

Social Audit of National Food Security Act A Pilot in Kerala



Tata Institute of
Social Sciences
Mumbai
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**SOCIAL AUDIT
OF
NATIONAL FOOD SECURITY ACT
A PILOT
IN
KERALA**

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FOREWORD

The National Food Security Act, 2013, aims to provide food and nutritional security in India through making the right to food a legal entitlement. The responsibility of providing ‘adequate quantity of quality food at affordable prices to people’ as spelt out in the Act, is carried out through the Midday Meal Scheme, Integrated Child Development Services scheme, and Public Distribution System (PDS). These schemes have nationwide reach. For large sections of people across the country in conditions of poverty and insecure work, they enable the family to subsist and survive.

The central, state and local administrations have specific responsibilities in implementing these schemes. For the PDS, these obligations are established for foodgrain provisioning till it reaches the (ration) cardholder through the Fair Price Shops in the neighbourhood. The PDS is, however, known to be riddled with problems including those of poor quality or inadequate foodgrains, pilferage at different stages in the supply chain, and lack of transparency in the transactions between the ration shopkeeper and cardholder. Although a system of grievance redressal is in place, people may be unaware of it, or lack faith in its potential to change practices at the ration shop level. It is therefore significant that Chapter XI of the Act details the mechanisms for ensuring transparency and accountability for the programme. It stipulates that periodic social audits of the schemes under NFSA are to be conducted, with the state governments taking action on the findings of these audits.

As a beginning with regard to the NFSA, the Department of Civil Supplies, Government of Kerala, invited Tata Institute of Social Sciences to conduct a pilot social audit of the functioning of Fair Price Shops. The insights from this exercise are expected to lead to chalking out of a clear plan and methodology for state-wide social audit of the NFSA schemes. This social audit, conducted systematically by Dr. Jyothi Krishnan, Senior Consultant, and a team of field level social auditors, working closely with the Social Audit Unit in the state, lays out the methodology for future social audits of NFSA. Its process highlights the educative potential of social audits, while the findings are evidence of the importance of institutionalised local level vigilance and monitoring of social service provision.

The Tata Institute of Social Sciences is glad to have had this opportunity to contribute to this exercise of strengthening grassroots democracy.

Mouleshri Vyas

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2019

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On behalf of my colleagues at TISS and members of the social audit team, I thank the Department of Civil Supplies, Government of Kerala for giving us this opportunity to conduct the Pilot Social Audit of NFSA in Kerala.

I thank the Commissioner of Civil Supplies, Ms Mini Antony IAS for support and encouragement. Special thanks to Director of Civil Supplies, Dr Narasimhugari T.L. Reddy IAS for his proactive support and timely interventions in the rolling out of social audit of NFSA. I also thank officers of the Department of Civil Supplies for facilitating the audit exercise during various stages as well as for the numerous discussions on issues related to NFSA implementation in the state.

I thank the State Social Audit Unit of Govt of Kerala for their active involvement in the social audit process. Special thanks to the Director of SAU, Dr Abey George for training the social auditors as well as for facilitating conduct of all the public events related to social audit. I also thank the Block and District Resource Persons of the SAU for their keen involvement in the process.

I thank the team of social auditors who participated in the social audit process with enthusiasm and commitment. I also thank student volunteers for their energy and enthusiasm. Most important, I thank ration cardholders for sparing their time to discuss various aspects of PDS distribution with us. I also thank the Authorised Ration Dealers for participating in the social audit process.

This report is an outcome of team work that has been very enriching. In addition to the social audit team members, I especially thank Prof Mouleshri Vyas, Centre for Community Organisation and Development Practice (TISS) for support, guidance and encouragement during all stages of the work.

We hope this report will help to strengthen measures to enhance the effectiveness of NFSA implementation in the state and ensure that the most deserving access their entitlements in the true spirit of the Act.

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Executive Summary

The National Food Security Act was passed in 2013. The Act seeks to make the right to food a legal entitlement, by providing foodgrains at subsidised prices to eligible households, with state governments entrusted with the responsibility of identifying eligible households. The existing Targeted Public Distribution System has been used to deliver foodgrains. The NFSA is anchored on the principle of citizen entitlements. The Act streamlines processes related to distribution of foodgrains at the ration shop, the point at which cardholders access their entitlements. It also streamlines all other back end processes related to the flow of foodgrains from the central depots to the state depots and finally to the ration shop. Being citizen-centred, the Act lays strong emphasis on measures related to grievance redressal, social audits, transparency and accountability. The effectiveness of these measures is dependent on a functional grievance redressal mechanism, periodic conduct of social audits and feeding in of social audit findings into implementation, periodic inspections and actively functioning Vigilance Committees along with widespread citizen education about the entitlements guaranteed under the Act. This would re-establish the Fair Price Shop as a site of public service delivery, where citizens access their legal entitlements.

The Pilot Social Audit of NFSA was conducted by the Tata Institute of Social Sciences, Mumbai for the Department of Civil Supplies, Government of Kerala. The objective was to demonstrate the conduct of a social audit of the NFSA and to develop a methodology specific to the Kerala context.

The pilot audit helped to identify existing problems with regard to distribution of foodgrains at the Fair Price Shop level. While the Electronic Point Of Sale system is functioning reasonably well barring a few issues of failed biometric authentication, the audit revealed ways in which foodgrain diversion is possible despite complete digitisation. The audit was able to identify measures that need to be taken to strengthen transparency and accountability. These include ongoing citizen education programmes focussed on awareness of category specific entitlements and functioning of the EPOS system, regular inspections of the weighing and billing process at fair price shops, conduct of grievance redressal drives and grievance redress hearings, putting in place effective grievance redressal mechanisms, setting up and strengthening of Vigilance and Monitoring Committees, regular inspections of foodgrain

quality, conduct of public weighing exercises and periodic conduct of social audits. The findings of the social audit need to be continuously fed into the Public Distribution System in order to bring about continuous improvements. Social audits provide an opportunity to reclaim the FPS as a site of public service delivery, ensuring food entitlements to the most deserving.

1. Introduction

The ration shop has often been viewed as the poor person's shop. The Public Distribution System (PDS) has rarely been conceived of as an entitlement driven programme. The commonplace understanding of the ration shop is one in which inferior quality grains are distributed. Consuming 'ration rice' (*ration ari*) is often viewed as a symbol of low economic status, the general perception being that anybody who is capable of purchasing rice from the open market will not consume poor quality ration rice.

The NFSA attempts to bring about a change in this perception. The Act is centred around the entitlements of the citizens. It also makes clear the roles and responsibilities of various stakeholders in the process, with specific emphasis on the responsibilities of the Fair Price Shop (FPS). The functioning of the fair price shop is in turn monitored by the Vigilance and Monitoring Committees and by periodic social audits. While the individual cardholder interacts with the state through the FPS, factors related to distribution of food grains from state and central godowns to the FPSs also play a role in the realisation of entitlements. Similarly, the role of the Department of Civil Supplies in ensuring that Authorised Ration Dealers (ARDs) function as per the mandate of the Act is critical.

At the outset ensuring category wise entitlements in full quantity and quality on a monthly basis is the responsibility of the state. While the state needs to take proactive measures to ensure the same, citizens on their part also need to be aware of their entitlements, so that they can assert and claim the same. This requires a departure from behavioural patterns that have set in firmly. While the ARD needs to view himself as a public service provider, the cardholder needs to view herself as a citizen with rights and responsibilities. The new system of commissions that are proportionate to the sales at each shop, as well as the category wise system of entitlements needs to be internalised by both the ration dealer and the cardholder. Central to this understanding is the appreciation of the fact that the entire system is built on public subsidies that are intended to arrest malnourishment and food deprivation in the country.

The social audit process therefore attempted to enhance citizens' understanding of entitlements under the NFSA. This was aimed through one-to-one conversations as a part of house-to-house visits, citizen education meetings, dissemination of written information and conduct of public events. The following sections detail different aspects of NFSA implementation where the citizen's awareness, assertion and participation play an important role.

Outline of the Report

The report is structured in six sections. Following this Introduction, Section 2 discusses issues related to NFSA implementation in the state. It details the implementation of the Electronic Point Of Sale (EPOS) system, identification of eligible households and so on.

Section 3 discusses the methodology followed in the Pilot Social Audit of NFSA.

Section 4 details the findings of the house-to-house visits to homes of cardholders, supplemented by other observations.

Section 5 discusses the Public Events conducted as a part of the social audit process.

Section 6 presents the Recommendations based on the Pilot Social Audit.

Section 7 presents the Toolkit for the future conduct of Social Audit of NFSA.

2. NFSA 2013

The Preamble to the National Food Security Act of 2013 defines the Act as one that aims to ‘provide for food and nutritional security in human life cycle approach, by ensuring access to adequate quantity of quality food at affordable prices to people to live a life with dignity and for matters connected therewith or incidental thereto’.

The primary objective is to distribute quality food grains to eligible households. Eligible households refer to households belonging to the Priority Household category as well as the Antyodaya Anna Yojana (AAY). It also brings under its ambit the provision of hot cooked meals to children in the age group of six months to six years, as well as pregnant women and lactating mothers at Anganwadis through the ICDS programme, and to children from the age of six to fourteen at schools through the Mid Day Meal Scheme. These schemes, in addition to the TPDS aim to provide food and nutritional security through the human life cycle.

While the percentage of coverage under the Targeted Public Distribution System in rural and urban areas is determined by the Central government (upto seventy five per cent of the rural population and up to fifty per cent of the urban population), identification of eligible households as per this guideline is undertaken by the state government.

The NFSA gives central focus to entitlements, with households in the priority category having the right to receive foodgrains at subsidised prices. Every AAY household is entitled to 35 kilograms of food grains per month free of cost. In the case of Priority Households, each member is entitled to receive five kilograms of foodgrains per month at subsidised prices specified by the state government.

The other notable features of the Act include its emphasis on digital transparency through application of information and communication technology tools and end-to-end computerisation, leveraging Aadhaar for unique identification of beneficiaries, full transparency of records, doorstep delivery of food grains to fair price shops and so on.

The Act mandates putting in place internal grievance redressal mechanisms as well as constitution of the State Food Commission for monitoring and reviewing implementation of

the Act. In addition, there is an explicit emphasis on Transparency and Accountability measures mandating that TPDS related records be placed in the public domain, and conduct of periodic social audits on the functioning of fair price shops as well as constitution of Vigilance Committees to regularly supervise implementation of all schemes under the Act.

NFSA implementation in Kerala

Following passing of the NFSA in 2013, the Government of Kerala framed the draft of the Rules on 20.1.16 in keeping with Section 40 of the Act. These rules have been subsequently revised, with the revised version issued on 16.5.2018. These Rules specify provisions related to criteria for inclusion and exclusion of eligible households, grievance redressal mechanisms, constitution of the State Food Commission, Vigilance Committees as well as Transparency and Accountability (including social audit) mechanisms.

Identification of eligible households

The Rules issued by the State government list the eligibility criteria for identification of eligible households. These include being designated as an Asraya family, belonging to the Scheduled Tribe community, any member in the household suffering from serious diseases and single women headed households. In addition, households having a select set of poverty parameters shall be included as per the weightage marks decided by government from time to time. These parameters include:

- i) being socially and physically vulnerable (existing BPL families, those suffering from fatal diseases, families with elders above 65 years of age, belonging to the SC community)
- ii) belonging to occupationally vulnerable groups (including those in the unorganised sector)
- iii) traditional labourers (conventional fishermen, weavers, artisans, potters, goldsmiths, barbers, blacksmiths etc. working on a daily wage basis)
- iv) head of household or male head of household is unemployed
- v) landless and homeless residing in ‘poromboke’
- vi) households living in huts/kutchha houses/ dilapidated houses/houses constructed under rehabilitation schemes of the government
- vii) no secure toilet facility

viii) no drinking water available around an area of 500 ms of the house (100 ms in hilly areas)

ix) non electrified houses

It also lists down criteria that would exclude households from being treated as eligible. This includes having a regular employment, being an income tax payee, ownership of land of more than .40 hectare, in possession of a four wheeler or heavy vehicle, owning a house or flat with an area of 1000 sq m or more, any member of household having a gross monthly income of Rs 25000 and above (these criteria are detailed in the Rules issued by the state government). The process of inclusion and exclusion is an ongoing one.

Households other than eligible households come under the category of General/Non-Priority households. The number of such households will be determined by the state government from time to time and they will get entitlements at subsidised prices as may be specified by the government from time to time¹.

Ration cardholders in the state of Kerala therefore fall into four categories, each with a distinct set of entitlements.

Categories of Cardholders

Category	Colour of the Card	Entitlement
AAY (Antyodaya Anna Yojana)	Yellow	<u>Per Card</u> - 30 kg rice + 5 kg wheat+ .5 litre kerosene (@Rs 36/litre) + 1 kg sugar (@Rs 21/kg) (No Atta)
PHH (Priority Household)	Pink	<u>Per member</u> - 4 kg rice (@Rs 2/kg)+ 1 kg wheat (@Rs 2/kg) (No Atta)
NPS (Non Priority Subsidy)	Blue	<u>Per member</u> 2 kg rice (@Rs 4/kg) + <u>Per card</u> - 3 kg Atta (@Rs 17 per kg)

¹ (G.O. (P) No. 5/2018/F&CSD), page 4

NPNS (Non Priority Non Subsidy)	White	<u>Per card</u> - 8 kg rice (@Rs 10.9/kg) + 3 kg Atta (@Rs 17/kg)
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End-to-end computerisation, EPOS and doorstep delivery

End-to-end computerisation was completed and ration distribution through the EPOS machines was initiated in 2018. Door to delivery from interim storages to FPSs was first implemented in Kollam in March 2017 and later implemented throughout the state. The nodal agency for distribution is Supply Co (the State Civil Supplies Corporation), which takes the stock from FCI and delivers to the FPS. Supply Co replaced the private dealers who used to earlier lift the stock from the state storages and deliver it to the FPS. This transition was not an easy one as the private dealers put up stiff resistance.

Ration distribution through the EPOS was first piloted in the Karunagappally Taluk of Kollam district. Subsequently, this was taken up in all districts and by the end of 2018, the entire state had switched to the EPOS mode.

Figure 1: Biometric authentication



The web portal (epos.kerala.gov.in) to track different aspects of the PDS became functional in 2018. This allows for tracking shop wise details, number of ration cards in each shop (category

wise), total intake and offtake, stock status, individual beneficiary details and the quantity of rations availed each month.

Changing Regime of Commissions to ARDs

The social audit was taken up soon after the new commission policy was introduced by the government. Following a long drawn out process of engagement with the ARD dealers, the Government introduced the new policy on commissions to the ARDs. Prior to this, ARD dealers got Rs 100 as commission for every quintal that was sold. As per the new policy, introduced in 2017, a monthly minimum commission of Rs 16000 was assured to all authorised ration dealers. A ration dealer who procures foodgrains of 45 quintals or less will be given commission of Rs 220 per quintal and Rs 6100 as financial assistance, amounting to Rs 16000 per month. For every additional quintal sold, the dealer gets Rs 220 per quintal. In the earlier regime, ration dealers selling 45 quintals would get only Rs 4500 as monthly commission as compared to the Rs 16000 that they now get. This amounted to a 250% of increase in commissions. In order to meet the additional fund requirement the government decided to levy Re 1 per kilogram of grain sold to all beneficiaries except AAY cardholders. This was expected to raise Rs 117.4 crores towards the additional expenditure required.

Despite getting this enhanced commission, ration dealers have expressed discontent. What remains unsaid during personal conversations is that transactions through the EPOS make it difficult for them to divert unsold grain. As per the new system, only if a beneficiary's finger print is authenticated via the EPOS machine can their ration be withdrawn from the stock. If the beneficiary does not do so, the stock remains unsold. Moreover, once the ration is given, an accurate weighing and billing process will ensure that there is no unsold grain remaining with the shopkeeper. This makes illegal diversions difficult. So it was commonplace to listen to comments of discontent that the new system would not be beneficial to them. 'We will not be able to move further with this new system', 'There is no profit in this new system' and so on.

3. Methodology of Pilot Social Audit of NFSA

The Pilot Social Audit of NFSA was undertaken with the aim of developing a methodology for the conduct of social audit, as mandated in the Act. While preliminary consultations and field level enquiries commenced in 2018, the actual field work was conducted during the months of January to June 2019. As the commencement of social audit followed the digitisation of ration distribution and sale through the EPOS system, the social audit was also aimed at examining the effectiveness of the new system as well as identifying the loopholes in implementation.

The NFSA places the Public Distribution System in a rights-obligations framework. The Act clearly defines the individual entitlement of each cardholder. It also positions the fair price shop as the site of public service delivery, clearly outlining the responsibilities to be discharged at each level of service delivery. The social audit process was aimed at assessing the extent to which both right holders and other stakeholders were aware of the entitlement driven nature of the Act, as well as the corresponding obligations and responsibilities.

Selection of ARDs

Following several rounds of discussions with officials from the Civil Supplies department, it was decided to commence the pilot at a fair price shop with a large number of AAY and PHH cardholders. Accordingly ARD No 107 located in Rajaji Nagar in Trivandrum city was identified, which had 38 AAY and 327 PHH cardholders. It serviced many of the residents living in the Rajaji Nagar colony (also known as Chengal Choola colony). While conducting preliminary house-to-house visits, it was observed that inhabitants of the thickly populated Rajaji Nagar colony were serviced by 5 fair price shops in the vicinity. Since citizen education and community mobilisation was an objective of the social audit process, it would not have been suitable to audit just one ARD and leave out the others. Hence, after joint consultation on this matter with department officials, it was decided to conduct a social audit of five ARDs that service the area. The ARDs chosen were 107, 77, 114, 116 and 117. Since 114 and 117 were subsequently merged into one ARD (ARD 114), the audit was finally conducted in four ARDs, viz. ARD Nos. 77, 107, 114 and 116. These four ARDs serviced a total of 2222 beneficiaries, of which 1174 belonged to the AAY and PHH category.

Chengal Choola

The Chengal Choola colony in which many of the cardholders resided is a low income settlement located in the heart of the city.

Figure 2 Rajaji Nagar Colony



Many cardholders also resided in the Poundkulam colony located nearby. The Chengal Choola or Rajaji Nagar colony is located on approximately 12 acres of land providing housing to approximately 1000 households. This figure could be much higher. The Kerala Housing Board and more recently COSTFORD had undertaken house construction programmes. Despite providing water connections and toilet facilities, overall sanitation and hygiene continues to pose a huge challenge in the area owing to locational specificities. The colony is located in a low lying area, by the side of a drainage channel, as a result of which the area is contaminated by overflowing sewage during the rains.

Figure 3 The open drainage channel that runs through the colony



Figure 4 Open sewage channels within the colony



Most residents are engaged in the informal sector, with a small percentage employed as permanent government employees. The vulnerable economic background of the residents is reflected in the fact that a great majority of the households located in the area belong to the PHH category. A large number of women are domestic workers in addition to working in hotels, as part time sweepers in the Corporation, running tea shops, vegetable and fish vending and other odd jobs. The menfolk too were found to be engaged in daily wage work of various

kinds- as auto drivers, painting and electrical work, working as salesmen in shops, lottery sales, loading and unloading work, running small tea shops in and around the area, vegetable and fish vending and so on. A small section of the younger generation had acquired jobs such as teaching and in the software sector. A number of tea shops selling tea and snacks including breakfast functioned for a few hours within the colony. Morning and evening markets selling fish and vegetables functioned in the area, with the sales mostly being undertaken by elderly women from the neighbourhood.

Study of the EPOS system

Visits were conducted to Karunagapally Taluk in neighbouring Kollam district where the EPOS was first piloted by the Department of Civil Supplies.

Visits were also conducted to ARDs in Trivandrum to city to understand details of the functioning of the EPOS system. The audit team also participated in the training organised by

The EPOS system

- Names of ARD salespersons have to be registered with their Aadhar cards. Only registered ARD salespersons can operate the EPOS machines after scanning their fingerprints
- The Main Page contains details of the Received Commodities in each ARD, Daily Reports of stock with opening and closing balance.
- Once stock is downloaded at the ARD, these details are automatically uploaded on the site and visible under the 'Received Commodities' tab.
- Ration cardholders without Aadhar and those whose mobile numbers have not been linked can access rations through a manual transaction.
- Poor internet connectivity(especially during the monsoons) coupled with power failures can disrupt functioning of the EPOS

the Department for ARD dealers on use of the EPOS system in April 2018. The FPS dealers were just getting familiarised with the new EPOS system.

It was observed that the FPS dealers too need to be familiarised with the EPOS website, to understand how the operations they undertaken on the EPOS machine get reflected on the website. They also need to appreciate how distribution of individual rations corresponds with the concept of entitlements assured under the Act. A handbook in Malayalam with instructions and terminologies may be given to all ration dealers. These instructions also need to refer to the entitlements assured in the Act. Such a handbook could be a speaking book not just about the use of the EPOS but also about NFSA entitlements.

Preliminary Visits to Rajaji Nagar

Prior to commencement of the Audit, the social audit team undertook visits to the 4 shops to be audited as well as to the Rajaji Nagar and Poundkulam areas where most of the beneficiaries resided. Audit team members held discussions with cardholders of the identified ARDs. Visits to ration shops and discussions with the ration shop dealers also helped to understand their perceptions and views on the changed situation.

Discussions with officials from the Civil Supplies Department

Several rounds of discussions were held with Department officials regarding the process to be followed in the pilot social audit. An initial consultation was held with Director of Civil Supplies and senior officials. This was followed up with discussions with various officers of the department including officers in the IT cell who coordinated the digitisation process. Issues related to distribution of grains at the FPS level, along with the supply of grains to FPS and the issues therein were discussed. Initial problems with EPOS systems, and other aspects of digitisation were also discussed.

Preparation of Interview Schedule and the Mobile App

Based on discussions with ration cardholders, ration shop dealers and officials from the department, an interview schedule was prepared to collect information during house-to-house visits. This covered subjects related to citizen awareness of entitlements, awareness about the functioning of the EPOS system, issues related to ration distribution, weighing and billing, as well as use of grievance redressal mechanisms. The interview schedule was converted into a mobile phone based App which made it easier for social auditors to collect information.

Along with collection of information social auditors also educated cardholders about their rights and entitlements under the NFSA. This included

- a) the full entitlement due to them every month
- b) the need to check quantity of monthly rations and to ensure that it corresponded with the amount printed on the bill
- c) the right to examine grain samples before purchasing rations
- d) the need to collect the bill after every transaction
- e) the portability dimension introduced by the Act.

Training of Social Auditors

Social auditors were selected and trained prior to commencement of audit. Care was taken to ensure that they did not live in the area in which the audit was being conducted. In addition a large number of student volunteers also participated in the social audit at different phases. 30 social auditors participated in the pilot audit at different points of time, in addition to about 10 Resource Persons from the Social Audit Unit and about 30 student volunteers.

Figure 5 Training of Social Auditors



As a part of the four day training, the social auditors were given an orientation to the NFSA and its implementation. They were also given an orientation to social audit processes undertaken for various other programmes such as MGNREGA. This was done in order to give

them a broader understanding of social audit processes, as well as larger efforts towards transparency and accountability.

Figure 6 Training of Social Auditors





The classroom training was followed by field visits and conducting sample interviews so that the auditors could familiarise themselves with the interview schedules. The content of the training session is attached in Annexure I.

House-to-house data collection

As a part of the social audit, trained social auditors undertook house-to-house visits to the homes of cardholders registered with the 4 ARDs.

A majority of the cardholders of the 4 selected ARDs resided in the low income colonies (Chengal Choola and Poundkulam). Some of the remaining were scattered around the area and others were located at a distance. While the beneficiary lists included address and phone numbers, the address was incomplete/incorrect in many cases and many phone numbers were also dysfunctional. Locating cardholders therefore, was a challenging task. In addition, in many cases the address was located, but the houses were locked.

Figure 7: House-to-house data collection



During the first round of house visits, which were focused on the Chengal Choola, Poundkulam and nearby areas, all cardholders were covered, irrespective of category. Following the first round, efforts were made to locate the residents by making phone calls. While doing so, the focus was on PHH and AAY cardholders. In some cases the phone calls were followed with house visits, but in cases where the cardholders had shifted residence, telephonic interviews were conducted.

Figure 8 House-to-house daata collection



Of the total number of 2222 cardholders in the 4 ARDs, 1174 belonged to the Priority category (i.e. PHH and AAY). Of these 1174 priority cardholders, 319 could not be located or contacted by phone. Of the remaining 855, the social audit team met with/contacted 650 cardholders from

the Priority category. Additionally they met with 166 in the non priority category. In total, information was collected from 816 cardholders from the 4 ARDs, which included all four categories.

Figure 9 House-to-house data collection



Of the 816 cardholders, it was not possible to meet with all of them, as they had shifted residence or were not available for personal discussion. In such cases telephonic interviews were conducted. Not all information was available through telephonic interviews, so the total sample size was further brought down to about 745 for certain queries.

Public Events

In addition to house-to-house verification, a number of public events were organised as part of the social audit process. This included a public weighing exercise for two consecutive days at all four ARDs, a Grievance Redress Drive, as well as a Public Hearing for Grievance Redressal. Each of these has been detailed in Section 4.

4. Findings Based on House-to-House Visits

Awareness of Ration Card Categories

Prior to the Priority and Non Priority classification introduced by the Act, cardholders were designated into the BPL, APL and AAY categories. Following NFSA implementation they are categorised into the AAY, PHH, NPNS and NPS categories. Each category has a distinct set of entitlements in terms of quantity and price; hence awareness about the card category and corresponding entitlements is critical.

When asked about card categories, 70% of cardholders responded that they knew the category to which they belonged while 30% said that they were not aware. This implies that one third of the cardholders were not aware of the significance of the category to which they belonged.

The understanding of the 70% who stated that they were aware of their respective categories was however peripheral. While most are aware that a government job/pension/income above a certain limit removes them from the PHH or AAY category, they are not fully aware of the other criteria that enables inclusion into AAY or PHH categories. They knew that AAY cardholders got a larger ration than the PHH, but were not clear about the difference. They were not aware that AAY was a per card entitlement, while the PHH was per member. The AAY and PHH cards were much in demand as they entitled the holder to free medical treatment and concessions for education as well. It was little understood that these categories were anchored in the NFSA framework and their primary objective was to deliver eligibility based food grain entitlements.

Awareness of category-wise entitlements

Cardholders were next asked about their understanding of the entitlements due to them. This is linked to their understanding of the different ration card categories.

Knowledge of entitlements

Awareness of Entitlements	Percentage
Aware	52
Unaware	38
Not clear	10

N=745

While 52% claimed awareness about entitlements, this knowledge was often faulty. When cross checked with the entitlement they got the last time they purchased rations, it was found that many of them had got less than what they were entitled to. This was evident in the case of both PHH and AAY cardholders. In the case of AAY cardholders who were entitled to 30 kg of rice, the rice entitlement consisted of a mix of three varieties (boiled rice, raw rice and milled rice), which also added to the confusion about their actual entitlement. Similarly the per member entitlement of PHH families was also inadequately understood.

It is a matter of concern that 38% were unaware of their entitlements and another 10% were not clear. Many of them responded in the following manner- ‘We do not know how much is due to us. It varies each month. We take what is given; in any case we can’t fight with them’.

SMS facility

During the commencement of audit activities in 2018, the department was sending out monthly SMSs to all cardholders informing them of their monthly rations. Subsequently, the department also started sending SMS after each EPOS transaction informing the cardholders about the actual grain purchased.

About 51% of cardholders were aware of the monthly SMS being sent by the department, informing them about their monthly entitlements. This coverage must be higher, but since many of the elderly women were not regularly reading their messages, they may not be in the know of this matter. In any case, measures are to be taken to ensure that the monthly SMS is being sent to all cardholders. The audit process revealed that many of the beneficiary phone numbers retrieved through the MIS were faulty. Efforts to locate the beneficiaries ended up in

vain as the phone numbers were dysfunctional. This must be reducing the effectiveness of information dissemination through SMS as well.

Claiming one's entitlement

Awareness of ration card categories and category specific entitlements enables cardholders to claim their entitlements. This awareness however needs to be coupled with an error-free weighing process that requires a calibrated weighing machine, a functional display screen and transparency in the transaction.

An error-free weighing process

A calibrated weighing machine is a pre-requisite. A public event was organised on May 30th and 31st 2019, wherein rations were weighed by the shopkeeper in the presence of the Rationing Inspector and the social audit team. This was undertaken on two consecutive days, with prior notice, in all the four ARDs. During this event, care was taken to ensure that the machine was calibrated at 00 kg after the weighing vessel was placed. During house-to-house visits it had been pointed out by cardholders that their rations often included the weight of the weighing vessel. In ARD 77 the machine could not be calibrated due to some problems during the above-mentioned public event. In this case, an additional quantity of grain (equivalent to the weight of the vessel) was added. This often leads to errors in calculation. No uniformity was observed in the weighing vessels used in different shops either.

The weighing vessel in ARD weighed 1 kg 80 g. If the weighing machine is not fixed at 00 once the vessel is placed, the cardholder gets 1.080 kg every time rations are weighed.

The image on the right side shows the display after the machine had been calibrated, with the screen showing 00 even after the vessel was placed.

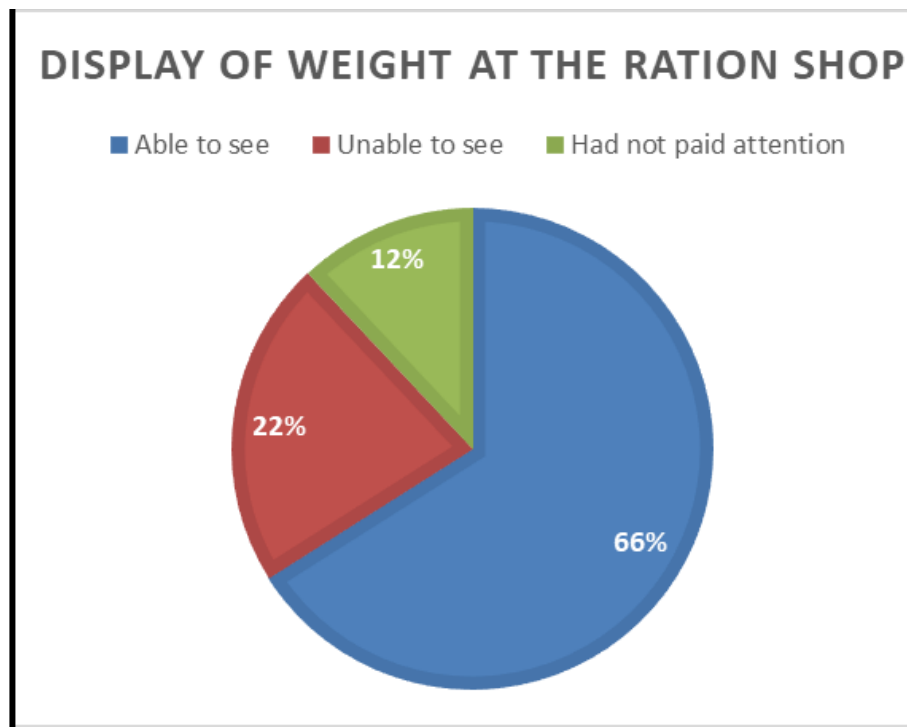
Figure 10 Weighing machines



However by the second day of this event, the social audit team members helped to rectify the error in calibration. While this was being ensured during the above mentioned public programme, shopkeepers soon reverted to the earlier practice. Customers need to be vigilant about this and insist on calibrated weighing machines.

Viewing the display screen

Next, the cardholder should be able to view the display of the weighing scale in order to ensure that the rations are given in full quantity. A person who claims her/his full ration will normally get four kinds of grain (three kinds of rice plus wheat). A person entitled to 16 kg of rice for instance needs to ensure that the three categories add up to 16. Having a functional display screen therefore enables cardholders to check on the weighing process.



N=730

While 66% of the cardholders said that they were able to see the display of weight at the ration shop, it is doubtful that they actually saw the display. This is so as in three out of the four shops the display screen was kept at an angle. So while the screen may be visible, it is doubtful that they could see the figures clearly.

Of the four shops, only in one shop, was the digital display clearly visible from outside. In one shop the display was not visible at all, as it was kept inside a small room near a window. In the remaining two shops the display was not facing the customer, so the customers would have to strain themselves to see the display clearly. It can be concluded that there was no attempt to position the weighing machine in a way that the display was *clearly visible* to customers. One cardholder mentioned that he told the shop owner that he could not see the display. The shop owner retorted- 'Should I place it on the road for you to see?'

Those who said that they had not paid attention felt that there was no point in looking at the display as they would never get their full quota. There were others who said that they did not plan to fight with the shopkeeper about this issue, so they did not pay attention. Some said that due to monthly variations in the rations it was evident that the weighing was not clear, so they

did not feel like paying attention to these details. One cardholder remarked- ‘Very few pay keen attention to the scale and weighing process. They go every month and collect what is given to them’.

It also needs to be noted that in many cases, it is the elderly women who go and collect rations. Some of them reported having problems with their eyesight, which makes it difficult for them to read what is displayed. Reading the bill is also difficult for them. In such cases, they do not pay attention to either the scale or the bill. Many complained that the weighing was done in a hurry, and they did not get time to see the display.

During the public event conducted to weigh the rations, the weighing scale was positioned in a manner that allowed customers to see the display. Particular mention is to be made of the Rationing Inspector who was present at ARD 114, who insisted on the display screen being shifted to enable customers to view the screen. This also indicates that this not usually done as a norm.

Getting their full entitlement

Cardholders were asked as to whether they were getting the full entitlement due to them. 52% of the cardholders felt they were getting their full entitlement, while 48% felt they were getting a reduced entitlement.

Most of those who said they were getting full entitlement did not speak any further. Many were reluctant to speak. Those who said they were getting a reduced entitlement however had much to say about this. It was observed that those who had single or two member families and who belonged to the NPNS/NPS category suffered lesser reductions in weight. It was the AAY and large sized PHH that suffered greater reductions. There were reports of families entitled to 20 kg, getting only 10 kg, and some others getting anywhere between 12-16 kg. In the PHH category, since they paid only for the amount given, they did not complain too much.

During a house visit, a PHH cardholder showed us the bill of commodities she had purchased the previous day. As shown in the bill below, she had purchased three different kinds of rice

along with kerosene and wheat. Her family was entitled to 32 kg of rice and 8 kg of wheat, which she was not aware of. The bill reflected sale of full entitlement. On asking her if she got 8 kg of boiled rice as was stated in the bill, she was shocked and showed us the bag of boiled rice she had got, which did not weigh even 5 kg (see photo below).

Figure 11 Bill and Commodities



Similarly, AAY cardholders entitled to getting 35 kg reported getting only 20-25 kg. Since their rations were fully subsidised, they did not have to pay anything, be it for 25 or 35 kg. In some cases when they asserted themselves, the ration shopkeepers would tell them, ‘This

month's quota is only 25 kg'. In other cases where the family consisted of only 2 or 3 members, the shopkeeper was reported to have said-'Why do you need 35 kg in a month?'. It needs to be mentioned here that as per the Destitute Free Kerala programme of the Government of Kerala, extremely vulnerable people experiencing severe poverty and deprivation are to be given AAY cards. Many of these families consist of single women or elderly with chronic health problems. It is such people who are in many cases denied their full entitlement. Getting the full 35 kg was unheard of except in a few rare cases. However those entitled to just 5 or 10 kg in the PHH or NPS categories reported far lesser reductions.

While many people reported reductions in weight, some of them got it weighed outside, or they measured it with their measuring glasses at home and found that they had received a reduced entitlement. Some of them said that their doubts about a reduced ration were confirmed when they took rice to the mill to get it powdered. People also reported that they started getting larger quantities after the social audit commenced and printed bills made available to them.

The reduced entitlement that a large number of cardholders reported was vindicated when the earlier mentioned Public Weighing of Rations was undertaken. All the customers who came that day reported getting a much larger quantity. Many of them came with 2 bags, in anticipation of a smaller quantity, but had to go back home to bring more bags. Details of this are mentioned later.

Need and adequacy of PDS

Despite the relatively higher standards of economic well-being in the state, pockets of poverty and deprivation do exist. The pilot audit was conducted in one such pocket, viz. Chengal Choola, where a large number of respondents belonged to the PHH and AAY category. As a result when asked as to whether they regularly access their rations, a significant 91% reported that they do so regularly. About 7% said they purchase rations at times and only 2% reported that they had not been accessing their rations. Most of those who reported that they did not avail of rations at all (2%) did not consume their rations and were more interested in the ration card as an identity document. Some said they did not avail of their rations owing to poor quality as well.

Do you avail of your entitlements every month?

Availing monthly rations	Percentage
Regularly avail	91
Avail at times	7
Never	2

n=747

The question regarding adequacy is critical for AAY and PHH cardholders who are substantially dependent on the PDS. When asked whether monthly rations were adequate, the response was as follows-

Adequacy of monthly entitlements

Adequacy	Percentage
Adequate	47
Inadequate	51
In excess	1
Not used for home consumption	1

N=622

It is pertinent to note that more than half of the respondents reported inadequacy, it being largely reported from larger families or families with few or no earning members.

Getting a Bill

In the new system, the bill clearly indicates the amount purchased by each customer along with price details. The ration sold against each card number is visible on the EPOS website. This amount is also shown to be deducted from the stock of grains at the FPS. Hence, the cumulative sales for one month should tally with the quantity sold from each FPS during the same period. In order to ensure transparency in transactions, bills should only reflect actual sale.

Figure 12: Bills are to be issued after every transaction

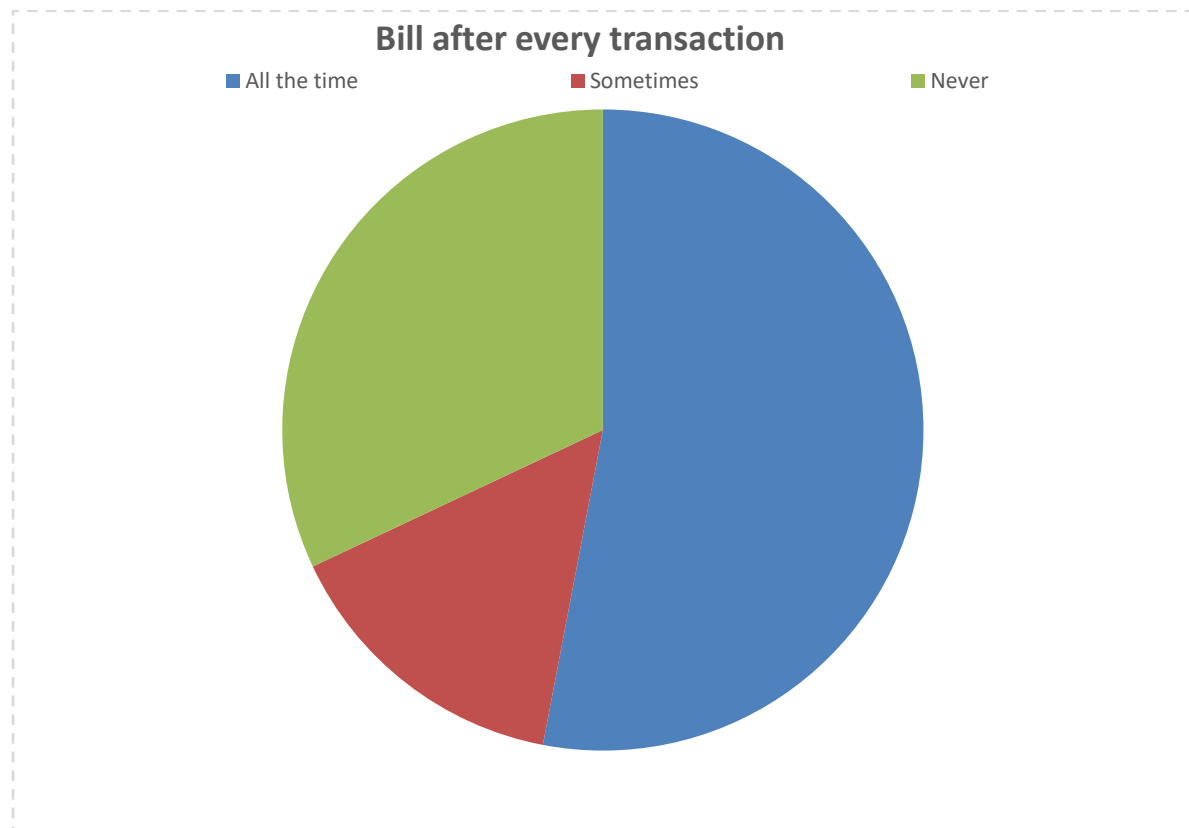


During the first few months after the EPOS was introduced in May 2018, the bill was rarely given. Many cardholders were not aware that the piece of paper that came out of the machine was a bill. Subsequently, some of them started asking for the bill. At the time of house-to-house visits in Feb 2019, more than six months after introduction after the EPOS, 53% reported getting the bill after every transaction. 32% of cardholders were still not getting the bill and 15% were getting it once in a while.

Whether they get the bill after every transaction

Getting the Bill	Percentage
All the time	53%
Sometimes	15%
Never	32%

N=730



That 53% said that they were given bills after every transaction is positive, but equally worrisome is that 47% were not getting bills after every transaction, or were not getting them at all. There were cardholders who said that the shopkeepers gave them bills, but they did not read it.

As stated earlier, the shop owners were apprehensive of the audit process and had mobilised support from within the community. Hence during the audit, we could sense some resistance to the audit process from certain people, who were trying to convince us that the shops in the area functioned very well and that they were happy with the treatment they received. Hence they answered some of our queries in a casual fashion. So while they may have said that they get the bill at all times, it needs to be viewed with caution.

There were many cardholders who reported that they did not know that a bill was to be given after every transaction. Neither did they ask for it, nor were they given a bill by the shopkeeper. ‘We did not know that we should read the bill and cross check it with the grain given’, ‘We did not know that the machine generated a bill’, were some of the responses. There were even some cardholders who asked us – ‘Is there a bill? We never knew it’. Cardholders who were unaware of their exact entitlement were found to say that they took whatever was given and did not ask for the bill.

There were cardholders who knew about the bill, but had not got it despite asking for it (it may be noted that following house-to-house visits, a larger number of cardholders began to ask for the bill. There were also those who mentioned that they saw the bill being printed but it was not given to them. The shopkeeper would tell them about the cash amount to be paid but would not give the bill in their hands. There were others who said that the shopkeeper would either tear the bill and throw it, or keep it away but would not give it to them. In one case the shopkeeper did not give the bill saying that it has to be returned to the department.

There were some shopkeepers who looked at the bill while weighing the rations, but after the weighing was over, would keep the bill away. Many cardholders reported that they were not given bills despite asking for the same. In some cases the shopkeeper would say that the machine was not working and hence the bill could not be given. One cardholder remarked, ‘They perhaps don’t give us the bill because we do not get everything that is printed on the bill’. Some remarked that they were given a bill only when they asked for it. Getting the bill was therefore not viewed as a part of the normal transaction at the FPS.

There were some who knew that the bill is to be given but did not ask for it as they did not want to be scolded by the shopkeeper. This was particularly so in cases where the shopkeeper behaved rudely with the customers. There were others who had a long term association with the shopkeeper and did not want to risk his displeasure; they felt that asking for the bill implied a certain kind of distrust in the shopkeeper and so they did not ask for it. There were others who had problems with the finger prints getting authenticated, so they had to resort to manual transactions. As a result, they had to sign in a register but they were not given bills.

Following the house-to-house visits and citizen education, some cardholders reported that they were getting bills without asking for them. They saw this as an outcome of the audit process. Getting a bill after every transaction was not viewed as a right of the cardholder. Neither was the bill viewed as a document to verify the quantity of rations received. Through the process of audit and citizen education, cardholders were asked to demand for the bill and to ensure that only the purchased amount was reflected on the bill.

Reading the Bill

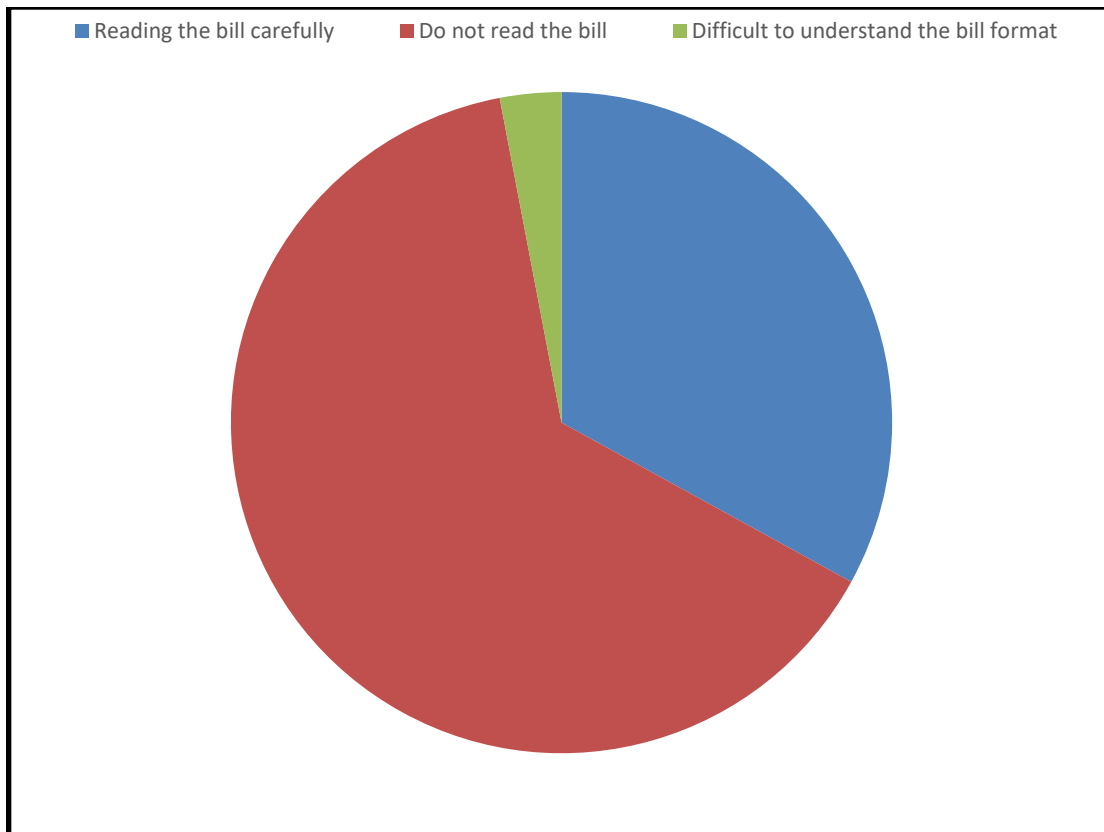
Of the cardholders who said they were getting the bill (either regularly or once in a while), only 33% said that they were reading the bill.

‘My father knew the shopkeeper well. How can I ask him for the bill?’ - A cardholder.

Reading the bill

Reading the Bill	Percentage
Read the bill carefully	33%
Do not read the bill	64%
Difficult to understand the bill format	3%

N=498



Hence while 53% said they were getting bills, only 33% amongst them were reading the bills and using it to verify that they were getting their full entitlement. A large majority said that if they were given bills, they would crumple it and throw it away. Very rarely were cardholders verifying the amount printed on the bill with the ration that they obtained. In many cases they reported that they found it difficult to decipher the bill, but the changed format was reportedly easier.

Bills can Deceive

This was one of the main findings of the social audit process. The issue of cardholders not getting their full entitlement was aggravated by the fact that bills reflected disbursement of full entitlement. If one views the EPOS site and verifies distribution against individual ration cards, the site reflects full disbursement of individual rations, as per the norm. So if it is an AAY cardholder, the cardholder gets a full 30 kg of rice and 5 kg of wheat. If she is a PHH cardholder with 4 members in her family, she gets a full 16 kg of rice and 4 kg of wheat. It appears as though the system is working perfectly. However, in almost every case, customers have not got the amount printed on the bill. This is most evident in the case of AAY cardholders and PHH cardholders with a large number of members. Only a few AAY cardholders reported getting the full 35 kg of their entitlement. Their rations ranged from 22 to 28 kg. Many were

unaware of the fact that they were entitled to 35 kg and when they asked for more the shop owner would send them away saying, 'That's all there is this month'. But in all such cases, the bills reflected sale of full 35 kg. In the case of PHH too, the cardholder may be given a lesser quantity (either because they did not want to purchase their full entitlement, or the shopkeeper convinced them that the full quota was not available). In such cases the cardholder would pay only for the amount purchased, but the bill would reflect sale of full amount. Hence if a person had purchased only 12 kg of rice instead of 16kg, the bill reflected sale of 16 kg but 4 kg remained with the shopkeeper. This he could later sell at a much higher price. The customer would however only pay Rs 24 for the 12 kg of rice purchased (@ Rs 2 per kg).

This malpractice was most common in the case of sale of Atta. Atta was sold to NPS and NPNS cardholders at the rate of Rs 17 per kg. Both categories of cardholders were entitled to 3 kg of Atta per card. Many of them did not wish to purchase the Atta, but the Atta would be printed on the bill and the amount would be manually deducted. The bill in the image below illustrates how this is done. The cardholder concerned did not purchase the Atta, but the price of Atta (Rs 51) was billed. The cardholder however had to pay only Rs 60 out of the total bill amount of Rs 111, implying that she did not have to pay for the Atta that had been billed to her account. . This transaction however implies that 3 kgs of Atta has been sold and thereby is deducted from the stock. In reality, this 3 kg remains with the shopkeeper.

Figure 13: Bills can deceive



So the cardholder suffered no loss, but the shopkeeper had an additional 3 kg of Atta at his disposal, at the rate of Rs 17 per kg. It was reported that this Atta would be sold at a higher price. Atta was found to be sold not just to PHH and AAY cardholders (who were entitled to wheat grain and not Atta) at a higher price (Rs 20 or more per kg), it was also sold to NPS and NPNS in larger quantities (they were entitled to only 3 kg per card). More important, it was reported to be sold even to migrant labourers who did not have ration cards, at a higher price. Other cardholders confidentially reported to us that when they wanted additional grain or Atta, shopkeepers would often ask them to come back towards the end of the month. They would

be able to assess the unsold grain towards month end and sell the same to others who were not entitled to the same.

What emerges from the manner in which the bills mask details of the actual transaction is the need for a revised bill format. After every transaction, the bill format should reflect the foodgrains that the cardholders had not availed of and which they can avail until the end of the month. If the cardholder has availed of the full entitlement, then the bill will reflect that nothing remains to be availed. This is similar to a bank pass book entry wherein after every withdrawal, the balance amount is indicated.

Quality of Foodgrains

This was one of the most important concerns of the people in the area. Complaints were widespread, and this was the one issue over which people fought with the shopkeepers. Some of the samples shown to the audit team soon after it had been purchased were of poor quality. Some others had received fairly reasonable quality. Shopkeepers claim that quality of grains is not within their control. However there were reports of cardholders getting differing quality of grains from the same shop. It was alleged that those who enjoyed close relations with the shopkeeper got better quality of grains. While it was not possible to examine the veracity of such claims, it basically points to the general lack of transparency in transactions at the ration shop. One of the simple ways in which this can be averted is through keeping a sample of the grains on display as mandated by the Act.

Sampling the grain

The NFSA mandates that samples of foodgrains be displayed in ration shops. Cardholders can decide to purchase after examining the quality. In three out of the four ration shops we found that the sample was enclosed in sealed plastic sachets, which were then hung up on the wall. This was being done merely to fulfil the requirement.

Figure 14: Sample of grains hung in plastic sachets

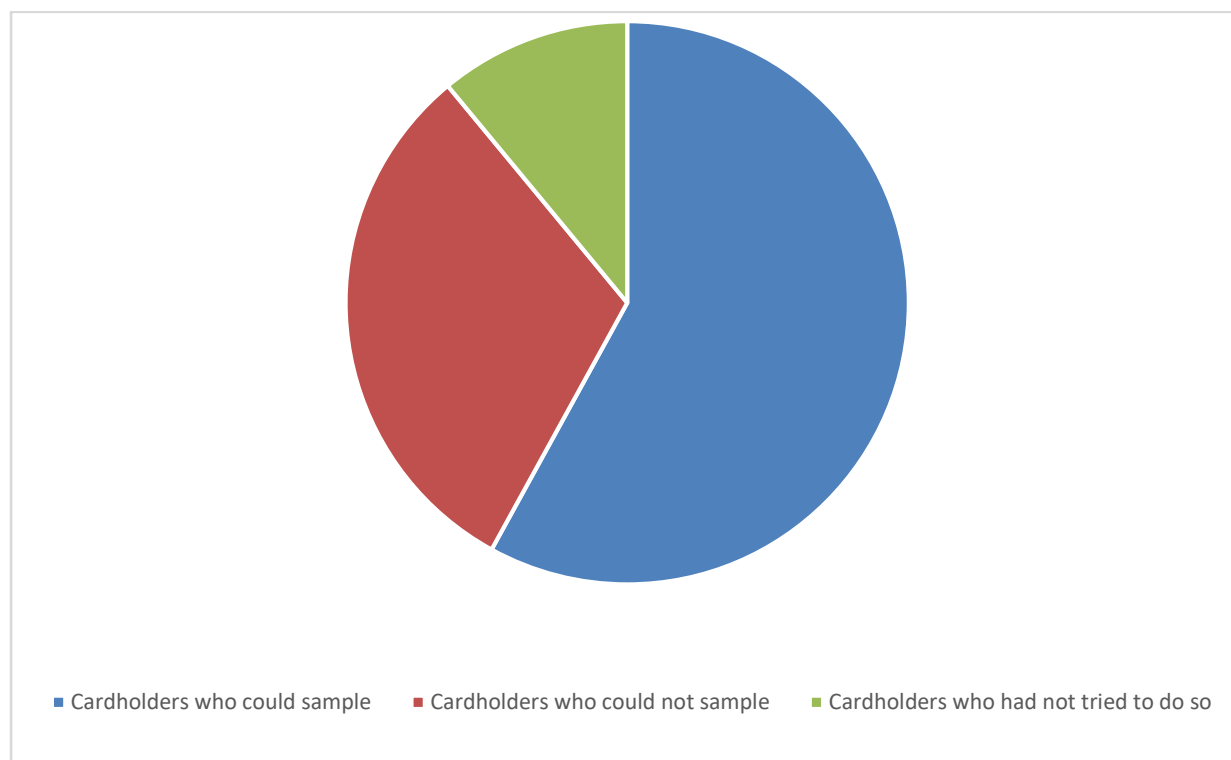


In some cases, the sachets were old and covered with dust. Ideally, these samples should be placed in small open containers so that it is clearly visible to the cardholder. This was visible in only one shop. In practice, the samples are hung up just for the sake of doing so, not serving the purpose of such display. It needs to be mentioned here that during the field visits to Karunagapally where the EPOS system was piloted, the ARD in which EPOS was inaugurated, had such a system. The foodgrains were placed in small steel containers, which the customer could freely examine.

Sampling of food grains

Sampling of foodgrains	Percentage
Cardholders who could sample	58%
Cardholders who could not sample	31%
Cardholders who had not tried to do so	11%

N=730



In addition, the sample placed for the cardholder to examine should be taken from the current stock. This was not being done in any shop. So viewing the sample was no indicator of the quality of grain that they were going to get. Hence many cardholders said, 'What is the use of examining the sample? In any case what we get is different and of poorer quality'.

While samples are not placed for examination in the spirit with which it is mandated in the Act, many cardholders reported that they got a chance to examine the grain from the sacks. The

shopkeeper takes out a sample from the sack that has been opened for supply, and customers can take a look at the grain. This however is not universally practiced. Some customers report they are able to do so and are happy about it; there are others who say that the shopkeepers express discontent when they demand to be allowed to examine the grain. In some cases, the shopkeeper was even reported to have shouted at the cardholder saying that it would waste time. Many women reported rude behaviour from shopkeepers in this regard. Some of them insisted on examining the grain and getting their full entitlement; some of them kept quiet in order to avoid being humiliated. Those who relied exclusively on the rations for food consumption were more insistent about the quality.

There were many who said that they could examine the foodgrain only while it was being weighed or after it had been put in the bag. So the concept of examining the foodgrains before deciding whether or not to purchase was not practiced all the time. However, there were a few people who said that they insisted on seeing the grain before they purchased it. There were also cases when people were unhappy with the quality, but they feared that not purchasing it would lead to a cut in their rations.

The grievance about the sample not reflecting quality of the grain they actually got was voiced by many. They said that while the sample appeared to be of good quality, the foodgrains they got had insects and too many stones. The fact that quality was a pressing issue for consumers was reflected in the fact that it was endorsed as an area where improvement was required by 87% of the cardholders. There were many in Rajaji Nagar who felt that poor quality of grains was distributed to them because they were poor and lived in the colony.

Cash for Grain

A worrisome implication of poor quality is the practice of giving cash instead of grain. A number of cardholders confidentially reported that when the quality was poor, the shopkeeper gave them cash instead of grain. Some even reported that at times the shopkeeper would stock some poor quality grain too, so that he could show it to them and then offer cash instead of grain. They suspected that there were other sacks with better quality grain, as there were instances when other customers got better quality grain during the same period. This is an issue that needs to be subject to thorough inspection. The contrary was reported as well - that certain

cardholders were not inclined to buy their rations as they preferred to purchase from the open market. In such cases the cardholders would ask for cash and forego their ration. Irrespective of the causes, this practice needs to be stopped with immediate effect.

Time spent waiting at the ration shops

When asked about the time spent in waiting at ration shops, 23% reported that they had to wait for a while, while 77% said that they did not have to wait for long. However many did mention that they went at a time when the crowd would be the least. The reasons for waiting were mostly related to biometric authentication, problems with the EPOS machine and internet connectivity issues. In such cases they would have to come back again. Problems related to irregular opening and closing of the shop were also reported; this led to a crowd at the shop during certain days.

Of the 23% who reported having to wait, the waiting period ranged from 10 minutes to one hour, with 50% people saying they waited between 10-15 minutes, 43% saying they waited between 20 to 30 minutes and 8% saying they waited between 40 to 60 minutes.

Waiting Period

Time Spent	Percentage
10-15 minutes	49
20-30 minutes	43
40-60 minutes	8

N=171

The reasons for waiting were mostly related to biometric authentication, problems with the EPOS machine and internet connectivity issues. In such cases they would have to come back again. Problems related to irregular opening and closing of the shop were also reported which led to a crowd at the shop during certain days. Premature closing of the shop at 6.30 pm was also reported to have caused crowds in the evening, that extended the waiting period.

Citizen Information Board

The positioning of the Citizen Information Board determines the ease with which customers can read the information. In ARD 107, the board is placed inside the shop and it is extremely difficult to read the information that is written. In ARD 77, it is kept outside and is visible to all. In ARD 114, it is inappropriately placed also due to the lack of space. In ARD 116, the board is not hung up but placed on the floor and hence it is not visible when people stand in front of it.

In addition to the positioning of the Board, the manner in which the details are filled up vary from shop to shop. As the images below suggest, the information is clearly written in two cases, with the per person/family entitlement clearly stated. In some cases, the information is unclear and not updated either. A lack of monitoring in this regard was evident. This was pointed out by the Vigilance Officer during the Public Weighing of Rations.

പൊതുവിതരണ കേന്ദ്രം
സിവിൽ സപ്ലൈ വകുപ്പ്, കേരള സർക്കാർ അംഗീകാരമുള്ളത്

വിതരണ നമ്പർ / ARD No. : 77 താലൂക്ക് : തോട്ടഞ്ച് തിരുവനന്തപുരം

രേഖപ്പെടുത്തലിനുള്ള പേര് : ജി. സുരേഷ്കുട്ടി പിള്ള പ്രവർത്തന സമയം : 08 am to 12 pm
4 pm to 8 pm

കുടുംബാംഗത്തിന്റെ പേര്	നിരക്ക്	പ്രതിമാസ വിതരണത്തോളം
എ.എ. മഹദ്വ	Rs 2/-	35 Kg
മുൻഗണനാ വിഭാഗം	Rs 2/-	35 Kg
മുൻഗണനാക്കുറവ് സമ്പന്നി വിഭാഗം	Rs 10.90	5 Kg

സ്റ്റോക്ക് വിവരം (ക്രി.ഗ്രാമീൻ) 30-5-2019

ഇനം	എ.എ. മഹദ്വ	പ്രയോധിനി	എസ്.പി.എസ്	എസ്.പി.എസ്. എസ്
അരി (പുഴുക്കാക്കി)	234	716	372	323
ചുണ്ണി	113	353	198	383
മധുര അരി	172	292	545	326
അട	117	362		160
അളവ്	95			
പ്രയോധിനി	362			
സംസ്കൃത വിതരണം	NIL			

ടോക്ക് പ്രി നം : 1967/1800-425-1550
സിവിൽ സപ്ലൈ ഓഫീസർ
9188527334
സിവിൽ സപ്ലൈ ഇൻസ്പെക്ടർ
9188527543

പ്രത്യേക അറിയിപ്പ്

പൊതു വിതരണ കേന്ദ്രം വേണ്ട കടയിൽ ലഭ്യമാണ്

പൊതു വിതരണ കേന്ദ്രം
സിവിൽ സപ്ലൈ വകുപ്പ്, കേരള സർക്കാർ അംഗീകാരമുള്ളത്

വിതരണ നമ്പർ / ARD No. : 114 താലൂക്ക് : തോട്ടഞ്ച് തിരുവനന്തപുരം

രേഖപ്പെടുത്തലിനുള്ള പേര് : ജി. സുരേഷ്കുട്ടി പിള്ള പ്രവർത്തന സമയം : 08 am to 12 pm
4 pm to 8 pm

കുടുംബാംഗത്തിന്റെ പേര്	നിരക്ക്	പ്രതിമാസ വിതരണത്തോളം
എ.എ. മഹദ്വ	Rs 2/-	35 Kg
മുൻഗണനാ വിഭാഗം	Rs 2/-	35 Kg
മുൻഗണനാക്കുറവ് സമ്പന്നി വിഭാഗം	Rs 10.90	5 Kg

സ്റ്റോക്ക് വിവരം (ക്രി.ഗ്രാമീൻ) 30-5-2019

ഇനം	എ.എ. മഹദ്വ	പ്രയോധിനി	എസ്.പി.എസ്	എസ്.പി.എസ്. എസ്
അരി (പുഴുക്കാക്കി)	191	716	297	1086
ചുണ്ണി	174	353	277	383
മധുര അരി	106	292	545	326
അട	172	362		160
അളവ്	95			
പ്രയോധിനി	362			
സംസ്കൃത വിതരണം	NIL			

ടോക്ക് പ്രി നം : 1967/1800-425-1550
സിവിൽ സപ്ലൈ ഓഫീസർ
9188527334
സിവിൽ സപ്ലൈ ഇൻസ്പെക്ടർ
9188527545

പ്രത്യേക അറിയിപ്പ്

പൊതു വിതരണ കേന്ദ്രം വേണ്ട കടയിൽ ലഭ്യമാണ്

Awareness about Portability

Compared to the first two months (May and June 2018) when the EPOS was first introduced, awareness of the portability option had increased considerably by the time the audit was conducted in February 2019. Within six months, people's awareness about this opportunity had risen. Though 32 % of cardholders were still unaware of this function, it is positive that 68%

were aware and many were exercising this option. During house-to-house visits, there were reports of cardholders shifting from one shop to the other, as they were getting better quality and quantity. This information was being passed on very fast. This led two of the ration shop owners to complain that social audit had resulted in a reduction in sales in their shop. The real trigger had been people's awareness of portability.

Standard Prescriptions for all Ration Shops

While all ration shops have a uniform colour code on their shutters and boards, there is not much uniformity in the available space. Out of the 4 ARDs that were audited, access was constrained in two cases. In ARD 114 for instance, the room in which the weighing machine was kept was too small and customers could not view the transactions when standing outside. A window in front of the machine made it difficult to view the transaction. This shop however had a separate room for storing kerosene, which was not the case with some of the other shops. In ARD 116 and 107, kerosene was stored along with the foodgrains in the same room. In the case of ARD 116, a narrow passage led to the shop and even the presence of 3-4 customers led to a crowd due to space constraints.

This indicates the need to enforce the mandate that minimum space inside and outside the shop should be adhered to. As stated earlier, the ration shop is a site of public service delivery and the overall ambience outside and inside the shop should reinforce the same.

Rude treatment

Many women have reported hostile and insulting behaviour by shop owners. This was particularly reported from a few shops. Many said they did not ask any question as they did not want to enter into a conflict with the shopkeeper. Since it is mostly women who go to collect rations, this needs to be taken seriously. Such behavioural problems emerge due to a lack of appreciation of the ration shop as a site of public service delivery. Just as in the case of an Anganwadi, a PHC, or government school, the ration shop too delivers certain public services with government subsidy. Society at large needs to understand that the shop owners are discharging a responsibility for which they are paid an honorarium by the government.

Timings of Ration Shops

The timing of ration shops is written on the Citizen Information Board. When asked about timings, most people reported the opening time in the morning to range between 8.30 to 9.30 or 10. Very few reported that shops open sharp at 8 am. The opening time in the afternoon was mostly reported to be around 5 pm. The closing was in most cases reported to be 7 pm, and very few reported that shops functioned till the stipulated time of 8 pm.

During the two days when the Public Weighing of Rations was carried out, shops were open during the stipulated timings. Many cardholders expressed surprise at seeing the shops open till 8 pm, remarking that this was only a two day affair. Some cardholders who went for daily wage work remarked that if the shops abided by the timings, they would be able to purchase their rations. Many a time the shop would not have opened when they left for work at 8.30 am, and would have closed by the time they returned.

Transparency about eligibility criteria

While all cardholders wish to get hold of an AAY or PHH card, the understanding about the criteria is limited. The understanding that there is an upper limit on the number of AAY cardholders is absent. Consequently the understanding that ineligible people on the AAY list can prevent the inclusion of the deserving is missing. Similar is the case with PHH cardholders. During the audit process, there were instances when more than one PHH card was found in one household. Citizen education therefore also needs to include information regarding the eligibility criteria, and to ensure that these are not diluted.

Ration cards with incorrect address, phone and member details

A large number of ration cards have incorrect/incomplete address and telephone details. This was evident during the audit process, as the audit team could not locate many of the cardholders. Such details need to be corrected, also because the department sends communication through SMS to cardholders.

Issues related to inclusion and exclusion of names from ration cards

There was considerable confusion regarding the inclusion of the names of new borns into ration cards. Similarly, a time lag was observed in the deletion of names of deceased family members. In the case of cards like the PHH with a per member entitlement this implies getting a higher entitlement. In some cases the shopkeeper is aware of the fact, and this often results in win-win situation for both. The cardholder stands to gain by getting a higher quota; the shopkeepers on their part may not give the full ration knowing that the number of members is exaggerated. The bill however would reflect full disbursement. Such discrepancies provide room for manipulation. A random checking of ration cards through house-to-house visits will address the situation.

Biometric authentication

Though few, cases of failed biometric authentication were reported. There have been cases when the cardholder has not been able to purchase rations for 2-3 months consecutively as the finger print was not authenticated. In such cases, manual transactions could have been undertaken, but were not. During the Public Weighing of Rations conducted on May 30 and 31, 2019, a woman came to collect her rations saying that she had not been able to purchase during the past two months as her biometric authentication had failed. Neither was she getting rations through a manual transaction. Efforts were made once again to authenticate her biometrics, but failed. The Vigilance Officer asked to the shopkeeper to provide her rations through a manual transaction. The lady had come with a few bags, which did not suffice to collect her full ration, and she went and got some additional bags. In some other cases, the cardholder was not aware that this problem could be resolved through updating of biometric details at the nearby Akshaya Centre. Similarly a few people have also reported that they had to go to the ration shop more than once to claim their ration due to problems with the functioning of the EPOS machine and internet connectivity. These problems were, however, fewer in number. A few cardholders did mention that they were not collecting rations because they did not have Aadhar cards.

It is also to be noted that instances of failed biometric authentication were fewer in the area. Being located right in the heart of the city, issues of internet connectivity are not a problem. This problem however could be more serious in areas with poor internet connectivity and frequent power failures.

Misconceptions of the role of the Authorised Ration Dealer who runs the Fair Price Shop

At the heart of many of the issues discussed in this report is a misconception of the roles and responsibilities of the ARD. People do not view it as an agency that discharges a public service, viz. distribution of subsidised food grains. The fact that foodgrains distributed are heavily subsidised is poorly appreciated.

Over the past many decades, the ration shop has come to be viewed as an income earning proposition for the ration dealer. While this is partially true, it cannot be equated with other income/profit making ventures. The ARD is eligible to receive the commission fixed as per government rules for the public service that the FPS delivers. Making profits by diverting individual entitlements is therefore strictly forbidden. The re-conceptualisation of the FPS as an agency to deliver public services will also communicate the need for entitlements to be honoured. Asking for one's full entitlement, or demanding for accurate weighing and other minimum standards need not be viewed as an attack on the ration dealer.

In addition to this deeply entrenched mis-conceptualisation, is the fact that the ration shop is often a powerful entity in a local context. The poorest people, who require full entitlements, are most often at the receiving end of arrogant and sometimes rude behaviour. Hence contesting this powerful position by drawing strength from the entitlements assured under NFSA requires facilitation. The Department of Civil Supplies, the VMCs and the social audit team should reinforce and reassure ordinary citizens to demand for their entitlements.

Grievance Redressal Mechanisms

During the course of interactions with cardholders as a part of social audit, a number of grievances were raised. Most prominent were those related to quality of foodgrains, not getting their full quota of grains and rude behaviour of the shopkeepers.

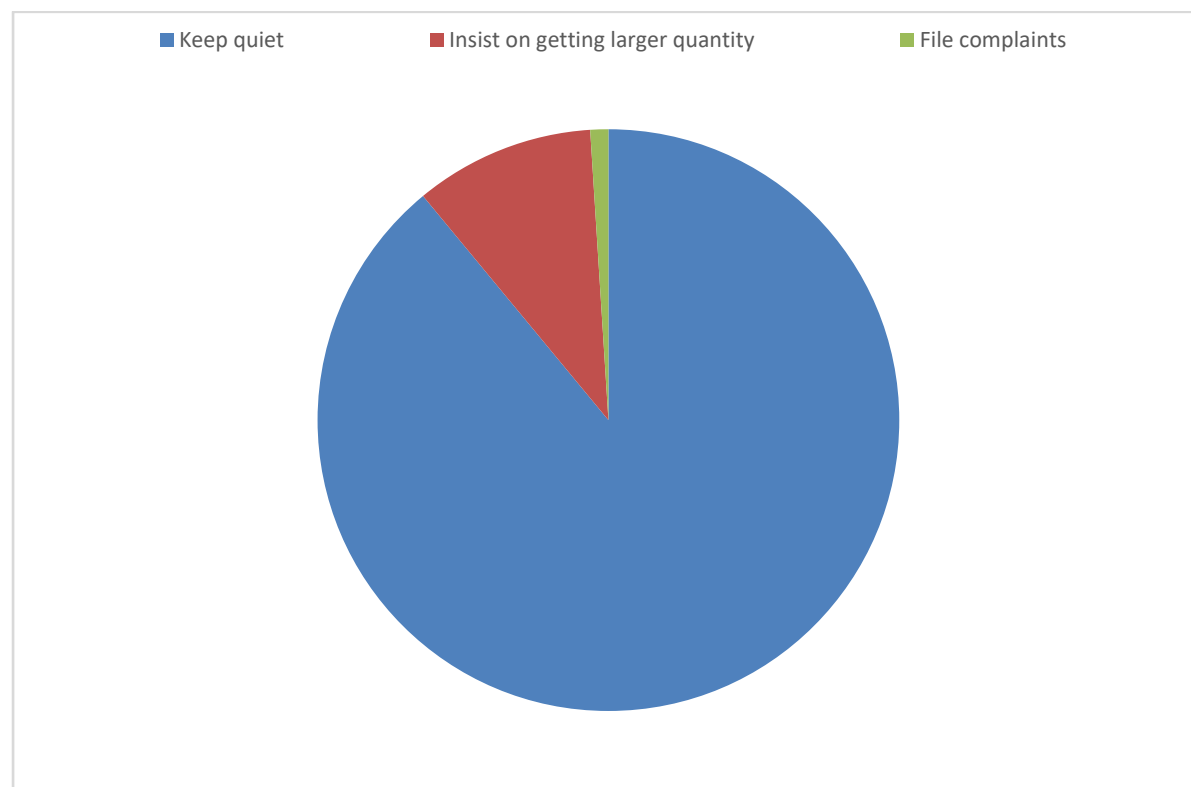
While the cardholders were articulate in speaking about these issues, very few came out and complained. The fear of being punished for complaining was high, especially amongst women, who normally go to buy the rations. This perhaps explains why such a large percentage of cardholders preferred to keep silent. When asked about how they responded when they got a

reduced entitlement, a significant majority of about 89% reported that they kept quiet about it. Only 1% said they had complained, and 10% said they fought with the shopkeeper and insisted on getting a larger quantity.

Cardholder response to lesser quantity of rations

Response to lesser quantity of rations	Percentage
Keep quiet	89%
Insist on getting larger quantity	10%
File complaints	1%

N=353

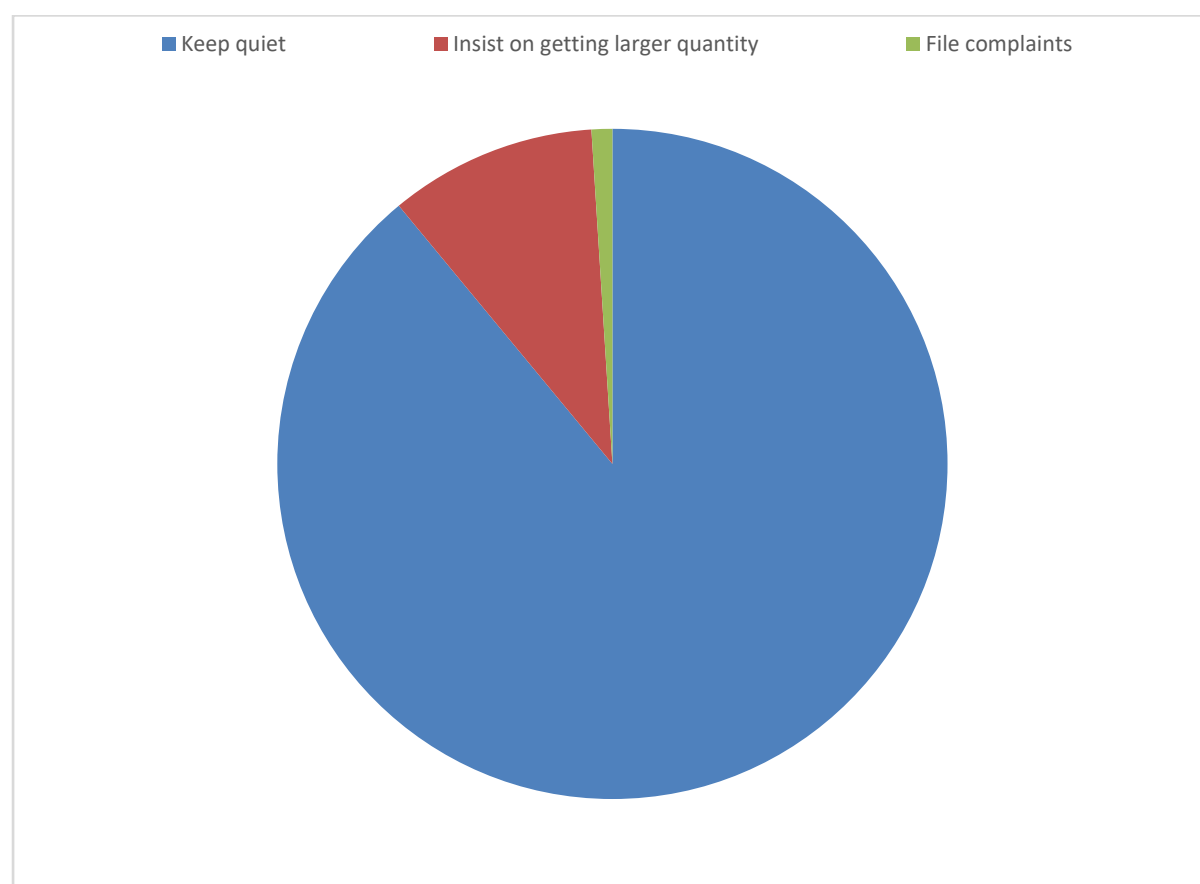


Cardholders were asked if they had ever lodged complaints regarding ration distribution. Only 1.4% of the cardholders covered through home visits had lodged complaints. Of those who had not given complaints, most did not do so as they felt it would invite further problems. This is

especially so as the AAY and PHH cards provided access to other social security programmes like free medical treatment and a priority in getting housing benefits. They were also apprehensive of upsetting the shopkeeper. Many of them said that they had known him for many years and therefore did not want to antagonise him. Some also reported that lodging complaints was futile, that they did not expect any punitive action to be taken when a complaint was lodged.

Awareness about Grievance Redressal Mechanisms

Awareness of GR mechanisms	Percentage
Those who said they were aware	37
Those who were unaware	63



The 37% of the cardholders who said they were aware of grievance redressal measures were

largely unaware of the mechanisms. The great majority said that they had to go to the Rationing or Supply office to give a complaint. Only one cardholder mentioned the telephone number mentioned on the cover of the ration card. There was very little awareness of the toll free number to lodge grievances.

Areas for Improvement

Ration cardholders were asked to comment on areas where improvement and reform was required. A great majority wanted higher quality foodgrains, followed by rations in the correct quantity. Quality was a pressing issue for most cardholders, with many of them asking us whether they were given poor quality only because they were poor.

Areas of Reform/Improvement

Areas of Improvement	Percentage
Quality of foodgrains	87
Getting rations in proper quantity	49
Ration shops to open at the right time	18
Behaviour of the shopkeeper	11

5. Public Events organised as a part of the Social Audit

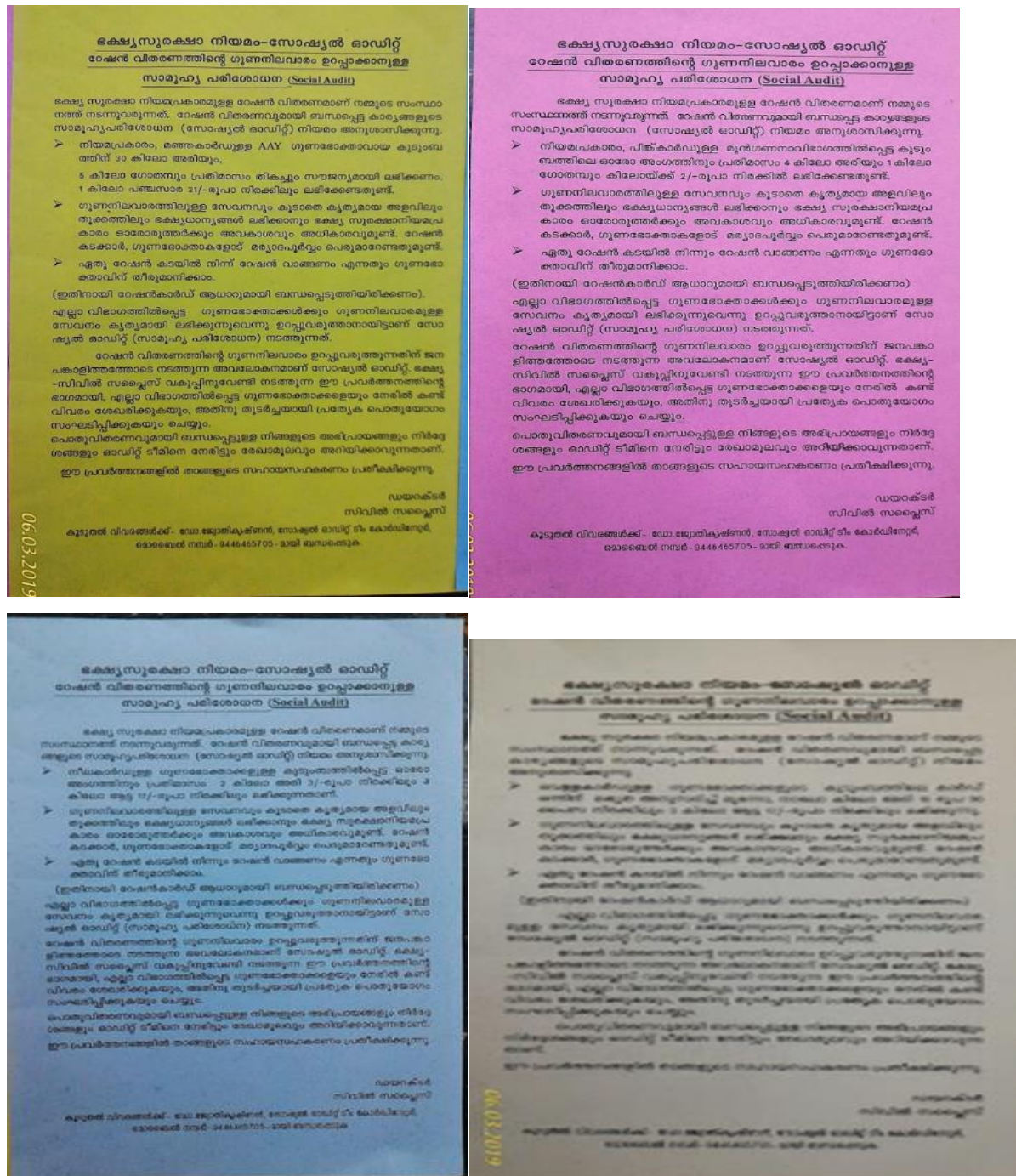
In addition to community level meetings that were organised to disseminate information regarding PDS entitlements, two larger public events were organised. This included the Public Weighing of Rations and a Public Hearing on Grievances.

Information Dissemination

In order to address the serious lack of understanding of category-wise ration entitlements, efforts were taken to educate cardholders of the four ARDs about their entitlements. Printed notices with information about ration card categories and entitlements were distributed house-to-house. This notice was brought out in the name of Director, Civil Supplies as a result of which it had high credibility. The notices were given to the shop owners as well.

Each household was given the printed notice in the colour that corresponded to their ration card (yellow/pink/blue/white). This printed notice explained the entitlements they were to get each month. Social auditors also explained the same in detail during house-to-house visits.

Figure 15: Category and colour specific notices



Yellow, Pink, Blue and White notices for AAY, PHH, NPS and NPNS cardholders respectively.

When visits were made the following month, it was found that most cardholders had folded the notice and kept it inside their ration card booklets. Some of them reported that when they went to collect rations after they got these notices, they got larger quantities. They said that the shop owners noticed the printed notices and were less antagonistic when they demanded for their

full rations. The contact phone number of the social audit team was mentioned on this printed notice. A number of cardholders made calls with queries and complaints.

Weighing exercise

Following door-to-door verification conducted in March 2019, and a process of citizen education, a programme of ‘weighing’ rations was conducted in all the four ration shops. This was following widespread allegations from people that they were not getting their full entitlement from ration shops.

The social auditors along with District and Block Resource Persons of the Social Audit Unit of Government of Kerala participated in the event. Social work students from two colleges in the city also took part in this programme.

Figure 16: Training Student Volunteers prior to the Weighing Event



Information regarding this programme was disseminated by the social audit team two days prior to the event.

The weighing of rations was conducted for two days—30 and 31 May, 2019. For the audit the whole team was divided into four sub groups and placed in each of the 4 ration shops. The customers were made aware of their entitlement and were also taught how to read the bill and check the weight.

Figure 17: Discussing entitlements during the Weighing Days



On both these days, the shops opened and closed as per the scheduled timings (8 am to 12 pm and 4 pm to 8 pm).

The aim of this exercise was to educate cardholders about their monthly entitlements as well as to demonstrate an accurate weighing process. This was done in the presence of the Rationing Inspector and social audit team members.

Figure 18: Weighing at ARD 77 in the presence of the Rationing Inspector



Figure 19: Weighing at ARD 107, with the Rationing Inspector checking the ration cards



When each customer came to the shop, the bill generated by the EPOS machine was first explained. The customer was asked to ensure that the weighing machine was calibrated and also to ensure that the full quota of both rice and wheat had been weighed correctly. On both the days, the exact amount was weighed and given.

Figure 20: Accurate weighing on both days of the Public Weighing of Rations



Social audit team members interacted with the cardholders before and after the purchase.

Figure 21: Interactions during purchase of rations



A significant majority reported that they had never got so much in the past. Some of the AAY cardholders had to hire an auto on their return. They said they had not expected to get ‘so much grain’. Another AAY holder, who works as a Kudumbashree waste picker lamented, ‘All these years, I lost out on so much of grain, they would never give me so much of grain’. The disbelief was evident amongst many. Many had to go to the nearby shops to purchase larger plastic bags to carry away the ‘additional grain’.

Figure 22: Cross checking entitlements



Cardholders were also made aware of the process of billing and to check whether they had been billed for grain that they had not purchased. It was commonly observed that many cardholders

were coming to purchase just kerosene. When enquired they reported that they had bought their rations the previous week, but had been asked to come back to purchase kerosene later as it was not available at that time. The kerosene had however been included in the bill. They said that this was common practice. Also, in the event of kerosene not being available the following week, they would have to forego it. The amount however had been billed. On many such bills, the cardholder had also been billed for Atta that they had not purchased.

It is evident that the billing process is being diluted. Instead of printing the bill after the cardholder has indicated what they wish to purchase, the bill with the full monthly entitlement is generated at first. This billed quantity is irrespective of the actual amount of grain that is actually given. At times the cardholder may choose not to purchase the full entitlement in which case the bill reflects more than what is purchased. In other cases, the shop owner may not give the full entitlement despite the full amount being printed on the bill. The digitised transactions can prevent such leakages only if the printed bill reflects the quantity of purchase.

On both days, the shops functioned as per the stipulated time, from 8 am to 12 pm and from 4 pm to 8 pm. People expressed surprise especially when the shops opened sharp at 8 am and went onto function till 8 pm. They told us that this would last only for these two days, unless it was monitored regularly, and that it was commonplace for most shops to close by 7 pm on normal days.

Figure 23: ARDs functioning till 8 pm



Grievance redress hearing

An Adalat for grievance redressal was held on 22 June, 2019 at the Community Hall at Rajaji Nagar. Prior to the Adalat, house-to-house drives were conducted to inform people about the Adalat and to collect grievances in advance, so that they could be looked into by the department prior to the Adalat.

Figure 24: House-to-house visits to collect grievances



It was noticed that people were hesitant to submit a grievance in writing, fearing the consequences. Most grievances related to the need to change their ration card category, inadequate rations, shops not keeping their timings, and failures in biometric authentication. With regard to the change in ration card categories, some of them could not be considered as they did not fulfil eligibility criteria. Of those that did, the department looked into it and issued three PHH cards to those who had submitted grievances. Department officials had brought all three cards on the day of the Adalat.

Figure 25: Grievance Redressal Hearing



Figure 26: Reviewing grievances



Grievances regarding poor quality of rations was discussed. In one case, an AAY card was confiscated and the applicant was told that she would be issued a NPNS card instead. The applicant was having problems in accessing rations following a shift in residence. However on further enquiry, the cardholder's absolute ineligibility to be included in the AAY category was revealed, following which the card was confiscated with the consent of the cardholder. In two cases where applicants had requested for a shift from the NPS category to the PHH category, efforts were made to explain the eligibility criteria to the cardholders.

Figure 27: Clarifying grievances



It was also made clear that there was an upper limit on the number of AAY cardholders and therefore there was a need to weed out ineligible cardholders from the AAY list.

The value of open discussions held in public was demonstrated at the Adalat. There is a need for more of such public meetings, so as to dispel misconceptions.

6. Recommendations

Citizen Education

The social audit revealed the serious lack of citizen awareness about category wise entitlements as well as the right to grievance redressal guaranteed under the Act. There is an urgent need to enhance citizen awareness about these entitlements, especially amongst the AAY and PHH cardholders who are the most vulnerable.

Citizen education programmes need to be tailored to the needs of different age groups. A significant number of people who go to collect rations are elderly women, whose reading abilities are limited. Catchy posters with writing in big and bold letters are needed for this group, and should be displayed at public places. At the same time, youngsters and others familiar with using smart phones need to be educated about the working of the EPOS website which provides details of ration distribution at the individual beneficiary level. Hence, citizen education programmes need to be flexible and adaptable to different needs in the local context. House-to-house distribution of printed notices proved to have a high educative value during the social audit process; this should not be a one-time affair, rather a continuous process. Information regarding entitlements can also be disseminated through radio and television. Animated videos may also be used.

Citizen education can also be imparted during ward/grama sabha meetings, where a pre - planned short session on NFSA entitlements can be delivered.

Education of Elected Members and Paraprofessionals

Education of elected members of the local government and paraprofessionals (anganwadi workers, ASHA workers, SC/ST Promoters, Kudumbashree members)

Elected members and paraprofessionals who are in close contact with the people need to be educated about the defining features of NFSA implementation. Interactions with elected representatives in different parts of the state indicates that their understanding of the details of

NFSA as well as the entitlement driven nature of the Act needs to be enhanced. Being in touch with people, they are likely to be familiar with the grievances that people face. Hence education about entitlements may be linked to the grievances they have heard of, so that they are able to relate to the same. They also need to have an understanding of NFSA that encompasses three critical programmes related to nutritional security viz. the ICDS, MDM and the PDS.

Setting up VMCs across the State and Initiating NFSA Training for VMC Members

The VMC at the FPS level plays a critical role in monitoring NFSA implementation. VMCs need to be set up across the state, so that their role in monitoring is appreciated. All VMC members need to be trained with regard to their specific roles and responsibilities, and the need to safeguard citizen entitlements. This training needs to be conducted periodically, and may be entrusted to the Social Audit Unit. The VMCs need support and handholding during the initial period and the SAU may be entrusted with this task as well.

Regular Inspections

Regular conduct of surprise inspection visits by both department officials and VMC members will help to enhance quality of service delivery. Random checks need to be conducted to ensure that ration shops follow the stipulated timings, that weighing machines are calibrated, and that weighing is error free. Inspections should also check whether bills reflect only the actual sale amount. Widespread complaints about weighing were reported during the audit exercise, with the audit revealing that bills do not reflect the actual sale of foodgrains. Most importantly, surprise checks should be conducted to physically verify the quantity of stock at the ARD and whether it tallies with the amount as per the EPOS machine.

While citizen awareness is a must, random but regular checking of the same through inspections and surprise checks should be made mandatory. A regular report of such inspection reports needs to be filed and placed in the public domain.

Regular Inspections of Foodgrain Quality

Grievances regarding quality of foodgrains were most widespread during the social audit process. This needs to be taken into account. Regular inspections need to be undertaken into

the reasons for poor quality of foodgrains and redressal mechanisms need to be put in place. This will help to restore the trust of people.

Monitoring the Quantity of Grain Offloaded at the FPS

Ration dealers report reductions in weight of grain on delivery. Surprise inspections of the same can help to correct anomalies.

Reforming the Bill Format and Bill Audit

With end-to-end computerisation and Aadhar seeding, it is difficult for shopkeepers to divert one person's entitlement to another. Each cardholder's entitlement can be withdrawn from the stock only when the cardholder provides biometric identification, failing which their stock cannot be accessed. However this provision can be diluted when the bill does not reflect actual delivery/sale of foodgrains. The current practice of the bill reflecting sale of full entitlement irrespective of the amount actually availed of by the cardholder, provides plenty of room for diversion of foodgrains.

If the bill format reflects the amount availed and the amount that remains to be availed for the month concerned (as in the case of a bank pass book entry), cardholders can track their own entitlement. They will also be aware of the balance amount of foodgrain that they can avail of till the end of the month, if they have not availed of their full entitlement. If bills reflect actual sale, it will also help the government to track the actual need of foodgrains in a given taluk or district.

Measures to Stop the Practice of Giving Cash in Lieu of Grain

Measures need to be taken to stop the entrenched practice of shopkeepers giving cash in lieu of grain to cardholders. This is an extremely worrisome practice that dilutes the spirit of the Act. It has been reported that shopkeepers at times deliberately show poor quality grain to prompt cardholders to take cash instead of grain. In some cases, cardholders who do not require the entitlement have been reported to ask for cash instead of grain. Either way, this practice deprives the truly deserving of their entitlement.

Strengthening Transparency Measures

The Citizen Information Board displayed at all ration shops should be placed in front of the ration shop so that cardholders can read the information. The details of foodgrains and prices should be displayed clearly and legibly. Samples of the current stock (not older stock) of foodgrains should be displayed in small steel containers that all cardholders can examine them freely. This should be done proactively, without the cardholder having to ask for it. The digital display on the weighing machine should be positioned in a manner in which cardholders can read it with ease. Additionally, the display screen should be big to make it clearly visible.

Proactive Disclosure of Monthly Commissions Earned by ARDs

Ration shop owners are found to complain of the ‘losses’ they have incurred following the introduction of the EPOS system. This is despite the new commission regime being more beneficial to them. During the social audit process, many cardholders also expressed their sympathy saying that ration shop owners too need to make money and take care of their families. Evident is a lack of understanding of the monthly commissions being earned by shopkeepers. Details of the monthly commission earned by the shopkeepers can be displayed on the information board, to dispel misunderstandings and to ensure greater transparency. This will also help to establish the FPS as the site of public service delivery, wherein the Authorised Ration Dealer gets a legitimate commission for the foodgrains sold.

Strengthening Grievance Redressal Mechanisms

- a) While the toll free helpline was not functional when social audit activities commenced in 2018, mechanisms are being put in place. However the current understanding amongst beneficiaries about the functioning of this system is poor. People also expressed their lack of faith in the grievance redress mechanism. This can be corrected by responding to the person’s grievance, and informing them of the action taken.
- b) Fixing a time frame for grievance redressal and adhering to it is necessary. This will help to restore faith in the grievance redressal mechanism.
- c) A mechanism needs to be put in place to track grievance redressal, such that complainants are aware of the same. Reports of grievance redressal need to be placed in the public domain.

d) Protecting the identity of the complainant is important. Most people hesitate to complain as they fear the wrath of the ration shopkeeper. Hence measures need to be taken to protect the identity of the complainant, which will encourage people to air grievances.

Organising Grievance Redressal Adalat

Grievance Redressal Adalats need to be organised at a decided frequency. Public discussion based on grievances helps to clarify issues. Actions taken need to be communicated so that people believe that the system works. Participation of all stakeholders viz. cardholders, shopkeepers, elected representatives and officials helps to bring in the culture of open and transparent dialogue.

Regular Conduct of Social Audits

The pilot audit led to an enhanced awareness of citizen entitlements. Cardholders also reported getting larger quantities as rations. This momentum however needs to be sustained through the conduct of periodic social audits. Social audits also need to be scaled up and conducted across the state. The State Social Audit Unit may be entrusted with the task of conducting periodic social audits of NFSA in the state.

7. TOOLKIT FOR CONDUCT OF SOCIAL AUDIT OF NFSA

The NFSA is an entitlement driven Act that aims to ensure food and nutritional security in a life cycle approach. The ICDS, MDM and the PDS are the three prominent programmes that come under the ambit of this Act.

Following is a toolkit for the conduct of Social Audit of the PDS component within NFSA. It lays down a step by step process to be followed in the rolling out of the audit process. Some of these steps may need to be undertaken simultaneously during the process.

Steps in the Social Audit Process-

Step I- Identification of ARDs to be audited

Step II- Identification of Social Auditors

Step III- Training of Social Auditors

Step IV- Acquiring details of cardholders and undertaking corrections

Step V- Setting up preliminary meetings with officials in the Department of Civil Supplies.

Step VI- Convening a Public Meeting prior to commencement of Social Audit

Step VII- Setting up the Vigilance and Monitoring Committee

Step VIII- Orientation of VMC members

Step IX- Contextualising the interview schedule and FPS level checklist for assessing citizen entitlements and quality of service delivery

Step X- Citizen Education through House to House visits

Step XI- Information dissemination

Step XII- Shop audit

Step XIII- Organising a Transparency Day

Step XIV- Grievance Redressal Drives

Step XV- Public Hearing of Grievances

Step XVI- Social Audit Public Hearing

Step I- Identification of ARDs to be audited

Since it is the AAY and PHH households who need rations the most, it is preferable that ARDs with a higher percentage of AAY and PHH cardholders be selected for audit. It is generally found that the non-priority cardholders, especially the NPNS cardholders are not inclined to collect monthly rations, neither are they concerned about the functioning of the FPS. In most cases, they retain the ration cards only as identity cards. The interest of the AAY and PHH households in correcting the system is higher, despite feeling powerless. Moreover, greater diversions of grain take place while distributing rations to the AAY and PHH households.

Step II- Identification of Social Auditors

Youth who have passed the higher secondary level may be identified to function as social auditors. Social auditors should not be residents of the area in which the audit is being conducted, so that they are not influenced in any manner by the ration shop owners of the area or by the local people.

Step III- Training of Social Auditors

This is a critical component of the audit process. Social auditors need to be given a thorough orientation on the social audit process as well as the key components of the NFSA. A four-day training programme would be optimal. An outline of a module that was followed during the pilot social audit is attached as Annexure I. The training will orient the auditors to the NFSA Act and provisions, to the rules formulated by the state government, category wise entitlements, conduct of day to day transactions at the FPS, weighing and billing and grievance redressal mechanisms. The training will also introduce the auditors to the beneficiary lists of the selected ARDs. This training should also include a field work component, wherein social auditors go to the field and evaluate the functioning of an FPS.

This training should be able to equip the social auditors with a clear understanding of the necessity of undertaking social audits. The need to emphasise citizen entitlements should also

be well appreciated so that the social auditors feel committed to the process of citizen education.

Step IV- Acquiring details of cardholders and undertaking corrections

The list of cardholders from the selected ARDs needs to be procured from the Department. The list with address and phone numbers is essential, as locating the cardholders is a challenging task.

Undertaking corrections- During the pilot social audit, the address and phone numbers provided had errors. This affects effective implementation of NFSA as monthly SMS sent by the department regarding entitlements may not reach the cardholder. Incorrect addresses also led to problems in identifying cardholders. The social audit exercise therefore can help to correct this anomaly. During house to house visits, the address and phone number of the cardholders may be collected and discrepancies may be corrected and communicated back to the Department. This will ensure that the list with the Civil Supplies department is updated.

Step V- Setting up preliminary meetings with officials in the Department of Civil Supplies.

The citizen and entitlement centered nature of NFSA necessitates a shift in thinking about the role of the FPS as well as citizen entitlements. Department officials need to be sensitized to the mandatory role of social audit in NFSA implementation. The importance of citizen education, citizen assertions of rights and entitlements, information dissemination, grievance redressal and vigilance committees and public hearings needs to be appreciated at the official level. Hence deliberations regarding the idea of social audit and its methodology need to be held with officials at various levels, so that there is consensus about the need for social audit.

Step VI- Convening a Public Meeting prior to commencement of Social Audit

Prior to commencement of the social audit, a public meeting is to be conducted with immediate stakeholders in the social audit process viz. cardholders registered with the selected shops,

ration shop dealers, members of the Vigilance and Monitoring Committees of the concerned ARDs, the local ward councillor/member, the Rationing Inspectors and other officials.

Prior intimation regarding this meeting needs to be provided to the cardholders (through SMS as well as public announcements, as well as intimation through the local government representative). Prior intimation also needs to be provided to the local ward member, VMC members, shop owners and Rationing Inspectors. This will ensure participation of all concerned.

The purpose of this meeting is to communicate the need for social audit as well as the process to be followed. Most often, shop owners and ration dealer association members view social audit as a process that is harmful to their interests. Citizens on their part are not aware of the full range of their entitlements and responsibilities. Elected representatives and the local community also need to view the PDS in a new light, wherein social audit functions as a corrective mechanism. An open deliberation with these various stakeholders will help to dispel likely misunderstandings about the process.

This public deliberation should be facilitated by members of the Social Audit team. It should discuss the following-

- a. The key aims of NFSA
- b. The citizen entitlements mandated by NFSA
- c. The inclusion/exclusion criteria with regard to Priority Households. This is important as many grievances of cardholders relate to inclusion/exclusion errors based on inadequate knowledge of eligibility criteria.
- d. The new commission policy of the government
- e. The need for grievance redressal and social audit and the role of citizen participation in the same
- f. The roles and responsibilities of the VMC
- g. The steps to be followed in the social audit process- citizen awareness, house visits, shop audits, bill audits, inspection of the weighing process, filing grievances and public hearings.

Step VII- Setting up the Vigilance and Monitoring Committee

In places where the VMC has not been constituted, the social audit team will work with the Department of Civil Supplies in constituting the Vigilance and Monitoring committee. This needs to be done as the VMC plays a critical role in the social audit process.

Step VIII- Orientation of VMC members

The VMC members need to be made fully aware of the NFSA provisions regarding citizen entitlements, grievance redressal, vigilance and monitoring as well as social audit. This orientation session needs to be conducted exclusively for VMC members, so as to make them aware of their responsibilities in this regard. Orientation to VMC members should focus on the following-

- a. The key aims of NFSA
- b. The citizen entitlements mandated by NFSA
- c. The need for grievance redressal and social audit and the role of VMC in strengthening the same.
- d. The roles and responsibilities of the VMC
- e. The inclusion/exclusion criteria with regard to Priority Households.
- f. The steps to be followed in the social audit process- citizen awareness, house visits, shop audits, bill audits, inspection of the weighing process, filing grievances and public hearings.

Step IX- Contextualising the interview schedule for assessing citizen entitlements and quality of service delivery

The existing interview schedule/checklist for assessing awareness about citizen entitlements and quality of services available at the FPS may be fine-tuned to the local context before commencement of the audit. The interview schedule and checklist is attached as Annexure II.

Step X- Citizen Education through House to House visits

House to house visits play a critical role in educating individual cardholders about their entitlements, the workings of the EPOS system and the manner in which they can safeguard their entitlements. While public meetings help to state these facts in an open forum, one to one

interactions help to educate the cardholder. During such house to house visits the social auditor should explain the significance of the ration card category and the entitlements due to the cardholder. The working of the EPOS system and the manner in which the bill is generated should also be explained. Written information regarding the same in the form of short notices/brochures may be distributed during such visits.

Step XI- Information dissemination

Information dissemination in the form of written material (short notices, brochures and posters) and pictures can help in communicating information regarding the role of social audit in enhancing effective implementation of NFSA. Information regarding category wise entitlements, working of the EPOS system and grievance redressal mechanisms needs to be widely disseminated amongst cardholders. A contact phone number of the social audit team needs to be given on such material, so that people can contact with queries and grievances. Posters may be put up at public places (community hall, panchayat building etc).

Information dissemination through street plays and skits may also be considered to effectively communicate information. Equally effective is information dissemination through the Radio and TV.

Step XII- Shop Audit

Following one round of house to house visits and information dissemination, selected ARDs are to be audited according to the following set of parameters-

- a. Hygienic environment
- b. Presence of a Citizen Information Board with details of monthly stock, entitlements and toll free numbers
- c. Grain samples for public examination
- d. Calibrated weighing scale with a functional and clearly visible display screen
- e. Registers are available for public scrutiny

Step XIII- Organising a Transparency Day

As a part of social audit, a Transparency Day may be organised when rations are weighed in public and when cardholders are educated about accurate weighing and billing.

Such an event needs to be conducted with prior notice such that cardholders are informed in advance. The presence of the Rationing Inspector adds credibility and also ensures the cooperation of the shop owner. The functioning of a calibrated weighing machine and accuracy in weighing to be illustrated at this event. The bill is to be explained to each cardholder, explaining how the billed amount tallies with the grain actually purchased.

Following the social audit, VMC members can organised one such event once a month, with the support of the Rationing Inspector whenever available, so as to sustain the momentum that is created.

Step XIV- Grievance Redressal Drives

Grievance redressal is an integral part of social audit. People should be encouraged to submit grievances that may be redressed in a time bound manner. Fear of filing grievances needs to be removed by assurance of time bound action. Social auditors can motivate and assist cardholders in filing grievances during such drives. These grievances can be handed over to the department for redressal prior to holding a Public Grievance Redressal Hearing, so that concerned officers would have looked into the grievances and made enquiries.

Step XV- Public Hearing of Grievances

This may be conducted after a grievance redress drive has been conducted so that grievances have been submitted in advance. In addition, cardholders may submit grievances at the time of the hearing as well. Concerned officers from the Department of Civil Supplies, the elected representative, cardholders of the concerned ARDs, shopkeepers and social audit team members to participate in the hearing. An open discussion on each of the grievances wherein each party gets a chance to speak leads to a transparent resolution of problems.

Step XVI- Social Audit Public Hearing

Social Audit public hearing to be held after each social audit exercise. Cardholders registered with the selected ARDs, shopkeepers, elected representatives from the area, department officials and VMC members to participate in the hearing. Social audit team members to present their findings and observations based on house to house visits and shop visits. All participants get a chance to express their opinions at this hearing. Areas where action needs to be taken are to be identified. Minutes of the social audit hearing are prepared by the social audit team members. The Social Audit report is to be prepared within 48 hours of the conduct of the public hearing, and to be placed in the public domain of the Department of Civil Supplies and the SAU. Action based on the social audit report to be taken within a one-month time frame. The Action Taken Report is also to be placed in the public domain and presented at the next Social Audit hearing.

8. ANNEXURE I -TRAINING OF SOCIAL AUDITORS: OUTLINE OF THE TRAINING MODULE

The social auditors were a mixed group in terms of educational qualifications and work experience. Educational qualifications ranged from plus two to post graduation. Work experience was also varied. There were social auditors who were post graduates but who did not have much experience in the field. On the other hand there were social auditors who had studied upto the plus two level, but who had relevant field experience.

As part of the pilot social audit, the following training module was used.

DAY 1

Session	Topic	Duration
1	General introduction and ice-breaking	1 hour
2	Open discussion on functioning of ration shops, issues of poverty and malnutrition	2 hours
3	Introduction to NFSA with emphasis on the role of nutrition in the human life cycle.	2 hours
4	Programmes under NFSA- ICDS, MDM and PDS	2 hours

DAY 2

Session	Topic	Duration
1	Introduction to the four ration categories and category wise entitlements	2 hours
2	Introduction to the EPOS system	2 hours
3	Introducing the interview schedule and discussions	2 hours

DAY 3

Field Exercise- Auditors tested the interview schedule and MobileApp in the field, by interviewing 2 cardholders each.

DAY 4

Reporting back from the field, and further refining of the Interview Schedule.

9. ANNEXURE II – TOOLS FOR SOCIAL AUDIT

Interview Schedule for house-to-house data collection

1. Name of Social Auditor
2. Name of Cardholder
3. Mobile No of Cardholder
4. Livelihood status of the cardholder's family
5. Local body- Corporation/Municipality/Grama Panchayat
6. Ration Card No
7. ARD No
8. Ward No
9. What is the colour of your existing ration card?- Yellow/Pink/Blue/White
10. Are you aware of the ration category to which you belong? Yes/No
11. If yes, select your ration card category- AAY/PHH/APL/NPNS
12. Do you buy rations?- Regularly/At times/Never
13. Are you aware of the monthly ration entitlement due to your household? Yes/No
14. If yes, ask for details
15. Do you avail of your full entitlement every month? Yes/No
16. Is the monthly entitlement sufficient for you- Yes/No/More than needed/Do not use it for consumption
17. When do you buy rations- Once a month/several times a month
18. Do you get a bill after purchase?- Always/Sometimes/No
19. Do you read what is printed on the bill? – Yes/No/Bill is not clear
20. Is the list of foodgrains for sale exhibited at the ration shop?- Yes/No/Have not paid attention
21. Are you able to examine the sample of foodgrains before purchase- Yes/No/Have not tried
22. When your ration is being weighed, are you able to see the display screen? – Yes/No/Have not paid attention
23. Are you getting your category wise entitlement in full quantity? Yes/No
24. When you do not get your full quota, what do you do?- Assert and get my full quantity/ Keep quiet/Give a complaint
25. Do you have to wait for a long while collecting rations? Yes/No

26. If yes, what is the reason for having to wait?- Internet connectivity/Biometric authentication failure/Other reasons
27. What is the average time spent in waiting at the ration shop?
28. If you are not getting the rations due to you, have you given a complaint in this regard?
29. If you have not filed a complaint, what were the reasons for the same?- Did not want to confront the shopkeeper/no trust in the department/satisfied with what I am getting
30. What are the opening and closing timings of your ration shop?
31. Your comment regarding the behaviour of the shopkeeper
32. What are the changes you observe since the introduction of the EPOS machine?
33. In which areas do you feel the need for further improvement- Quality of foodgrains/Getting rations in full quantity/Ration shops to function during the prescribed timings
34. Are you aware that you can buy rations from any ration shop in the state? Yes/No
35. Do you get an intimation regarding your monthly entitlement- Yes/No
36. If yes, is it through the SMS?
37. Are you aware of the existing grievance redressal system? Yes/No
38. What is your understanding of this system?
39. Have you submitted a complaint with the department? Yes/No
40. Was your grievance redressed in a time bound manner?

Checklist for FPS level audit

1. Is the FPS maintained in a clean and hygienic manner?
2. Is there is a board displaying the shop number, name of the shop owner and shop timings?
3. Is there a board displaying stock details at the beginning and end of the day?
4. Is a complaint register maintained in the shop?
5. Is the information regarding the availability of the complaint register displayed in the shop?
6. Is the monthly availability of food grains displayed in the shop?
7. Is the sample of food grains certified by the PDS depot displayed in the shop?

8. Is the display screen of the electronic weighing machine positioned in a manner that enables cardholders to view it clearly?
9. Are the weighing machines sealed by the authorities?
10. Is the bill generated from the EPOS machines given to cardholders?
11. Is the Civil Supplies Helpline number exhibited?
12. Are the numbers of the Taluk Supply Officer and the Rationing Inspector (with their names and designation) displayed in the shop?