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Chapter **5** Registration and Employment

Registration and Employment

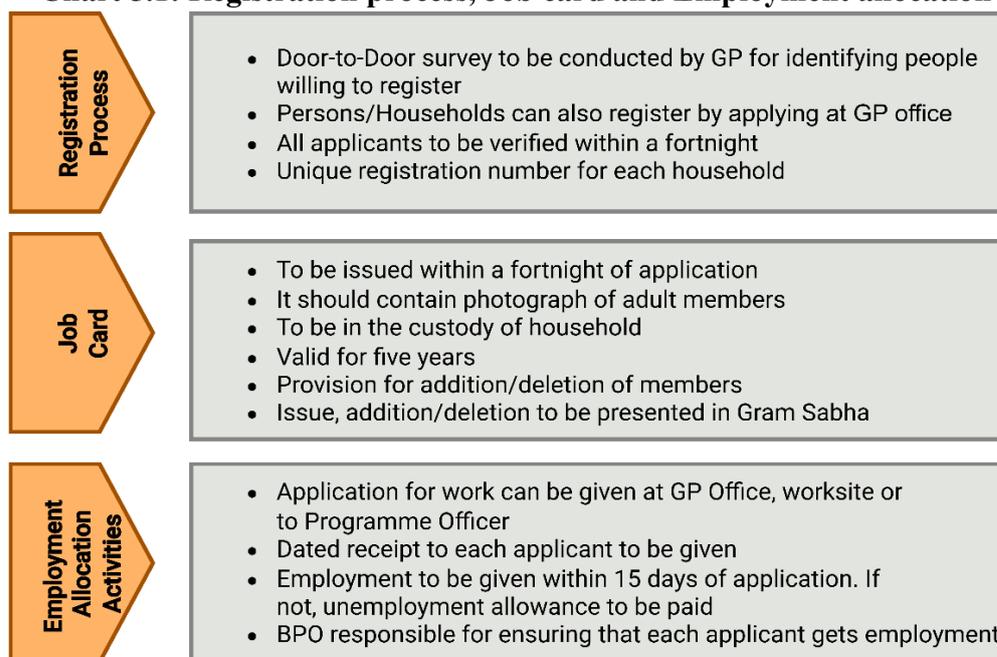
None of the test checked GPs conducted the door-to-door survey to identify eligible households who were missed out and wished to be registered under the Act. Against the timeline of 15 days fixed for issuing job cards, audit noticed delay up to 264 days in the issue of job cards. Though it was mandatory to issue dated receipts on receiving application for job card, seven of the 24 test checked GPs did not issue dated receipts. 14,353 job cards were deleted stating reason as “not willing to work” by test checked GPs in violation of the MGNREG Act. Audit noticed that demand for work declined by 14 *per cent* during 2023-24 compared to 2020-21. As a result of the declining demand for work, the person days of employment generated declined by six *per cent* during the period 2021-22 to 2023-24. Low percentage of active job cards/workers also pointed to ineffective IEC activities, leading to poor awareness levels of entitlements among potential beneficiaries. In test checked BPs, the percentage of households provided with employment of 100 days and above ranged between 19 *per cent* and 58 *per cent*. The percentage of employment provided to differently abled persons at the State level ranged from 24.88 *per cent* (2019-20) to 69.47 *per cent* (2022-23). Of the test checked 24 GPs, dated receipts, on receiving application for work, were not issued to the wage seeker by 13 GPs. Non-issue of dated receipts violated the mandatory transparency provision to ensure the provision of work within stipulated time.

5.1 Registration and issue of job cards

The first step in guaranteeing the beneficiary’s right to 100 days of employment under MGNREGS was registration of the household with the GP. According to MGNREG Act, it was the duty of the GP to register the household, after making suitable enquiries, and issue a job card. The application for the job card could be given on plain paper to the GP or the individual could appear personally and make an oral request. The job card was to be issued to the beneficiaries within 15 days of receipt of application.

The process for registration of households, issue of job cards and employment allocation is detailed in **Chart 5.1**.

Chart 5.1: Registration process, Job card and Employment allocation



(Source: MGNREG Act Operational Guidelines, 2013)

Scrutiny of the process of registration and allocation of employment in test checked GPs revealed the following:

5.1.1 Non-conducting door-to-door survey

Para 3.1.1 (ii) of Operational Guidelines, 2013 stipulated for conducting a door-to-door survey by each GP every year to identify eligible households who were missed out and who wished to be registered under the Act. The survey team was to associate/involve GP members, village level government functionary, Panchayat Secretary, SC and ST members, SHG leaders, Anganwadi workers, ASHAs, etc. Special efforts were to be made to reach out to disadvantaged groups like destitutes, differently abled, primitive tribal groups, nomadic tribal groups, SCs/STs, etc. Apart from identification of eligible households, details of individuals in the registered households were also to be verified and compared with the details in the MIS.

Audit noticed that none of the test checked GPs conducted door-to-door survey during the period from 2019-20 to 2023-24. Further, no directions were issued by MGNREGS State Mission for conducting door to door survey. In the absence of door-to-door survey of households, it could not be ensured that all eligible households, disadvantaged groups, etc., who wish to be registered, were included, thereby defeating the fundamental objective of the scheme.

The Government stated (June 2025) that audit observation has been noted and appropriate corrective actions will be taken.

5.1.2 Delay in issue of job cards

According to Operational Guidelines, the job card is to be issued to the beneficiaries within 15 days of receipt of application. Audit noticed that though MGNREG Act Schedule II stipulated for issuing dated receipts on receiving

application for job card, seven¹¹ of the 24 test checked GPs did not issue dated receipts. In the absence of dated receipts, issuance of job card within the prescribed period of 15 days could not be ascertained in audit.

Test check of applications received and dated receipts issued by nine GPs, during the period 2021-22 to 2023-24, revealed that though these GPs had issued dated receipts from front office on receipt of application for job cards, entry in MIS was made three to 249 days later than actual date of receipt of the application. With reference to the actual date of receipt, delay in issue of job cards ranged from three to 264 days. Audit noticed that delay indicated in MIS in respect of these job cards was zero to 204 days. Details are given in **Appendix 5.1**. Audit observed that test checked GPs indicated a later date in MIS to circumvent indication of delay in MIS.

The Government stated (June 2025) that date of Job card issued is reflected in the MIS only when a command for printing is given in the MIS. In the State, physical Job Cards are issued following the direction of MoRD. If the GP officials forget to give print option in the MIS, it will be reflected in the MIS as job card not issued. It was also stated that audit observation has been noted and appropriate corrective action will be implemented to prevent the recurrence in future.

Reply is not tenable as process of registration of beneficiaries could be commenced in MIS only if job card application is registered in MIS. Delay of up to 249 days in registering application of job card in MIS indicates that there was delay in issue of job cards.

5.1.3 Irregular cancellation of Job cards

According to the Operational Guidelines, 2013 and Annual Master Circulars issued by GoI, no Job Card should be cancelled in a routine manner and certainly not on the ground of non-demand/non-reporting for work. The Job Cards could be cancelled, only if, (i) the household migrated permanently to the urban areas/to a different Grama Panchayat, (ii) job card proved to be duplicate or (iii) it was registered based on forged documents. Before cancellation of Job Cards, the Programme Officers should conduct independent verification of facts and give the person concerned an opportunity to be heard. List of all cancelled Job Cards should be made public and should be presented to the Grama Sabha. Scrutiny of cancelled job cards in test checked GPs revealed the following:

- (i) Out of 17,879 job cards deleted by the test checked GPs, 14,353 job cards (80.28 *per cent*) were deleted stating reason as “not willing to work”. Further, the list of deleted cards was not presented in Grama Sabha. This violated stipulated conditions and procedure prescribed for deletion of job cards.
- (ii) Audit noticed that details of deleted job cards were not available in MIS. Thus, the requirement of having details of deleted cards in public domain for ensuring transparency and accountability was not satisfied.
- (iii) Deleted job cards could be restored only by the State Mission. Scrutiny of restored job cards revealed that application for restoration of deleted

¹¹ Chirayinkeezhu, Vellanad, Agali, Pudur, Akathethara, Puthuppariyaram and Padne GPs

cards forwarded by JPC did not indicate any reason for deletion/restoration of job cards. Audit observed that proper verification of reason for restoration/deletion was not ascertained by State Mission before restoring deleted job cards. Once restored, MIS did not capture date of deletion and restoration, and the card appears to have never been deleted in the MIS. This feature may result in restoring deleted card without proper authorisation and illegal usage of job card.

The Government stated (June 2025) that the request for resumption of job card is received from the districts once it is identified that the deletion of job card was done by mistake. To ensure the right of workers to work under the scheme, the requests from districts are immediately processed at the State Mission for providing employment to the workers.

The reply substantiates the audit finding that job cards were deleted incorrectly and without any verification with the persons concerned.

5.2 Employment generation

The Act guaranteed 100 days of employment to every household whose adult members are willing to undertake unskilled manual labour. Details of employment demanded and provided in the State under MGNREGS during the period from 2019-20 to 2023-24 are shown in **Table 5.1**.

Table 5.1: Details of employment demanded and provided under MGNREGS

Particulars	2019-20	2020-21	2021-22	2022-23	2023-24
Total Job cards issued (In lakh)	36.41	39.00	40.97	41.03	39.74
Household demanded employment (In lakh)	15.92	17.65	17.47	16.31	15.22
Households that availed employment (In lakh)	14.39	16.17	16.45	15.51	14.69
Total person days generated (In lakh)	802.30	1023.00	1059.66	965.78	994.59
Person days per household	55.75	63.27	64.42	62.27	67.71
Household provided 100 days of employment (In lakh)	2.51	4.70	5.13	4.50	5.69

(Source: Information furnished by the Department and MIS data)

The above data reveals that not even half of the households registered had demanded work during the period from 2019-20 to 2023-24. Audit noticed that demand for work declined by 13.77 *per cent* during the period 2020-21 to 2023-24. As a result of the declining demand for work, the person days of employment generated declined by six *per cent* during the period 2021-22 to 2023-24.

Audit noticed that in the test checked BPs, the percentage of households who were provided with employment for one to 30 days ranged from nine *per cent* to 33 *per cent*. Households ranging from 17 *per cent* to 26 *per cent* were provided employment for 71 to 99 days whereas 19 *per cent* to 58 *per cent* households were provided employment for 100 days and above.

Audit noticed that though Tribal Plus scheme of GoK provided additional 100 days of employment to every Scheduled Tribe (ST) household in every financial year, Attappadi, a tribal BP could register 100 days employment only to 58 *per cent* of the households.

5.2.1 Employment to the differently abled persons

Operational Guidelines, 2013 stipulated for conducting a special drive to identify all persons with disability and other vulnerable persons (nomadic tribal group, HIV positive person, internally displaced persons, *etc.*) and providing 100 days of work to each of the households they belong to, within a specified timeframe. Paragraph 9.2.2 mandated that State Government should designate an officer in each District as a Co-ordinator (Vulnerable Groups) who would exclusively look after the needs and requirements of the special categories and create enabling conditions for their inclusion in MGNREG Act works. The Co-ordinator (Vulnerable Groups) was to hold a monthly meeting to review the progress of such implementation with Block/Grama Panchayat level officials and submit monthly and quarterly progress reports to the DPC.

The percentage of employment provided to differently abled persons at the State level ranged from 24.88 *per cent* (2019-20) to 69.47 *per cent* (2022-23) of the registered differently abled persons. Details are given in **Table 5.2**.

Table 5.2: Details of employment provided to differently abled persons

Year	Number of differently abled persons registered	Number of differently abled persons worked	Percentage at State level	Average days of employment provided to persons worked
2019-20	7867	1957	24.88	51
2020-21	4780	2238	46.82	62
2021-22	4561	2735	59.96	60
2022-23	3826	2658	69.47	57
2023-24	3867	2563	66.28	62

(Source: NREGASoft MIS Report R5.1.2)

It was seen that average number of days of employment provided to differently abled persons ranged from 51 days to 62 days. Audit noticed that no special drive was conducted in test checked GPs for identifying the differently abled and other vulnerable persons. Further, Co-ordinator (Vulnerable Groups) was not posted to any of the districts in the State.

The Government stated (June 2025) that the scheme was demand driven. The demand for employment may vary according to weather, workers health, availability of other job opportunities, etc. Hence, their participation could not be ensured. However, the State was taking earnest efforts to ensure that employment was provided to all families willing to work under the scheme. It was also stated that the State was comparatively in a better position at national level in providing 100 days employment. Regarding employment to vulnerable groups, it was stated that special focus was given to this matter and instructions were issued to ensure that the scheme becomes more beneficial to them.

However, Audit is of the view that though the scheme is demand driven, in the absence of baseline survey, special drives/special Rozgar Diwas, IEC activities, etc., to assess/invite demand from various sections of people including differently abled, capturing of demand for jobs by all the needy could not be ensured. Regarding employment to vulnerable groups, reply is silent on the non-engagement of Co-ordinator (Vulnerable Groups), envisaged in the Operational Guidelines, to exclusively look after the needs and requirements of the special categories.

Recommendation 8: The Government may strive towards achieving 100 days guaranteed wage employment as stipulated under MGNREG Act.

5.2.2 Dated receipt for demand for work

According to Para 2.1.1 (iii) of Operational Guidelines, 2013, on receipt of application for work, dated receipt for the application should be given to the wage seeker. The GP/Programme Officer (PO) was bound to accept valid applications for work and to issue a dated receipt to the applicant. Refusal to accept work applications and to provide dated receipts would be treated as a contravention under Section 25 of MGNREG Act.

Of the 24 test checked GPs, 13 GPs had not issued dated receipts to the wage seeker on receiving application for work. Though the test checked 11 GPs issued dated receipts, instead of providing individual receipts only single receipt was provided on receipt of group application for work, even though Operational Guidelines stipulated for providing individual receipts even for group demand.

During the beneficiary survey, 271 of the 334 beneficiaries surveyed responded that they were not issued dated receipts for the applications submitted to GPs, demanding work. In the absence of dated receipts, the mandatory provision of providing employment within 15 days of demand could not be ascertained in audit.

The Government stated (June 2025) that appropriate corrective actions will be implemented.

5.3 Non-payment of unemployment allowance

According to Section 7 of the MGNREG Act, 2005, an applicant not provided with employment within fifteen days of receipt of his/her application seeking employment, he/she would be entitled to a daily unemployment allowance. The allowance should not be less than one-fourth of the wage rate for the first thirty days and not less than one-half of the wage rate for the remaining period of the financial year. According to Section 8(3) of the Act, the State Government should take all measures to make the payment of unemployment allowance to the households concerned as expeditiously as possible.

Audit noticed that only an amount of ₹3.25 lakh was calculated towards unemployment allowance for the period from 2019-20 to 2023-24. But, in the absence of dated receipts for applications for work, correctness of calculation of unemployment allowance could not be ascertained. Of ₹3.25 lakh an amount of ₹1.47 lakh was paid and ₹1.78 lakh was pending for payment (March 2024). Details are given in **Appendix 5.2**.

The Government stated (June 2025) that though amount needed to be paid to the workers were sanctioned to the districts in July 2024, the amount could not be transferred to the beneficiaries due to technical issues in the MIS viz., inability to generate wage list, inability to create FTOs, FTOs were not available for the first signatory, etc. It was also stated that as of June 2025, only ₹1.16 lakh was pending for payment.

Reply is not tenable as payment of unemployment allowance of ₹1.10 lakh pertaining to the period 2021-22 remaining pending till date (June 2025) is not

justified. This also indicates the lack of initiative on the part of the State in addressing the technical issues to ensure timely payment to the beneficiaries.

Recommendation 9: The Government may ensure that the demand for labour may be accurately recorded, including issuing dated receipts by the GPs, and matched with the actual provision of labour to calculate the entitled unemployment allowance.

5.4 Social Security - Insurance coverage to MGNREGS workers

According to paragraph 8.9 (i) and (ii) of Operational Guidelines, 2013, MGNREGS beneficiaries are covered under the *Janashree Bima Yojana* (JBY)¹² and *Rashtriya Swasthya Bima Yojana* (RSBY)¹³. RSBY has been extended to all MGNREGS workers/beneficiaries who have worked for more than 15 days in the preceding financial year. RSBY was subsumed in PM-JAY in 2018 and JBY was subsumed in *Aam Admi Bima Yojana* in 2013.

Apart from the above insurance schemes, MGNREGS workers were also eligible for accident insurance cover under *PM Suraksha Bima Yojana* (PMSBY). The beneficiaries themselves could register to avail the insurance cover under PMSBY through *e-Shram portal* launched on 26 August 2021. The e-Shram portal was a centralised database of unorganised workers in India, including those who work in MGNREGS. The portal was designed to help workers access Government schemes and social security benefits. DPCs and POs were required to create awareness among workers about these schemes.

In test checked blocks, only 35 per cent to 69 per cent of active workers were registered in e-Shram portal. Action was not taken to ensure enrolment of all eligible workers in insurance schemes by GPs after 2018. Audit noticed that though Annual Master Circular 2022-23 stipulated for inclusion of social security scheme details in job cards to create awareness among beneficiaries, these details were not included in job cards issued by the test checked GPs. Beneficiary survey conducted by audit revealed that 44.01 per cent of beneficiaries surveyed were not enrolled in any insurance schemes.

Audit observed that sensitising and enrolling job card holders under these Bima Yojnas and further extending due benefits to them under it in case of unpleasant circumstances are some of the paramount responsibilities of the State.

The Government stated (June 2025) that Audit observation has been noted and awareness programmes on the insurance schemes will be conducted for the workers.

5.5 Information, Education and Communication (IEC)

An important precondition for ensuring effective implementation of MGNREG Act was the creation of awareness among rural people and other stakeholders, particularly MGNREGS workers, in respect of the scheme provisions as well as their rights and entitlements. The IEC activities were to aim at facilitating dissemination of right based provisions of the Act to ensure that the workers

¹² JBY provided life coverage and disability benefits to rural people

¹³ RSBY implemented by Ministry of Labour and Employment provided health insurance coverage for BPL families

know their right to demand wage employment and exercise their right by applying for jobs as per their need. Guidelines identified communication as an integral part of the implementation process and suggested a few modes of communication for conducting IEC activities such as conduct of meetings, wall paintings, door-to-door contact programmes, engagement of SHGs for educating the beneficiaries on their rights and entitlements, etc. Audit noticed deficiencies as detailed below:

5.5.1 Non-preparation of IEC Plan

Para 5.4.2 of Operational Guidelines, 2013 stipulated for developing an IEC plan for the scheme with focus on reaching out to the registered workers as well as other groups which could benefit from the scheme. The IEC plan should clearly indicate State, District, Block and local level activities. Annual Master Circulars prescribed for nominating State IEC Nodal officers to look after IEC activities in the State.

Audit noticed that though a Programme Officer (IEC) was posted in August 2009 as nodal officer in the State Mission, Annual IEC plan was prepared only for the year 2022-23. Further, no action was taken to ensure the conduct of IEC activities at lower levels. Of the 24 test checked GPs, IEC activities were undertaken by only four GPs and incurred only ₹8,400 from Administrative Expenditure Fund during the audit period.

Audit noticed that despite the State Mission's instruction (April 2019) to JPCs to widely advertise individual beneficiary asset creation projects and eligibility criteria in newspapers to attract more beneficiaries, no such activities were carried out.

The MoRD Guidelines on UNNATI skilling project launched in 2019-20 though stipulated for giving wide publicity through IEC activities about the project, no specific IEC activities were undertaken resulting in ineffective implementation of UNNATI as detailed in Paragraph 3.4.2.

The Government stated (June 2025) that due to the shortage of Administrative Expenses Fund, IEC activities were affected under the scheme. The IEC plan for the State has been prepared for the year 2025-26 and provided to the districts.

However, the fact remains that PRIs/State failed to fully utilize one of the important means available for registering demands, creating awareness and redressing grievances.

5.5.2 Non-inclusion of MGNREGS services in Citizen's Charter

According to para 13.12.1 of Operational Guidelines, Citizens' Charter should cover all aspects of the duties of panchayats and officials under the MGNREG Act. It should describe the specific steps involved in implementing the provisions of the Act and lay down the minimum service levels mandated by these provisions on the Panchayats and the officers concerned. Though test checked GPs in Kerala had published and displayed citizen charter in Panchayat offices, minimum service levels for MGNREGS activities were not included in the published charter.

The Government stated (June 2025) that appropriate action will be implemented.

5.5.3 Shortfall in conducting Rozgar Diwas

Para 3.3 (i) of Operational Guidelines, 2013 stipulated for organizing Rozgar Diwas by every GP at least once every month. At this event, the GP should proactively invite applications for work from potential workers for the current, as well as subsequent quarters. The ‘Employment Guarantee Day’ should be earmarked for processing work applications and related activities such as disclosure of information, allocation of work, payment of wages and payment of unemployment allowances. Audit noticed that test checked GPs failed to achieve the envisaged target of conducting monthly Rozgar Diwas during the period 2019-20 to 2023-24. Shortfall in organising the Rozgar Diwas ranged between 36 per cent and 98 per cent.

Audit noticed that the State Mission had directed (July 2022) GPs to conduct special Rozgar Diwas once in three months for analysing work demand of differently abled and elderly people and finding solutions to the problems they face in worksites. But Special Rozgar Diwas was not conducted by any of the test checked GPs.

Audit observed that non-conducting IEC activities had resulted in poor dissemination of the rights and entitlements available under the scheme. This was also evident from the beneficiary survey conducted by Audit.

IEC- Beneficiary survey results

Survey of 334 beneficiaries in 24 test checked GPs revealed ineffective IEC activities as given below:

- 81.14 per cent (271 numbers) of beneficiaries stated that they did not receive dated receipts to ensure eligibility for unemployment allowances.
- 44.01 per cent (147 numbers) of beneficiaries were not enrolled in any insurance schemes.
- 55.69 per cent (186 numbers) of beneficiaries were not aware about the grievance redressal mechanism involving ombudsperson at the district level.

Regarding non-conduct of Rozgar Diwas, Government stated (June 2025) that though directions were issued for conducting Rozgar Diwas once in a month, there was a gap in organising the event properly.

However, the reply is silent about non-conducting special Rozgar Diwas by GPs.

Recommendation 10: The Government may

- ***prepare a State level IEC plan and take action to strengthen the IEC activities to create adequate awareness among the beneficiaries and public regarding the rights/entitlements available under MGNREG Act.***
- ***direct GPs to conduct surveys and special drives and utilise available data with various line departments to identify eligible households and differently abled individuals including vulnerable persons and provide employment under the scheme.***