issued block-wise/ FPS-wise allotment orders. The scale of issue of foodgrains as fixed by GoI for APL, BPL and AAY cardholders was 35 kg per cardholder since April 2002. In March 2008, the State Government scaled down the quantity of foodgrains for BPL families to 20 kg per card holder and also reduced the rates¹⁰ of consumer price. There was no fixed scale of issue for APL cardholders in the State.

However, Government enhanced¹¹ (May 2011) the consumer price of wheat and rice for APL cardholders. The distribution of sugar was made at subsidised rate of ₹ 13.50 per kg. to BPL and AAY families. The financial burden in excess of GoI subsidy (₹ 18.50 per kg.) was to be borne by the State Government. The salt was distributed to BPL/AAY families at ₹ 1 per kg. by the State Government from its own sources.

During 2009-14, expenditure incurred by the State Government was ₹ 1,891.14 crore for BPL and ₹ 163.97 crore for AAY on subsidisation of issue price of foodgrains, in excess of the subsidy given by GoI.

Due to implementation of NFSA 2013, priority households were to be issued foodgrains at 5 kg. per person per card and AAY cardholders at 35 kg. per card per month from March 2014. The flow diagram of the distribution of PDS commodities from State level to FPS is given in the chart (**Appendix 2.14**).

The deficiencies noticed in the allotment, lifting, distribution and handling of PDS commodities are discussed in succeeding paragraphs:

2.2.8.1 Diversion of APL quota of wheat for BPL beneficiaries

PDS (Control) Order, 2001 stipulates that the State Government should not divert the allocation made by GoI under PDS for distribution under other Schemes.

The total number of BPL families identified (March 2014) by State Government was 75.79 lakh. However, GoI allotted foodgrains for only 41.25 lakh BPL families¹². During scrutiny of records of allocation of foodgrains by Commissioner (FC&CP), we noticed that 6.84 lakh MT APL quota wheat was diverted to meet the requirement of BPL families. As a result, State Government had to bear additional burden of ₹ 507.96 crore¹³, towards difference amount of Central Issue Price (CIP)¹⁴ and consumer price fixed by

APL quota wheat of 6.84 lakh MT was diverted for BPL card holders causing additional financial burden of ₹ 507.96 crore

¹⁰ The consumer price of wheat reduced from ₹ 5 to ₹ 3 per kg and rice ₹ 6.50 to ₹ 4.50 per kg.

¹¹ The price of wheat increased from ₹ 7 to ₹ 9 per kg and rice from ₹ 9.20 to ₹ 11.00 per kg.

¹² As per the number calculated by the Planning Commission (GoI)

¹³ The difference in CIP ₹ 1,950 per MT (₹ 6,100 for APL wheat - ₹4,150 for BPL wheat) X 6,83,873 MT = ₹13,335.52 lakh + difference in consumer price fixed by State Government ₹ 37,460.60 lakh (2009-11, ₹ 4,000 per MT X 2,80,806 MT = ₹ 11,232.24 lakh+ 2011-13, ₹ 6,000 per MT X 2,77,800 MT= ₹ 16,668.00 lakh + 2013-14, ₹ 6,000 per MT X 23050 MT= ₹ 1383 lakh+ ₹ 8,000 per MT X 1,02,217 MT= ₹ 8177.36 lakh).

¹⁴ The Price notified by GoI for distribution of foodgrains under PDS.

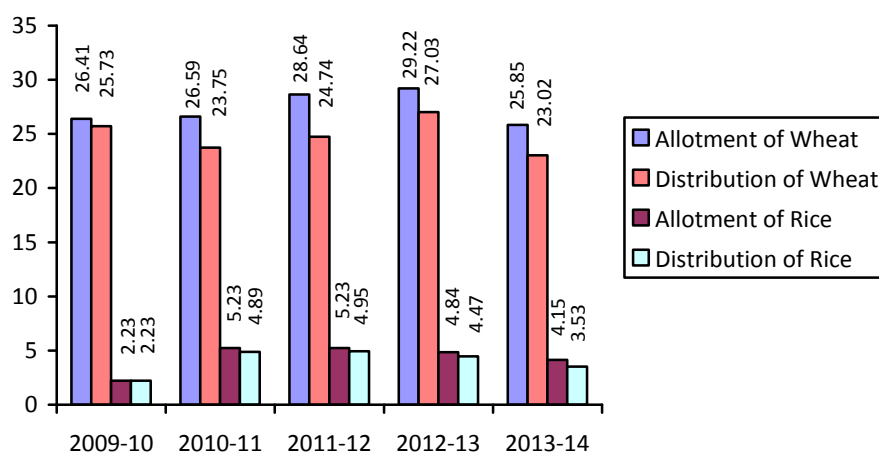
State Government for the total quantity of foodgrains diverted during 2009-14. Thus, APL quota wheat was diverted in violation of GoI order.

In the exit conference, the Principal Secretary stated that the APL quota of wheat was diverted to BPL due to less allotment in BPL and the extra financial burden was borne by the State Government.

2.2.8.2 Shortfall in distribution of wheat and rice

The allotment of wheat and rice by GoI and distribution by the State Government through MPSCSC during the period 2009-14 was as under

Allotment and distribution of wheat and rice (in lakh MT)



The Department did not distribute 12.44 lakh MT wheat and 1.61 lakh MT rice during the period 2009-14.

The percentage of distribution of wheat by the State against allotment made by GoI ranged between 97 per cent (2009-10) and 86 per cent (2011-12). The percentage distribution of rice ranged between 100 per cent (2009-10) and 85 per cent (2013-14). The details of distribution of foodgrains against allotment made by GoI for various categories of cardholders are given in **Appendix 2.15**.

The distribution of wheat and rice against GoI allotment for various categories of cardholders during the period 2009-14 are shown in **Table 3**.

Table 3: Distribution of wheat and rice against GoI allotment to APL/BPL/AAY cardholders

(in lakh MT)

Year	Category	APL		BPL		AAY	
	Commodity	Allotment	Distribution (Percentage)	Allotment	Distribution (Percentage)	Allotment	Distribution (Percentage)
2009-10	Wheat	9.33	8.65(93)	11.48	11.48(100)	5.60	5.60(100)
	Rice	0	0	1.19	1.19(100)	1.04	1.04(100)
2010-11	Wheat	10.98	7.35(67)	10.01	10.92(109)	5.60	5.49(98)
	Rice	0.66	0.33(50)	3.54	3.54(100)	1.04	1.02(98)
2011-12	Wheat	9.99	6.33(63)	12.74	12.95(102)	5.92	5.46(92)
	Rice	0.19	0	3.88	3.93(101)	1.16	1.01(87)
2012-13	Wheat	10.04	6.90(69)	12.95	14.20(110)	6.23	5.94(95)
	Rice	0	0	3.68	3.36(91)	1.16	1.11(96)
2013-14	Wheat	9.20	5.95(65)	9.78	10.34(106)	5.14	5.14(100)
	Rice	0	0	2.73	2.15(79)	0.95	0.94(99)

(Source: information furnished by MPSCSC)

It is evident from the table that the distribution of APL wheat against the GoI allotment ranged from 63 to 93 *per cent*. The distribution of BPL wheat was more than the allotment during the years 2010-11 to 2013-14. The distribution of AAY wheat ranged from 92 to 100 *per cent* and that of rice ranged from 87 to 100 *per cent*.

Under NFSA 2013, the beneficiaries were provided 92 *per cent* wheat and 91 *per cent* rice against the allotment during the month March 2014.

MPSCSC did not furnish the reasons for shortfalls in distribution of wheat and rice.

In the exit conference, the Principal Secretary attributed less distribution in APL scheme to non-reaching of consumers because of less difference in the market price and consumer price.

The reply to short distribution of foodgrains to APL cardholders was not tenable as diversion of APL wheat to BPL cardholders was made at Directorate level and less quantity of wheat allotted to APL cardholders.

Efforts should be made to lift the entire quantity of PDS commodities allotted to ensure adequate food security to poor.

2.2.8.3 Selling of wheat at lower rates to lead societies for distribution

Under PDS, MPSCSC sold the commodities except kerosene to lead/link societies at the rate fixed by Government and these societies sold the commodities to FPS at the sales price fixed for them.

As per the cost sheet¹⁵ approved (August 2010) by State Government, the selling price of adhoc/additional wheat to the lead societies was ₹ 930 per quintal for urban areas and ₹ 921 per quintal for rural areas. The rates were revised in October 2010 to ₹ 963 and ₹ 957 respectively. However, it was clarified (October 2010) that if the wheat had been distributed at old rates, the difference in rate should be recovered from the concerned lead societies.

We observed that against allotment of 87,902 MT in the test checked districts, MPSCSC sold 51,479 MT of wheat (urban 24,442 MT and rural 27,037 MT) at old rates instead of revised rates to the lead societies. The selling at lower rates resulted in loss of ₹ 1.78 crore (**Appendix 2.16**).

In the exit conference, the Principal Secretary stated that instructions for making recovery from lead societies had been issued to district offices.

2.2.8.4 PDS commodities remained undistributed in FPS

MP PDS (Control) Order, 2009 provides that the DSOs/DSCs should sub allocate the commodities to FPS after deducting the balance quantity of previous month remaining with the FPS. But the DSOs/DSCs allocated the foodgrains without taking into account the closing stock of previous month with the FPS. Scrutiny of monthly reports on allocation and distribution by FPS (M1) in test checked districts revealed that there were 3,693 Kilo Litre (KL.) kerosene and 20,971 MT foodgrains/sugar and salt worth ₹ 10.56 crore were lying undistributed at FPSs as on 31 March 2014 in nine test checked districts (**Appendix 2.17**). These included 1,575 MT APL foodgrains, which was not distributed due to launching of NFSA 2013.

Selling of wheat at lower rate to the lead societies resulted in loss of ₹ 1.78 crore

Large quantity of PDS commodities remaining undistributed with FPS may lead to illegal diversion

¹⁵

Statement showing the sales rate fixed for lead societies and consumer.

Large quantity of stock of PDS commodities remaining un-distributed at FPS level may lead to illegal diversion of subsidised commodities.

In the exit conference, the Principal Secretary stated that the undistributed APL stock 4,181.7 MT had been allocated to Jails for prisoners at APL rates and allocation of foodgrains at present was being made from Directorate level after adjusting the quantity lying in FPSs.

2.2.8.5 Acceptance of damaged/inferior quality of rice for PDS

The quality of rice as specified by GOI was to be ensured before distribution in PDS. Test check of records of DM, MPSCSC, Khandwa revealed that 49,756 bags (24,224.84 quintal) of rice was received in Central Warehousing Corporation (CWC), Khandwa in February 2013 from Jabalpur District as per the rake movement plan (through goods train). The Manager CWC reported (February 2013) DM Khandwa that 250 bags of rice received were water affected, damaged stock and 215 bags were mixed with coal, cement and dust and not fit for human consumption since, the rice bags were loaded without cleaning the wagon and without putting polythene on the floor. District Manager, Khandwa also reported (February 2013) DM Jabalpur regarding receipt of inferior quality of rice and accepted 465 bags (229.80 quintal) of rice valued ₹ 4.24 lakh.

Similarly, 161 bags (70.78 quintal) of rice valued ₹ 1.38 lakh received in CWC Khandwa in December 2013 through rake movement were found cement mixed. The District Manager, Khandwa stated (May 2014) that disposal of inferior quality rice was under process at Headquarter level.

In the exit conference, the Principal Secretary stated that audit would be intimated after taking necessary action.

2.2.8.6 Non-delivery of sugar by sugar factories

Scrutiny of records of allotment and lifting of sugar revealed that the GoI instructed (April to June 2012) five sugar factories in MP for supplying 3,936.6 MT for the period June to August 2012 under PDS. Due to short supply of levy sugar of 2,746.40 MT, both GoI and State Government issued (January and June 2013) instructions to seize the sugar and take action as per provisions contained in Essential Commodities (EC) Act, 1955. As of August 2014 four factories did not supply 2,398.40 MT sugar.

Similarly, based on MPSCSC report (April 2013) regarding short supply of 23,114.40 MT of sugar by 12 sugar factories, GoI issued instructions (April 2013) to seize the stock of concerned sugar factories. As of August 2014, short supply of sugar was 12,000.62 MT by four factories of MP (328.90 MT) and eight factories of Maharashtra (11,671.72 MT).

There were no records to show that the districts authorities had taken any action for seizure of sugar.

Non-delivery of sugar by the sugar factories affected distribution of sugar to the poor.

In the exit conference, the Principal Secretary stated that action taken against non-delivery of sugar by the concerned sugar factories would be intimated to Audit after getting information from District Collectors.

Action against defaulter sugar factories for not delivering 14,399 MT sugar was not initiated during 2012-14

2.2.8.7 Distribution of Kerosene oil

Entitlement of kerosene under PDS was five litres for the BPL cardholders and four litres for APL cardholders per month, if they do not have any Liquefied Petroleum Gas (LPG) connection. The cardholders having LPG double bottle connection (DBC) were not eligible for supply of kerosene under PDS and the cardholders having single bottle connection (SBC) would receive half of the entitlement. Further, as per Government instructions issued to the District Collectors, the ration cards were to be stamped as DBC or SBC to prevent distribution of kerosene to ineligible cardholders.

Distribution of kerosene was not restricted to cardholders possessing two/one LPG cylinder

We observed that there were 35.01 lakh DBCs and 35.03 lakh SBCs as of March 2014. However, information about cardholders having one or two LPG cylinders and about stamped or unstamped ration cards was not available in the Directorate. Out of 14 test-checked districts, six¹⁶ had the information about total gas connections. Only Khargone District had the information of stamped/unstamped cardholders. However, all the DSOs/DSCs allotted the kerosene without ascertaining the actual entitlement of the cardholders. As a result, distribution of kerosene to DBC cardholders and to the single connection holders in excess of their entitlement can not be ruled out.

In the exit conference, the Principal Secretary stated that the data of LPG connection holders had been obtained from oil companies and distribution of kerosene according to the entitlement of households would be ensured.

The Government needs to expedite stamping of LPG connection details in the ration cards to eliminate supply of kerosene to ineligible cardholders.

2.2.8.8 Distribution of salt under PDS without ensuring iodine contents

The Commissioner (FC&CP) issued (November 2006) instructions for distribution of salt at ₹ 1 per kg per month to each category of cardholder in 89 tribal blocks. In May 2013, the Department decided to distribute salt in all districts except APL cardholders. Against allotment of 2.10 lakh MT salt, 1.68 lakh MT (80 per cent) was distributed during 2009-14. In the test checked districts, 0.66 lakh MT salt out of 0.74 lakh MT was distributed during 2009-14.

In the test checked districts, salt was distributed without ensuring prescribed iodine contents

MPSCSC issued (February 2008) instructions to conduct regular test of iodine contents in the salt distributed to cardholders to ensure 30 ppm contents in salt as prescribed in Prevention of Food Adulteration Act 1954 (PFA Act) by random sampling through analysis kit. The random samples were also to be taken jointly by the District Manager and representative of Food Controller and sent to Controller Food & Drugs twice in a month. The report of analysis was to be sent to MPSCSC Headquarters. We noticed in 13 test checked districts that no sample of salt was taken and sent to laboratory for analysis. This indicated that the salt supplied by the supplier was distributed in PDS without ensuring the iodine contents.

In the exit conference, the Principal Secretary attributed the shortfall to non-purchase by APL beneficiaries. He stated that quality testing kits would be provided and instructions would be issued to districts for ensuring quality.

¹⁶ Dhar, Khandwa, Khargone, Satna, Sidhi and Ujjain.

2.2.9 Working of Lead Societies and Fair Price Shops

All the lead societies and FPSs are run by the Co-operative societies which are registered under MP Co-operative Societies Act, 1960. The running of FPS is to be regulated by procedures laid down in MP PDS (Control) Order, 2009. There should be one fair price shop in every Gram Panchayat (GP) provided that a second FPS may be opened where the cardholders do not have FPS within three kilometres and there are at least 200 cardholders. In the urban area there should be one FPS for every 5,000 population.

The allotment of FPS is done by SDO (Revenue) at block level and by DSO at district Headquarter. The allocation of foodgrains made to FPS should be verified by two members of FPS level Vigilance Committee and monthly reporting on allocation and distribution was to be sent to lead societies by FPS by seventh of ensuing month.

There were shortages of 982 FPSs in rural areas and 295 FPSs in urban areas in test-checked districts

As of March 2014, there were 4124 FPSs in urban areas for 2.01 crore urban population, (40.13 lakh households) and 18,041 FPSs in rural areas for 23,006 Gram Panchayats having 1.11 crore households.

We observed that in the test-checked districts, there were shortages of 982 FPSs in rural areas and 295 FPSs in urban areas. District-wise details are given in **Appendix 2.18**. In 168 FPSs and 54 lead/link societies test checked, we observed instances of non-compliance with the terms and conditions prescribed in MP PDS (Control) Order 2009 as shown in **Appendix 2.19 and 2.20**. Important observations are as under:

- Physical verification of PDS commodities received were not conducted by members of Vigilance Committees in 146 FPSs.
- 133 FPSs did not maintain the cash book during the period 2009-14.
- None of the FPSs displayed sealed sample of foodgrains to be sold in the FPSs.
- Fifty five FPSs salesman intimated that they opened the shop less than six days in a week.

In the exit conference, the Principal Secretary stated that FPSs could not be operated in each Panchayat as the Panchayats having less number of households were not able to operate the FPS due to economic viability and deficiencies would be eliminated after implementing door delivery system in the entire State.

2.2.9.1 Non-recoupment of losses to lead societies and FPS

Non-recoupment of losses amounting to ₹ 8.51 crore to lead societies and fair price shops

Co-operative Department, GOMP fixed (September 2000) the rates for compensation to the lead societies and FPS for the losses incurred in operation of PDS. The recoupment amount fixed for FPS was ₹ 6,500 per FPS per year and for lead societies it was ₹ 1.00 lakh or one *per cent* of their business transaction whichever is less. Scrutiny of records of Commissioner (FC&CP) revealed that losses amounting to ₹ 8.51 crore for the period 2006-13 were not recouped to 220 lead societies (₹ 2.13 crore) in 29 districts and 10,102 FPSs (₹ 6.38 crore) in 30 districts, though ₹ 15 crore was provided for this purpose during 2013-14.

The Commissioner (FC&CP) attributed (May 2014) non-payment to restriction on drawals made by Finance Department.

2.2.10 Monitoring and Vigilance mechanism

2.2.10.1 Operation of Global Positioning System¹⁷ (GPS) in vehicles transporting PDS commodities

The State Government made amendment (January 2012) in PDS (Control) Order, 2009 and directed (February 2012) District Collectors and MD,MPSCSC to install GPS instrument in all the vehicles engaged in transporting PDS commodities within six months. Further, in response to a PIL submitted by an organisation the Government submitted an affidavit in March 2013 before Hon`ble Supreme Court of India that the work on installation of GPS system was in progress.

Scrutiny of records of Commissioner (FC&CP) revealed that the software for GPS based vehicle tracking system was to be developed by Madhya Pradesh State Electronics Development Corporation Limited (MPSEDC) for monitoring of the GPS equipment installed by the vehicle owners at district level. The Commissioner paid ₹ 1.22 crore to MPSEDC between October 2012 to March 2013. However, the Commissioner stated (August 2014) that in the minutes of meeting held on 23 May 2014 with the Chief Minister, it was decided not to adopt the GPS system in the PDS.

Thus, the objective of monitoring leakage and diversion of PDS commodities during transportation, through GPS, could not be fulfilled. The admission made to the Hon`ble Supreme Court through affidavit was not also adhered to.

2.2.10.2 Inspection of distribution agencies

As per clause eight of MP PDS (Control) Order, 2009, the Collector of the District was to prepare rosters for inspection of fair price shops by executive officers of Food, Co-operative and Revenue Departments at least once in every three months and inspection of the lead societies at least twice in a month. The Collector should review the lifting and supply of PDS commodities to the FPS once in a month.

In the test checked districts, we observed that the rosters for inspecting the FPS and lead societies were prepared only in six¹⁸ districts and one district (Khargone) respectively. Further, the monthly review was conducted by the Collector only in five¹⁹ test checked districts. The reports of reviews conducted were also not maintained. However, the Directorate had no information about the inspection conducted in the districts.

Further, we observed that there were shortfalls in inspection of the district offices by the officers of MPSCSC Headquarters ranging from 25 *per cent* to 70 *per cent* compared to the roster/norms fixed during the years 2009-10 to 2013-14. The inspections actually conducted by the District Managers were not ascertained by MPSCSC since the monthly reports of inspection conducted

¹⁷ A radio-wave based navigation system that allows land, sea and airborne users to determine their exact location, velocity and time 24 hours a day, in all weather conditions, anywhere in the world.

¹⁸ Dhar, Khandwa, Khargone, Raisen, Ratlam and Satna.

¹⁹ Khandwa, Rewa, Satna, Sidhi and Ujjain.

by District Managers were not sent regularly to MPSCSC Headquarters. This indicates lack of control over the PDS activities carried out by the districts officials. The MD, MPSCSC stated that there was shortage of staff in Headquarters.

Further, misappropriation/shortage in store of PDS commodities i.e. wheat, rice and kerosene etc. were noticed during inspection of FPSs conducted by the departmental authorities. The prescribed records i.e. stock register, sales register were not available during inspection. The details are shown in **Appendix 2.21**.

In the exit conference, the Principal Secretary stated that inspection and monitoring of FPSs would be strengthened by establishing grievance redressal mechanism and by inspection through officers.

The Department should strengthen the inspection mechanism over the functioning of FPSs to prevent distribution of commodities to ineligible persons and diversion of foodgrains if any.

2.2.10.3 Holding of Vigilance committee meetings

In February 2004, State Government issued instructions for formation and holding meetings of the Vigilance Committees (VC)²⁰ at different levels. It was directed to hold weekly meeting at district level and monthly meeting at block and FPS level.

We observed that the State level VC was formed in May 2009 and only two meetings were held during 2009-14 against four meetings due each year. Vigilance Committees were not constituted in 301 FPSs (out of 7,259) and the meetings were not held regularly as shown in **Appendix 2.22**. The shortfalls in meeting were 47 *per cent* at FPS level, 48 *per cent* at block level and 58 *per cent* at district level. It was also observed that information relating to VC was not sent to GoI during the review period due to non-submission of reports by district authorities.

The Directorate issued (March and October 2009) instructions for sending monthly reports through online software developed for this purpose. We observed that the reports submitted by the DSOs/DSCs were not compiled at Commissioner (FC&CP) level. The Commissioner stated (August 2014) that the reports received from districts would be compiled in future. He also stated that monitoring was done through video conferencing with districts officials.

Thus, monitoring and VC at all levels were ineffective and supervision/inspection over functioning of PDS was lax.

In the exit conference, the Principal Secretary stated that regular meeting of VC would be ensured after formation new VC under NFSA 2013.

The Department should review the performance of vigilance committees at all levels in monitoring the distribution of foodgrains.

There was shortfall in constitution of Vigilance Committees at FPSs level and required number of meetings were not held at all levels

²⁰ Consisting of Chairman, Member Secretary and other members at block level and district level, Chairman, Co-ordinator and other members at FPS level.

2.2.11 Conclusion

- Number of BPL and AAY ration cards issued were more than the number of such families, indicating issue of bogus cards. Though the Department detected and eliminated 1.07 lakh bogus ration cards during 2009-14, the initiatives were not effective since reconciliation of BPL/AAY ration cards with BPL survey list and total ration card holders with households projected in population census 2011 was not done.
- Computerisation of TPDS was not completed within the timeline fixed by GoI and funds provided for this purpose remained unutilised.
- The Department did not distribute 12.44 lakh MT wheat and 1.61 lakh MT rice during the period 2009-14. APL quota wheat of 6.84 lakh MT was diverted for BPL card holders causing additional financial burden. Large quantity of PDS commodities remaining undistributed with FPS may lead to illegal diversion.
- There were shortages of 982 FPSs in rural areas and 295 FPSs in urban areas in test checked districts.
- There was shortfall in conduct of monthly review of lifting and supply of PDS commodities to FPSs by the Collectors. The Vigilance committee meetings for review of allotment, distribution of foodgrains were not held regularly.

Panchayat and Rural Development Department

2.3 Implementation of Total Sanitation Campaign/Nirmal Bharat Abhiyan

Executive Summary

Government of India (GoI) introduced the Central Rural Sanitation Programme (CRSP) in 1986 with the objective of improving the quality of life of the rural people through proper sanitation facilities and to provide privacy and dignity to women. GoI modified CRSP in 1999 and renamed the programme as Total Sanitation Campaign (TSC). TSC was again renamed as *Nirmal Bharat Abhiyan* (NBA) with effect from 01 April 2012. NBA envisages covering the entire community for saturated outcome with a view to create *Nirmal* Gram Panchayats.

- There were significant delays up to 81 days in release of State share by State Water and Sanitation Mission to the District Water and Sanitation Missions. TSC funds were not transferred to NBA funds and were lying idle in bank accounts of Janpad Panchayats.

(Paragraphs 2.3.6.2 and 2.3.6.3)

- Annual Implementation Plans were prepared without following bottom up approach and community saturation approach. Holding of meetings of the State level and district level Missions was not adequate.

(Paragraph 2.3.7.2)

- Number of GPs targeted for saturation and making ODF were not commensurate with achieving the vision of *Nirmal Bharat* by 2022. Only 13 per cent of the GPs targeted for saturation were completed during 2012-14.

(Paragraph 2.3.8.3)

- Targets under various components of the scheme were not achieved. During the years 2009-10 to 2013-14 there was significant shortfall in achieving the targets of construction of Individual Household Latrines (11 to 69 per cent) and Community Sanitary Complexes (66 to 90 per cent).

(Paragraph 2.3.8.1)

- Information Education and Communication activities did not continue throughout the year and no funds were provided to GPs for IEC activities.

(Paragraph 2.3.9.1)

- *Swachhta Diwas* and *Gram Swachhata Sabha* were not convened in the test checked GPs, impacting the social audit of the Scheme.

(Paragraphs 2.3.10.2 and 2.3.10.3)

2.3.1 Introduction

Government of India (GoI) introduced the Central Rural Sanitation Programme (CRSP) in 1986 with the objective of improving the quality of life of the rural people through proper sanitation facilities and to provide privacy

and dignity to women. GoI modified CRSP in 1999 and renamed the Programme as Total Sanitation Campaign (TSC). The Programme was again renamed as *Nirmal Bharat Abhiyan* (NBA) with effect from 01 April 2012

Meanwhile, *Nirmal Gram Puraskar* (NGP) was launched in October 2003 to give a fillip to TSC. The award was given to those *Nirmal* Gram Panchayats, blocks, and districts which had become fully sanitised and open defecation free (ODF).

The objective of TSC/NBA is to bring out an improvement in the general quality of life in rural areas by accelerating sanitation coverage to achieve the target of attaining *Nirmal* status for all Gram Panchayats (GPs) by 2022.

The components of TSC/NBA are Information, Education and Communication (IEC), startup activities and capacity building, construction of Individual Household Latrines (IHHLs), community sanitary complexes, institutional toilets including schools, anganwadi sanitation and solid and liquid waste management (SLWM).

2.3.2 Organisational set-up

For implementation of TSC/NBA, State Water & Sanitation Mission (SWSM), a registered society was constituted in 2005. The Apex Committee of SWSM is headed by Minister-in-charge of Panchayat and Rural Development Department (PRDD) and the Development Commissioner is the Member Secretary. The Executive Committee is headed by the Principal Secretary, PRDD. The State Programme Officer (SPO), NBA has the overall responsibility of implementation of TSC. Besides, there are District Water and Sanitation Missions (DWSMs) at district level, Block Water and Sanitation Committees (BWSCs) at block level and Village Water and Sanitation Committees (VWSCs) at village level for implementation of the Scheme.

In these Committees, State Programme Officer (SPO) at State level, District Coordinator at district level, Block Coordinator at block level and Secretaries of the Gram Panchayats (GPs) at GP level are responsible for implementing the Scheme.

2.3.3 Audit objectives

The audit objectives were to examine whether:

- planning for implementation of the Scheme at different levels was adequate and effective;
- funds were released, accounted for and utilised by the State Government in compliance with the guidelines issued under the Scheme;
- the targets set under various components of the Scheme were sufficient to achieve Scheme objectives;
- IEC strategy under the Scheme was effective in generation of demand of TSC/NBA services through community mobilisation; and
- the mechanism for monitoring was in place and evaluation of the outcomes of the programme was done.

2.3.4 Audit criteria

Following were the sources for the criteria adopted for the performance audit:

- TSC guidelines, IEC guidelines, NBA Guidelines and Nirmal Gram Puraskar guidelines issued by GoI.
- Instructions issued by Central and State Governments relating to implementation of the TSC/NBA.

2.3.5 Scope and methodology of audit

The implementation of TSC/NBA for the period 2009-14 was reviewed (June to August 2014) through a test check of records of 13¹ out of 51 districts as detailed in **Appendix 2.23**. We conducted audit at the following levels:

State level	State Water and Sanitation Mission (SWSM)
District level	13 District Water and Sanitation Missions (DWSMs)
Block level	27 Block Resource Centres/Janpad Panchayats (JPs)
Village level	231 Gram Panchayats/Village Water and Sanitation Committees

An entry conference was held on 2 June 2014 with the Additional Chief Secretary (ACS), Panchayat and Rural Development Department (PRDD) to discuss the audit objectives, criteria and scope of audit. The audit findings were discussed with the Government in an exit conference held on 5 November 2014, views of the Government have been incorporated suitably in the review.

Audit findings

2.3.6 Financial Management

The TSC/NBA Scheme fund consists of component-wise Central share, State share and contribution of Households/Panchayat (in case of IHHLs and Community Sanitary Complexes). Interest accrued on TSC/NBA fund was also to be a part of the Scheme fund.

2.3.6.1 Utilisation of available funds by DWSMs

During the years 2009-10 to 2013-14, the funds released by SWSM to DWSMs, expenditure incurred by DWSMs and unspent balances with DWSMs is given in **Table 1**.

Table 1: Details of TSC/NBA fund flow in the State

(₹ in crore)						
Year	Opening balance	Total receipts	Total funds available	Expenditure	Percentage of expenditure	Closing balance
1	2	3	4	5	6 (5/4*100)	7
2009-10	96.80	135.51	232.31	148.12	64	84.19
2010-11	84.19	246.85	331.04	145.73	44	185.31
2011-12	185.31	223.29	408.60	245.68	60	162.92
2012-13	162.92	367.30	530.22	317.37	60	212.85
2013-14 [#]	212.85	804.16	1017.01	544.05	54	472.96
Total		1777.11	1873.91	1400.95		472.96

(Source: Audited Annual Accounts (2009-10 to 2012-13) of SWSM, Bhopal)

[#]Information furnished by SWSM, Bhopal (unaudited figures)

¹ Anuppur, Balaghat, Badwani, Chhindwara, Dewas, Dhar, Khandwa, Ratlam, Sagar, Satna, Shahdol, Ujjain and Vidisha.

During the years 2009-10 to 2013-14; significant amount of TSC/NBA funds remained unspent

It could be seen from the above table that during the years 2009-10 to 2013-14, the expenditure out of total funds available with DWSMs ranged between 44 per cent and 64 per cent and ₹ 84.19 crore to ₹ 472.96 crore remained unspent at the year-end in bank accounts of DWSMs. Under-utilisation of funds led to slow progress under various components of the Scheme. We observed significant shortfalls in achievement of targets in construction of IHHLs and community sanitary complexes, as discussed in para 2.3.8.1.

In the exit conference, Government stated that since the funds were received at the end of financial year, same could not be utilised in that financial year. This programme relates to change in human behavior; hence, progress was slow.

Optimum utilisation of funds for implementation of the Scheme should be ensured.

2.3.6.2 Delay in release of funds by SWSM

As per TSC/NBA guidelines, the State was required to release Central grant received along with State share to DWSMs within 15 days of receipt of the Central grants.

There were delays ranging from 6 days to 81 days in release of State share to DWSMs

We observed that there were delays ranging from 6 days to 81 days in release of State share to DWSMs during the period 2009-14; the details are given in **Appendix 2.24**.

Delays in release of funds to implementing agencies resulted in slow progress in implementation of the Scheme.

In the exit conference, Government admitted that there were delays in release of State funds due to delay in approval from Finance Department and non-availability of funds in the State Budget.

2.3.6.3 Scheme funds lying idle at Janpad Panchayats (JPs)

As per funding norms under TSC, DWSMs released the funds to JPs, which in turn, released the same to the GPs for implementation of the Scheme. TSC was renamed as NBA from April 2012. As per funding arrangements under NBA, DWSMs were required to transfer the funds received from SWSM directly to the GPs.

After inception of NBA, the funds lying with the JPs were required to be surrendered to the DWSMs for its release to the GPs under NBA.

Significant amount of Scheme funds were lying idle with the 22 Janpad Panchayats

We observed that out of 27 test checked JPs, unspent amount of ₹ 6.58 crore pertaining to TSC in respect of 22 JPs were lying idle in the bank accounts of JPs as of March 2014. Thus, Scheme funds remained blocked for more than two years. The details are given in **Appendix 2.25**.

In the exit conference, Government stated that funds lying at JPs would be refunded to DWSMs for its release to GPs as per revised funding norms of NBA.

2.3.6.4 Keeping scheme funds as fixed deposits

As per para 13.2.2 of NBA guidelines, DWSMs were required to transfer the funds for works directly to the GPs within 15 days of receipt of funds from SWSM. The funds were to be utilised for construction of sanitation facilities and were not to be kept blocked by keeping it as fixed deposits.

₹ 81.50 lakh of scheme funds was kept as fixed deposit by two test checked JPs

During scrutiny of records of JP Badnagar of District Ujjain and JP Balaghat of District Balaghat, we found that ₹ 81.50 lakh² was kept as fixed deposit (August 2014).

In the exit conference, Government stated that funds lying at JPs would be returned to DWSMs for its release to GPs as per revised funding norms of NBA. If any district/block was keeping NBA fund as FDR, necessary action would be taken accordingly.

Funds lying at Janpad Panchayats should be refunded to DWSMs for its release to Gram Panchayats as per revised funding norms of NBA.

2.3.6.5 Non-accountal of interest on TSC/NBA funds at block level

The TSC and NBA guidelines stipulate that the interest accrued on NBA funds would be treated as a part of NBA resources. DWSMs were to submit utilisation certificate of interest accrued on NBA funds while submitting claim(s) for subsequent instalment. This amount should include interest earned at JP level and the total amount was to be reflected in Utilisation Certificates (UCs).

The interest earned on TSC/NBA funds at the Janpad Panchayats was not accounted for

We observed that during 2009-10 to 2012-13, ₹ 74.17 lakh of interest earned on TSC/NBA funds at 23 test checked JPs was not accounted for. Thus, the UCs submitted by DWSMs to SWSM did not reflect the amount of interest accrued on TSC/NBA funds at JP level. The details are given in **Appendix 2.26**.

In the exit conference, Government stated that the interest accrued on TSC/NBA funds at block level would be taken into account of DWSM.

2.3.6.6 Non-recovery of loan given to Rural Sanitary Marts

As per para 5.5.1 of NBA guidelines, the Rural Sanitary Mart (RSM) was an outlet dealing with the material, hardware and designs required for the construction of sanitary latrines, soakage and compost pits, vermi-composting etc. The main aim of having a RSM was to provide material, services and guidance needed for constructing different types of latrines and other sanitary facilities for a clean environment.

An interest free loan up to ₹ 3.50 lakh could be given for establishing a RSM out of revolving fund available with the district. The loan was to be recovered in 12-18 instalments after one year from the date of payment of the loan.

Loan of ₹ 14.25 lakh given for setting up of RSMs was outstanding for recovery (August 2014)

During test check of records of DWSMs of Anuppur, Dewas, Sagar and Shahdol, we found that ₹ 16.50 lakh was given to Self Help Groups (SHGs) as loan for setting up 16 RSMs. Out of these RSMs, only one RSM (Shakti SHG, Tonkikhurd, District Dewas) was functional (August 2014) and only two RSMs made repayment of ₹ 2.25 lakh after a lapse of nine years from the date of sanction of the loan. The remaining ₹ 14.25 lakh was outstanding for recovery (August 2014). The details are given in **Appendix 2.27**.

Since RSMs were non-functional and were not able to provide material, services and guidance needed for constructing different types of latrines and

² JP Balaghat of district Balaghat deposited ₹ 70 lakh on 31.03.14 and JP Badnagar of district Ujjain deposited ₹ 10 lakh on 14.03.14 and ₹ 1.5 lakh on 30.03.13.

other sanitary facilities, the expenditure incurred on setting up of RSMs remained unfruitful.

In the exit conference, Government stated that necessary action for recovery of loans given for the establishment of RSMs would be taken.

2.3.6.7 Inflated reporting of expenditure in Utilisation Certificate

During scrutiny of records of DWSM Shahdol, we noticed that an amount of ₹ 2.00 crore was transferred to DWSM Gwalior in 2010-11 as advance. The amount was returned in May 2014. However, DWSM Shahdol showed it as final expenditure in the annual accounts of the year 2010-11. We further noticed that DWSM Gwalior showed the funds received from Shahdol District as GoI share (inter-district transfer) and also showed the same as expenditure against it in the UCs for the year 2010-11 sent to the Government.

Thus, the UCs for the year 2010-11 sent to the Government was inflated to the extent of ₹ 2.00 crore.

In the exit conference, Government accepted the observation and stated that in future inter-district transfer of funds would be shown as advance/loan in the UCs.

2.3.6.8 Unfruitful expenditure on installation of Force Lift Pumps in school toilets

As per TSC/ NBA guidelines, the unit cost of construction of school toilet under NBA was ₹ 35,000. As per orders of PRDD, Government of Madhya Pradesh (February 2011), the unit cost of construction of school toilet was decided as ₹ 27,000. The remaining ₹ 8,000 was to be used for installation of Force Lift Pump (FLP) in school toilets for availability of running water.

During scrutiny of records of DWSM and 23 test checked GPs of Shahdol District, we observed that 43 FLPs installed in 43 school toilets in these GPs were non-functional due to which an expenditure of ₹ 2.91 lakh incurred on these FLPs remained unfruitful.

In the exit conference, Government stated that instructions would be issued to the School Education Department for proper operation and maintenance (O&M) and safety of FLPs.

The reply was not justifiable as due to non-functioning of the FLPs, availability of running water in these school toilets could not be ensured.

2.3.7 Planning

2.3.7.1 Revision of Project Implementation Plan

The Project Implementation Plan (PIP) is a long term plan for implementation of the Scheme. As per TSC/NBA guidelines, each project officer at district was required to revise the PIP and prepare a revised project proposal after change in the funding norms. The proposal should originate from the GPs, compiled at block level and then at district level by DWSM.

During the period 2009-14, the funding norms for providing incentive to IHHL beneficiaries were changed three times³. We observed that except for

³ 2008-09, 2011-12 and 2012-13.

The PIPs were not revised after change in funding norms

district Chhindwara where PIP was revised four times, remaining 12 test checked districts did not revise the PIPs after change in funding norms. District Khandwa revised the PIP two times and eight⁴ districts revised the PIP only once during the period 2009-14. In the remaining three districts no revision was made. The details are given in **Appendix 2.28**.

Due to non-revision of the PIPs, the targets set in PIPs were not commensurate with attainment of *Nirmal* status by each GP in a time bound manner.

In the exit conference, Government stated that Ministry of Drinking Water and Sanitation, GoI, revised the PIPs and the State wise project cost, whenever norms were changed and accordingly, PIPs were auto updated.

Reply was not in order. The Scheme guidelines envisaged that the revisions in the PIPs were to be originated from the GPs and routed through DWSM, SWSM and further to be ratified by GoI. Thus, there were no provisions for auto updating of PIPs by GoI.

The PIPs should be revised after change in funding norms so that actual requirement of sanitation facilities in rural areas may be reflected in the PIPs.

2.3.7.2 Preparation of Annual Implementation Plan by SWSM and DWSMs

As per TSC/NBA guidelines, SWSM was required to prepare the Annual Implementation Plan (AIP) for each district as per the progress made by the districts, ensure convergence mechanism between line departments, receive Central grant for specific project district and disburse the funds to the DWSMs. In the meetings, SWSM was required to review the implementation of the Scheme during previous year and plan for current/coming year.

The TSC/NBA guidelines stipulated that AIP was to be prepared after identification of GPs to be saturated for attaining the project objectives. These GP plans should be consolidated into Block Implementation Plan and further into District Implementation Plan. The SWSM would consolidate the District Implementation Plans for preparation of the State Implementation Plan. For this purpose, SWSM was required to meet at least once in six months.

The guidelines of TSC/NBA stipulate that the DWSM should plan and implement the district project. It should review and monitor programme implementation so that the targets of the district annual action plan can be achieved leading to *Nirmal* GPs. The DWSM was required to meet at least once in every quarter. During the meeting, evaluation of performance of previous year and planning for next year was also to be done.

- We observed that AIPs were prepared only at district level without preparation of annual plans at block and GP levels.
- The community saturation approach by identification of GPs that could be made *Nirmal* during the year/in the coming years was not adopted as discussed in para 2.3.8.3.

Bottom up approach and community saturation approach was not adopted for preparation of AIPs

⁴ Anuppur, Dewas, Dhar, Ratlam, Sagar, Satna, Shahdol and Ujjain.

- Only four⁵ meetings of SWSM were held against the required 10 meetings during the period 2009-14. No meetings were held during the years 2011-12 and 2013-14. This was indicative of lack of planning and monitoring of the Scheme at State level.
- Prescribed number of meetings of the DWSMs was not held during the period 2009-14. In Anuppur, Balaghat and Ratlam Districts, only one meeting each of the DWSM was held in 2010-11 and in Dhar District, the meetings of DWSM were held only twice during 2011-12. Details are given in **Appendix 2.29**.

In the exit conference, the ACS admitted that bottom up approach was adopted only from 2014-15. Regarding conduct of meetings, the ACS stated that review meetings were conducted quarterly. However, the ACS stated that conducting regular meetings of SWSM and DWSMs would be ensured.

AIPs should be prepared by following bottom up approach and by adopting community saturation approach so as to achieve the vision of Nirmal Bharat by 2022.

2.3.8 Programme implementation

2.3.8.1 Targets and achievement

The objectives of NBA were to bring about an improvement in the general quality of life in the rural areas and to accelerate sanitation coverage in rural areas so as to achieve the vision of *Nirmal Bharat* by 2022, with all GPs in the country attaining *Nirmal* status. For achieving the above objective, construction of Individual Household Latrines (IHHLs), Community Sanitary Complexes and school toilets were to be carried out.

We observed that the annual targets set in the AIPs under various components of the Scheme were not fully achieved as discussed below:

(a) Construction of IHHLs

As per the Scheme guidelines, a duly completed household sanitary latrine shall comprise of a basic low cost unit with a super structure. Incentive is provided on completion and use of toilets.

During the period 2009-14, the shortfalls in achievement of targets for construction of IHHLs for BPL and APL families were as under:

Table 2: Shortfalls in achievement of targets of Individual Latrines

Year	Shortfalls in IHHL for BPL families			Shortfalls in IHHL for APL families		
	Targets	Shortfall	Percentage	Targets	Shortfall	Percentage
2009-10	10,64,259	4,50,715	42	14,09,582	6,20,780	44
2010-11	6,98,278	76,535	11	8,67,482	3,23,209	37
2011-12	7,44,240	2,71,719	37	7,16,461	2,60,281	36
2012-13	7,76,638	4,37,356	56	7,87,842	5,68,935	72
2013-14	9,07,293	6,27,448	69	9,92,368	7,56,630	76

(Source: Annual Performance Reports of SWSM (2009-14))

It could be seen from the above that *percentage* of shortfalls against the targets for construction of IHHLs for BPL families ranged between 11 and 69 *per cent* and that for APL families between 36 and 76 *per cent*.

⁵ The meetings were held on 19.05.2009, 06.02.2010, 06.09.2010 and 18.06.2012.

The annual targets set under various components of the Scheme were not fully achieved in the State

(b) Construction of Community Sanitary Complexes (CSCs)

As per the Scheme guidelines, CSCs comprising an appropriate number of toilet seats, bathing cubicles, washing platforms, wash basins etc. were to be set up in a place in the village acceptable to women/men/landless families and accessible to them. Gram Panchayats would be responsible for maintenance of the complexes.

During the audit period 2009-14, the shortfalls in achievement of targets for construction of CSCs were as under.

Table 3: Shortfalls in achievement of targets of Community Sanitary Complexes

Year	2009-10	2010-11	2011-12	2012-13	2013-14
Targets	490	114	412	412	1123
Shortfall	373	No shortfall	272	324	1,011
Percentage	76	Nil	66	79	90

It could be seen from the above that there were shortfalls in community sanitary complex, which ranged between 66 and 90 *per cent*.

(c) Construction of school toilets

As per the Scheme guidelines, separate toilets for boys and girls are to be constructed in all government schools. Number of toilet should be adequate to meet the requirement of all students of the schools.

The status of shortfalls in construction of school toilets was as under:

Table 4: Shortfalls in achievement of targets of school toilets

Year	2009-10	2010-11	2011-12	2012-13	2013-14
Targets	15,128	12,994	12,290	10,644	No target
Shortfall	4,333	No shortfall	No shortfall	9,611	Nil
Percentage	29	Nil	Nil	90	Nil

Thus, there were shortfalls of 29 *per cent* and 90 *per cent* against the targets for construction of school toilets in the years 2009-10 and 2012-13 respectively. However, there were no shortfalls in achievement of targets of construction of school toilets in 2010-11 and 2011-12.

The details of targets and achievements under various components of the Scheme are given in **Appendix 2.30**.

We further observed that percentage of shortfalls in construction of IHHLs and Community Sanitary Complexes showed increasing trend during the period 2011-14. In 2013-14, no targets were set for school toilets by PRDD since the activity was transferred to School Education Department.

In the exit conference, Government stated that achievement of targets under various components would be ensured in future.

Effective steps should be taken to achieve targets particularly for construction of IHHL and community sanitary complexes.

2.3.8.2 Individual Household Latrines constructed through GPs

As per Para 5.4.1 of the NBA guidelines, construction of Individual Household Latrines (IHHLs) was to be undertaken by the household itself and on completion and use of the toilet, the cash incentive was to be given to the household in recognition of its achievement.

In 221 test checked GPs, construction of IHHLs was done by GPs

As per guidelines of “*Maryada Abhiyaan*” issued by PRDD, Government of Madhya Pradesh, the execution of works through contractors was not allowed.

During scrutiny of records of 231 test checked GPs, we found that in 221 GPs of 13 districts, construction of IHHLs was done through GPs instead of transferring the incentive amount to the beneficiaries.

In the exit conference, Government stated that State has adopted two modes to release incentive for IHHL i.e. if beneficiary requests only for NBA funds then incentive would directly be released to the beneficiary after construction of toilet. In contrary, if beneficiary opts for IHHL through convergence with MGNREGS, then incentive would be released to the GPs for construction of toilets.

The reply was not in conformity with the guidelines as the beneficiaries were to purchase the construction material themselves and construct the toilets as per their choice which they were deprived of.

2.3.8.3 Non-achievement of targets of saturation

As per para 2.1 of NBA guidelines, the main objective of NBA was saturation of all Gram Panchayats to achieve the vision of *Nirmal Bharat* by 2022.

As per the records of SWSM, the number of GPs of the State targeted for saturation and achievement against the targets during 2012-14 was as under:

Table 5: Details of Gram Panchayats targeted for saturation and achievement

Year	Total no. of GPs in the State	No. of GPs targeted for saturation	No. of GPs saturated	Percentage of GPs saturated
2012-13	23,006	5,800	772	13
2013-14	23,006	1,815	228	13
Total		7,615	1,000	

(Source: Information furnished by SWSM, Bhopal)

It is evident from the above that the number of GPs targeted during the years 2012-13 and 2013-14 for saturation and making ODF after inception of NBA were not commensurate with achieving the vision of *Nirmal Bharat* by 2022. We observed that only 1,000 GPs (13 *per cent*) were made Open Defecation Free (ODF) against 7,615 GPs targeted for saturation. Thus, after inception of NBA only four *per cent* of total GPs (23,006) could be saturated as of March 2014.

With such pace of programme implementation, possibility of achieving the target of making the State “*Nirmal*” by 2022 is remote.

In the exit conference, Government stated that this programme can be accelerated when there is a behaviour change and demand comes from the community. As this is a slow and difficult process, the progress was also slow.

2.3.8.4 Non-release of second instalment of Nirmal Gram Puraskar and slip back of awarded GPs

As per *Nirmal Gram Puraskar* (NGP) guidelines 2010, the prize money of NGP to the selected GP would be released in two equal instalments. The first instalment would be released immediately after the GPs were selected for the award. Random checks were to be carried out by SWSM after six months in all the awardee GPs. If *Nirmal Gram* and ODF status was found continuing, second instalment would also be released by the DWSM. Otherwise, State

212 GPs selected for NGP were paid only first instalment but the second instalment of NGP award money was not released

would take necessary measures to revive the *Nirmal Gram* status of the awardee. NGP award money was to be recovered from persistent defaulters.

The amount of award money ranges from ₹ 0.50 lakh to five lakh depending upon the population of the GP. The GPs receiving NGP award were required to utilise the award money for maintaining sanitation facilities and sustaining ODF status, creation of additional sanitation facilities in the village, Solid and Liquid Waste Management (SLWM) and purchasing land for SLWM purposes.

During scrutiny of records of SWSM, we observed that during the year 2011-12, total 212 GPs of the State were selected for NGP to whom first instalment of ₹ 1.35 crore of NGP was released (May 2012) but second instalment was not released to these GPs (September 2014). On an audit query, the SWSM stated that second instalment of award money was not released due to non-receipt of verification report from the DWSMs. It was observed that SWSM also did not conduct random checks of these GPs for ascertaining *Nirmal* and ODF status maintained by these GPs.

Non-release of entire amount of award money adversely affected the objective of maintaining the existing facilities and creation of additional sanitation facilities suffered.

In the exit conference, Government stated that due to non-receipt of UCs of first instalment of NGP award money and some gap in number of toilets in the awarded GPs, second instalment was not released.

The reply was not justifiable as SWSM did not ensure conduct of survey of NGP awarded GPs and timely release of second instalment.

32 NGP awarded GPs in Shahdol District did not maintain the *Nirmal* status

- During scrutiny of records of DWSM Shahdol we found that during the period January 2008 to December 2011, total 33 GPs were awarded NGP, of which only one GP (Pongri of Sohagpur Block) was released second instalment of NGP and an amount of ₹ 17.50 lakh of second instalment in respect of remaining 32 GPs was retained by the district (August 2014) due to non-maintenance of *Nirmal* status by these GPs. This indicated that the DWSM did not conduct adequate survey to ensure maintaining the “*Nirmal Gram*” status of these GPs. Thus, the objective of achieving *Nirmal* status of the GPs was not achieved.

In the exit conference, Government replied that regular survey/ monitoring/ evaluation of NGP awarded GPs would be ensured so as to ascertain that these GPs were maintaining ODF status.

Survey of NGP awarded GPs should be carried out at regular intervals so as to ensure maintenance of Nirmal status by these GPs.

2.3.8.5 Non-implementation of Solid and Liquid Waste Management

As per TSC/NBA guidelines, Solid and Liquid Waste Management (SLWM) is a key component of the Scheme. Under this component, activities like compost pits, vermin composting, low cost drainage, soakage channels/pits, system for collection, segregation and disposal of household garbage etc. were to be undertaken. SLWM project was to be prioritised in identified GPs targeted for *Nirmal* status and GPs, which had already been awarded NGP.

No work was done under Solid and Liquid Waste Management component

During test check of records of SWSM, we found that no work was done by the SWSM under SLWM during the period 2009-14, since no GPs were identified and no funds were allotted for this purpose.

Due to non-implementation of SLWM, the objective of bringing about improvement in the general quality of life in rural areas was defeated.

In the exit conference, Government stated that under first phase, 31 GPs having population above 10,000 were identified for implementation of SLWM projects. Detailed Project Report (DPR) was under preparation through expert agencies and works would be started.

The reply was not in order since no work of SLWM was done during 2009-14. Even the NGP awarded GPs were also not considered for implementation of SLWM projects.

Solid and Liquid Waste Management should be carried out on priority basis in NGP awarded GPs.

2.3.9 Information Education and Communication (IEC) activities

2.3.9.1 Lack of IEC activities

The IEC activities are intended to trigger the demand and sanitary facilities in the rural areas for households, schools, anganwadis and community sanitary complexes through behavioural change. IEC activity should be continued throughout the year and should be conducted at all three tiers i.e. districts, blocks and GPs. The guidelines also stipulate that for effective dissemination of the IEC material, funds should also be provided under IEC component to blocks and GPs for execution of works.

We observed that IEC activities were carried out by DWSM. Separate funds were not provided to the test checked blocks or the GPs for IEC component.

Analysis of the information obtained through questionnaires from the Secretaries of 231 test-checked GPs revealed the following:

- The Secretaries of 218 GPs (94 *per cent*) stated that IEC activities did not continue throughout the year.
- The Secretaries of all the 231 GPs stated that no funds were provided to GPs for IEC activities.
- The Secretaries of 224 GPs (97 *per cent*) stated that the Block Resource Coordinators (BRCs) were not involved in making strategy for IEC activities at GP level.
- The Secretaries of 225 GPs (97 *per cent*) stated that IEC personnels were not imparted training for capacity building.

It is evident from the above that there was lack of IEC activities in the test checked GPs. As a result, the objective of bringing about behavioural change was not fully achieved. During joint physical verification, we noticed instances of toilets being used for storing fuel woods and other material as shown in the photographs below:

The IEC activities did not continue throughout the year. The funds were not provided to GPs for IEC activities



₹ 12.92 lakh of IEC funds were spent for printing works by DWSM, Shahdol

The SPO, NBA stated that evaluation of IEC activities to assess the impact on rural population was not done at the State level.

Further, we observed that DWSM, Shahdol spent ₹ 12.92 lakh of IEC funds for printing of VWSC minutes register, monitoring registers, measurement books (MBs), forms of evaluation reports and completion certificates.

In the exit conference, Government stated that plan for regular and intensive IEC, Inter Personnel Communication (IPC), Behavior Change Communication (BCC), training and capacity building activities throughout the year was prepared and its execution would be ensured. Government also stated that henceforth, IEC funds would be utilised for IEC activities only as mentioned in new guidelines of *Swachha Bharat Mission*.

The IEC activities should be continued throughout the year and adequate funds should be provided to GPs also for IEC activities.

2.3.10 Monitoring and evaluation

2.3.10.1 State Review Mission

As per para 16.1 of NBA guidelines, State Review Mission was to be set up, headed by Joint Secretary level officer of the State Government with at least three members from other linked departments and independent representatives from reputed organisations in the field of sanitation. The State was also required to set up a panel of experts at State level for conducting reviews into various NBA districts periodically.

During test check of records of SWSM, we observed that the State Review Mission was not constituted and no panel of experts was set up at State level. As such, no periodical review of district projects was conducted to evaluate the Scheme implementation and take corrective measures.

In the exit conference, Government stated that necessary action would be taken to establish State Review Mission.

2.3.10.2 Swachhata Diwas (Sanitation Day)

As per para 17.2.1 of the NBA guidelines, each GP was required to earmark a particular day of the month to be named as '*Swachhata Diwas*' (Sanitation Day) with the objectives to record the achievements made in previous month, identifying individuals demanding sanitation facilities, projecting monthly plan for construction of toilets in the GPs, IEC events, trainings undertaken,

The State Review Mission was not constituted and no Panel of Experts was set up at State level

Swachhta Diwas was not organised in any of the test checked GPs

identifying slip back cases under IHHL and verifying expenditure made on various activities in the previous month.

Secretaries of all the 231 test checked GPs stated that *Swachhta Diwas* was not organised during the period 2009-14.

In the exit conference, Government replied that necessary instructions had been issued to the GPs for convening *Swachhata Diwas* regularly.

2.3.10.3 Conduct of Gram Swachhata Sabha for social audit

As per para 17.3.1 of NBA guidelines, a *Gram Sabha* was to be convened by the Secretary, GP as '*Gram Swachhata Sabha*' (GSS) every six month to review the progress made under various monthly plans and proceedings of *Swachhata Diwas* that were held in the GP. DWSM/District Collector was responsible for ensuring that the social audit/review was convened timely as per schedule.

No Gram Swachhata Sabha was convened in any of the test checked GPs

The Secretaries of all the 231 test checked GPs stated that no GSS was convened in any of the test checked GPs during the period 2009-14.

Due to non-convening *Swachhata Diwas* and GSS at the GP level, social audit of the Scheme was not conducted.

In the exit conference, Government stated that necessary instructions had been issued to the GPs for convening GSS regularly.

Swachhata Diwas and Gram Swachhata Sabha should regularly be convened by the GPs so as to ensure social audit of the Scheme.

2.3.10.4 Non-existence of mechanism for verifying authenticity of data at State level

As per para 19.1 of NBA guidelines, the Ministry of Drinking Water and Sanitation developed an online monitoring system for NBA. The State was required to have a mechanism in place for verifying the authenticity of data uploaded on NBA website.

There was no system of reconciliation of data of Annual Performance Report with the data uploaded on NBA website

On being enquired, the SPO, NBA stated that there was no system for verifying authenticity of data and the data of Annual Performance Report (APR) were not cross checked with the data uploaded on NBA website. However, the development of system for authentication of data was under progress.

In the exit conference, Government stated that output (number of toilet constructed) and outcome (usage of toilets) based monitoring had been started at State level from the year 2014-15. In the State, SAMAGRA database was prepared in which households having toilets were entered. In future, this database would be bridged to the GoI MIS database.

Due to absence of system of reconciliation of data, the authenticity of data could not be ascertained.

2.3.11 Conclusion

- There were significant delays up to 81 days in release of State share by SWSM to the DWSMs. TSC funds were not transferred to NBA funds and were lying idle in bank accounts of Janpad Panchayats.

- Annual Implementation Plans were prepared without adopting bottom up approach and community saturation approach.
- Number of Gram Panchayats targeted for saturation and making open defecation free was not commensurate with achieving the vision of *Nirmal Bharat* by 2022.
- Targets under various components of the Scheme were not achieved. There was significant shortfall in achieving the targets of construction of Individual Household Latrines and Community Sanitary Complexes.
- Information Education and Communication activities for generating demand for sanitary facilities did not continue throughout the year and no funds were provided to the GPs for IEC activities.

**Women and Child Development Department,
Tribal Development Department and
Scheduled Caste Development Department**

2.4 Implementation of Schemes for Welfare and Empowerment of Girl Child

Executive Summary

For empowerment of girls through self-development and generating awareness about health and nutrition, the State Government implemented *Kishori Shakti Yojana* (KSY) and Rajiv Gandhi Scheme for Empowerment of Adolescent Girls (SABLA) (in 15 districts). *Kanya Saksharta Protsahan Yojana* (KSPY) has been implemented for increasing female literacy and to continue study up to higher secondary level among SC and ST girl students.

- Identification of girls under the KSY for providing training and health check-up was done without conducting a separate survey. Thus, no target was set for coverage of girls under KSY. However, the eligibility of the selected girls was also not got scrutinised through Gram Sabha. Under SABLA, survey was conducted for identification of girls.

(Paragraphs 2.4.7.1 and 2.4.8.2)

- Vocational training was not imparted to girls under KSY and there were shortfalls in providing guidance and counseling on nutrition and health education, family welfare and life skill education under SABLA.

(Paragraphs 2.4.7.2 and 2.4.8.4)

- Health check-up of girls was not done under KSY. Under SABLA, health check-up was not done in 79 AWCs test checked and Iron Folic Acid (IFA) supplementation was not provided in 68 AWCs test checked. Convergence with the schemes/programmes of other departments was also not done.

(Paragraphs 2.4.7.3, 2.4.8.6 and 2.4.8.8)

- Monitoring and supervision of KSY and SABLA was not adequate since there was significant shortfalls in required meetings of monitoring committees at district and project levels, which affected scheme implementation.

(Paragraphs 2.4.7.4 and 2.4.8.10)

- Under KSPY, assistance was provided to the girl students without ensuring the eligibility criteria. There were delays up to 18 months in distribution of benefits in eligible cases. The objective of encouraging the SC/ST girls to continue study up to higher secondary level was not fully achieved. There was no monitoring of the Scheme at any level.

(Paragraphs 2.4.9.2, 2.4.9.3, 2.4.9.5 and 2.4.9.6)

2.4.1 Introduction

In Madhya Pradesh, female literacy rate was 50 *per cent* as per Census 2001 and 60 *per cent* as per Census 2011, lower than the National women literacy rate of 65.46 *per cent*, as per Census 2011. The Government of India (GoI) as well as the State Government launched various schemes for improvement in the health, nutrition, personal hygiene, education and self development of the girls. Audit findings on implementation of the schemes *Ladli Laxmi Yojana*¹, *Gaon Ki Beti Yojana*² and *Pratibha Kiran Yojana*³ were included in the Report of the Comptroller and Auditor General of India on General and Social (Non-PSUs) Sectors for the year ended 31 March 2013. With the same objectives, the State Government implements the following three other programmes:

Kishori Shakti Yojana (KSY) and Rajiv Gandhi Scheme for Empowerment of Adolescent Girls (SABLA):

GoI introduced (2000) KSY as a component of Integrated Child Development Services (ICDS) Scheme in order to empower adolescent girls (AGs) through self-development, generating awareness about nutrition, health and family care and learning life skills. With the same objectives, Rajiv Gandhi Scheme for Empowerment of Adolescent Girls (*SABLA*) was introduced in December 2010 in 15 districts⁴ in the State by replacing KSY. KSY is fully funded by GoI. Under *SABLA*, cost of nutrition is equally shared by Centre and State. For non-nutrition component, GoI provides 100 *per cent* grant to ICDS project.

Kanya Saksharta Protsahan Yojana (KSPY):

The State Government introduced (1986-87) KSPY in order to increase enrolment and female literacy among Scheduled Caste (SC) and Scheduled Tribe (ST) girl students for sixth standard in educational institutions. From 2003, Government decided to extend the financial benefit to the SC/ST girls for continuation of their education up to higher secondary level, students of ninth and eleventh standards were also included. Under the Scheme, financial assistance is provided to SC/ST girl students at the time of their enrolment in school.

2.4.2 Implementation arrangements

The Schemes KSY and *SABLA* are implemented by Women and Child Development Department (WCD), headed by the Principal Secretary. The Commissioner is the administrative head of the Department, who is assisted by District Programme Officers (DPOs) at district level and Child Development Project Officers (CDPOs) at block level.

The Scheme KSPY is implemented by Tribal Development Department and Scheduled Caste Development Departments, headed by Principal Secretaries. The Commissioner, Tribal Development (CTD) and the Commissioner, Scheduled Caste Development (CSCD) are the administrative heads of the Department. Assistant Commissioners, Tribal Development (ACTDs) in 26

¹ To promote educational improvement, family planning and prevent child marriage.

² To promote higher education among meritorious girls from villages.

³ To promote higher education among meritorious girls from urban BPL families.

⁴ Balaghat, Betul, Bhind, Bhopal, Damoh, Indore, Jabalpur, Jhabua, Neemuch, Rajgarh, Rewa, Sagar, Sheopur, Sidhi and Tikamgarh.

districts and District Organisers, Tribal Welfare (DOTWs) in 24 districts implement the Scheme through Block Education Officers (BEOs)/Principals/Head Masters of the Middle/High/ Higher Secondary Schools.

2.4.3 Audit objectives

The audit objectives were to ascertain whether:

- identification and selection of beneficiaries under Schemes was done as per Scheme guidelines;
- financial management of the Schemes was efficient;
- the Schemes were implemented as per guidelines and the intended objectives of self-development, generating awareness of girls about nutrition, health and family care and education development of SC and ST girls were achieved; and
- the monitoring of the schemes were adequate and effective.

2.4.4 Audit criteria

The norms, standards, procedures laid down in the following documents have been adopted as audit for the performance audit:

- Scheme guidelines;
- Instructions issued by Central and State Governments for implementation of the Schemes;
- Madhya Pradesh Treasury Code, Volume I (MPTC Vol. I); and
- Prescribed monitoring and evaluation mechanism.

2.4.5 Scope of audit

In the Performance Audit (PA), implementation of the Schemes KSY and KSPY has been covered for the period 2009-14 and the *SABLA* Scheme has been covered from January 2011 to 2013-14. Out of 51 districts⁵ in the State, 13 districts⁶ including four⁷ districts where *SABLA* is being implemented were selected randomly on the basis of Simple Random Sampling without Replacement (SRSWOR) method.

Four ICDS projects in each selected district with 10 *Anganwadi* Centers (AWCs) in each Project where *SABLA* is implemented, were randomly selected. Five Middle and Higher Secondary Schools in each district under KSPY were test checked. List of units covered under various schemes are in **Appendix 2.31**.

An entry conference was held in March 2014 with the Principal Secretary, WCD, the Secretary, Tribal Welfare Department (TWD) and the Commissioner, Scheduled Caste Development Department to discuss the audit objectives, audit criteria and the scope of audit. In the exit conference held in

⁵ One district (Agar-Malwa) created in August 2013.

⁶ Balaghat, Burhanpur, Chindwara, Dindori, Gwalior, Hoshangabad, Jhabua, Mandla, Mandsour, Neemuch, Sagar, Seoni and Umaria.

⁷ Balaghat, Jhabua, Neemuch and Sagar.

November-December 2014 audit findings were discussed with the Principal Secretaries of the WCD, Scheduled Caste Welfare Department (SCWD) and Tribal Welfare Department (TWD); their views have been incorporated in the review.

2.4.6 Budget and expenditure

The details of budget allotment and expenditure under the schemes during the period 2009-14 are shown in **Table 1**.

Table-1: Budget allotment and expenditure during the period 2009-14

Scheme	₹ in Crore)	
	Allotment	Expenditure
<i>Kishori Shakti Yojana (KSY)</i>	21.54	19.82
Rajiv Gandhi Scheme for Empowerment of Adolescent Girls (SABLA)	418.64	403.57
<i>Kanya Saksharta Protsahan Yojana (KSPY) (SC)</i>	135.51	122.00
<i>Kanya Saksharta Protsahan Yojana (KSPY) (ST)</i>	120.43	119.70
Total	696.12	665.09

(Source-Data furnished by the Departments)

Year-wise details of budget allotment, expenditure and savings under the Schemes are given in paras 2.4.7, 2.4.8.1 and 2.4.9.

Implementation of Schemes

2.4.7 Kishori Shakti Yojana (KSY)

Under KSY Scheme, the training was to be imparted to the girls in the age group of 11 to 18 years on balanced diet, health consciousness and economic empowerment. Besides, health check-up of girls was to be carried out and IFA tablets were to be provided by ANMs of Public Health and Family Welfare Department. The Scheme was implemented in 51 districts up to 2010-11 and in 36 districts since 2011-12.

Under the Scheme, GoI provided funds at ₹ 1.10 lakh per annum to each ICDS project. Out of ₹ 21.54 crore released under KSY during 2009-14, expenditure was ₹ 19.82 crore. Thus, savings of ₹ 1.72 crore, occurred mainly under 'training'. Year-wise details are given in table below:

Table-2: Year-wise budget allotment and expenditure during the period 2009-14

Year	₹ in crore)					
	2009-10	2010-11	2011-12	2012-13	2013-14	Total
Allotment	4.98	4.98	4.98	3.30	3.30	21.54
Expenditure	4.24	4.68	4.67	3.12	3.11	19.82
Savings	0.74	0.30	0.31	0.18	0.19	1.72

(Source: Data furnished by the Departments)

2.4.7.1 Identification and selection of eligible girls

As per KSY guidelines, *Anganwadi*-wise survey was to be conducted separately for identification of girls in the age-group of 11 to 18 years. A list of identified girls was to be kept at AWCs and POs. It was observed that no separate survey was conducted and no separate list prepared for the purpose of KSY at *anganwadi* level. As such, the POs did not have any list of identified girls for the Scheme. Thus, identification of beneficiaries through survey, as envisaged in the guidelines, was not done.

No separate survey was conducted and list prepared for the purpose of KSY

Further, in order to select girls for imparting panchayat level training, preference was to be given to girls from Below Poverty Line (BPL) family and out of school girls in descending order of their age. A list of selected girls was to be forwarded by the POs to the Supervisors and Health Committee of Gram Sabha for confirmation of their eligibility. However, the selected POs reported that list of girls selected for training was not forwarded to Gram Sabha for scrutiny of eligibility.

Adherence to the norms for selection of girls was not ensured

We observed that during 2009-14, 1.97 lakh girls in respect of 34 POs were selected for three-days training (out of 2.10 lakh girls selected in 36 test checked POs) without ensuring adherence to the norms prescribed. There was no record to show that prioritisation of the eligible girls, as envisaged in guidelines, was done either by the POs or by the Health committees of Gram Sabha. Of them, 395 girls in 21 POs were imparted Panchayat level training though the girls were not in the age group of 11-18 years.

In the exit conference, the Principal Secretary, WCD stated that due to non-availability of register, the survey list of girls was not available in AWCs and POs. From year 2014-15 survey data would be maintained in register.

The Department and the Project Offices should maintain a complete database of girls in the age-group of 11 to 18 years to ascertain eligibility of beneficiaries under the Schemes.

2.4.7.2 Conduct of training programme

As per KSY guidelines, two-days training on balanced diet, health consciousness and economic empowerment was to be imparted at block level by the CDPOs, Lady Doctors and Assistant Project Officers (APO)/District Rural Development Authority or Chief Executive Officer (CEO) of Janpad Panchayat to the Supervisors of WCD and Health Department, Auxiliary Nurse Midwife (ANMs), AWWs and two girl beneficiaries from each AWC so as to prepare them as master trainers.

These master trainers, in turn were to impart three-days training at Panchayat level to the beneficiary girls on the above issues at an interval of three months (i.e. one day in every three month). Gram Panchayat-wise roster of training programme for girls was to be prepared by the Supervisors of WCD and ANM of Health Department, which was to be forwarded for approval to the DPO of WCD and the Chief Medical and Health Officer (CMHO).

We observed that no targets were set for coverage of girls under the programme. However, the number of girls imparted training on balance diet, health consciousness and economic empowerment was 14.21 lakh in the years 2009-10 and 2010-11. The number of girls covered under 'training', decreased to 9.39 lakh during 2011-12 and to 9.42 in next two years 2012-13 and 2013-14. The decrease was because of replacement of KSY Scheme by *SABLA* in 15 districts during these years.

The number of Panchayats and beneficiaries covered under KSY in the test checked POs during 2009-14 is shown in **Table 3**.

Table- 3 Number of Panchayat level training held and girls imparted training in test checked projects

Year	Number of Panchayat in selected POs	Number of Panchayat in which Panchayat level training was held	Number of girls imparted Panchayat level training
2009-10	2,206	1,967	39,678
2010-11	2,290	2,075	41,658
2011-12	2,293	2,139	43,809
2012-13	2,246	2,092	42,483
2013-14	2,246	2,092	41,903
Total	11,281	10,365	2,09,531

(Source: Information furnished by the Project Offices)

We observed the following:

- Roster of training programme for trainers and trainees was not prepared by 26⁸ out of 36 test checked POs and forwarded to DPO and CMHO for approval.
- Two-days training to prepare master trainer at block level was imparted in all the test checked POs. However, the CEOs and APOs did not participate in any block level training in 36 test checked POs. Besides, training for health consciousness by a lady doctor was imparted only in eight⁹ out of 36 test checked POs.
- During the period 2009-14, three-days training to girls at Panchayat level was imparted by 33 POs out of 36 test checked POs. In PO Dindori, training was not conducted during 2009-10 to 2011-12 by CDPO because the funds were utilised on block level training. Similarly, in Sitamau (2009-10) and Malhargarh (2009-11 and 2012-14) in Mandsour District the CDPOs did not conduct Panchayat level training reportedly due to non-receipt of list of girls from AWCs. Hence, entire fund was surrendered.

Further, as per guidelines, after completion of three-days Panchayat level training, Supervisors were to prepare lists of girls who were found fit for vocational training and forward their names to POs. The CDPOs were to forward the lists of girls to the Commissioner through the respective DPOs.

We noticed that girls were not selected by the Supervisors for vocational training in any of the test checked POs under KSY. As a result, vocational training was not imparted to girls as envisaged in the Scheme.

In the exit conference, the Principal Secretary, WCD accepted the fact and stated that instructions would be issued to field offices for taking action.

Preparation of roster for training programme and participation of CEOs and APOs in block level training under KSY may be ensured.

⁸ Amarpur, Bajag, Bichua, Bijadandi, Burhanpur rural, Chindwara Rural, Dindori, Gwalior Urban I, Gwalior Urban III, Ghughri, Hoshangabad Urban, Hoshangabad Rural, Itarsi, Karanjia, Kesla, Khaknar, Manpur, Mandla, Malhargarh, Mohgaon, Mohkhed, Nepanagar, Pali, Sitamou, Tamia and Umaria I.

⁹ Burhanpur Urban, Gwalior Urban II, Hoshangabad Urban, Itarsi, Khaknar, Mallahargarh, Sitamou and Umaria II.

CEOs and APOs did not participate in block level training

Vocational training was not imparted to girls under KSY

2.4.7.3 Health check-up and IFA supplementation

As per guidelines of the Schemes, the health check-up of girls and Iron Folic Acid (IFA) supplementation was to be done by ANMs and any girl appeared seriously ill was to be referred to Primary Health Center (PHC).

Health check up of girls was not conducted in AWCs

We observed that health check-up and IFA supplementation was not done in any of the test checked districts where KSY was being implemented. On being enquired in audit, the CDPOs stated that CMHOs/Block Medical Officers were not informed the schedule for conducting training and health check-up.

In the exit conference, the Principal Secretary, WCD stated that instructions would be issued to the DPOs and CDPOs in this regard.

2.4.7.4 Monitoring

The KSY guidelines envisaged that a 'Review Committee' in each district and in each block was to be formed, which would review the progress of Scheme implementation once in every three months. However, no provision was made in the guidelines for constitution of a Committee at State level for overall monitoring of the Scheme implementation.

Meetings of monitoring committee were not held

We observed that out of nine test checked districts, only the DPO, Umaria held meetings, that too only in 2010-11 and 2011-12. In eight other districts, no meetings were held. Similarly, out of 36 test checked projects, meetings were held only in four projects¹⁰ during the years 2009-10 to 2013-14.

Thus, there were deficiencies in monitoring at all levels, adversely affecting the Scheme implementation.

In the exit conference, the Principal Secretary, WCD accepted the fact and stated that instructions would be issued to hold the meetings by monitoring committees as prescribed in the guidelines.

2.4.8 Rajiv Gandhi Scheme for Empowerment of Adolescent Girls (SABLA)

The objectives of the Scheme were to empower the adolescent girls for self-development, improve their nutritional and health status, promote awareness about health, hygiene, nutrition, Adolescent Reproductive and Sexual Health (ARSH) and family and child care, upgrade their home-based skills, life skills, bringing back the school dropout adolescent girls into formal/non formal education and provide information/guidance about working of various public institutions. In addition to these, nutrition supplementary diet is provided to eligible adolescent girls. SABLA Scheme, is being implemented in 15 districts of the State.

2.4.8.1 Utilisation of funds

Under SABLA Scheme, GoI provided funds at ₹ 3.80 lakh per annum to each ICDS project for non-nutrition component. For this component, ₹ 12.51 crore was utilised against ₹ 15.75 crore provided by GoI during 2010-14. Similarly, for the nutrition component, the Commissioner utilised ₹ 391.06 crore against

¹⁰ Hoshangabad Rural (District-Hoshangabad), Amarpur (District-Dindori), Khaknaar (District-Burhanpur) and Tamia (District-Chhindwara).

the provision of ₹ 402.89 crore; savings were mainly during 2012-13 and 2013-14, as shown in table below:

Table-4: Year-wise budget allotment and expenditure during the period 2009-14
(₹ in crore)

Year	Allotment			Expenditure			Saving
	Non-Nutrition Component	Nutrition Component	Total	Non-Nutrition Component	Nutrition Component	Total	
2010-11	0.00	10.00	10.00	0.00	9.95	9.95	0.05
2011-12	4.13	100.00	104.13	4.10	99.99	104.09	0.04
2012-13	5.81	145.00	150.81	5.55	141.08	146.63	4.18
2013-14	5.81	147.89	153.70	2.86	140.04	142.90	10.80
Total	15.75	402.89	418.64	12.51	391.06	403.57	15.07

(Source: Data furnished by the Departments)

It would be seen from the above that there were significant saving under both nutrition and non-nutrition components during the year 2013-14.

We observed that 11 test checked Project Offices (POs)¹¹ did not fully utilise the funds allotted for various activities such as conduct of Kishori Diwas, Life Skill Education, Nutrition and Health Education and Vocational Training planned under non-nutrition component of *SABLA*. Out of total allotment of ₹ 31.90 lakh under these activities, actual expenditure was ₹ 24.52 lakh. (*Appendix 2.32*).

Further, we observed that the Commissioner, WCD withdrew ₹ 3.06 crore for procurement of *SABLA* training kits and ₹ 0.48 crore for *SABLA* registers and kept the amounts in Civil Deposit on 28 March 2012 and on 31 March 2013 respectively to avoid lapse of funds. Of these, ₹ 3.06 crore was spent in 2012-13 and ₹ 0.48 crore remained parked in Civil Deposit as of November 2014. Blocking of Scheme funds affected the Scheme implementation and achievement of targets.

In the exit conference, the Principal Secretary, WCD accepted the fact and stated that IFA tablet is being provided by the Health Department and selection of Vocational Training Providers (VTPs) was not done by some districts as such funds could not be utilised. He also stated that the amount kept in Civil Deposit would be utilised shortly.

2.4.8.2 Coverage of beneficiaries

Under *SABLA* Scheme, baseline survey for identification of adolescent girls in 15 districts for different components was conducted by *Anganwadi* Workers (AWWs) during 2010-11. The number of beneficiaries covered and the shortfalls under various components of *SABLA* Scheme was as under:

11 Project Offices did not fully utilise the allotted funds for programme activities. Besides, ₹ 0.48 crore remained in Civil deposit

¹¹ Javad, Jhabua, Lalburra, Manasa, Meghnagar, Neemuch Urban, Neemuch Rural, Petlavad, Sagar Urban I, Sagar Urban II and Thandla.

Table-5: Component-wise shortfall in coverage of girls under SABLA

Component	No. of AGs as per base line survey	2011-12		2012-13		2013-14	
		Girls benefited	Shortfall (with percent-age)	Girls benefited	Shortfall (with percent-age)	Girls benefited	Shortfall (with percent-age)
Iron Folic Acid (IFA)	3,36,081 ¹²	2,01,506	1,34,575 (40)	2,05,850	1,30,231 (39)	2,15,850	1,20,231 (36)
Health Check-up	3,36,081	98,329	2,37,752 (71)	1,12,305	2,23,776 (67)	1,14,850	2,21,231 (66)
Training to girls imparted under SABLA ¹³	3,36,081	1,10,100	2,25,981 (67)	1,15,090	2,20,991 (66)	1,15,800	2,20,281 (66)
Nutrition provided to girls under SABLA	10,07,594 ¹⁴	8,00,758	2,06,836 (21)	8,92,666	1,14,928 (11)	8,97,000	1,10,594 (11)

(Source: Data furnished by the department and Progress Report submitted to GoI)

Significant shortfall noticed in providing services to girls under SABLA

The reasons for significant shortfall under various components of SABLA Scheme have been discussed in paras 2.4.8.4, 2.4.8.6 and 2.4.8.9. The Department stated that the coverage under the Scheme was less as these were the initial years of implementation and more awareness amongst the beneficiaries and the service providers was needed.

2.4.8.3 Conduct of vocational training

Vocational training was not conducted in seven projects

As per para 6.8 of SABLA guidelines, vocational training for girls in the age group of 16 to 18 years for their skill development and employment was to be imparted by vocational training providers. GoI provided ₹ 30,000 every year to each PO for imparting vocational training. We observed that vocational training was not conducted in the seven¹⁵ out of 36 test-checked POs during the period 2011-12 to 2013-14.

In the exit conference, the Principal Secretary, WCD accepted the observations

2.4.8.4 Providing guidance/counseling

Under SABLA, guidance/counseling to the 'out of school' girls on 'Nutrition and Health Education' were to be provided for a minimum two sessions in a quarter; 'Family Welfare, Adolescent Reproductive & Sexual Health (ARSH) and Child Care Practices' for at least three sessions and 'Life Skill Education' for minimum two sessions in a quarter.

The status of guidance and counseling sessions conducted in 160 test checked AWCs of four selected districts during 2011-14 is given in **Table-6**.

¹² Out of school girls in the age group of 11 to 18 years.

¹³ Three types of training imparted are (i) Nutrition and Health Education (NHE), (ii) Family Welfare and Child Care and (iii) Life Skill Education.

¹⁴ Out of school girls in the age group of 11 to 14 years plus all girls in the age group of 15 to 18 years.

¹⁵ Jhabua (2011-12), Javad (2012-13), Lalburra (2013-14), Manasa (2011-12 and 2013-14), Neemuch Urban (2012-13), Neemuch Rural (2013-14) and Petlad (2012-13).

Table-6: Status of guidance and counseling provided in selected AWCs

Name of District	No of AWCs test checked	Nutrition and Health Education		Family Welfare and ARSH		Life Skill Education	
		Guidance provided in AWC	Shortfall (Percentage)	Guidance provided in AWC	Shortfall (Percentage)	Guidance provided in AWC	Shortfall (Percentage)
Balaghat	40	40	0(0)	36	4(10)	31	9(23)
Jhabua	40	27	13(33)	04	36(90)	11	29(73)
Neemuch	40	24	16(40)	01	39(97)	21	19(47)
Sagar	40	19	21(53)	17	23(57)	25	15(38)
Total	160	110	50(31)	58	102(64)	88	72(45)

(Source: Information furnished by AWWs and Supervisors)

There were shortfalls in guidance and counseling sessions in the test checked AWCs

It is evident from the above that only in Balaghat District, shortfall was minimum (0 to 23 *per cent*) whereas in other test checked districts shortfall in guidance and counseling ranged from 33 *per cent* (NHE) to 97 *per cent* (Family Welfare and ARSH).

In the exit conference, the Principal Secretary, WCD stated that the coverage under the Scheme was less, as these were the initial years.

Guidance and Counseling may be provided to the girls, as envisaged in the guidelines.

2.4.8.5 Distribution of Training Kits

As per para 5.2 of *SABLA* guidelines, funds for procurement of training kits were provided by GoI at ₹ 1,000 per operational AWC every year to assist the girls in understanding various health, nutrition, social and legal issues. We observed that the training kits were not provided by Directorate during the years 2010-11, 2011-12 and 2013-14. Training kits were provided to AWCs twice during 2012-13, for current year and for the previous year, since administrative sanction for 2011-12 was delayed. Training kits for the year 2013-14 were also not provided to AWCs due to late allotment of funds to district offices.

Training Kits were not provided to AWCs

We also observed that the DPOs of all the test checked districts surrendered entire funds (₹ 60.06 lakh¹⁶) as the funds were received at the end of the year. As a result, the girls remained deprived of the practical knowledge of various health, nutrition, social and legal issues which they could get through the kits.

In the exit conference, the Principal Secretary, WCD stated that due to delayed administrative approval training kits were not provided to AWCs.

2.4.8.6 Health check-up and IFA supplementation

As per guidelines of the Scheme, the health check-up of girls and Iron Folic Acid (IFA) supplementation was to be done by ANMs, and in case of girls having problems requiring specialised treatment, Medical Officers would refer the girls to the District Hospital/Primary Health Centre (PHC).

Health check up of girls was not conducted in AWCs

Out of 160 test-checked AWCs in four selected districts, where *SABLA* was being implemented, health check-up was not conducted in 79 AWCs and IFA supplementation was not done in 68 AWCs.

In the exit conference, the Principal Secretary, WCD stated that instructions would be issued to the DPOs and CDPOs in this regard.

¹⁶ Balaghat (₹ 16.50 lakh), Jhabua (₹ 12.00 lakh), Neemuch (₹ 9.57 lakh) and Sagar (₹ 21.99 lakh).

Conducting health check-up of girls and supply of IFA tablets may be ensured at PO level.

2.4.8.7 Maintenance of Kishori Cards

As per para 5.4 of *SABLA* guidelines, *Kishori* cards for each girl was to be maintained in AWCs. The card contains information about the weight, body mass index, IFA supplementation and services like counselling sessions, take home ration (THR) received, etc. We observed that against the requirement of 15.44 lakh *Kishori* Cards¹⁷, the Commissioner placed order in July 2011 for supply of 12 lakh cards. Supply was made to the districts only in October 2012.

We observed that in four test checked districts, 2.34 lakh cards (60 per cent) were procured against requirement of 3.89 lakh *Kishori* Cards as detailed below:

Table-7: Status of availability of Kishori Cards

Name of district	Girls enrolled	Kishori cards supplied	Shortfall (percentage)
Sagar	1,51,419	75,350	76,069 (50)
Neemuch	49,960	44,595	5,365 (11)
Balaghat	1,07,447	66,871	40,576 (38)
Jhabua	80,395	47,515	32,880(41)
Total	3,89,221	2,34,331	1,54,890 (40)

(Source: Information furnished by the District Offices and Directorate)

As per information furnished by the AWWs, out of 160 test checked AWCs, 31 AWCs did not receive any *Kishori* Card, 86 AWCs did not receive required number of *Kishori* Cards and only 43 AWCs had received *Kishori* Cards as per their requirement. Due to short distribution of *Kishori* Cards, information about IFA supplementation, health check-up, counselling sessions attended and THR provided to each girl was not maintained at AWCs.

In the exit conference, the Principal Secretary, WCD stated that *Kishori* Cards were provided to the districts on the basis of baseline data for the year 2011-12.

The reply was not acceptable as the order placed for *Kishori* Cards was much less than the requirement as per the baseline survey data of the districts.

2.4.8.8 Convergence with different departments

The *SABLA* Scheme envisaged an integrated delivery of a multiplicity of services which were to be handled by different departments at different levels. For this, Districts/Project Offices were to converge the services under the Schemes with various schemes/programmes of the Education Department, Health Department, Youth Affairs Department, Labour Department and Panchayati Raj Institutions for implementation of different components under the Scheme.

The DPOs and CDPOs could not produce to Audit any records in support of convergence done, if any, with other departments. However, the DPO Neemuch converged with Health and Education Departments. Thus, the

¹⁷

As per baseline data of 15 districts where *SABLA* was implemented.

Short distribution of *Kishori* Cards (40 per cent) to AWCs

Convergence with schemes/ programmes of different departments was not done at district/ project level

objective of *SABLA* to achieve effective co-ordination of policy and implementation amongst the various departments to promote girl empowerment remained unaccomplished.

In the exit conference, the Principal Secretary, WCD accepted the fact and stated that DPOs and CDPOs would be instructed to keep records of convergence with concerned departments.

For effective implementation of the Schemes convergence with various schemes of different departments may be done at all levels to ensure integrated delivery of a multiplicity of the services.

2.4.8.9 Providing Supplementary Nutrition to girls

As per GoI guidelines, THR as supplementary nutrition was to be provided for 300 days in a year to 'out of school' girls in the age group of 11 to 14 years and all girls in the age group of 15 to 18 years. Under the Scheme, girls were provided THR packets of *Soya Barfi/Khichdi* per week of 900 grams each. For providing 300 days THR in a year, each girl was to be given at least 50 packets (a packet for six days) in a year.

We noticed that there were shortfalls ranging from 11 *per cent* to 21 *per cent* in providing the THR in the State under *SABLA* Scheme as mentioned in **Table 5**. Scrutiny of THR stock register, supplementary nutrition records and enrolment data of supplementary nutrition for girls furnished by the DPO, Neemuch revealed that against the total requirement of 42.07 lakh¹⁸ packets for providing THR to all enrolled girls 30.08 lakh packets (72 *per cent*) were supplied during the period 2011-14. This resulted in 23,957 girls (28 *per cent*) being either deprived of getting benefit of supplementary nutrition or provided less than 300 days of THR to 84,131 girls as shown in **Table-8**.

Short coverage of beneficiaries under nutrition component

Table-8: Shortfall in providing THR in Neemuch district

Year	Enrolled girls under supplementary nutrition	THR packets required	THR packets received	Shortfall of THR	No. of girls deprived due to short received of THR	Percentage of deprived girls
2011-12	28,753	14,37,650	9,37,460	5,00,190	10,004	37
2012-13	26,754	13,37,700	11,03,800	2,33,900	4,678	17
2013-14	28,624	14,31,200	9,67,440	4,63,760	9,275	32
Total	84,131	42,06,550	30,08,700	11,97,850	23,957	28

(Source: Data furnished by the DPO Neemuch)

No shortfall in other selected districts was noticed in audit and the weight, cost, quantity and nutrition value were same as prescribed in GoI guidelines.

In the exit conference, the Principal Secretary, WCD stated that 100 *per cent* girls could not be benefited with THR because girls belonging to well to do families were not taking THR.

The reply is not acceptable as all enrolled girls under Nutrition Component of *SABLA* should have been provided Supplementary Nutrition as per norms. Further, the Department has not furnished any record in support of their reply.

¹⁸

84,131 girls x 50 packets =42,06,550.

2.4.8.10 Monitoring

Under SABLA, a State Level Monitoring and Supervision Committee headed by the Chief Secretary was to be formed and was required to meet quarterly or as and when required. The State Level Committee was formed in March 2011. However, no meeting was held as of July 2014.

Meetings of monitoring committee were not held

At district level, a Committee headed by the District Magistrate and at Project level, a Committee headed by the DPO was to be formed. They were required to meet once in each quarter and in a month respectively. We observed that the Monitoring Committees at project level and district level were not constituted in Sagar District. In Neemuch and Jhabua Districts though the Committees were constituted (March 2011 and May 2011 respectively) at both levels, quarterly meetings for supervision and monitoring were not held. In Balaghat District, only four quarterly meetings were held by district level committee against 12 prescribed meetings during 2011-14. Out of 16 test checked projects, only Baraseoni and Katnagi projects held monthly meetings.

Thus, there were deficiencies in monitoring at all levels, adversely affecting the Scheme implementation.

In the exit conference, the Principal Secretary, WCD accepted the fact and stated that instructions would be issued to hold the meetings by monitoring committees as prescribed in the guidelines.

Monitoring committees at all level may be constituted and meetings held regularly as per guidelines to review the progress of the Scheme and to take corrective action, if required.

2.4.9 Kanya Saksharta Protsahan Yojana (KSPY)

The KSPY, a State sponsored Scheme, is being implemented in all 51 districts in the State. The Scheme provides financial assistance of ₹ 500 for class sixth, ₹ 1000 for class ninth and ₹ 3000 for class eleventh SC/ST girl students, whose parents are not Income Tax payee at the time of their enrolment in schools. The incentive amount was to be paid in the bank account of beneficiary. However, payment of incentive in cash was allowed for those institutions where banks were not available.

Under the Scheme, ₹ 241.70 crore was spent out of ₹ 255.94 crore allocated during the period 2009-14, as shown in table below:

Table-9: Year-wise budget allotment and expenditure during the period 2009-14

(₹ in crore)

Year	2009-10	2010-11	2011-12	2012-13	2013-14	Total
Allotment	34.75	41.71	51.72	60.74	67.02	255.94
Expenditure	34.24	40.18	51.45	57.26	58.57	241.70
Saving	0.51	1.53	0.27	3.48	8.45	14.24

(Source: Data furnished by the Departments)

Incentive amount of ₹ 1.25 crore was lying in the bank account of ACTDs/BEOs/Principals

In the 13 test checked districts, expenditure incurred was ₹ 65.60 crore against provision of ₹ 67.98 crore during the period 2009-14. We observed that out of ₹ 65.60 crore released by the district offices, a total amount of ₹ 1.25 crore was lying in the bank account of ACTDs/BEOs/Principals in six districts, as shown in **Appendix 2.33** and the same was not deposited in the Government account.

2.4.9.1 Coverage of beneficiaries

There was no record to show the number of identified girls or targets set by the concerned departments for KSPY Scheme. Year-wise number of beneficiaries covered under the Scheme was as under:

Table-10: Status of achievement under KSPY

(figures in lakh)

Class	Number of students covered in classes 6 th , 9 th and 11 th under KSPY														
	2009-10			2010-11			2011-12			2012-13			2013-14		
	SC	ST	Total	SC	ST	Total	SC	ST	Total	SC	ST	Total	SC	ST	Total
6	1.19	1.23	2.42	1.33	1.46	2.79	1.42	1.78	3.20	1.62	1.83	3.45	1.40	1.87	3.27
9	0.57	0.38	0.95	0.67	0.51	1.18	0.92	0.75	1.67	1.06	0.93	1.99	0.91	1.01	1.92
11	0.18	0.14	0.32	0.25	0.20	0.45	0.30	0.25	0.55	0.30	0.28	0.58	0.28	0.36	0.64
Total	1.94	1.75	3.69	2.25	2.17	4.42	2.64	2.78	5.42	2.98	3.04	6.02	2.59	3.24	5.83

(Source: Data furnished by the Departments)

In the 13 test checked districts, 2.79 lakh SC and 4.19 lakh ST girls were identified under the Scheme. Of them, incentive was paid to 2.76 lakh SC (99 per cent) and 4.13 lakh ST (99 per cent) girl students.

2.4.9.2 Benefits given without obtaining requisite documents

The KSPY guidelines envisaged that the eligibility criteria for sanction of scholarship by the State Government should be applicable for sanction of financial assistance under the Scheme.

Benefits extended to girls without obtaining documents in support of eligibility

As per Scholarship Rule (1972) and instructions issued by CTD (July 2011), submission of applications along with caste certificates and certificates regarding the parents not being income tax payee was mandatory before the incentive is released to the eligible girls.

We observed that in nine out of 13 selected districts, benefits of ₹1.48 crore were given to 9189 beneficiaries without ascertaining the eligibility criteria. In eight districts¹⁹, benefits were given to 7,354 girls (of 13 schools) without obtaining applications and certificates regarding income, while in three districts²⁰ 1,835 girls (of four schools) were given benefits without obtaining caste certificates during the period 2009-14, as shown in **Appendix 2.34**. In absence of requisite documents eligibility of the girls could not be ascertained in audit.

The Principals of schools accepted and stated that the applications and caste certificates could not be obtained and would be obtained in future.

In the exit conference, the Principal Secretaries, SCWD and TWD stated that instructions had been issued to district offices for maintaining the records as per norms.

2.4.9.3 Delayed distribution of incentive amount to girl students

We observed that there were delays from two to 15 months in release of funds by the district authorities to the schools, despite availability of funds. Scrutiny of records in 62 selected higher secondary schools and middle schools

There were delays ranging from two to 18 months in distribution of incentive

¹⁹ Balaghat, Burhanpur, Chhindwara, Dindori, Hoshangabad, Neemuch, Sagar and Seoni.

²⁰ Burhanpur, Dindori and Gwalior.

revealed that the incentives amounting to ₹ 1.25 crore pertaining to 10,332 SC/ST girl students in 34 schools (12 districts) were paid with delays ranging from two to 18 months, as shown in **Appendix 2.35**. The delay was due to non-submission of sanctions/proposals in time by the head of educational institutes and delayed release of funds by District Offices.

In the exit conference, the Principal Secretaries, SCWD and TWD stated that delayed distribution of incentive amount was mainly due to non-opening of bank accounts of girls, delayed drawal of allotment by the district offices and delay in providing of additional fund as per actual demand received from field offices.

The Department should ensure timely payment of incentive to avoid any adverse impact on enrolment and retention of girls in schools.

2.4.9.4 Incentive amount paid in cash

**Incentive amount
paid in cash to
the beneficiaries**

Scrutiny of paid vouchers in 13 test checked districts revealed that during the period 2009-14, in 841 schools²¹ of six districts,²² 69,348 girls students were paid ₹ 6.82 crore in cash, as shown in **Appendix-2.36**. Possibility of mis-utilisation of funds in these cases cannot be ruled out. In seven other districts incentives were paid through the bank accounts of beneficiaries.

On this being pointed out, the heads of educational institutions stated that due to non-opening of bank account of girls, incentive amount was paid in cash.

In the exit conference, the Principal Secretaries, SCWD and TWD stated that incentive amount would be paid in the bank account of girl students/parents through School Education Department from year 2014-15.

2.4.9.5 Decrease in number of girls in secondary and higher secondary classes

The KSPY scheme was launched for improvement in literacy of SC and ST girls and continuation of their education in secondary and higher secondary classes.

We noticed that enrolment of SC and ST girl students improved during the period 2009-14. There was gradual increase in the number of beneficiary from 1.94 lakh (SC) and 1.75 lakh (ST) in 2009-10 to 2.59 lakh (SC) and 3.24 (ST) in 2013-14 (as detailed in Table-10).

Further, we observed that during the year 2009-10 the number of SC and ST girls was 2.42 lakh in 6th class. During 2012-13 the same number of girl should have been available in 9th class. We noticed that the actual number of SC and ST girls in 9th class during 2012-13 was 1.99 lakh i.e. a decrease of 18 *per cent*.

Against the number of SC and ST girls of 6th class in 2010-11 (2.79 lakh), the number of girls in 9th class during 2013-14 was much less (1.92 lakh) indicating a decrease of 31 *per cent*.

²¹ Includes 16 schools out of 65 schools test checked and 825 other schools in Mandla district (out of 902 schools) paid vouchers of which were examined separately.

²² Chindwara (3), Jhabua (4), Mandla (825+5), Neemuch (1), Seoni (1) and Umaria (2).

Similarly, the number of SC and ST girls in 9th class during the years 2009-10, 2010-11 and 2011-12 was 0.95 lakh, 1.18 lakh and 1.67 lakh respectively. The same number of girl should have been available in 11th class during 2011-12, 2012-13 and 2013-14. We observed that the number of SC and ST girls in 11th class during these years was 0.55 lakh, 0.58 lakh and 0.64 lakh respectively, indicating decrease of girls in 11th class by 42 per cent, 51 per cent and 62 per cent respectively.

Thus, though there was an increase in overall enrolment of SC and ST girls in the State, the number of girl students decreased in secondary level and higher secondary level.

In the exit conference, the Principal Secretary, SCWD stated that efforts would be made to reduce the drop out of girls. Principal Secretary, TWD stated that implementation of the schemes resulted increase of enrolment of ST girl students. However, no reply in respect of decrease in number of girl students in higher classes was received.

The fact remains that the objective of the scheme was not fully achieved.

2.4.9.6 Monitoring

Absence of monitoring mechanism

As per instructions issued (October 1986) by Tribal Welfare Department, the Block Development Officer of *Janpad* and the BEOs are responsible for reviewing the progress of Scheme through quarterly meetings and evaluation of the Scheme was to be conducted by Tribal Development and Research Institute. We noticed that monitoring of the Scheme was not done during 2009-14 at any level. Due to non-monitoring at prescribed levels the delayed disbursement of incentive amount to girls, blockage of fund at all levels remained unnoticed.

Further, evaluation of the Scheme was not done by the Tribal Development and Research Institute.

The Government stated that evaluation of the Scheme would be done through Tribal Development and Research Institute.

The implementation may be monitored as prescribed, for effective impact of the Scheme.

2.4.10 Conclusion

- Under KSY, identification of girls through anganwadi-wise survey was not done. Also, list of the selected girls was not sent to Gram Sabha for scrutiny of eligibility. There was no target for coverage of girls under KSY. Under KSY, vocational training and health check-up was not done at all.
- Under *SABLA*, the Programme was improved by introducing the component 'nutrition' for girls; 79 per cent to 89 per cent of selected girls were benefitted. However, the coverage under the component 'guidance and counseling' on nutrition and health education, family welfare and life skill education introduced under *SABLA* was much less than the target set. Health check-up was conducted in 79 out of 160 selected anganwadi centres.
- Under KSPY the objective of encouraging the SC/ST girls to continue study up to higher secondary level was not fully achieved since the girl

students decreased from upper primary level to secondary level and further reduced to higher secondary level. There were delays up to 18 months in extending the financial assistance to the girl students.

- Monitoring and supervision of the programmes KSY and SABLA was not adequate, since there were significant shortfalls in meetings of monitoring committees. Monitoring of the programme KSPY was not done at any level.

Public Health and Family Welfare Department

2.5 Implementation of Health Schemes in Tribal Districts

2.5.1 Introduction

Tribal Sub Plan (TSP) initiated by Government of India (GoI) is seen as critical initiative in closing the development gap between the Scheduled Tribes (ST) and others. In Madhya Pradesh, tribal population is 21 *per cent* of total population (7.26 crore). As per procedure evolved by the Planning Commission, Central Ministries are to ensure appropriate earmarking of funds for various sectors (including Health Sector) under TSP in the Annual Plan proposals. However, no mechanism has been evolved for maintenance of separate accounts for TSP funds.

Under Health Sector, the flow of TSP funds was in 21 schemes of National Rural Health Mission (NRHM) and seven¹ non-NRHM schemes. Two non-NRHM schemes viz. National Programme for Prevention and Control of Cancer, Diabetes, Cardiovascular Disease and Stroke (NPCDCS) and National Programme for Health Care for the Elderly (NPHCE) were selected for performance audit (PA) covering the period 2011-14.

NPCDCS was launched in 2008 for reducing the incidences of Non-Communicable Diseases (NCDs) such as cancer, diabetes, cardiovascular diseases and stroke. The aim of the NPHCE programme launched in 2010 is to provide separate and specialised comprehensive health care services to the senior citizens at various levels of State health care units. These programmes have been implemented in five tribal districts² of the State.

At the State level, Principal Secretary of the Department is responsible for implementation of the programmes who is assisted by Director, Health Services and Mission Director of State Health Society (SHS). A State NCD (Non-communicable Disease) cell headed by Deputy Director and at district level a District NCD cell headed by Chief Medical and Health Officer (CMHO) were established for overall implementation and monitoring of both the programmes.

2.5.2 Audit objectives

The broad objectives of the review were to examine whether:

- planning for implementation of the programmes was well designed;
- adequate financial outlay was earmarked under TSP;
- health care services were delivered efficiently, as envisaged in the Programmes; and
- effective monitoring mechanism was in place.

¹ (i) National Programme for Prevention and Control of Cancer, Diabetes, Cardiovascular Diseases and Stroke, (ii) National Programme for Health Care for the Elderly, (iii) National Mental Health Programme, (iv) Assistance to State for Capacity Building (Trauma Care), (v) Human Resource for Health, (vi) Strengthening of State Drug regulatory system, (vii) Strengthening of State Food Regulatory System.

² Chhindwara, Dhar, Hoshangabad, Jhabua and Ratlam.

2.5.3 Scope and methodology of audit

These programmes were implemented in five tribal districts out of 21 tribal districts in the State. In addition to the State NCD Cell, we test-checked record of three District NCD Cells at Chhindwara, Dhar and Ratlam, nine CHCs³ (Community Health Centres) out of 32, 16 PHCs (Primary Health Centres) out of 138 and 34 SHCs (Sub-health Centres) out of 858 were selected for the review.

An entry conference was held in June 2014, where the audit objectives and methodology were discussed with the Director, Health Services (DHS)/Director, National Rural Health Mission (NRHM). The exit conference was held in November 2014 with the Principal Secretary alongwith other concerned officers. The views of the Department have been incorporated in the relevant paragraphs.

2.5.4 Financial management

During the period 2011-14, total budgetary allocation under TSP (Health Sector) was only seven *per cent* of total allocation under Health Sector in the State. Under the programmes NPCDCS and NPHCE, funds allotted under TSP were 20 *per cent* and 13 *per cent* respectively of total allocation for the Programme.

Year-wise details of funds available and expenditure incurred under NPCDCS and NPHCE during the period 2011-14 were as in **Table 1**.

Table 1: Funds available and expenditure incurred under NPCDCS and NPHCE
(₹ in crore)

Year	Open- ing balance	Central Share			State share	Interest & other receipts	Total funds available with State NCD Cell	Expendit- ure ⁴ incurred during the year	Closing balance (percent- tage)
		Gen- eral and SCSP	TSP	Total					
NPCDCS									
2011-12	1.27	6.75	1.70	8.45	1.92	0.13	11.77	0.03	11.74 (100)
2012-13	11.74	0.07	0	0.07	0.32	0.43	12.56	2.93	9.63 (77)
2013-14	9.63	3.68	0.94	4.62	0.09	0.12	14.46	3.18	11.28 (78)
TOTAL		10.5	2.64	13.14	2.33	0.68	17.42	6.14	11.28
NPHCE									
2011-12	1.04	1.68	0	1.68	0.68	0.27	3.67	0.20	3.47 (94)
2012-13	3.47	3.78	0.79	4.57	1.14	0.20	9.38	1.51	7.87 (84)
2013-14	7.87	0	0	0	0	0	7.87	2.37	5.50 (70)
TOTAL		5.46	0.79	6.25	1.82	0.47	9.58	4.08	5.50

(Source: State NCD Cell)

- Under-utilisation of funds was 77 to 100 *per cent* under NPCDCS and 70 to 94 *per cent* under NPHCE. As a result, various activities viz. establishment of geriatric wards and clinics, procurement of machinery, equipment, drugs, deployment of human resources, training and public awareness were not carried out, as discussed in paragraphs 2.5.6 and 2.5.7.

- GoI released funds in three components viz. General Head, Tribal Sub-plan and Scheduled Caste Sub-Plan. However, these three components were mixed in a corpus fund and the State NCD Cell released the same to the districts without earmarking as TSP funds of ₹ 3.43 crore (₹ 2.64 crore under NPCDCS and ₹ 0.79 crore under NPHCE). Further, neither separate records of

Under-utilisation of funds during 2011-12 to 2013-14 was 77 to 100 *per cent* under NPCDCS and 70 to 94 *per cent* under NPHCE

³ Damua, Dhanora, Harrai, Jamai, Kukshi, Namli, Pithampur, Sailana and Tamia.

⁴ At State and District level.

expenditure were maintained at any level nor separate utilization certificate submitted to GoI for TSP funds.

- During the years 2011-12 to 2013-14, out of total Central share released for NPCDCS and NPHCE, funds earmarked under TSP component was 20 per cent and 13 per cent respectively. We observed that the five districts where programmes were implemented had 44 per cent tribal population.

In the exit conference Principal Secretary stated (November 2014) that the shortage of manpower was the main reason for non-utilisation of funds. It was also stated that separate plan for TSP was not prepared and no instructions were received from GoI to maintain separate accounts for TSP funds.

Optimum utilization of available financial resources may be ensured.

2.5.5 Planning

As envisaged in programme guidelines, State and District NCD cells were responsible for overall planning, implementation, monitoring and evaluation of the different activities and achievement of physical and financial targets planned under both the programmes in the State. We observed the following:

- During the years 2011-12 and 2012-13, State Action Plan or District Action Plan and database on physical and financial targets was not prepared. The State Action Plan for 2013-14 was prepared and sent to GoI, for which approval was not received (July 2014). According to the guidelines, State and district level data on physical, financial, epidemiological profile was to be maintained at State and district level for determining the priorities for action plan. However, no such data was maintained either at State NCD Cell level or by the test checked district NCD Cells.

- The guidelines provided for a wider knowledge base in the community for effective prevention, detection, referrals and treatment strategies through convergence with ongoing interventions of NRHM, NTCP⁵ and AYUSH⁶ etc. On an audit enquiry, the State NCD Cell stated that no plan for convergence of NPCDCS and NPHCE activities with other related programmes was prepared.

In the exit conference, Principal Secretary confirmed the fact and stated (November 2014) that convergence with other schemes would be taken into consideration during the preparation of next year's Action Plan.

2.5.6 Implementation of NPCDCS

To achieve the objectives of NPCDCS, strategies to be undertaken were prevention through behaviour change, early diagnosis, treatment, capacity building of human resource, Surveillance and Monitoring.

2.5.6.1 IEC activities for generating awareness about NCDs

To prevent the risk factors to NCD, general awareness about the NCD was to be created through mass media, community education and interpersonal communication for behaviour change. As per guidelines, Central NCD Cell was to prepare prototype Information, Education and Communication (IEC)

⁵ National Tobacco Control Programme.

⁶ Ayurveda, Yoga, Unani, Siddha and Homeopathy.

State and district action plan and database on physical, financial and epidemiological profile was not prepared

material on NCD diseases to sensitise the community about the risk factors and inform about services available through various electronic and print media. These were to be provided to States by Central NCD cell for dissemination. Further, public awareness regarding health promotion and prevention of NCD through communication messages, distribution of printed material and social mobilization were to be carried out at State, district and CHC levels.

IEC activities were not organised for public awareness

- As reported by State NCD Cell, no IEC material was received from Central NCD Cell during the period 2011-14. Further, no IEC activities were organised at State and CHC level. However, few activities were organised at district level during the years 2012-13 and 2013-14 at a cost of ₹ 1.86 lakh out of available funds of ₹ 6.13 lakh. We observed that due to non/short deployment for the posts of nurse, counselor and care coordinator, no interpersonal communication campaign in the selected districts was organised during the year 2011-12. However, only two campaigns were organised by the districts test-checked during the years 2012-13 and 2013-14, which were attended by 403 participants.

- In respect of mass media and community education for public awareness, the banners, posters etc. were not received at district level from State NCD Cell and therefore message was also not broadcasted or telecasted in two test-checked districts viz. Dhar and Ratlam.

Thus, IEC activities were not organised as envisaged and the objectives of prevention from NCDs through behaviour change could not be fully achieved.

In the exit conference Principal Secretary stated (November 2014) that due to paucity of manpower IEC activities could not be carried out in a satisfactory manner.

Awareness generation activities may be carried out for bringing behavioural change among the NCD patients.

2.5.6.2 Strategy for early diagnosis

For early diagnosis of chronic NCDs, opportunistic screening was to be carried out at DH, CHC and SHC level and suspected cases were to be either investigated or referred to higher level health facility centre. We observed the following:

Screening camps were not organised in two test checked districts and pilot study on school based screening programme for diabetes was not conducted

- Screening camps were not organized in Dhar and Ratlam Districts during the period 2011-14. In Chhindwara District, screening camps were organised during 2013-14 where 7.39 lakh individuals were screened for NCD diseases.

- GoI initiated (2011-12) a school-based screening programme for diabetes on pilot basis in the Ratlam District. The screening was primarily focused on school children in the age group of 5 to 15 years. We observed that pilot study was not conducted in Ratlam District despite availability of funds.

In the exit conference, Principal Secretary stated (November 2014) that due to shortage of manpower screening activity could not be carried out and unspent fund of pilot study would be refunded to GoI.

Thus, shortage of manpower defeated the strategy for early diagnosis of NCD diseases.

2.5.6.3 Lack of investigation facilities

Guidelines provided that nine types of investigation facilities⁷ were to be available at district NCD clinics. We observed that against ₹ 8.13 crore allotted during 2012-13 and 2013-14 for procurement of investigation facilities only ₹ 4.29 crore were utilised. As a result, essential investigation facilities mainly related to Cancer diseases such as Colposcopy and mammography were not available at District NCD clinics as detailed in *Appendix 2.37*. Further, according to the guidelines, chemotherapy facility was to be made available at each District NCD clinic. We noticed that this facility was not available in any of the three test-checked District NCD clinics.

Essential investigation facilities were not available in districts as well as CHC level NCD clinics

As per guidelines, five types⁸ of essential investigation facilities were to be available at CHC level NCD clinics. We observed that ultra-sound facility was not available in any of the test checked CHC clinics. Further, lipid profile facility in eight CHCs⁹, X-ray in four CHCs¹⁰ and ECG facility in six CHCs¹¹ was not available, as detailed in *Appendix 2.38*. It was also reported by the test-checked districts and CHC NCD clinics that facilities not available were not outsourced and facility for management of common CVDs, Diabetes and Stroke cases was not available in five CHCs¹² clinics.

2.5.6.4 Strengthening of Cardiac Care Unit (CCU)

Due to shortage of buildings and equipment cardiac care unit could not be strengthened

According to the guidelines, CCUs at districts were to be strengthened with seven types of equipment¹³ for providing timely and emergent care to the referred patients. We observed that essential equipment for cardiac patients viz. 12 channel stress ECG test equipment treadmills were not available at Dhar and Ratlam Districts and cardiac monitor with defibrillator was not available in Ratlam District. Further, separate CCU was not established in District Hospital, Ratlam and machines and the equipment procured during August 2012 to March 2014 at a cost of ₹ 41 lakh were lying idle in absence of CCU unit. Hence, intensive cardiac care was not provided to the NCD patients.

In the exit conference, Principal Secretary confirmed the fact and stated (November 2014) that a timeline for recruitment of human resources, procurement of equipment and civil works has been decided and would be completed up to December 2014, June 2015 and December 2015 respectively.

⁷ Blood sugar, Lipid profile, Kidney function test, Liver function test, ECG, Ultrasound, X-Ray, Colposcopy and Mammography.

⁸ Blood sugar, ECG, Lipid profile, Ultra sound and X-ray.

⁹ Damua, Dhanora, Jamai, Kukshi, Namli, Pithampur, Sailana, and Tamia.

¹⁰ Damua, Dhanora, Namali and Tamia.

¹¹ Damua, Dhanora, Jamai, Kukshi, Sailana and Tamia.

¹² Damua, Dhanora, Kukshi, Pithampur and Sailana.

¹³ Computerised ECG machine, ECG machine ordinary, 12 channel stress ECG test equipment tread mill, Cardiac monitor, Cardiac monitor with defibrillator, Ventilators, Pulse oximetre.

2.5.6.5 Shortage of essential drugs

Shortages of 29 to 45 per cent drugs under DCS component and 91 to 100 per cent drugs under cancer component were noticed in District NCD clinics

As per the guidelines, 38 types of drugs for Diabetes, CVD and Stroke (DCS) component and 22 types of drugs for Cancer component were to be made available at District NCD clinics. We observed that 29 to 45 per cent drugs under DCS component and 91 to 100 per cent drugs under Cancer component were not available in the three test-checked District NCD clinics (detailed in *Appendix 2.39*). Thus, District NCD clinics were not fully equipped to provide specialised health care services to the NCD patients.

In the exit conference, Principal Secretary stated (November 2014) that remaining drugs would be made available to the District NCD clinics.

2.5.6.6 Tertiary Cancer Centres (TCCs) for specialised Cancer care

Government did not identify any health institution as tertiary cancer centre

In view of developing regional referral cancer centres to provide specialised cancer care including training and research facilities in all types of Cancer, Government Medical Colleges/ District Hospitals/ Government Institutions were to be identified by the State Government for providing financial assistance under TCC Scheme. We observed that during the period 2011-14, no hospital or health institution was identified by the State NCD cell as TCC. Hence, the objective of providing specialized treatment was not achieved.

In the exit conference, Principal Secretary stated (November 2014) that identification of a TCC in Vidisha District was in progress.

2.5.6.7 Capacity building of human resources

There were shortage of man power at district level NCD clinics (85 per cent) and at CHC level NCD clinics (81 per cent)

As envisaged in the guidelines, NCD cells were to be supported by contractual staff at State and district levels. We noticed that against the requirement of four posts¹⁴, no staff was deployed at State NCD cell.

Further, one post each of District Programme Officer (DPO), Programme Assistant, Finance cum Logistic Officer and Data Entry Officer was required for each District NCD Cell. We noticed that the posts of the DPOs in Dhar and Ratlam Districts and the posts of Programme Assistant in Chhindwara, Dhar and Ratlam Districts were lying vacant.

As per the guidelines, additional staff was to be recruited on contract basis to manage District and CHC NCD clinics. The position of man power in five districts and 45 CHCs was as under:

Table 2 Men in position at various levels

Sl. No.	Name of post	Required as per norms	Working	Shortage
District NCD clinics				
1	Diabetologist/Cardiologist/ M.D. Physician	5	0	5
2	Medical Oncologist	5	0	5
3	Cyto Pathologist	5	0	5
4	Cyto Pathology Technician	5	0	5
5	Nurses	20	5	15
6	Physiotherapist	5	3	2
7	Counsellor	10	1	9
8	Data Entry Operator	5	1	4
9	Care Co-ordinator	5	0	5
	Total	65	10	55 (85 per cent)

¹⁴ **State NCD Cell-** State Programme Officer (1), Programme Assistant (1), Finance cum Logistic Officer (1) and Data Entry Operator (1).

CHC NCD clinics				
1	Doctors	45	1	44
2	Nurses	90	21	69
3	Counsellor	45	15	30
4	Data Entry Operator	45	6	39
	Total	225	43	182 (81 per cent))

(Source: State NCD Cell)

It would be seen from the above that there was 85 per cent shortage of manpower at District NCD clinics and 81 per cent shortage in CHC level NCD clinics. Moreover, all the posts of specialists and doctors in the district level clinics and the post of doctors in 44 CHC level clinics were lying vacant.

Acute shortage of specialists/doctors and para-medical staff in the clinics adversely impacted the implementation of the programmes.

In the exit conference Principal Secretary confirmed the fact and stated (November 2014) that a timeline for deployment of human resource has been decided and would be completed up to December 2014.

All vacant posts may be filled up expeditiously so that the health care services could be provided at health facility centres.

2.5.7 Implementation of NPHCE

To achieve the objectives of NPHCE, strategies to be undertaken were community education and public awareness, expansion of treatment facility, capacity building of the medical and paramedical professionals and continuous monitoring of the programme.

2.5.7.1 Community education and public awareness

The NPHCE guidelines also envisaged generation of public awareness as required under the programme NPCDCS. However, no IEC material was received from Central NCD Cell and the IEC activities were not carried out as already discussed in paragraph 2.5.6.1

2.5.7.2 Training for capacity building not conducted

As per para 2.3.6 of NPHCE guidelines, plan for training of personnel of various facilities under the programme was to be prepared by the State NCD Cell detailing training institutions, duration, broad curriculum etc. We observed that due to non-posting of manpower, only 1391 personnel were imparted training during 2012-14 against 3225 personnel planned. Details are in **Appendix 2.40**. Hence, against the available funds of ₹ 37.88 lakh during 2012-14, only ₹ 16.59 lakh could be utilised.

In the exit conference, Principal Secretary confirmed the fact and stated (November 2014) that as per guidelines Medical Colleges and other institutions would be identified for imparting training.

2.5.7.3 Non-availability of Geriatric Wards and Clinics

According to the guidelines, 10 bedded geriatric ward for in-patient care of the elderly people was to be established in each District Hospital (DH) and separate geriatric clinic was also to be established at each DH, CHC and PHC. For this purpose, against the available fund of ₹ 3.40 crore in 2012-14, only ₹ 1.31 crore were utilised. We noticed that out of three test-checked districts,

Only 1391 personnel were imparted training against 3225

Geriatric wards and clinics were not established in districts and CHCs level NCD clinics for elderly people

geriatric ward and clinic were not established in Dhar District Hospital. Geriatric clinic was not established in eight out of nine test-checked CHCs and in any of the 16 test-checked PHCs.

Further, rehabilitation unit for physiotherapy and counselling was also not available in eight out of nine test-checked CHCs. Callipers and supportive devices were also not issued to ANMs for providing to elderly people in seven out of 16 test-checked PHCs. (detailed in *Appendix 2.41*).

Thus, dedicated health facilities/services were not established in terms of the programme for treatment of elderly people.

2.5.7.4 Shortage of manpower

Guidelines provided that in case of scarcity of specialists in geriatric field, the services of existing specialists in various fields like General Medicine, Orthopaedics, Ophthalmology, ENT etc. were to be utilised for managing Geriatric Clinic and Wards of DHs. Additional staff viz. Medicine consultant, Nurse, Physiotherapist etc. was also to be recruited on contractual basis. We noticed that against the requirement of 39 additional staff in the three test-checked DH, there was shortage of 24. Further, out of nine test checked CHCs Rehabilitation Worker was not posted in eight CHC¹⁵, as detailed in *Appendix 2.42*.

2.5.7.5 Annual check-up of elderly people

As envisaged in guidelines, annual check-up of all the elderly people at village level was to be organized by PHC/CHC in health check-up camps and information was to be updated in Standard Health card for the elderly people.

We have noticed that annual check-up of elderly people was not conducted in any of the nine test-checked CHCs and 15¹⁶ out of 16 test-checked PHCs.

2.5.8 Supervision and monitoring under NPCDCS and NPHCE

The Central NCD Cell prescribed standard formats for recording and reporting by various health centres, District and State NCD Cells. A Management Information System was also to be developed to computerize the information. Review meetings at State level were to be organised on quarterly basis to discuss constraints in implementation of the programme.

We observed that reporting was being done from SHC to CHC, CHC to District NCD Cells and district to State NCD Cell. However, only number of patients screened and suspected cases were being reported in these formats. Total number of patients treated, details of patients for whom follow-up, physiotherapy, home based care and counselling was provided at NCD clinics were not being reported. The quarterly review meetings at State level were also not organised and the quarterly reports were not sent to Central NCD Cell.

In the exit conference (November 2014) Principal Secretary Stated that prescribed mechanism as per guidelines would be followed.

¹⁵ Damua, Dhanora, Harrai, Jamai, Kuskshi, Namli, Sailana and Tamia.

¹⁶ Barelipar, Batkakhapa, Bilpank, Burrikhurd, Chindi, Dehri, Delakheri, Dhamnod, Dungaria, Haldi, Hanotia, Nalchha, Sagore, Sharvan and Shivgarh.

Prescribed mechanism for supervision and monitoring may be followed to ensure effective and efficient implementation of the programmes.

2.5.9 Conclusion

- Annual Action Plan for NPCDCS and NPHCE programmes and database on physical, financial and epidemiological profile was not prepared at State and district levels.
- Information, Education and Communication for general awareness of the non-communicable diseases were not carried out at State and district levels.
- There were shortages of geriatric wards, clinics, essential drugs, machinery and equipment in NCD clinics mainly due to under-utilisation of funds.
- Due to non-deployment of medical and para-medical staff, health care services could not be provided efficiently under the programmes.

School Education Department

2.6 Implementation of Tribal Sub-Plan under Education Sector

2.6.1 Introduction

Tribal Sub Plan (TSP) was initiated by the Government of India (GoI) during the Fifth Five-Year Plan period. TSP is seen as critical in bridging the development gap between the ST people and others, with direct plan resources across the Union Ministries and Departments in the States at least in proportion to the ST population. For Education Sector, GoI allotted funds under TSP for implementation of *Sarva Shiksha Abhiyan* (SSA), National Programme of Mid Day Meal (NPMDM) and *Rashtriya Madhyamik Shiksha Abhiyaan* (RMSA) in Madhya Pradesh.

The SSA was introduced (2003) for implementation of Universal Elementary Education (UEE) for children in the age group of 06-14 years with greater emphasis on girls. Primary and Upper primary level education is provided under this Programme. The NPMDM was introduced (1995) for providing nutritional support and increasing attendance of children in schools. RMSA (launched in 2009) was implemented to widen the secondary level education with emphasis on enrolment of girls, Schedule Caste (SCs) and Scheduled Tribe (STs) in the age group of 14-18 years.

The Commissioner, *Rajya Shiksha Kendra* (RSK) is the Mission Director of SSA and is responsible for implementation of SSA at State level. At the district level, the District Programme Co-ordinator (DPC) under the supervision of District Collector as District Mission Director (DMD) and Chief Executive Officer (CEO) as District Project Director (DPD) implement the SSA. Besides, the Block Resource Centre Coordinator (BRCC) at block level and the Cluster Resource Centre Coordinator (CRCC) at village level are also involved in implementation of SSA.

At State level NPMDM is implemented by the *Madhya Pradesh Madhyam Bhojan Karyakram Parishad Samiti* (MPMBKPS) headed by the Development Commissioner, who is assisted by CEO, *Zila Panchayat* (ZP) at district level.

The Commissioner, *Madhya Pradesh Madhyamik Shiksha Abhiyan Samittee* (MPMSAS) is the Mission Director of RMSA, and is responsible for implementation of RMSA at State level. At District level, the DPC (RMSA) implemented the programme under the supervision of District Collector and CEO (ZP).

2.6.2 Audit objectives

The audit objectives were to ascertain whether:

- the Schemes were planned as per the guidelines issued by GoI;
- funds provided by the Central and State Governments were fully utilised in the tribal districts;

- the Schemes for primary, upper primary and secondary education were implemented in conformity with the approved Plans; and
- infrastructure development was adequate.

2.6.3 Scope and coverage of audit

For the Performance Audit, 10 districts¹ out of 21 tribal districts and their 21 blocks² out of 88 tribal blocks were test checked covering the period 2011-14. Eighty four schools³ of selected 21 blocks were test-checked. For SSA, we audited records of Commissioner, RSK and DPCs. For NPMDM, the Schools selected for SSA were examined for NPMDM as well and we audited records of Commissioner, NPMDM and CEOs of ZP. For RMSA, records of MPMSAS and DPCs (RMSA) were test checked and one High School (HS) and one Higher Secondary School (HSS) of each selected district were test-checked. Details are shown in *Appendix 2.43*.

During the entry conference held (June 2014) the audit objectives, criteria and coverage were discussed with the Commissioner, RSK and Secretary, Panchayat and Rural Department for NPMDM and Joint Director of Public Instruction and Joint Director of RMSA. The exit conference was held (November 2014) with the Additional Chief Secretaries (ACSS) of School Education Department (SED) and Panchayat and Rural Development Department (PRDD). The views of the Department have been incorporated in the relevant paragraphs.

Audit findings

2.6.4 Financial management

The released funds were not earmarked as General, SCSP and TSP under SSA. Funds were not fully utilised under SSA, RMSA and NPMDM

For the Schemes, the Central and State Governments released funds separately for General Head, Tribal Sub-Plan (TSP) and Scheduled Caste Sub-Plan (SCSP). However, during execution, these separate funds were mixed in a corpus funds of the schemes. Further, funds under SSA and RMSA were released to districts without earmarking as General Head, TSP and SCSP. As a result, separate records of expenditure under TSP were not maintained at any level. However, under the NPMDM, TSP funds were released separately to the districts.

Year-wise expenditure against available funds under these schemes is given in *Appendix 2.44*. We observed the following:

- During the period 2011-14, total available fund under SSA was ₹ 12,191.07 crore (including opening balance of ₹ 2404.60 crore as on 1st April 2011). Out of which ₹ 10,304.19 crore was utilised, leaving an unspent balance of ₹ 1886.88 crore (15 *per cent*). The overall utilisation of funds during the period 2011-14 was ranged from 63 to 72 *per cent*. Hence, optimum utilisation of available financial resources could not be ensured.

¹ Barwani, Balaghat, Betul, Chhindwara, Dhar, Dindori, Khargone, Mandla, Ratlam and Seoni.

² **Barwani:** Rajpur, Sendhwa, **Balaghat:** Bahiar, Paraswada, **Betul:** Bhainsdehi, Ghoradongri, **Chhindwara:** Harrai, Junnardev, Tamiya, **Dhar:** Dhar, Kukshi, **Dindori:** Dindori, Shahpura, **Khargone:** Bhagwanpura, Jhirnya, **Mandla:** Bichhiya, Ghugri, **Ratlam:** Ratlam, Sailana **Seoni:** Ghansore, Lakhnadaun.

³ Two primary schools and two upper primary schools in each block.

Funds provided for TSP component were ranged from 18 to 20 *per cent* of the total funds. But due to non-maintenance of separate accounts, expenditure against the TSP funds could not be ascertained.

- Under the NPMDM, annual accounts were not prepared by the MDM *Parishad*, hence, opening/closing balance and other receipts were not provided to audit. However, against the total available Central and State share of ₹ 3031.95 crore, expenditure of ₹ 3041.24 crore was incurred as per the statement of expenditure of the MDM *Parishad*. Under the scheme, separate accounts for TSP funds was maintained. We observed only 83 *per cent* of TSP funds could be utilised against the available funds during 2011-14.
- We noticed that during the period 2011-14, total available fund under RMSA was ₹ 1601.02 crore (including opening balance of ₹ 76.99 crore as on 1st April 2011). Out of which ₹ 1484.01 crore was utilised, leaving an unspent balance of ₹ 117.01 crore (seven *per cent*). Release of funds by GoI for TSP component for the years ranged between 5 and 14 *per cent*. But, due to non-maintenance of separate accounts, expenditure against the TSP funds could not be ascertained.

In the exit conference, the ACS (SED) stated that the savings under SSA were due to excess release of funds by the GoI. In respect of RMSA, the ACS (SED) stated that savings were due to code of conduct for elections during October 2013 to December 2013 and March 2014 to May 2014.

The Government's reply in respect of unspent balances is not acceptable as there was a window of three months in between the periods of code of conduct in which funds could have been released/utilised.

Optimum utilisation of funds may be ensured under each component.

2.6.5 Planning

As envisaged in the guidelines of NPMDM, overall planning, implementation and monitoring of the different activities and achievement of physical and financial targets planned under these programmes was to be done at State level as well as district level. In this regard, following shortcomings were noticed in audit:

We observed that during the period 2011-14, submission of Annual Work Plan and Budget (AWP&B) by MDM *Parishad* to MHRD was delayed by 39 to 45 days, which caused delay in approval of AWP&B and release of funds as well. Details shown in **Appendix 2.45**.

In the exit conference, the ACS (PRDD) stated that the time schedule would be adhere to in future.

The Annual Work Plans and Budget may be prepared and submitted timely so that funds could be timely released.

Programme Implementation

2.6.6 Sarva Siksha Abhiyaan (SSA)

The goals of the SSA are (i) enrolment of all children in school, (ii) retention of all children till the upper primary stage by 2010 and (iii) bridging of gender and social category gaps in enrolment, retention and learning etc.

The AWP&B were not submitted timely under NPMDM

2.6.6.1 Out of school children

Guidelines of SSA and RTE Act stipulate that every child in the age group of 6 to 14 shall have free and compulsory education in a neighbourhood school. As per the norms specified in SSA framework, special training facility shall be provided for ‘out of school’ children in order to bring them into the mainstream.

All ‘out of school’ children could not be brought into mainstream during the period 2011-14

We observed that at the State level ‘out of school’ children during the years 2011-12 to 2013-14 ranged between 0.03 *per cent* and 0.90 *per cent*. Details are shown in the **table-1** below:

Table-1: Statement showing the position of ‘out of school’ children at State level
(Number of children in lakh)

Year	Number of children	Number of enrolled children	Out of school children	Percentage of out of school children
2011-12	139.33	138.06	1.26	0.90
2012-13	138.71	137.97	0.74	0.53
2013-14	138.31	137.67	0.64	0.03

(Data Source: AWP&B of Rajya Shiksha Kendra)

Similarly, in the 21 Tribal districts in the State, percentage of ‘out of school’ children during the years 2011-12 to 2013-14 ranged between 0.68 and 1.34 *per cent*. In 10 selected districts it ranged between 0.75 and 1.28 *per cent*. Details are given in **table-2** below:

Table-2: Statement showing the position of ‘out of school’ children in 21 Tribal districts and 10 selected districts

Year	21 Tribal districts				10 selected districts			
	No. of Children	En-rolled	Out of school (<i>per cent</i>)	Brought into mainstream (<i>per cent</i>)	No. of Children	En-rolled	Out of school (<i>per cent</i>)	Brought into mainstream (<i>per cent</i>)
2011-12	51.24	50.56	0.68 (1.34)	0.16 (24)	28.54	28.18	0.36(1.28)	0.12 (33)
2012-13	51.07	50.66	0.41 (0.81)	0.45 (110)	28.32	28.11	0.21(0.75)	0.27 (129)
2013-14	49.10	48.78	0.33 (0.68)	0.20 (61)	27.60	27.39	0.21 (0.77)	0.11 (52)

(Data Source: AWP&B of Rajya Shiksha Kendra)

It would be seen from the above table that in 21 tribal districts, the number of children brought into mainstream during 2011-12 was only 0.16 lakh (24 *per cent*) and during 2013-14, it was only 0.20 lakh (61 *per cent*). Thus, 13,000 children could not be brought into mainstream as of March 2014. Similarly, in 10 selected districts, only 0.12 lakh children (33 *per cent*) during 2011-12 and 0.11 lakh children (52 *per cent*) during 2013-14 were brought into mainstream.

2.6.6.2 Drop out of ST students in selected schools

According to information furnished by 84 test-checked primary and upper primary schools of 10 selected districts, total 49,291 students were enrolled in schools during the period 2011-14, out of which 33,722 (68 *per cent*) were STs. As reported by the schools total 689 students dropped out, of which 619 were of ST students (90 *per cent* of total dropped out students). Thus, drop out rate among the ST children was higher than that of all categories of children. Details are given in **Appendix 2.46**.

In the exit conference, the ACS (SED) stated that the process of entering the ‘out of school’ children into the mainstream was in progress through “*School Chalein Hum*” was in progress.

2.6.6.3 Non-rationalisation of teachers

The Section 19 of the RTE Act, 2009 prescribed norms for posting of teachers in Primary Schools⁴ and Upper Primary Schools⁵. The pupil-teacher ratio should be 40:1 for the schools having more than 200 students.

Teachers in PSs/UPSs were not posted as per RTE norms

In 10 selected districts, we observed that 4227 Primary Schools (PSs) teachers and 931 Upper Primary School (UPSs) teachers in 3474 PSs and 882 UPSs respectively were declared surplus by the RSK. We noticed that expenditure of ₹ 2.58 crore⁶ was incurred every month on account of salaries of these surplus teachers.

In the exit conference, the ACS (SED) stated that the Government has issued an order (September 2014) for rationalisation of teachers.

The reply is not acceptable because in view of fixed sanctioned strength of teachers, the position of surplus teachers may affect the prescribed pupil teacher ratio.

2.6.6.4 Availability of infrastructure

As per SSA guidelines, position regarding availability of infrastructure i.e. number of schools without classrooms, drinking water facilities, toilet facility, girls' toilets, access ramps, boundary wall, gap in classrooms and number of UPSs without Head Master (HM) rooms etc. was to be included in the plan to assess the gap in school infrastructure.

There was non-availability of basic amenities in various PSs/UPSs

Scrutiny of records and information in respect of 29,939 Schools in 10 selected districts revealed non-availability of basic amenities and infrastructure in the schools as shown in **Table-3** below. District-wise details are given in **Appendix 2.47**.

Table-3: Statement showing the position of infrastructure

Total school	Schools without drinking water facilities	Schools without boys toilets	Schools without girls toilets	Schools without ramps	Schools without boundary wall	UPSs without furniture
29939 (PSs: 22559, UPSs: 7380)	No. of school (per cent) 1738 (5.81)	No. of school (per cent) 3725 (12.44)	No. of school (per cent) 3442 (11.50)	No. of school (per cent) 12283 (41.03)	No. of school (per cent) 19881 (66.40)	No. of school (per cent) 3329 (45.11)

(Source: *Rajya Shiksha Kendra*)

Thus, non-availability of basic amenities affected the retention rate of children.

In the exit conference, the ACS (SED) stated that water sources will be provided through Rural Drinking Water Scheme. Construction of toilets would be done from the funds of Member of Parliament/Member of Legislature Assembly and GoI sanction for furniture was awaited.

⁴ PS: up to 60 pupil: 2 teachers, from 61-90 pupil: 3 teachers, from 91-120 pupil: 4 teachers, 121-200 (5 teachers).

⁵ UPS: At least one teacher for 35 pupil.

⁶ As per MER, per month salary of a teacher is at least ₹ 5000 and on this basis calculation was done. (minimum salary @ ₹ 5000 x 5158 teachers=₹ 2,57,90,000).

Reply is not acceptable since infrastructure was lacking despite significant unspent funds under SSA, indicating lack of planning.

The availability of infrastructure in schools may be ensured so as to improve enrolment and retention of students.

2.6.6.5 Distribution of text books

As per SSA guidelines, free textbooks were to be provided to all the children of Government/Local Body schools. We randomly selected two classes each of 71 schools and four KGBVs for scrutiny of distribution of test books. Analysis of the information provided to Audit revealed that prescribed set of books for class I to VIII were provided to all the students.

2.6.7 National Programme for Mid Day Meal (NPMDM)

The NPMDM is implemented with the aim of universalisation of education, improve nutritional health standard of the children by providing cooked meal and to increase retention and attendance and reduce dropout rate of children.

During scrutiny of the Annual Work Plans for the years 2011-12 to 2013-14 we observed that all students who attended schools were served MDM under the Scheme. No shortfall in providing the MDM was noticed in the test checked schools. During 2011-12, 2012-13 and 2013-14 the number of students covered under NPMDM in the 10 test-checked districts was 20.10 lakh, 18.66 lakh and 18.27 lakh respectively. District-wise details are given in *Appendix 2.48*.

2.6.7.1 Delay in construction of Kitchen-cum-store

We observed that out of 10 selected districts, in four districts⁷ MDM Parishad did not release the allotted funds (₹ 7.61 crore) during the year 2012-13, despite receipt of the Central funds in September 2012. The amount was released in May 2013. As a result, construction works of 376 kitchen-cum-stores⁸ in four districts were not completed up to March 2014.

We also observed that out of 84 selected schools in 10 districts, store-rooms were not available in 30 schools, drinking water facility was not available in six schools and the required number of utensils was not available in 28 schools, as shown in **table-4** below:

Table-4: Statement showing the position of non-availability of infrastructure under MDM

Sl. No.	Name of District	No. of Schools	Schools without Infrastructure		
			Store room	Drinking water	Utensils
1	Balaghat	8	2	0	2
2	Barwani	8	2	0	5
3	Betul	8	2	2	0
4	Chhindwara	12	4	0	1
5	Dhar	8	1	0	0
6	Dindori	8	3	0	5
7	Khargone	8	2	0	4
8	Mandla	8	4	0	5
9	Ratlam	8	6	1	4
10	Seoni	8	4	3	2
	Total	84	30	6	28

(Source: Figures supplied by the test-checked schools)

⁷ Balaghat: ₹ 0.79 crore, Betul: ₹ 3.42 crore, Chhindwara: ₹ 1.89 crore and Dindori: ₹ 1.51 crore.

⁸ Balaghat: 100, Betul: 46, Chhindwara: 118 and Dindori: 112.

There was delay in release of fund for construction of Kitchen-cum-store

In the exit conference, the ACS (PRDD) stated that the delay was due to opening of new Accounting Head of construction of Kitchen-cum-Store. The funds would be released soon to the districts for purchasing the utensils.

Availability of infrastructure under NPMDM may be ensured for delivery of mid day meal.

2.6.8 Monitoring and Evaluation

As per NPMDM guidelines, the State fixed monthly targets for inspection of MDM served in schools by ZP level. Feedback received through the inspection reports were to be analysed by MPMBKPS. On an average, 25 *per cent* of the PSs were to be visited every quarter.

In the selected 84 schools only 885 inspections were carried out during 2011-14 against the required 3024 inspections. Thus, there was shortfall of 2139 inspections (71 *per cent*). It was also noticed that no evaluation study was conducted by any other agency in the test-checked school.

Further, as per the guidelines of NPMDM, State level Steering cum Monitoring Committee headed by Development Commissioner and Additional Chief Secretary and Vice-President of MPMBKPS was required to be set up to oversee the implementation of the Scheme. As per the instructions issued (August 2010) by GoI, the meetings of the Steering Committee at State level were to be held at least once in six months.

The records of the State level committee showed that only one meeting was held each year during 2011-12 and 2012-13. Thus, monitoring of the Scheme implemented at State level was not adequate.

The ACS (PRDD) stated that instructions for conducting the inspections would be re-issued to the ZPs and the GoI instructions for conducting meeting of Steering Committee would be complied with in future.

2.6.9 Rashtriya Madhyamik Shiksha Abhiyaan (RMSA)

The main objective of the scheme RMSA is to make good quality education available, accessible and affordable to all young person in the age group of 14-18, so as to ensure Universal Secondary Education by 2017.

2.6.9.1 Non-availability of secondary schools

Under RMSA, State was to provide High Schools within reasonable distance of five km and Higher Secondary Schools within 7-10 km.

Scrutiny of records revealed that out of 19409 habitations, 13438 habitations were covered with HSs and 1970 (13 *per cent*) habitations were without HSs within a distance of five km radius, as of March 2014. Information was not provided by two districts, namely, Balaghat and Khargone. Details are shown in **table-5** below:

There was shortfall in inspections of schools upto 71 *per cent*

There was non-availability of HSs in 1970 eligible habitations.

Table-5: Statement showing the position of non-availability of secondary schools

Name of districts	Number of habitations	Habitations to be covered	Habitations covered	Shortfall (<i>per cent</i>)
Barwani	2640	2299	1891	408 (18)
Betul	1874	1600	1358	242 (15)
Chhindwara	3036	2524	2413	111 (4)
Dhar	3514	2519	2104	415 (16)
Dindori	1681	1481	1377	104 (7)
Mandla	3222	2065	2021	44 (2)
Ratlam	1419	1419	965	454 (32)
Seoni	2023	1501	1309	192 (13)
Total	19409	15408	13438	1970 (13)

(Source: Figures supplied by the DPCs)

In the exit conference, ACS (SED) accepted the audit observation and stated that a huge gap persists in access. GoI has not approved new schools since 2012-13.

2.6.9.2 Monitoring

As envisaged in Para 9.1.1 of RMSA Framework, the School Management and Development Committee (SMDC)/ Gram Sabha and Gram Panchayat was to monitor the progress of implementation of the scheme at school level.

According to the information furnished by 20 selected schools of ten districts, 16 schools stated that no monitoring was conducted by the SMDC/Gram Panchayat. Though, two schools of Balaghat and Dhar districts stated that monitoring was done by SMDC, the related records were not furnished. Two schools of Dindori and Khargone districts did not give reply.

In the exit conference, ACS (SED) replied that Programme implementation and outcome indicators were being monitored on regular basis. Facts remains that there was lack of monitoring on the part of the SMDC/ Gram Panchayat.

2.6.10 Conclusion

- Optimum utilisation of funds was not ensured and persistent savings during the period 2011-14 was observed in SSA, RMSA and NPMDM.
- Preparation of Annual Work Plan and Budget of NPMDM and submission to GoI for approval was delayed affecting timely release of Central funds.
- Despite implementation of SSA, there were 33,000 ‘out of school’ children; of them 13,000 could not be brought into mainstream during the year 2013-14 in the tribal districts. In the test-checked schools drop out rate of ST children was higher than that of the total children of all categories.
- Availability of basic amenities and infrastructure such as drinking water, girl toilets, utensils, furniture in schools was inadequate under SSA and NPMDM.
- Under RMSA, 13 *per cent* habitations were not covered with high schools within the radius of five kilometres as of March 2014.