Delivery of Social Welfare Entitlements in India

Unpacking Exclusion, Grievance Redress, and the Role of Civil Society Organisations

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Acknowledgments

Protection of Personal Data/Privacy Disclosure:

All personal identifiers, including names, specific identification numbers (ration card number, universal account number, etc.) were removed from the data that was collected for this research. Further, the case studies that form part of this project use pseudonyms so as to protect the identity of the citizens interviewed.

List of Tables and Figures

List of Abbreviations

AePS	Aadhaar-enabled Payment System
APB	Aadhaar Payment Bridge
BAO	Block Agriculture Office/Officer
BDO	Block Development Office/Officer
BPL	Below Poverty Line
CEO	Chief Executive Officer
CIDL	COVID-19 Impact on Daily Life Survey
CSC	Common Services Centre
CSO	Civil Society Organisation
CSP	Customer Service Point
CSS	Centrally Sponsored Scheme
DAO	District Agriculture Officer
DBT	Direct Benefit Transfer
DC	District Collector
DM	District Magistrate
DoB	Date of Birth
DoE	Date of Exit
DoJ	Date of Joining
EPF	Employee Provident Fund
EPFO	Employees' Provident Fund Organization
FPS	Fair Price Shop
FPSO	Fair Price Shop Owner
FTO	Fund Transfer Order
GRS	Gram Rozgar Sahayak
IVR	Interactive Voice Response
KYC	Know Your Customer
MIS	Management Information System
MGNREGA	Mahatma Gandhi National Rural Employment Guarantee Act

NeGP	National e-Governance Plan
NFSA	National Food Security Act
NGO	Non-Governmental Organisation
NPCI	National Payments Corporation of India
NSAP	National Social Assistance Programme
PAN	Permanent Account Number
PDS	Public Distribution System
PFMS	Public Financial Management System
PHH	Priority Household
PM JDY	Pradhan Mantri Jan Dhan Yojana
PM Kisan	Pradhan Mantri Kisan Samman Nidhi
PMGKY	Pradhan Mantri Garib Kalyan Yojana
PMT	Proxy Means Testing
PMUY	Pradhan Mantri Ujjwala Yojana
PO	Programme Officer
PoS	Point of Sale
PWD	Public Works Department
RTI	Right to Information
RTPS	Right to Public Service
SDM	Sub Divisional Magistrate
SDO	Sub Divisional Officer
SECC	Socio Economic Caste Census
SHG	Self Help Group
SMS	Short Messaging Service
SOP	Standard Operating Procedure
TA	Technical Assistant
UAN	Universal Account Number
UIDAI	Unique Identification Authority of India

Summary of Findings

The outbreak of the COVID-19 pandemic in India has had far-reaching socio-economic implications in the form of national lockdowns, consequent suspension of economic activity, and reversal of internal migration, to name a few. The lockdown particularly led to significant distress among citizens due to employment loss, wage cuts, transportation and food supply disruption, and other issues that increased the dependency of people on social protection schemes. Relief packages by governments included ex-gratia food and cash entitlements delivered using the Direct Benefit Transfer (DBT) and the Public Distribution System (PDS) infrastructure.[i] We also saw many returning migrant workers from cities turn towards the Mahatma Gandhi National Rural Employment Guarantee (MGNREGA) programme to seek temporary work.[ii] The pandemic has underscored the necessity of building safety nets. However, it has also brought to surface the various gaps that have continued to impede the delivery of many welfare interventions. A plethora of challenges is faced by both prospective and existing beneficiaries attempting to access their entitlements. These challenges have proven to be difficult to resolve in the absence of robust grievance redress mechanisms, causing widespread exclusion. Volunteers from civil society organisations such as Gram Vaani have attempted to intermediate in many of these instances, assisting citizens in navigating a complex system that is marked by inadequate transparency and weak accountability structures.

This report is a compilation of our research efforts over the last year. It encompasses an analysis of the typology of challenges faced by citizens in accessing their entitlements and the resolution pathways that were used by volunteers to assist such citizens. We cover welfare beneficiaries across seven DBT schemes, MGNREGA, PDS, and Employer Provident Fund (EPF) in the states of Bihar, Uttar Pradesh, Madhya Pradesh, and Tamil Nadu. Lastly, in addition to broad policy recommendations, we also propose a set of Standard Operating Procedures (SOPs) that can be a ready reference for Civil Society Organisations (CSOs) that are engaged in citizen assistance in the field of social welfare and accountability.

Understanding Exclusionary Factors in Social Welfare

Exclusion may occur in various forms across the many stages of scheme design and implementation. Using data from Gram Vaani's Interactive Voice Response (IVR) platform and deep-dive interviews of beneficiaries selected through critical case sampling, we documented the various scheme-related challenges citizens faced during March-November 2020. To understand the typology of challenges citizens faced in accessing welfare benefits (including those announced in the wake of the outbreak), we developed a framework that maps exclusionary factors under four key stages of welfare interventions, viz., targeting, enrolment, back-end processing of benefit, and lastly, disbursement. The key insights that have emerged from processing the IVR data using this exclusion framework as a guiding tool have expanded our understanding of welfare access and the existing gaps therein. We summarise them below:

- The highest incidence of exclusion in **DBT** schemes occurs during the back-end processing stage. A variety of reasons (Aadhaar linkage, spelling error, blocked accounts) can lead to unsuccessful crediting of beneficiary accounts. About 55% of the total DBT-related complaints from March-June 2020 (the stipulated period for transfers of PMGKY DBT entitlements) belonged to this category of issues.

- In the context of **MGNREGA**, we found that 66% of all complaints pertained to either problems with work allocation or wage payment processing. About 77% of all complaints falling in the '*Work Allocation*' category are instances of complete exclusion, i.e. people not having been allotted any work at all. The scale of the issue has underscored that the efficacy of the scheme is seriously compromised, even while there is substantial demand for it. A similar percentage of those calling to report wage issues stated either not having been paid at all or not having received the full wage due to them.

- Analysis of **PDS** complaints highlighted that many citizens who needed government support were excluded from in-kind transfers under PMGKY simply by virtue of not having a ration card, given the relief package's eligibility criteria. Secondly, another interesting aspect that emerged from our analysis is the prevalence of discretionary denial and quantity fraud by fair price shop officers, wherein people are denied their ration or sent away empty-handed or with less ration than the entitled quota, with no clear or documented reasons for the shortfall.

- Most **EPF** complaints pertained to problems people faced in withdrawing their PF contributions due to incomplete employee records or inconsistencies in the spelling of names, date of birth, dates of employment, etc. Lack of cooperation and timely assistance by employers was found to be a key reason for these issues.

These findings provided us with a worm's eye view of the welfare ecosystem, helping us document challenges self-reported by citizens attempting to access their entitlements. Following this was the next step in our research, which involved understanding how volunteers have assisted citizens in resolving some of these challenges across schemes in all the four states.

Resolving Grievances in Social Welfare

In the second stage of our research project, we studied the various modalities through which Gram Vaani volunteers assist citizens. Through a detailed qualitative analysis of IVR recordings and volunteer interviews (to document the actions taken by volunteers), we were able to create an Impact Framework (analogous to the aforementioned Exclusion Framework) that categorised volunteer actions under three broad heads (see *Glossary of Action Pathways* for more detail): **Information Provision to Citizen**, **Issue Escalation to Higher Officials**, and **Direct Assistance by Volunteer**. The last action pathway can be further broken down into two sub-categories, **Resolution on Citizen Behalf** (in which volunteers fill forms/file complaints on citizen's behalf) and **Interaction with Access Point** (in which volunteers informally negotiate with local access points to help citizens). It must be noted that the action pathways used by volunteers differ from one stage of exclusion to another for each scheme. Further, they may not always be successful, resulting in volunteers using a trial and error method to resolve grievances. A detailed analysis of this has been provided in Chapter 3. Below we only summarise some of the broad insights:

- **Issue Escalation** to officials at the block or district level is the most prominent action pathway used by volunteers across schemes for a variety of citizen grievances. This is done by forwarding the voice recording of the grievance directly through the IVR to the appropriate officials, or via WhatsApp or Facebook to their official account. Our analysis shows that this action pathway is primarily used by volunteers when any one or more of the following contexts characterises citizen complaints:

- The delivery mechanism of the scheme follows a top-down structure in which most crucial functions are not in the jurisdiction of local-level officials (such as those at the Panchayat-level), who, if not more effective, are usually more accessible to ordinary citizens. This necessitates that the complaint is escalated to officials at higher tiers who have the official capacity to address grievances.
- In schemes which may follow a more decentralized implementation mechanism (such as the PDS) but there is prevalence of petty corruption or lack of cooperation on part of local-level officials.
- There are inadequate or cumbersome official grievance redress mechanisms in place, that make issue escalation more efficient, or a necessary mechanism to gain more information.
- All other action pathways have proven to be unsuccessful.

- **Local advocacy** by writing letters to the administration is also used as an *Issue Escalation* pathway for problems that are faced by many citizens in a community. Broad-based evidence is collected by the Gram Vaani team by running IVR surveys and documenting the voice reports received on their platforms. Rather than taking an approach of addressing individual grievances, this method often helped initiate system-wide steps by the administration to address the problems.
- **Resolution on Citizen Behalf** as an action pathway has been prominent for schemes (and certain stages within the scheme) that have some front-end mechanisms in place for complaint filing, application tracking, data correction, etc., which citizens themselves are not able to navigate. This occurs in cases where the processes are complex, or resolution requires access to online portals which citizens are not able to use.
- **Interaction with Access Point** as an action pathway has been prominent for those cases in which there is lack of cooperation/non-compliant behaviour on the part of local-level officials, individual banking agents, or operators of Fair Price Shops. Such interaction may sometimes also entail warnings given by volunteers, citing the possibility of issue escalation if the said local functionary does not comply/address the grievance.

Key Recommendations

The key observations that emerge from our research is that ensuring access to social entitlements is impeded by many last-mile problems that citizens are not able to navigate on their own. They need assistance from CSOs and social workers who are well-versed with the procedures for various government schemes and can guide them or act on their behalf for smoother citizen-state interactions. This could take the form of escalating issues to appropriate government officials who have the authority to solve problems, or report to senior officials about violations by lower-ranking officials, or assist the citizens in filling out appropriate forms, or in some cases even provide actionable information to the citizens. However, what is clear is that the citizen-state interface for access to social protection is not seamless by any means, and by-and-large it cannot be managed by the citizens alone. The introduction of technology is not a solution, and in fact the centralization of processes that it typically initiates often makes it harder for citizens to deal with the system, disempowering the very stakeholder that it was meant to support. The resounding conclusion from our research is that until state-citizen interfaces in welfare schemes are redesigned to become more citizen-centric and ergo effective, CSOs and social workers will remain a critical cog in the last mile. Therefore, in addition to recommending a set of systemic improvements that need to be set in motion using policy levers, we also provide a detailed set of standard operating procedures that can be used a ready reference by other CSOs involved in resolving citizen grievances in welfare. We also note that given the hyper-local expertise of such organisations, government departments may choose to embed them as part of their official grievance redress system or alternatively, may adopt similar simple technological innovations to ensure more accessible and transparent grievance redress systems.

The report has been organised in the following manner. Chapter 1 provides a broad overview of the project, the key research objectives and the broad research methodology. Chapter 2 and its accompanying Annexure 2A explore the various causal factors that lead to exclusion of citizens from social welfare schemes and the EPF respectively. Chapter 3 and its accompanying Annexure 3A provide a detailed description of the various action pathways that Gram Vaani volunteers employed to resolve these grievances. Chapter 4 consists of a set of Standard Operating Procedures for civil society organisations, and Chapter 5 provides broad policy recommendations for various governmental and banking entities. The appendices at the end of the report include, explanation of

the various technical processes under DBT for reference, an excerpt from our volunteer interview questionnaire, and lastly, further details on the volunteers of Gram Vaani, without whom this piece of work would not have been possible.

1. Project Overview

1.1 Background

The COVID-19 lockdown and subsequent public health measures followed in India to contain the pandemic spread have severely impacted poor and vulnerable populations on food security, livelihood, and access to health services[2]. Although the government has mobilized several relied measures, there has been extensive documentation of exclusion of deserving people from availing these social protection measures.[3] In this research project, the four collaborating organisations utilised our collective knowledge and field resources to undertake action research specific to the context of the COVID-19 pandemic. Over the course of last year, teams across these organisations have been documenting such issues faced by the citizens,[4] understanding reasons behind the exclusions,[5] assisting them in availing welfare and social security schemes,[6] and advocating for improvement in the operational processes to reduce exclusions.[7] Our three key research objectives along with the specific research methodology used at each step have been detailed in the section below.

1.2 Research Methodology

Research Objective 1: *Analysis of user-generated content to understand the different challenges citizens face in accessing social welfare entitlements.*

Gram Vaani operates a network of voice-based community media platforms in several rural areas of North India (Bihar, Jharkhand, Uttar Pradesh, Madhya Pradesh) and among industrial sector workers in Delhi NCR and several districts in Tamil Nadu.[iii] The organisation provides an

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[2] Janta Parliament, https://jantaparliament.wordpress.com/, Aug 16-21, 2020: With representation from across the country by over 250 speakers, this is an exhaustive documentation of issues facing the citizens, including issues related to social protection schemes.

[3] COVID-19: Analysis of Impact and Relief Measures, https://cse.azimpremjiuniversity.edu.in/covid19-analysis-of-impact-and-relief-measures/, Accessed September 5th 2020: A compilation of several surveys, including some specifically on access to relief measures – APU survey of 5,000 households, Gram Vaani survey of 2,400 people, Dalberg survey of 47,000 households

[4] Mira Johri, Sumeet Agarwal, Aman Khullar, Dinesh Chandra, Vijay Sai Pratap, Aaditeshwar Seth. *The First 100 Days: How Has COVID-19 Affected Poor and Vulnerable Groups in India?* Under review, August 2020. A policy brief based on the study is available.

[5] Dvara Research and Gram Vaani. Falling Through the Cracks: Case-studies in Exclusions from Social Protection. Accessed September 5th 2020.

[6] Gram Vaani. Campaigns for the Rights and Dignity of the Marginalized, During COVID-19. August 2020.

[7] Aaditeshwar Seth, Sultan Ahmad, Orlanda Ruthven. #NotStatusQuo: A Campaign to Fix the Broken Social Protection Systems in India. August 2020.

Interactive Voice Response (IVR) platform, through which users can obtain local news updates, record their own voice messages requesting help, or simply narrate their own experiences[iv]. The simple, low-tech innovation permits access to grievance redressal and information that marginalised communities generally lack. Figure 1 describes the Gram Vaani model in further detail. In March 2020, the Gram Vaani COVID-19 response network formed in collaboration with 25+ CSOs began documenting people's experiences and complaints specific to the national lockdown and socio-economic fallouts of the pandemic. During the COVID-19 lockdown in India, more than 1 million users called into the platforms during the first two months of the lockdown itself, and over 20,000 voice reports were left by the people, describing their experiences or reporting grievances or asking for assistance to access social protection schemes.[v] The primary data of audio recordings used to fulfil this research objective was obtained through Gram Vaani's community media platforms.

We then undertake an exercise to code the grievances based on reasons of exclusion as per exclusion frameworks developed for the schemes studied. Grievances coded against this framework help us understand the relative extent of different issues that can lead to exclusion, such as documentation gaps for scheme eligibility, mismatches in the spelling of names between Aadhaar and other pieces of documentation, problems in Aadhaar-bank account linkages, inactive bank accounts, etc. These issues spanned various schemes including, PDS, MGNREGA, DBT-linked schemes such as PM-KISAN, Jan Dhan, and NSAP, and employment-linked schemes like PF. We hence select these schemes as our focus for this segment of our research project. Extensive campaigns were also undertaken by Gram Vaani on some of these schemes, and therefore rich data already exists to understand the nature of problems that arise on the ground.

Another component of our analysis is a compilation of deep-dive case studies in exclusion, titled [Falling through the Cracks: Case Studies in Exclusion from Social Protection](). In this ongoing blog series, we cover stories of citizens who have been excluded from social protection benefits delivered as a part of DBT, PDS, and MGNREGA. We analyse these cases as per the aforementioned exclusion frameworks, to build strong narratives about exclusion on the ground.

Research Objective 2*: Understanding the various modalities through which Gram Vaani volunteers assist citizens in resolving the challenges they face.*

When grievances recorded are taken up by volunteers and subsequently resolved, the practice on Gram Vaani platforms is to record an impact story detailing the process that was followed for resolution. Gram Vaani has accumulated a rich set of impact stories recorded during the COVID-19 period about problems resolved with access to government schemes. We develop a coding schema for impact stories, to help understand the actions volunteers become required to take when exclusion occurs at various stages, across various schemes.

Research Objective 3*: Proposing a set of Standardised Operating Procedures (SOPs) that can be used by civil society organisations for grievance redressal.*

Many of the systemic improvements that have been proposed in the report require concerted efforts on the part of governmental departments and the political will to move towards more inclusive systems. Therefore, for the short-term, we propose a set of procedures that can guide civil society organisations engaged in social welfare and accountability in their work. These procedures lay down the various steps that such an organisation can follow to reduce exclusion at the last-mile and work hand-in-hand with local government officials to assist citizens in accessing their welfare benefits.
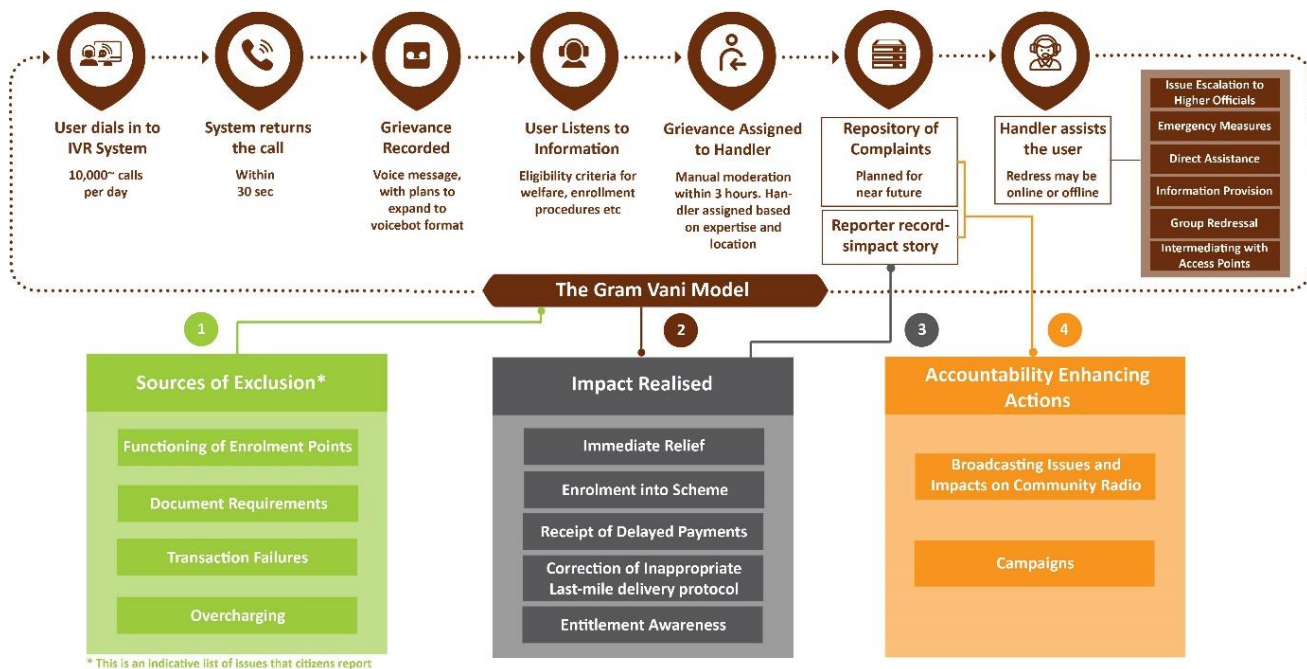
Figure 1: The Gram Vaani Model

The broad components of our research methodology across the aforesaid objectives are as follows:

Pre-processing of Complaints Data

A subset of approximately 1000 audio recordings that were specifically complaints related to welfare schemes were compiled after human-moderated transcription of the complaints. At this step, all personal information was anonymized as well. The data were further coded using the exclusion frameworks described in the previous section. The dataset was first partitioned according to the scheme to which a recording pertains. For each recording, we identified the source of exclusion using the information provided by the caller. Using this information, we decide which stage of the relevant exclusion framework it maps to best, and code accordingly.

Analysis of Coded Data

The processed data was analysed to compile aggregate statistics on the prevalence of exclusion across each stage of welfare delivery. This also included a spatial and temporal analysis of the complaints. Data summaries and descriptive statistics have been compiled and presented at the beginning of each chapter.

Deep Dive Case Studies

We also used a critical case sampling approach to identify cases that highlighted archetypal exclusionary factors and undertook deep-dive interviews to develop written case studies. We have currently compiled eight such in-depth case studies which provide a local context to exclusion and provide further information than what is limited to the original recording. These telephonic interviews adopted a semi-structured format, and were conducted with the beneficiary and the community volunteer that was assigned to the original case, and sometimes with concerned local functionaries (such as a Fair Price Shop (FPS) officer, or Common Services Centre (CSC) operator).

Impact Stories Dataset

The dataset of impact stories provided a clear view regarding how volunteers functioned when grievances were brought to them. By listening to, and organising these audio clips by the actions taken by volunteers, we were able to create an Impact Framework (analogous to the previous

Chapter's Exclusion Framework) that categorised volunteer actions based on the resolution pathways adopted by them.

Interviews with Volunteers and Local Government Stakeholders

A substantial part of our understanding of how citizen grievances are resolved was obtained through deep-dive telephonic interviews of volunteers from each state in a semi-structured format. A secondary aspect of our research methodology involved deep-dive interviews with government officials responsible for the local administration of the welfare schemes. We used some of our preliminary insights from volunteer interviews and fed them into our interviews with relevant officials.

A detailed discussion of the research methodologies used for each component of the project has been provided in the respective chapters.

1.3 Project Limitations

1. Since most of the data analysed were user generated, the level of information varies greatly across complaints from it being too little to it being very rich and detailed. To ensure consistency in our analysis, we extracted the relevant information only for a fixed set of information categories, potentially resulting in either loss of information for some detailed calls or in missing data for some. However, this limitation was partly countered by undertaking extensive deep-dive case studies of beneficiaries from the dataset selected through a critical case sampling approach.

2. The dataset on citizen complaints has relatively fewer number of calls pertaining to cash withdrawal compared to the other stages of exclusion. Since our dataset only contains user-generated complaints, we speculate that this might be the case because citizens may not generally prefer approaching a civil society organisation to report issues of cash accessibility, unless they are quite serious (such as CSP/bank manager fraud). One can also argue that this might happen because of the low prevalence of such problems. However, results from other action research projects[8] do not lend much credence to that narrative.

3. The dataset comprising of citizen complaints used to document exclusion and the dataset comprising of impact stories/action pathways do not overlap. That is, the impact stories analysed in Chapter 3 are not of those complaints that were analysed in Chapter 2. This is because the audio recordings in each dataset did not have any personal identifiers apart from citizen names to track a given complaint and its resolution pathway.

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[8] A recent study by LibTech India, titled, Length of the Last Mile, finds that MGNREGA workers spend a considerable amount of time and money in accessing banking infrastructure across the surveyed states.

2. Exclusion from Social Welfare Entitlements

2.1 Background

The outbreak of the COVID-19 pandemic has brought to surface the various gaps that have continued to impede welfare delivery in India, for both cash and in-kind welfare transfers. The urgency to reach citizens in dire need of financial and livelihood support, dictated by the socio-economic fallouts of the pandemic-induced lockdown, has led to the mobilisation of increased funds for various social welfare schemes.[vi] A relief package, in the form of Pradhan Mantri Garib Kalyan Yojana (PMGKY), was also announced by the Ministry of Finance, Government of India. As part of this scheme, ex-gratia cash transfers were deployed for women Pradhan Mantri Jan Dhan Yojana (PMJDY) account holders and below poverty line (BPL) pensioners, and free ration was announced for approximately 80 crore poor citizens.[vii] While the introduction of these relief measures was timely on the part of the government, their effective delivery to citizens has been less than ideal. Archetypal last-mile issues, exacerbated by the COVID-19 lockdowns, have either delayed beneficiaries' entitlements or, as seen in some cases, led to the failure of receipt altogether.[viii,ix,x] With COVID-19 ex-gratia transfers as one of the recent interventions, the welfare landscape in the country has gone through significant changes over the past few years as well, in particular with the introduction of a new system for digitised transfer of cash benefits under various schemes in the form of 'Direct Benefit Transfers' (DBT). DBT, along with the coupling of Aadhaar as an identification system and PMJDY bank accounts, has dominated recent welfare discourse. Most of these efforts have been introduced as policy tools to reduce leakages in delivery and to eliminate ghost beneficiaries, but have introduced new issues as welfare beneficiaries continue to flag challenges in accessing their entitlements.[xi] While some challenges relate to typical bureaucratic delays, database errors, blocked bank accounts, others may include discretionary denial of benefit or overcharging by last-mile functionaries. Given the diversity of delivery issues as well as their source of origin, we developed a framework to systematically document exclusion in welfare delivery. This framework, by mapping points of exclusion across four key stages viz., beneficiary identification, enrolment, back-end processing, and disbursement, provides an overview of the beneficiary journey and the challenges faced therein. Each process in the framework corresponds to a unique layer of exclusion and helps us document the problems in the pipelines of welfare delivery.

Table 1: Overarching Exclusion Framework

Process Number	Exclusion Stage	Sources of Exclusion
Process 1 (**E1**)	**Pre-Entry**	Enumeration Targeting and Eligibility Rules
Process 2 (**E2**)	**Entry**	Proof of Eligibility and Application Processing
Process 3 (**E3**)	**Benefit Processing**	Authorisation and Release of Benefit
Process 4 (**E4**)	**Endpoint**	Cash Withdrawal/In-kind Collection by Beneficiary

Overarching Exclusion Framework

First Stage of Exclusion or E1 (Pre-Entry): The first point of exclusion within the welfare system is the methodology for identifying beneficiaries. Although a few schemes such as MGNREGA and PM Kisan allow for self-registration,[xii] most depend on the Below Poverty Line (BPL), and Socio-Economic Caste Census (SECC) lists for identifying beneficiaries. The reliability of Proxy Means Testing (PMT), as seen in the case of identifying deprived households using a BPL list, has been called into question multiple times in the past. In 2015, the erstwhile Planning Commission, during a performance evaluation of PDS (a programme that relied on BPL list for identification of beneficiaries), stated that a large section of the population (particularly daily wage earners) who have been kept out of the target group because of their income levels, were potentially food insecure households and therefore the proportion of people with food insecurity need not be identified with the Commission's poverty ratio.[xiii] Although the more recent SECC is an improvement over the BPL approach, concerns related to its data have also emerged. Vested interest to overstate the extent of deprivation by respondents and errors in enumeration leading to under-counting of the poorest sections are some of the major concerns associated with SECC (2011).[xiv] Lastly, SECC was conducted in 2011, almost ten years ago, and is therefore not up-to-date.[xv] Additionally, the eligibility rules of many schemes by default exclude groups that are in need of the said safety net, for example, exclusion of informal sector workers from Provident Fund[xvi]. Such targeting methodologies and eligibility rules form the first layer of exclusion.

Understanding the exclusion in the targeting stage may help us design more inclusive ways to identify poor households in the next SECC to be conducted in 2021.

Second Stage of Exclusion or E2 (Entry): Given the targeted nature of most welfare schemes, the process of enrolment consists of stringent eligibility checks which require the beneficiary to submit a range of documents to prove their eligibility. Prospective beneficiaries must incur high costs, for instance, foregoing a day's wage, having had to make multiple visits to finish the enrolment process or procure necessary documents. Secondly, with the introduction of digitised databases, spelling/linkage errors in beneficiary records during the data entry stage might lead to the failure of validation checks during the onboarding of beneficiaries. Such errors may take an inordinately long time to get corrected, given the scarcity of fully functioning enrollment points. For instance, the functional capacity of enrolment points such as Common Services Centres (CSC) or local government functionaries (such as the *lekhpal*[9] or *patwari*[10]) has been limited only to the collection and submission of scheme applications but has not been extended to include functions such as processing corrections in scheme databases, corrections in Aadhaar details, etc. Record correction processes (a major factor causing inordinate delay in credit of beneficiary accounts) continue to require action of government departments, often subject to bureaucratic delays. The lack of a streamlined system, despite the presence of CSCs[11], and cumbersome documentation requirements continue to be a source of exclusion at this stage.

Third Stage of Exclusion or E3 (Benefit Processing): For cash transfer schemes, back-end processing involves the transfer of funds in the form of payment files from the relevant Ministry/Department to beneficiary accounts via the National Payments Corporation of India's digital infrastructure. Most DBT transactions rely on the digital infrastructure of the Aadhaar Payment Bridge (APB) and are routed using the Aadhaar-enabled Payment System (AePS).[xvii] This stage may be characterised by transaction failures, i.e., failure of crediting a beneficiary's

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[9] A *lekhpal* is a clerical government officer who primarily maintains revenue accounts and land records at the village level.

[10] A *patwari* is the lowest state functionary in the Revenue Collection System and is tasked with maintaining land records and tax collection.

[11] In the Pragya Kendra Assessment study, more than four in ten of the survey respondents indicated that they had to additionally visit an elected official/government official to get their work done, indicating that CSCs were not functioning as one-stop shops.

account, which may occur due to a variety of reasons.[12] These include improper Aadhaar seeding, invalidity of account status (blocked/frozen/dormant), pending Know Your Customer (KYC), etc. Recently, data of failure rates received from four financial institutions with a pan-India presence reveal an average percentage of AePS failed transactions of 39% across providers in April 2020.[xviii]

As a rule, we describe all procedures that pertain to the back-end processing of benefits as E3. For instance, the aspects of work allocation and payment of wages under MGNREGA qualify as *E3*. Similarly, issues that potentially disrupt the PDS supply chain have also been bucketed under *E3*.

Fourth Stage of Exclusion or E4 (Endpoint): This stage relates to the endpoint of the welfare chain. Assuming the beneficiary did not fall through any of the previously mentioned fractures in the welfare pipeline, they may still face issues while withdrawing the cash from their bank account or collecting ration from a fair price shop (FPS). This might sometimes be due to the unavailability of a cash-out point/FPS (especially exacerbated during the COVID-19 lockdown) or operational issues such as network failures, biometric failures, and in some cases, overcharging/fraud/discretionary denial. For instance, Dvara Research's COVID-19 Impact on Daily Life (CIDL) survey highlighted that, even before the lockdown was announced, banking points have not been available in close proximity to many villages present in the sample, and the residents of those villages had to travel to other villages to avail banking services.[xix] Even when they are accessible, networks errors or glitches in Point of Sale (PoS) devices might lead to multiple visits by beneficiaries, leading to high costs especially for those residing in peri-urban and rural areas. Further, DBT beneficiaries requiring access to banking services are often vulnerable to overcharging and fraud[xx] in the last-mile. This is due to the absence of robust monitoring mechanisms and the inadequacy of incentives paid out to last-mile functionaries.[xxi,xxii]

Scheme-specific Exclusion Frameworks

While these four broad stages in the design and delivery of welfare interventions are common across schemes, their individual components vary from one scheme to another. Given the unique

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[12] See relevant case studies: Exclusions in Tamil Nadu's Labour Welfare System, Exclusion from PM Kisan due to payment of instalments into wrong bank account, and Exclusion from PM Kisan due to delay in correction of PFMS records.

nature of each welfare scheme that forms part of this project, we have developed specific exclusion frameworks that capture the granularity of processes involved in each scheme.

1. **Exclusion framework for all DBT schemes**: This framework details points of exclusion common to all DBT schemes, given the common architecture they all rely on for benefit delivery. The analysis of DBT schemes also includes the various ex-gratia cash transfers announced under PMGKY.

2. **Exclusion framework for MGNREGA**: This framework details the various points of exclusion that are unique to the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA) programme. While wage payments under MGNREGA are made through DBT, the remaining procedures are characterised by specific exclusionary factors found only under this programme.

3. **Exclusion framework for Public Distribution System**: This framework captures points of exclusion in the Public Distribution System (PDS), an in-kind transfer programme under the National Food Security Act, 2013.[xxiii] The analysis of PDS also includes the various ex-gratia PDS transfers announced under PMGKY.

4. **Exclusion framework for Provident Fund**: This framework details the various potential exclusionary stages in the process flow of the Employees Provident Fund scheme, which institutes provident funds, pension funds and deposit-linked insurance funds for employees of factories and other establishments under the Employees Provident Funds and Miscellaneous Provisions Act, 1952.[xxiv]

Table 2 unpacks these four exclusion frameworks and maps them back to the four key exclusionary stages. **Table 3** provides a glossary of exclusion, defining various sources of exclusion under each scheme from Table 2.

Table 2: Scheme-specific Exclusion Frameworks

Scheme \ Stage	Pre-Entry Stage (E1)	Entry Stage (E2)	Benefit Processing (E3)	Endpoint (E4)
DBT	Targeting Methodologies and Eligibility Rules*	Documentation Requirements	Failure of Benefit Crediting	Availability of Access Points
		Application Processing		Operational Issues
				Overcharging
MGNREGA	Not Applicable[13]	Job Card Application Processing	Work Allocation	Availability of Access Points
			Wage Payment Processing	Operational Issues
				Overcharging
PDS	Targeting Methodologies and Eligibility Rules*	Documentation Requirements	Supply Chain Issues	Accessibility
		Application Processing	AePDS Back-end	Authentication Failures
		Details in Ration Card		Non-Compliance
Provident Fund (PF)	Targeting Methodologies and Eligibility Rules*	Completion of Employee Records	PF Contribution	Fund Withdrawal Issues
		Registration Process (of either Employer or Employee)		

Evidence on exclusion during the pre-entry stage has only been documented for ex-gratia PDS transfers under PMGKY and not for other schemes as it is outside of the scope of this research project.

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[13] Under MGNREGA, any person who is above the age of 18 and resides in rural areas is entitled to apply for work.

2.2 Glossary of Exclusion

Table 3: Sources of Exclusion- Explained

Exclusion Code	Source of Exclusion	Description
DBT Exclusion		
E2 (Enrolment Procedures)	*Documentation Requirements*	Scheme applicants bear both time and monetary costs in order to procure documents to prove their eligibility, especially under list-based schemes.
E2 (Enrolment Procedures)	*Application Processing*	Inordinate delays in the processing of scheme applications have excluded many deserving people who continue to await the receipt of their entitlements. General opaqueness, lack of status communication, and weak GRM (Grievance Redressal Management) make welfare transfers inaccessible for many citizens.
E3 (Benefit Processing)	*Failure of Benefit Crediting*	The failure to receive DBT entitlements in one's bank accounts. The reasons for failure may vary, including improper Aadhaar seeding, database errors, blocked bank accounts, etc.
E4 (Cash Withdrawal)	*Availability of Access Points*	Includes availability of a proximate banking point to withdraw or check the status of DBT entitlements.
E4 (Cash Withdrawal)	*Operational Issues*	Includes issues such as overcrowding at banks, time-consuming provision of services, network failures, cash shortages, biometric authentication failure, glitches related to Point of Sale (PoS) devices, etc. Some of these issues may not lead to exclusion necessarily but result in high costs (both temporal and monetary) for welfare beneficiaries

	Overcharging	Includes instances of bribery, fraudulent behaviour, or any other improprieties on the part of cash-out point personnel.
MGNREGA Exclusion		
E2 (Entry Stage)	*Job Card Application Processing*	Includes issues where a job seeker is unable to obtain a job card, despite having enquired about/applied for the same. This may be due to non-cooperation from the enrolment point, or a processing error post-submission of documents.
E3 (Benefit Processing)	*Work Allocation*	The job cardholder is unable to obtain work, despite having requested the same. This category includes cases wherein cardholders faced issues in raising their demand for work and were consequently excluded from unemployment benefits. It also includes the ad-hoc allotment of work for only a few days despite requests for longer periods of time.
	Wage Payment Processing	Includes all improprieties after work allocation, such as workers being unpaid/partially paid or experiencing payment delays.
E4 (Cash Withdrawal)	*Availability of Access Points*	*Same as above*
	Operational Issues	
	Overcharging	
PDS Exclusion		
E1 (Pre-Entry Stage)	*Targeting Methodologies and Eligibility Rules*	The eligibility rules for identifying beneficiaries of ex-gratia in-kind transfers under PMGKY excluded many people who were in need of government support but did not receive free ration due to lack of a ration card.
E2 (Enrolment)	*Documentation Requirements*	The citizen is unable to procure the required documentation to prove their eligibility as a ration cardholding candidate.
	Application Processing	The citizen has not been allotted a ration card despite having

		submitted the requisite forms and documentary proof. They may experience undue delays due to impropriety at the enrolment point, or issues with the submitted documents/forms causing rejection or stalling of an application.
	Details in Ration Card	Citizens may face issues in updating details on their ration card. This may pertain to the addition/deletion of family members after a change in family structure or to errors/changes in addresses, names, etc.
E3 (Benefit Processing)	*Supply Chain Issues*	Any disruptions in the transportation of foodstuff between godowns, or from godowns to the Fair Price Shop can cause exclusion due to supply chain issues.
	AePDS Back-end	Includes issues related to the linkage of Aadhaar and ration card or other backend database issues that lead to the failure of ration collection at FPS.
E4 (Ration Collection)	*Accessibility*	Implies exclusion due to the unavailability of a proximate Fair Price Shop. It also accounts for improper operation of the Fair Price Shop in the form of crowding or erratic hours of functioning.
	Authentication Failures	Authentication failures may be caused by POS device errors, biometric failures or network errors that prevent citizens from collecting their entitled grains at the Fair Price Shop.
	Non-Compliance	Includes all problems caused by improper behaviour by the Fair Price Shop Officer, who may charge higher prices than stipulated, provide lower quantity than entitled, or exercise discretion in how they distribute grain.
PF Exclusion		
E2 (Enrolment Procedures)	*Completion of Employee Records*	Includes failures due to incomplete employee records that ultimately impede withdrawal of PF by

		workers: KYC procedures of the employee must be complete, and bank details must be in order. The Date of Joining/Date of Exit provided must be correct. If the employee transfers from one company to another, either company must make the requisite linkages between the old and new PF accounts.
	Registration Process (of either Employer or Employee)	Inclusive of all issues that may arise during the registration process: The company's registration with the PF Office may be expired or incomplete. Second, the employer may fail to properly register an employee with the PF Office.
E3 (Benefit Processing)	*PF Contribution*	Includes issues where the employer fails to match the employee's contribution to their provident fund monthly.
E4 (Withdrawal)	*Fund Withdrawal Issues*	Includes issues employees face while withdrawing their PF entitlement due to company closure or company not cooperating. Can arise is the company has shut down and is not available for approving the withdrawal application or is not cooperating to sign-off on the withdrawal forms.

2.3 Research Methodology

The database of complaints collected through Gram Vaani's COVID-19 response network for the period of March – November 2020 forms a qualitative dataset to study exclusion in a systematic manner. However, the incoming cases range from specific complaints of exclusion pertaining to a welfare scheme, to general reports of distress during the COVID-19 lockdown. This report only covers those complaints that were specific to a welfare scheme from the lens of exclusion and does not analyse calls related to general distress. The research methodology for this chapter is detailed below:

Pre-processing of Complaints data

The database of approximately 1000 complaints were compiled after human moderated transcription of the complaints and all personal information was anonymised. The data was further coded using the exclusion frameworks described in the previous section. The dataset was first partitioned according to the scheme to which a recording pertains. For each recording, we identified the source of exclusion using the information provided by the caller. Using this information, we decide which stage of the relevant exclusion framework it maps to best, and code accordingly. In some instances, wherein the caller does not provide enough information with which to recognise correctly why exclusion occurs, NAs are introduced into the dataset.

Analysis of Coded Data

The processed data was analysed to compile aggregate statistics on the prevalence of exclusion across each stage of welfare delivery, spatial and temporal analysis of complaints data across schemes. Data summaries and descriptive statistics have been compiled and presented in the following sections.

Deep Dive Case Studies

We used a critical case sampling approach to identify cases that highlighted archetypal exclusionary factors and undertook deep-dive interviews to develop written case studies. We have currently compiled 8 such in-depth case studies which provide a local context to exclusion and provide further information than what is limited to the original recording. These telephonic

interviews adopted a semi-structured format, and were with the beneficiary, the community volunteer that was assigned to the original case, and sometimes with concerned local functionaries (such as a Fair Price Shop (FPS) officer, or Common Services Centre (CSC) operator).

2.4 Data Summary

The dataset of complaints comprises approximately 1000 complaints which have been used to document exclusion as per the aforementioned frameworks. This overall dataset represents some of the key social welfare measures in India: Direct Benefit Transfer (DBT) schemes[14], Public Distribution System (PDS), Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA), PM Kisan, and Provident Fund (PF), among others. Figure 2 provides the scheme-wise composition of our dataset. As mentioned above, the complaints span the time frame of March – November 2020. This allows us to understand the occurrence of exclusion during the COVID-19 lockdown period (which also coincides with the deployment of the COVID-19 welfare package under PMGKY) and the post-lockdown period.
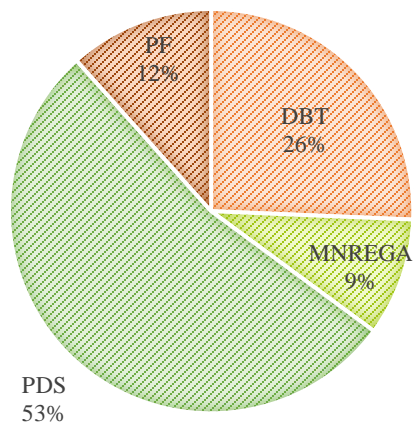
The maximum number of complaints analysed belong to PDS (53%) category, followed by DBT (26%).

Figure 2: Scheme-Wise Composition of Specific Complaints

On 22 March 2020, a nationwide lockdown was announced, which closed businesses and suspended transportation services. This severely impacted people's livelihoods and their ability to

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[14] For the purpose of this study, the set of DBT schemes includes the Pradhan Mantri Kisan Samman Nidhi (PM-KISAN), Pradhan Mantri Ujjwala Yojana (PMUY), Pensions, Jan Dhan Yojana, cash transfers under the Pradhan Mantri Garib Kalyan Yojana, Welfare Board schemes (specific to Tamil Nadu), and some other state-specific transfers.

afford and access essential items. On 26 March, the Finance Minister announced a slew of relief measures under the Pradhan Mantri Garib Kalyan Yojana, including direct cash transfers. Our dataset witnesses its highest frequency of complaints in April (See Figure 3), corresponding to the period immediately following the lockdown and relief announcements. Perhaps in the first phase of lockdown (25 March – 14 April), users required the most assistance or informational clarifications regarding their welfare entitlements when they were suddenly rendered out of work and deprived of other income sources. The number of complaints peter down as the months pass, which may be attributed to several reasons. The severity of users' living situations may have tempered down as the lockdown eased up, or they became more familiar with accessing relief-welfare, requiring the Gram Vaani platform less.

The geographical context for this analysis is described in Figure 4. The state from which most complaints originate is Bihar at 32%, followed by Uttar Pradesh and Tamil Nadu. There are a considerable proportion of calls for which the origin location is unknown. This geographical distribution is largely reflective of the strength of the Gram Vaani network in certain areas.

Number of incoming complaints peaked in April.
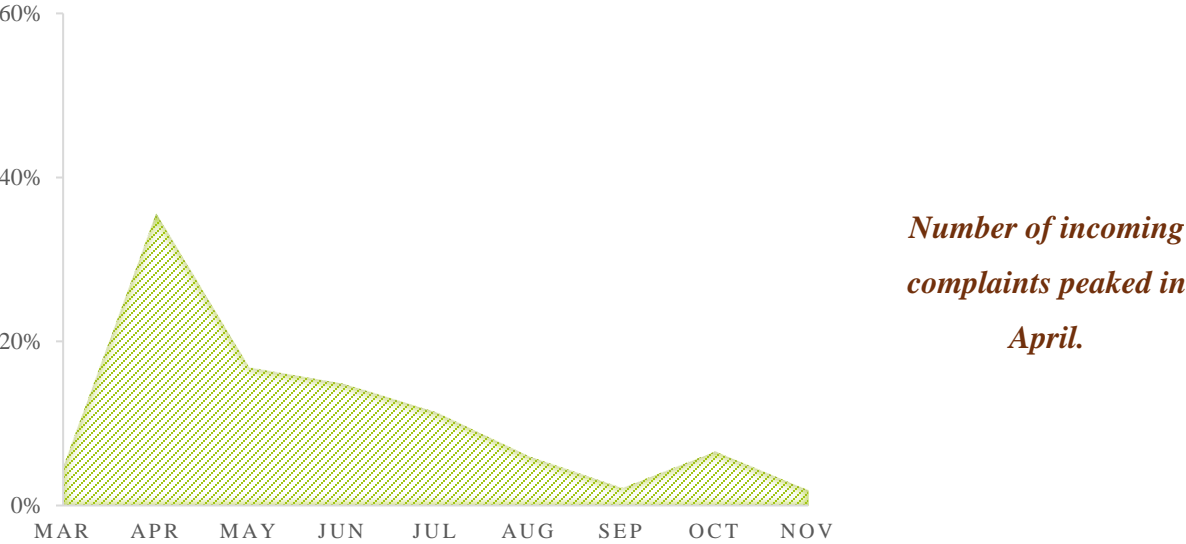
Figure 3: Temporal Progressions of Specific Complaints

Most complaints in the dataset (32%) originate from Bihar, followed by Uttar Pradesh (21%).
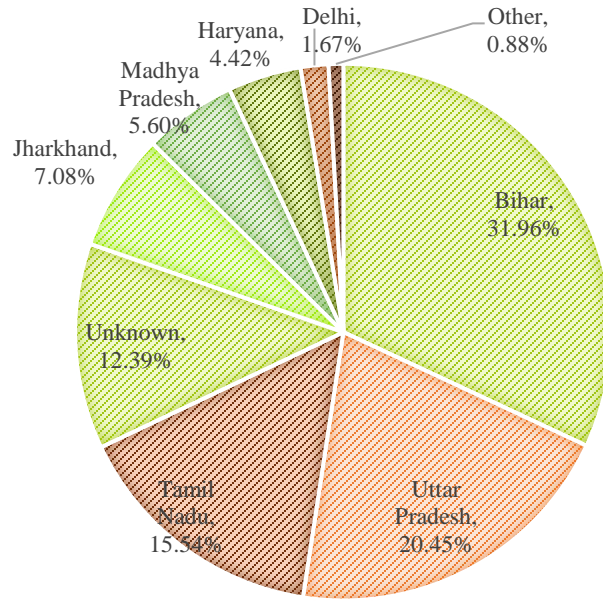
Figure 4: Location-wise Distribution of Complaints

2.5 Data Analysis: Understanding Exclusionary Factors in Welfare Schemes

In this section, we provide an overview of the various sources of exclusion that have been reported under each of the welfare schemes and take a closer look at the various temporal trends that emerge from the data.

2.5.1 Typology of Exclusion (All Schemes)

Before delving into scheme-specific analyses, it is worth understanding the broad typology of exclusion in the sample using our overarching framework (Figure 5). The overarching framework serves to tie exclusion across schemes together, by defining broad stages from which a citizen may be excluded from any of the welfare schemes within the scope of this project.

The highest incidence of exclusion occurs during the 'Benefit Processing' stage across all welfare schemes, followed by 'Endpoint'.
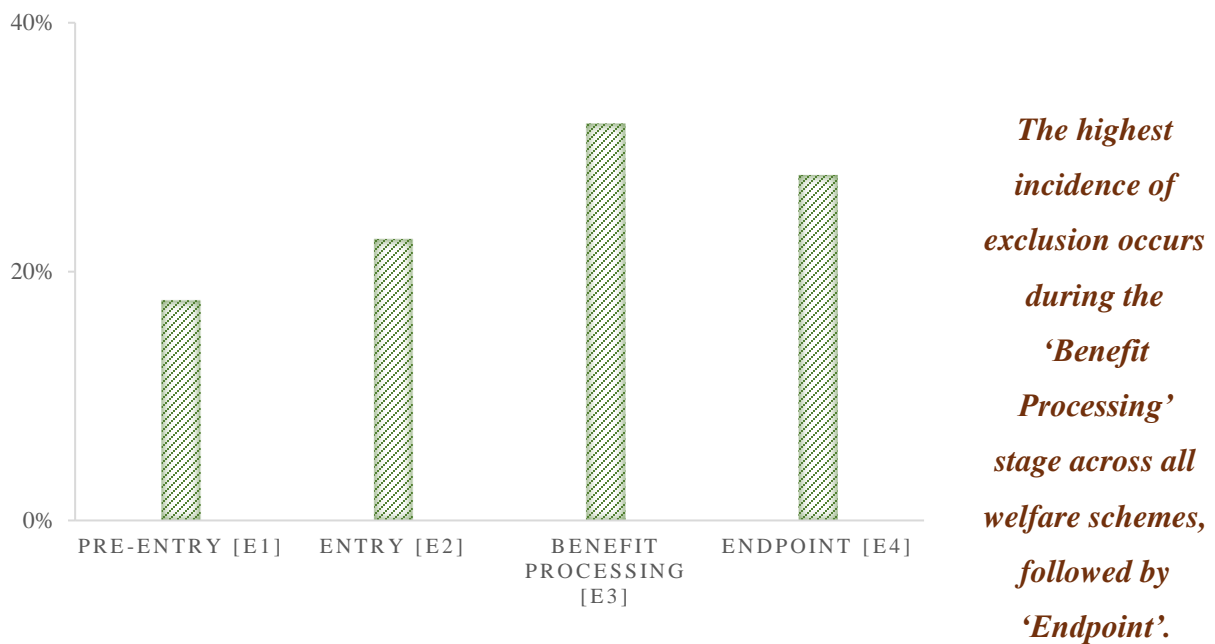
Figure 5: Typology of Exclusion (Overarching Framework)

From Figure 5, it is apparent that *Benefit Processing* (E3) is the most prominent stage at which citizens experience exclusion across schemes. The prevalence of this exclusion category in the overall sample indicates the extent of opacity involved in the back-end processing of all welfare transfers.
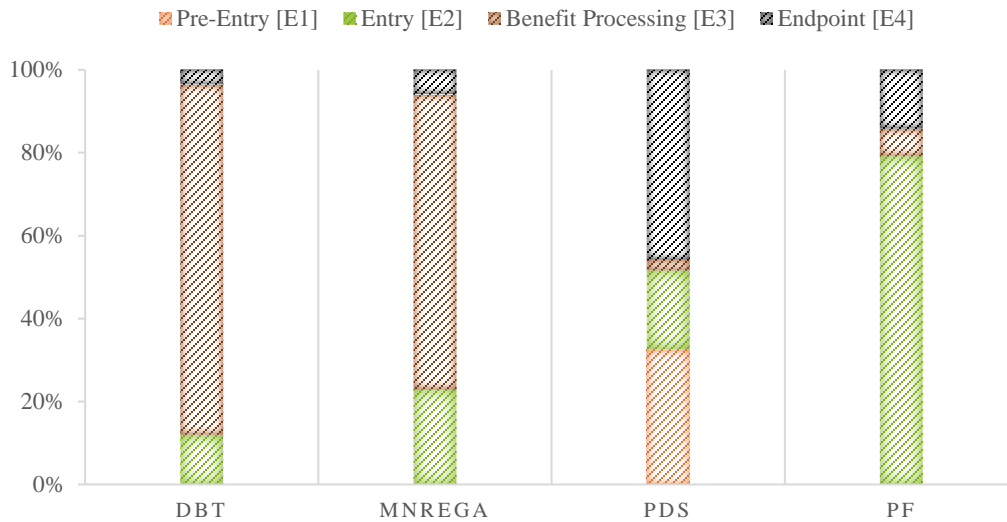
Figure 6: Typology of Exclusion Disaggregated by Scheme (Overarching Framework)

Endpoint (E4) issues are most prominent for the PDS, while Benefit Processing (E3) is a significant problem in both DBT and MGNREGA.

Further, we identify the prominence of stage-wise exclusion across the four schemes studied (Figure 6). For both DBT and MGNREGA, we see a prominence of issues at the *Benefit Processing Stage (E3). Benefit Processing (E3)* issues are responsible for nearly 85% of all issues amongst DBT schemes, and approximately 71% of all issues amongst MGNREGA grievances. Analysis in later sections reveals that the concerning sources of exclusion for these schemes are the processing of payments (for DBT) and allocation of work and subsequent payment of wages (for MGNREGA).

Complaints at the *Pre-Entry* (E1) stage are present only for PDS, and not for any of the other schemes. Even within PDS, it is specifically the *ex-gratia* in-kind entitlements under PMGKY that have been marked as exclusion at *Pre-Entry (E1).* that the *Pre-Entry (E1)* stage of other schemes is outside the scope of this project. Finally, issues at the Entry (E2) stage are most prominent in the PF set of complaints as compared to all other schemes.
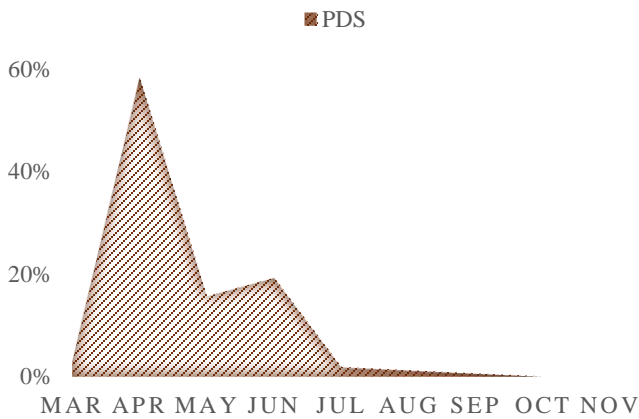
Figure 7: Temporal Progression of Complaints at Pre-Entry Stage
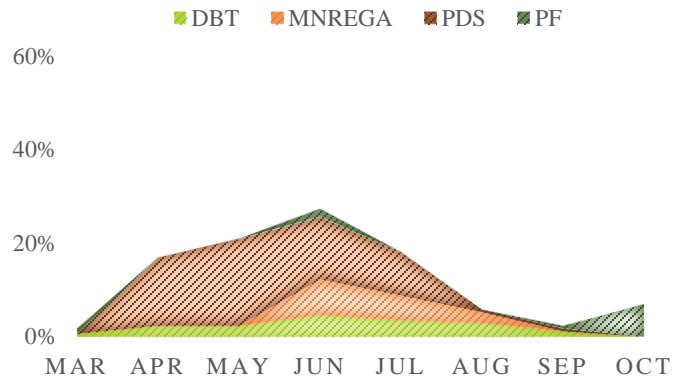
Figure 8: Temporal Progression of Complaints at Entry Stage
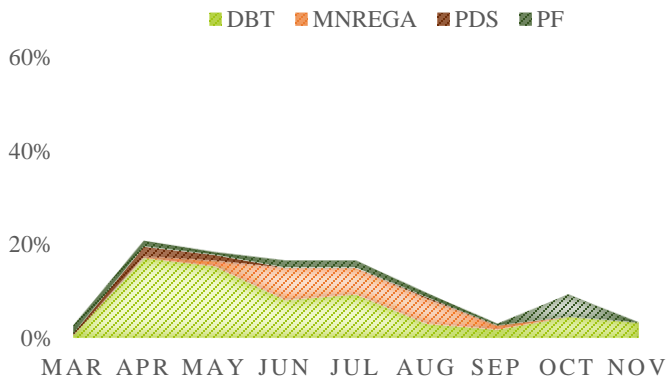
Figure 9: Temporal Progression of Complaints at Benefit Processing (E3) Stage
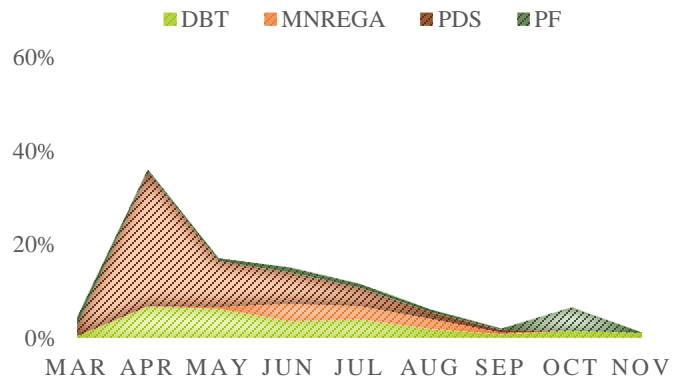
Figure 10: Temporal Progression of Complaints at Endpoint (E4) Stage

Pre-Entry (E1), Benefit Processing (E3) and Endpoint (E4) complaints peak in April. Whereas complaints at Entry (E2) peak in June.

The graphs above display the time progression of complaints specific to each source of exclusion (E1 to E4), disaggregated by the scheme. It can be seen from Figure 7 that *Pre-Entry (E1)* issues (regarding the PDS) peak in April. About 60% of all *Pre-Entry* complaints occur in April. This is not surprising as all *Pre-Entry* complaints pertain to the ex-gratia PDS transfers, and April was

during the beginning of the COVID-19 lockdown period. Figure 8 shows that *Entry* (E2) issues peak in June, mostly due to the PDS related complaints, and Figure 9 shows that *Benefit Processing (E3)* issues in April, mostly due to DBT. Finally, Figure 10 displays that *Endpoint* (E4) issues peaked in April as well due to PDS related complaints.

2.5.2   Typology of Exclusion (DBT)

Under DBT, beneficiaries enrolled under welfare schemes receive monetary benefits from the concerned Ministry directly into their bank accounts. The DBT architecture used in the transmission of monetary benefits involves a variety of agencies, governmental or otherwise, and a standard operating procedure[xxv] that guides these actors. Under DBT, the three key processes involved are detailed in Table 4.

Table 4: Process Flow under DBT[15]

Process 1	Enrolment	Proof of Eligibility, Application Submission, and Processing
Process 2	Back-end Transfer	Generation and Transmission of Payment File
Process 3	Withdrawal	Money Withdrawal by Beneficiary

Composition of DBT schemes in the sample: 27% of all complaints pertained to issues in Direct Benefit Transfer schemes. Figure 11 provides an overview of the composition of the DBT scheme set.

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[15] For a detailed description of DBT Process Flow, please refer to the Appendix.
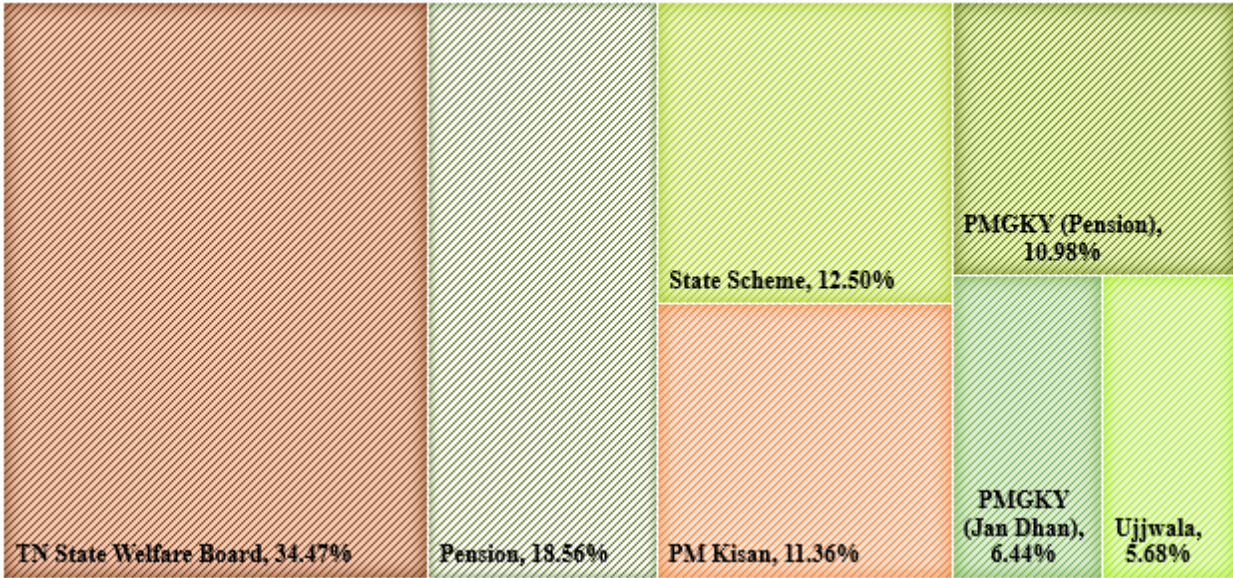
Figure 11: Composition of DBT Schemes

Identification of Key Exclusionary Factors in DBT

The following section analyses calls across the aforesaid schemes using the DBT exclusion framework detailed in Table 5 below. We discuss the stages in the order of the frequency in which they occur in our dataset.

Table 5: DBT Exclusion Framework

Scheme / Stage	Pre-Entry Stage (E1)	Enrolment (E2)	Benefit Processing (E3)	Cash-Out (E4)
DBT	Targeting Methodologies and Eligibility Rules*	Documentation Requirements	Failure of Benefit Crediting	Availability of Access Points
		Application Processing		Operational Issues
				Overcharging

***Documenting evidence on exclusion during the pre-entry stage of DBT is outside of the scope of this research project**.

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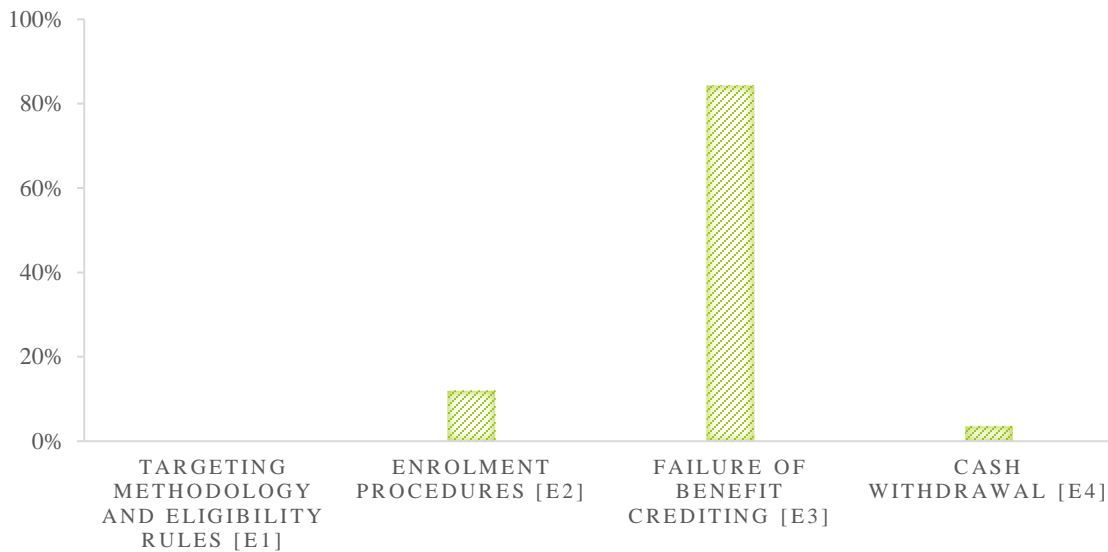
Amongst DBT calls, Failure of Benefit Crediting (E3) is the primary source of exclusion.

Figure 12: Sources of Exclusion in DBT

<u>Enrolment Process as a Source of Exclusion in DBT</u>:

The second most prominent source of exclusion in DBT has been the *Enrolment* (E2) stage.

> "*I haven't received my disability pension. I had filled the application form 6-7 months back in an enrolment camp. I cannot walk so I cannot work in MGNREGA.*"*

*Transcribed and translated version of the original audio recording.

For DBT schemes, the enrolment process involves the procurement of necessary documents as eligibility proof, followed by application submission and its backend processing. The highest number of complaints (83%) from amongst enrolment-based exclusion calls pertain to the '*Application Processing*' stage. Inordinate delays in the processing of scheme applications have excluded many deserving people who continue to await the receipt of their entitlements. General opaqueness, lack of status communication, and weak grievance redress mechanisms make welfare transfers inaccessible for many citizens. For many schemes, temporary enrolment camps are established at the village or taluk-level which enrol people in batches. However, there are two key concerns in a system where enrolment is done through temporary camps. First, the efforts made by state or local authorities towards setting up of enrolment camps is also closely related to the

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electoral timelines of the said region. Secondly, temporary enrolment points operate erratically and make it difficult for citizens to track their application status, especially when there is no real-time tracking online of application, or there is a delay in digitisation of records submitted by the citizen[xxvi]. In many cases, applicants simply lack the know-how to tracking their DBT applications online, without assistance from civil society organisations or formal points such as Common Service Centres, with a cost-component involved in the latter in the form of user fees. In Madhya Pradesh, we find that there is a special provision in place for camps to be set up every Monday and Friday by village registrars at the Panchayat level to resolve issues related to PM Kisan enrolment. These camps are meant to facilitate grievance resolution at the local level and provide assisted access to the website's online portal. However, such a provision was yet to be implemented (at the time of interview). Since such simple mechanisms (which if implemented can fundamentally improve the enrolment experience) have not been routinised, beneficiaries find it difficult to track their applications and keep awaiting the crediting of their accounts. Unfortunately, while temporary camps are being set up to hastily enrol citizens in batches, no such camps are being set up to resolve grievances for prospective or existing beneficiaries. The latter is a much better fit for group-level processes.[16]

83% of all DBT complaints at the Enrolment stage pertain to Application Processing issues.

Document Requirements 17%

Application Processing 83%
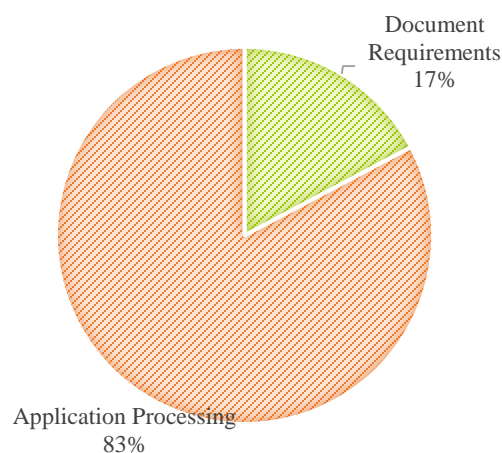
Figure 13: Exclusion during DBT Enrolment

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[16] Our analysis in Chapter 4 reveals that complaint filing and issue escalation for/by multiple persons simultaneously allows for utilisation of collective action strategies and seems to be more effective compared to attempts made by/on behalf of individual beneficiaries.

Figure 14: Scheme-Wise Exclusion (DBT
Enrolment)

As seen in Figure 14, the highest number of complaints pertaining to Enrolment stage exclusion (E2) belonged to Pension schemes. These were followed by calls pertaining to enrolment issues in PM Kisan.

> "*I had applied for disabled pension 5 years back and submitted my application to the village head. But I am yet to receive any money. My application has been pending for a long time.*"[*]

*Transcribed and translated version of the original audio recording.

> "*I haven't received any money under PM Kisan scheme. I had filled forms and submitted to lekhpal 1.5 years ago. I have also gone to the Vikas Bhawan. Data checks have revealed some problem in my bank details.*"[*]

*Transcribed and translated version of the original audio recording.

Failure of Benefit Crediting as a Source of Exclusion in DBT:

As seen in Figure 12, the most recurring source of exclusion in DBT schemes in our sample was benefit processing[17], i.e., failure of crediting beneficiary accounts with the said cash transfer. 84% of the total DBT complaints pertained to exclusion in the *Benefit Processing (E3)* stage. The predominance of this issue is quite understandable, given the general level of opaqueness associated with the processing of DBT amounts in the back-end. These failures may result from either issues that may have emerged during enrolment/record digitisation stage or when the payment file is generated in Public Financial Management System (PFMS) before being pushed via the National Payment Corporation of India (NPCI) switch. Most DBT transactions rely on the digital infrastructure of the Aadhaar Payment Bridge[18] (APB) and are routed using the Aadhaar-enabled Payment System (AePS). AePS allows a bank customer to use Aadhaar as an identity to access their Aadhaar-linked bank account and perform functions like balance enquiry, cash deposit, and cash withdrawal. The system is a crucial element in ensuring the last-mile delivery of cash-based welfare entitlements under the DBT framework.[xxvii]

A thorough taxonomy of failure reasons in DBT revealed through a Right to Information (RTI)[xxviii] filed by an independent researcher in 2019 and our own data scraping of the PM Kisan website provide interesting insights into the functioning of the back-end. Interviews with the volunteers also revealed a similar pattern of failures. Aadhaar seeding in the NPCI mapper, as well as closing/freezing of bank accounts, seem to be persistent issues despite notifications by the Ministry of Finance to that effect. In many instances, beneficiary accounts are closed/blocked by banks without notice for too few transactions having been done by the beneficiary. In some cases, incorrect or lack of Aadhaar linkage with the bank account/pending KYC may lead to credit failure. Sometimes, there might be issues in Aadhaar details itself such as wrong spellings of beneficiary names that lead to rejection in the DBT back-end. At the outset, these reasons all seem to be easily rectifiable. One may assume that beneficiaries can simply walk into their bank branch or an Aadhaar Seva Kendra and get the due corrections made. However, this would be an unrealistic expectation, one that incorrectly assumes that welfare beneficiaries will be able to diagnose the

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[17] We identify recordings as pertaining to backend processing issues if the caller, an enrolled beneficiary, indicates they missed a payment that was due to them or are yet to receive any payments despite being successfully enrolled.
[18] Aadhaar Payment Bridge (APB) is a payment system implemented by NPCI, which uses Aadhaar number as a central key for electronically channelising government benefits and subsidies in the Aadhaar Enabled Bank Accounts (AEBA) of the intended beneficiaries.

problem independently, and once diagnosed, they will be able to navigate the digitised architecture that has been put in place.

> "*My mother's widow pension has not been received. We applied in October 2019, application was accepted in November, but the pension amount has not been credited.*"[*]

[*]Transcribed and translated version of the original audio recording.

> "*I have not received PM Kisan money for past 5 months. I used to get Rs. 2000 previously. I also gave Aadhaar copy to the village head 5 months ago to fix the problem. But nothing has happened.*"[*]

[*]Transcribed and translated version of the original audio recording.

The aforesaid excerpts from the sample indicate a recurring issue in unpacking the back-end mechanisms of DBT entitlements. In most cases, the beneficiary is either unaware about the reason for credit failure or is still engaged in the process of resolution, despite knowing the reason. Even the search costs associated with problem diagnosis of failed DBT transactions are high. Most beneficiaries run from pillar to post to ascertain the nature of the error and then in resolving it. Since investigating the various reasons for failed transactions for each relevant audio recording in our dataset was not possible due to paucity of time and resources, we used a critical case sampling approach to select beneficiaries for deep-dive case studies in exclusion that can be found here.

As seen in Figure 15, the highest number of complaints pertaining to 'Failure of Benefit Crediting' or E3 belonged to Tamil Nadu State Welfare Board DBT transfers. This is mostly because Gram Vaani's Tamil Nadu team worked closely with trade unions in several districts who facilitated enrolment of people into the welfare board to avail cash transfer benefits. The second highest number of complaints under E3 belong to pension schemes.
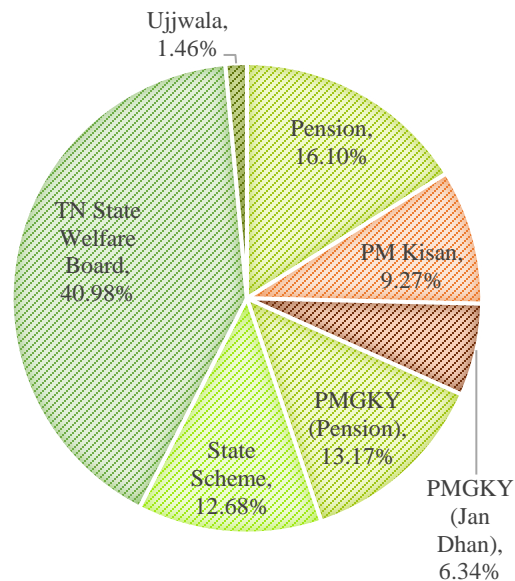
Figure 15: Scheme-Wise Exclusion (DBT Failure of Benefit Crediting)

The highest number of complaints pertaining to 'Failure of Benefit Crediting' or E3 belonged to Tamil Nadu State Welfare Board DBT transfers.

> "*I am a construction worker. Everyone in construction workers union got Rs.1000, but I didn't get it. They have got the money from the Welfare Board.*"*

*Transcribed and translated version of the original audio recording.

> "*I am a buffalo farmer. I am not getting any widow pension. The local officials do not listen to my complaints.*"*

*Transcribed and translated version of the original audio recording.

<u>Cash Withdrawal as a Source of Exclusion in DBT</u>:

The last process in the delivery of DBT benefits is the withdrawal of cash by the beneficiary. This process requires access to cash-out infrastructure, including bank branches, ATMs, Business Correspondents, etc. and includes the modalities used by the beneficiary to withdraw money. In our sample, only 3.6% of the complaints pertained to issues related to cash-out infrastructure, be it their accessibility, operational issues or instances of overcharging.[19] Even out of these complaints, most of them belong to the months of April and May 2020 (Figure 18), wherein people were unable to step out of their homes to access cash-out points or experienced overcrowding after having reached such points, due to the COVID-19 induced lockdown. The proportion of complaints gradually decline in the period July-November 2020.

Notwithstanding the operational issues that COVID-19 lockdowns brought about, cash-out issues have been posing challenges for welfare beneficiaries for long. Despite various efforts towards financial inclusion, beneficiaries from rural areas continue to incur disproportional costs (in terms of both money and time) in accessing banking points.[20] Even when easily accessible, they are vulnerable to overcharging or fraud. We came across several such cases in our interviews with the volunteers. One such case was that of CSP operators visiting homes of PM Kisan beneficiaries, taking their thumb-prints but only disbursing a part of the instalment due to them. Another case involved a CSP operator embezzling around Rs. 1 lakh from an MGNREGA worker who had received the said amount from his relatives[xxix].

Temporal Progression of Key Exclusionary Factors in DBT (*March-November 2020*)

The announcement of the COVID-19 lockdown was followed by the announcement of the PMGKY relief package by the Ministry of Finance. Given that most relief measures announced under this scheme were ex-gratia or frontloaded transfers relying upon pre-existing DBT schemes, there was a clear surge in audio calls related to crediting of beneficiary accounts.

 Almost 55% of the total DBT audio clips recorded belonged to the '*Failure of Benefit Crediting*' category for the period of March to June 2020 (the stipulated period for transfers of PMGKY DBT

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[19] The percentage breakup of sub-categories in cash-out issues has not been provided due to very few recordings under each sub-category. Please refer to the section on Project Limitations for more details.

[20] A recent study by LibTech India, titled, Length of the Last Mile, finds that MGNREGA workers spend a considerable amount of time and money in accessing banking infrastructure across the surveyed states.

entitlements). This number fell to almost 29% for the period July-November 2020, corresponding to the fall in the number of calls pertaining to PMGKY transfers (see Figure 16).

Complaints pertaining to this exclusion point peaked during the month of April – the first month of PMGKY scheme, indicating a high number of citizens reporting failure of benefit receipt (Figure 17).
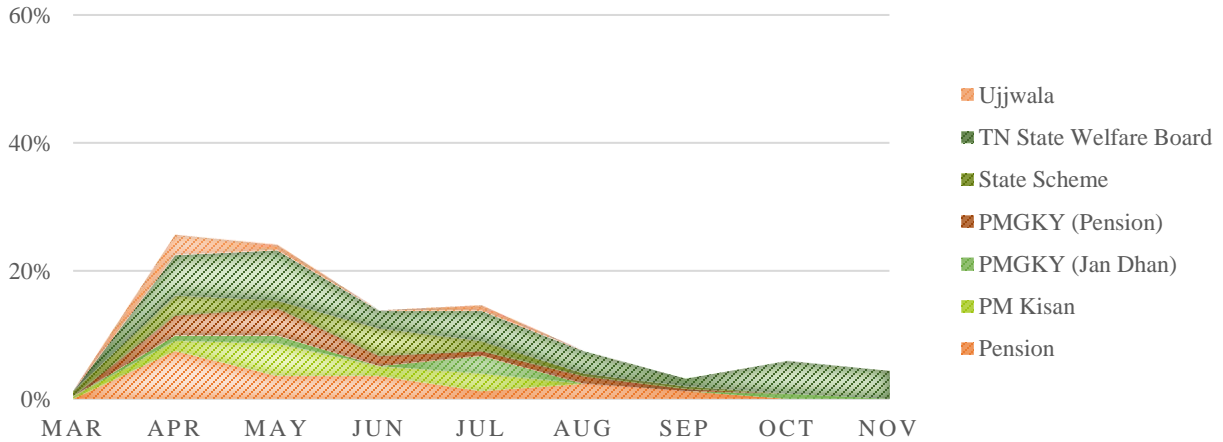
Figure 16: Scheme-Wise Temporal Progression of DBT Complaints

Complaints of exclusion in PMGKY (Pension) peaked in June.
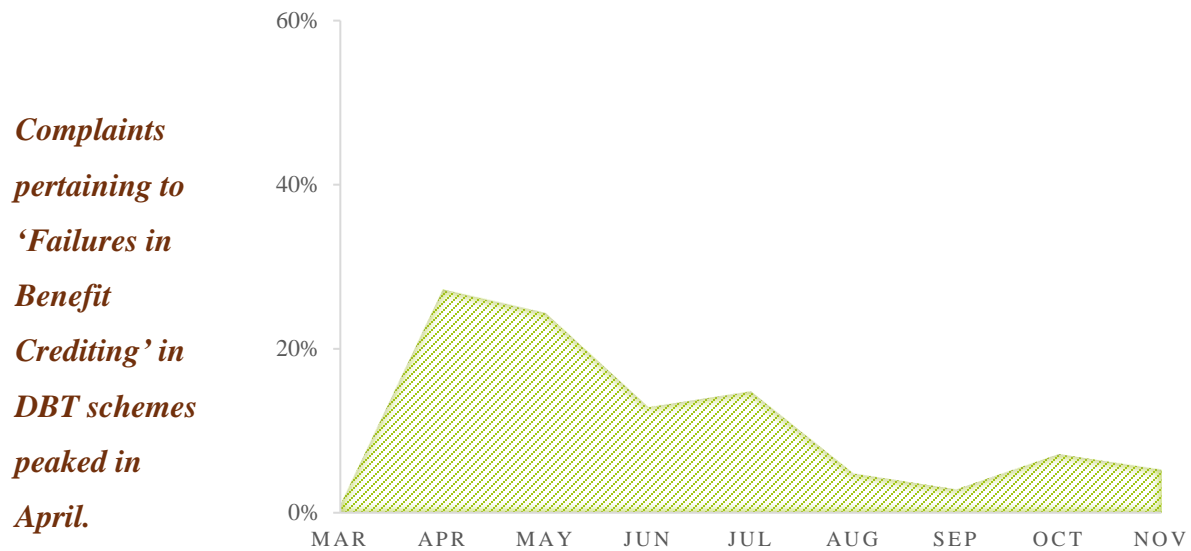
Complaints pertaining to 'Failures in Benefit Crediting' in DBT schemes peaked in April.

Figure 17: Temporal Progression (Failure of Benefit Crediting)

Complaints pertaining to enrolment as a point of exclusion peaked during the month of June – the last month of PMGKY scheme (Figure 18). June 2020 was also the period during which many migrant workers returned from cities to their villages after the shutdown of establishments and places of employment during the lockdown. The corresponding loss of livelihood caused by the lockdown may also explain the increase in the number of citizens looking to enrol for cash transfers.
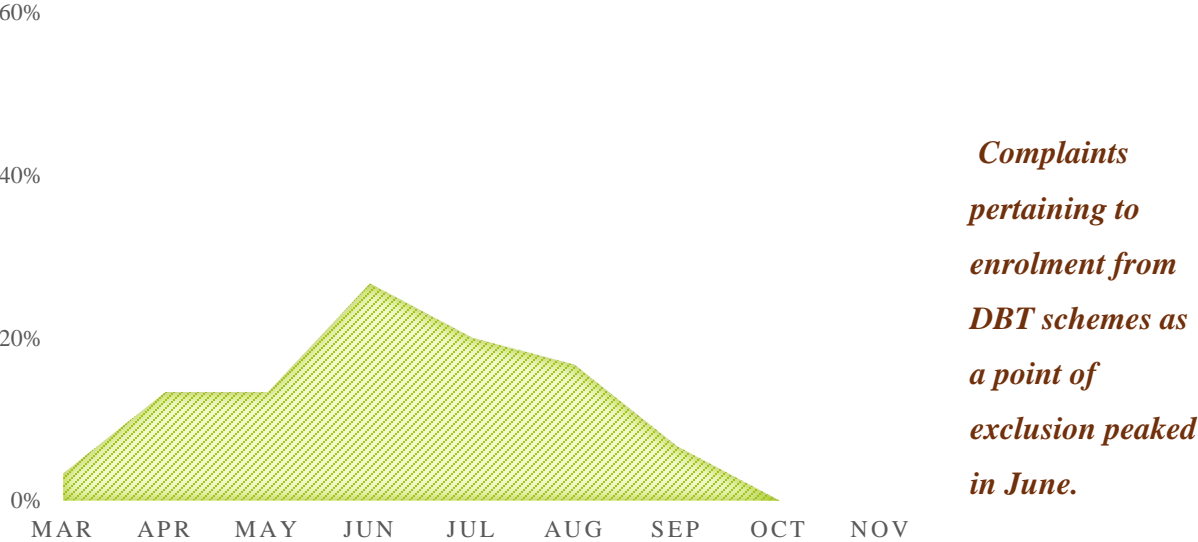
Complaints pertaining to enrolment from DBT schemes as a point of exclusion peaked in June.

Figure 18: Temporal Progression (DBT Enrolment)

Complaints pertaining to cash withdrawal as a point of exclusion peaked during the month of May 2020, followed by April (Figure 19). Both months correspond to the imposition of the COVID-19 induced national lockdown, which explains the decrease in accessibility to cash-out points or operational issues such as overcrowding, time-consumption, etc.

Most exclusions at the cash withdrawal stage for DBT calls occur in May.

60%

40%

20%

0%

MAR   APR   MAY   JUL   AUG   SEP   OCT   NOV
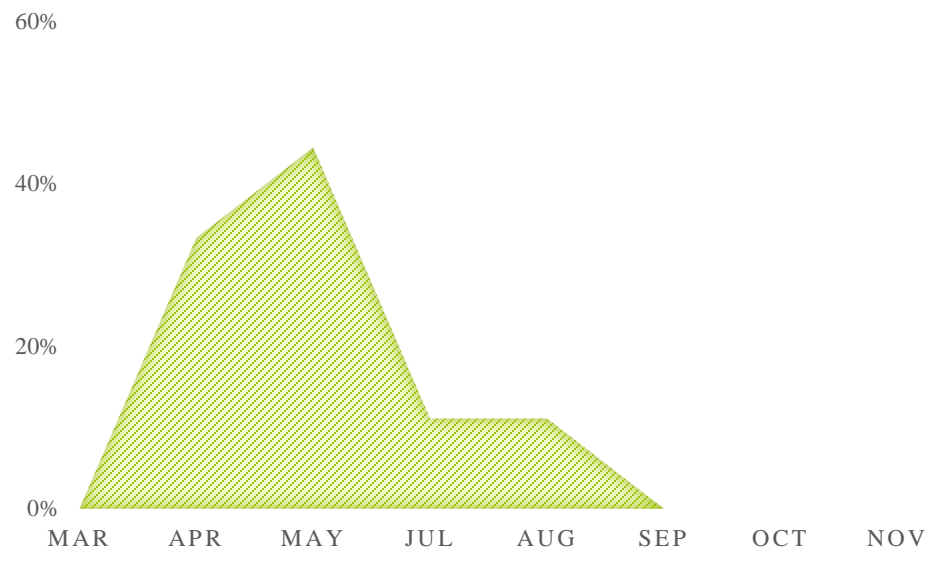
Figure 19: Temporal Progression (DBT Cash Withdrawal)

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2.5.3 Typology of Exclusion (MGNREGA)

MGNREGA is a monumental welfare intervention in both size and spirit, being rights-based, demand driven, and citizen-centric. The programme was designed with the objective to provide a means of income smoothing for beneficiaries through a universal and rights-based approach, upholding the dignity of its workers and being inclusive of the oft-ignored informal sector.

However, issues in the implementation of processes under MGNREGA continue to undermine the objectives of the programme. Delays in wage processing,[xxx] difficulty in finding work, corruption and petty graft,[xxxi,xxxii] and possible collusion among different public and quasi-public actors are some of the many prevalent issues in MGNREGA.[xxxiii] In recent years, the requirement of Aadhaar-linking has also caused complications for wage-seekers[xxxiv]. Both scholarship[xxxv,xxxvi,xxxvii] and advocacy efforts around these issues have been quite expansive[xxxviii,xxxix,xl]. It is against this backdrop that we have designed an exclusion framework (see Table 6) that will help us consolidate the diverse issues under various stage of the MGNREGA process flow. The following section provides the sources of exclusion most prevalent in MGNREGA for our sample.

Table 6: MGNREGA Exclusion Framework

Stage \ Scheme	Pre-Entry Stage (E1)	Entry Stage (E2)	Benefit Processing (E3)		Endpoint (E4)
MGNREGA	Not Applicable*	Job Card Application Processing	Work Allocation	Not Allotted Work	Availability of Access Points
				Ad Hoc, Limited Days	
			Wage Payment Processing	Unpaid/Partially Paid	Operational Issues
				Unaware of Payment Date/Delay	Overcharging

Under the Mahatma Gandhi Rural Employment Guarantee Act, any person who is above the age of 18 and resides in rural areas is entitled to apply for work.

Recapitulating the MGNREGA exclusion framework, the *Entry* stage (E2) includes obtaining a job card as well as raising demand for work. The next set of processes, after successful enrolment, include, allotment of work and wage payment. These two processes are classified under *Benefit*

Processing (E3). The final *Endpoint (E4)* of the scheme pertains to the citizen's attempts to obtain their wages as cash in hand.
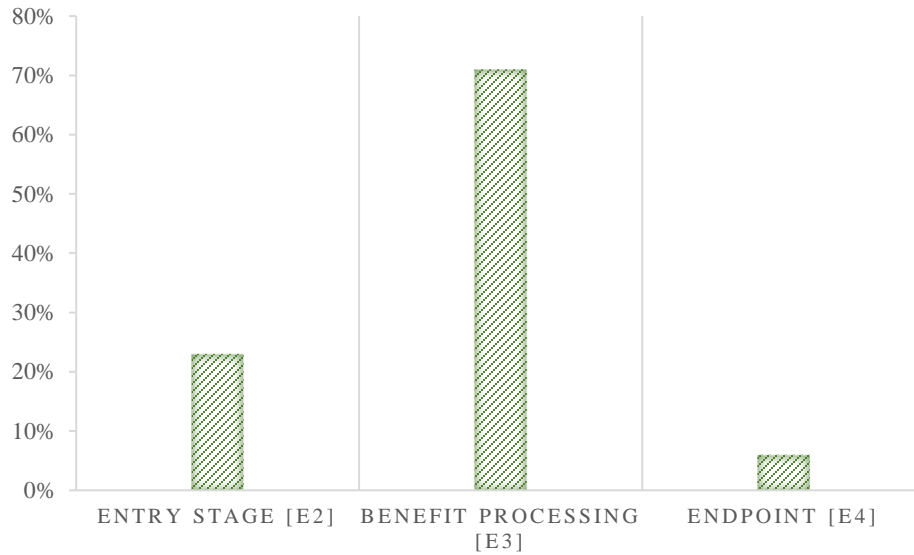
Figure 20: Sources of Exclusion in MGNREGA

71% of all MGNREGA exclusionary complaints are due to issues in Benefit Processing.

Entry Stage as a Source of Exclusion in MGNREGA

In about 23% of all the MGNREGA-related exclusion complaints, the issue reported by beneficiaries pertains to the entry-stage of the scheme. This includes the inability to obtain a job card due to various reasons. Those who have applied for job cards may not have received them yet due to procedural delays. Perhaps the point of enrolment (usually the Gram Pradhan) has failed to (or refused to) process an application for a job card.

The pendency of applications reflects the typical bureaucratic delays that characterise opaque welfare programmes.

> "*I am a migrant labourer. I returned to my home village in May. The lekhpal and pradhan took my Aadhaar and Bank details, saying that my job card will be made, but that did not happen.*"*

*Transcribed and translated version of the original audio recording.

The insights gleaned from our interviews with Gram Vaani volunteers provide a better understanding of the nature of exclusion that may occur at this stage. In Uttar Pradesh, volunteers have seen instances wherein the Village Head (who is the primary point of enrolment) would only provide job cards to those who voted for him in the past elections, excluding all others.

Benefit Processing as a Source of Exclusion in MGNREGA:

As Figure 20 demonstrates, exclusion in MGNREGA most often occurs at the *Benefit Processing* stage (E3). For this scheme, E3 comprises two primary components: issues in *Work Allocation* and *Wage Payment Processing*. Under the former, we consider two forms of exclusion: work not allotted at all, or the allotted work is ad-hoc and temporary in nature. 71% of all MGNREGA-related complaints are exclusions at this stage (E3).

Figure 21 displays more detail, illustrating the two forms of exclusion within E3. Both see nearly equal representation, with 42% of the complaints under E3 pertaining to processing of wage payments, and 57% pertaining to issues in work allocation. *Work Allocation* and *Wage Payment Processing* respectively can be divided into further sub-categories (Figure 22). Within the first, '*Not being Allotted Work*' is the most prominent point of exclusion, while in '*Wage Payment Processing*', '*Unpaid/Partially Paid*' is the predominant exclusionary factor.[21]

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[21] In our methodology we differentiate between 'Unpaid/Partially Paid' and 'Unaware of Payment Date/Delay'. When the caller states that they have not been paid, the recording is categorised under 'Unpaid/Partially Paid' while recordings in which the caller has approached some local official who confirm that the payment is delayed, are categorised under 'Unaware of Payment Date/Delay'.

Figure 21: Exclusion during MGNREGA Benefit Processing
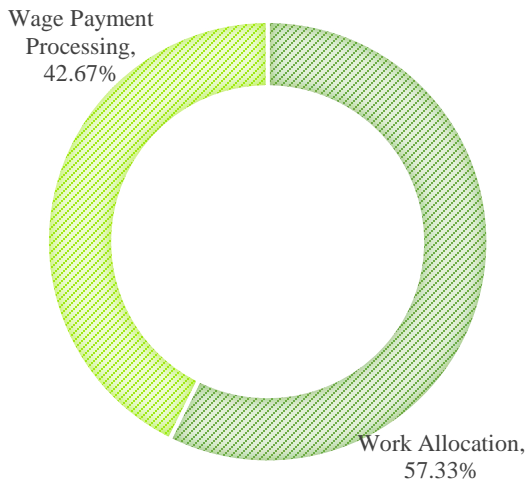
Amongst MGNREGA exclusions at E3, nearly 60% pertain to work allocation, while 44% pertain to wage payment processing.

Figure 22: Exclusion in Work Allocation and Wage Payment Processing
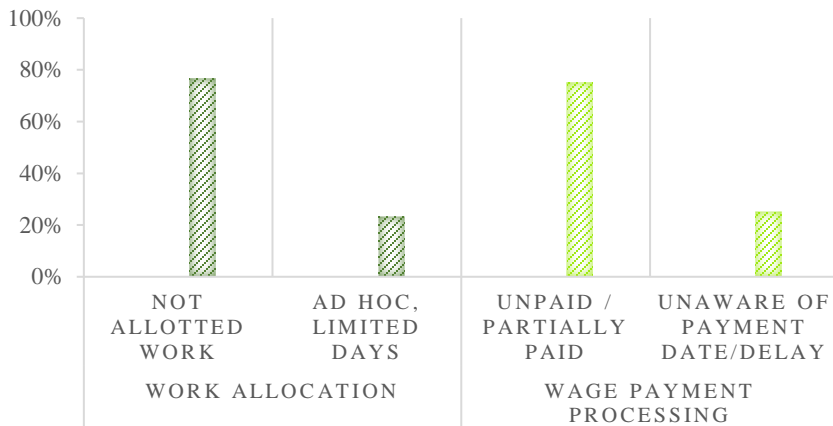
Workers not being allotted any work is the most prominent exclusion within 'Work Allocation'.

Workers not being paid at all is the most concerning issue withing 'Wage Payment Processing'.

About 77% of all *Work Allocation* issues are instances wherein jobseekers have not been allotted any work at all. While the persistence of exclusion at the stage of work allotment may be attributed to the suspension of MGNREGA work during the lockdown (as some callers explicitly mention having been told), it must be noted that even under normal circumstances, getting work allotted has proven difficult for beneficiaries. According to the MGNREGA Operational Guidelines, Gram Pradhan plays the key role in work allotment, though the Project Officer may also have some say

in the process. With no strict oversight mechanism in place to ensure accountability of these local government functionaries, exclusion continues to happen at this stage. The interviews also reflected a general reluctance to take the required effort to allot work to citizens. A stakeholder interview with Panchayat Officials reveals their opinion that people seek job cards, but do not express much of an interest to work due to the low wages and delays in payment.

> "*I have a job card, but I don't get work under MGNREGA. Once the Gram Rozgar Sahayak phoned me and told me to bring the job card to avail work. It has been one month since that happened, and I still do not have work. The Rozgar Diwas also does not happen regularly.*"*

*Transcribed and translated version of the original audio recording.

The other aspect of exclusion at the *Work Allocation* stage is when jobseekers are only allotted limited days of work, as opposed to the 90 days guaranteed under the Act, or to the days of work demanded by the jobseeker. Such ad hoc allocations of days of work undermine the effectiveness of MGNREGA in supplementing wage income of rural workers. About 23% of all exclusions at the *Work Allocation* stage pertained to such issues.

> "*I was given 50-70 days of work in a year under MGNREGA which is insufficient. 100 days of work would be better. My job card was made 2-4 years ago. In the lockdown period, I have been allotted only 15 days of work, which is insufficient to support my family.*"*

*Transcribed and translated version of the original audio recording.

Note here that citizens may complain of not being allotted work, even in instances where they have failed to raise an official demand for work. That is, the reason for exclusion may not be a supply-side issue of non-provision of work, but a demand-side problem of improper requesting of work instead. As per the MGNREGA guidelines, a jobseeker must raise an official and written demand seeking work. Since MGNREGA is a demand driven program, this aspect of work allocation is particularly important. Indeed, volunteers inform us that citizens are often unaware of this formal requirement, and often request work in a verbal and informal manner. Our stakeholder interviews with a *Gram Rozgar Sahayak* and Village Head confirm that most citizens approach them at the worksite verbally requesting work. They go on to say that they do process such requests as per the

prescribed format. Despite this, it is not difficult to imagine instances wherein individuals may be turned away after simply a verbal request.

The other form of exclusion within *Benefit Processing* has to do with how MGNREGA wages are processed and transferred to the beneficiary. In 75% of the total cases under *Wage Payment Processing*, the worker is unpaid or partially paid, whereas in 25% of the cases, the worker experiences an undue delay in payment, or has no knowledge of when the payment might reach them. In call cases pertaining to non-payment of wages, many of them are synonymous to the ones described in E3 stage exclusion of DBT. This is because MGNREGA wages are delivered using the DBT architecture.

An interesting insight from the volunteer interviews is about how local systems have adapted to possible delays in wage payments. Volunteers from Madhya Pradesh detail that in their region, there is a mutually agreeable, trust-based understanding between the Village Head (an elected official) and those who work under MGNREGA. When payments get delayed, the Village Head pays the wages to workers out-of-pocket, and are paid back when wages are credited to workers. While this situation denotes how local systems can positively adapt to systemic limitations, it also exposes the vulnerability of workers who have to depend on such informal mechanisms for their livelihood. A similar situation could turn sour if the same arrangement required workers to pay hefty interests when they return the money or approached local moneylenders instead of a public official.

> "*I am a migrant labourer, I returned to my home village in a train arranged by the government. Now I am unemployed. I did 2-3 days of work under MGNREGA, but I have not received the pay.*"[*]

[*]Transcribed and translated version of the original audio recording.

> "*I have a job card and have been doing MGNREGA work for the past 15 days. Our wages not being paid. I am being told that the money will be paid, but each time I check it hasn't been credited. I still work and wait for the pay, what else can I do? I even spoke to the Gram Rozgar Sahayak who said that in 2-4 days the money will be paid. I don't know when it will come.*"[*]

[*]Transcribed and translated version of the original audio recording.

<u>Endpoint or Cash Withdrawal as a Source of Exclusion in MGNREGA</u>:

The final stage of MGNREGA includes attempts to access wages transferred to the beneficiaries. Complaints highlighting exclusion at this stage, although least in number under all MGNREGA complaints, highlight the paucity of basic cash-out infrastructure in the last-mile. Many beneficiaries fail to receive an SMS about crediting of wages into their accounts and are compelled to travel long distances to check their account balance. Even when accessible, they might face operational issues in the form of PoS device or network failures, resulting in them returning empty-handed.

> "*I have a job card, but it is with the mukhya. I have worked under MGNREGA for about 4 days, the money was given by the mukhya as cash in hand, not in my bank account. The wage amount was about Rs. 250.*"*

*Transcribed and translated version of the original audio recording.

> "*I am yet to receive my MGNREGA wages. The bank manager tells me money hasn't been credited to my account. However, the pradhan says that the issue has been resolved and payments have been made to all labourers.* "*

*Transcribed and translated version of the original audio recording.

> "*Those who work in MGNREGA don't get money. Those who don't work get money in their banks. I worked 8, and 9 days in MGNREGA at two different locations. The pradhan said money will come in bank account. When I went to check with the records officer, he started asking for money.* "*

*Transcribed and translated version of the original audio recording.

Temporal Progression of MGNREGA Complaints

Our dataset reflects that MGNREGA-related complaints of exclusion spiked in June (Figure 23), the same month in which 43.7 million households were reported to have sought work, the highest demand in a seven-year period[xli].
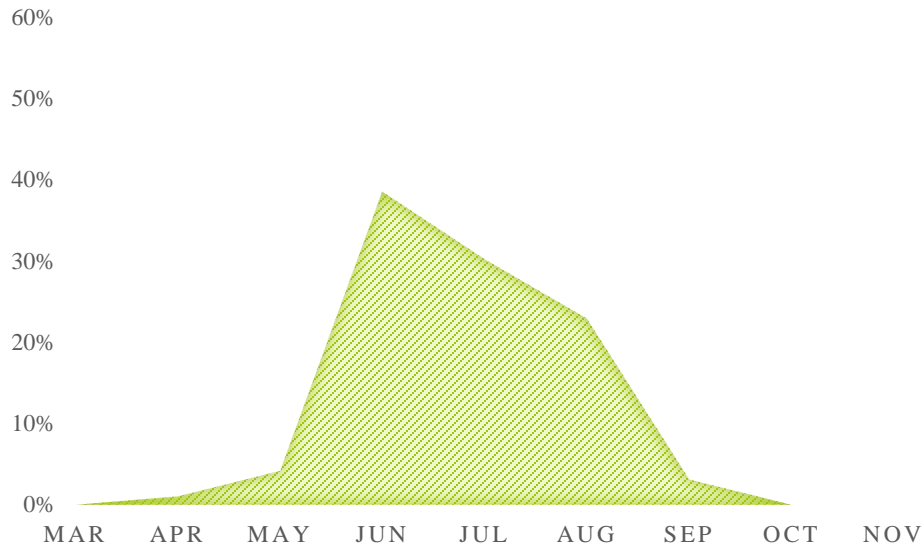
Figure 23: Temporal Progression of MGNREGA Complaints

MGNREGA-related complaints of exclusion spiked in June.

2.5.4   Typology of Exclusion (PDS)

The Public Distribution System is a key component of India's social protection architecture. It ensures access to subsidised grains across the country and is crucial to the stability of many poor households. The ex-gratia PDS in-kind transfers were one of the flagship components of PMGKY, under which free 5 kilograms of food grain (rice or wheat) per person and 1 kilogram of pulses per household was announced for households holding a 'priority' ration card or Antyodaya Anna Yojana ration card under the National Food Security Act (NFSA).[xlii] Various state governments also announced in-kind relief measures which acted as 'top-ups' over and above existing entitlements to ration cardholders[xliii]. For example, the Bihar state government announced cash transfers of Rs. 1000[xliv] and provided one month of free ration to ration cardholders.

Despite the mounting importance of the PDS, there is compelling evidence that the PDS is exclusionary in nature. Economists Jean Dreze and Reetika Khera estimate that over 100 million Indians are left out of the system as the government uses 2011 Census data to calculate coverage under NFSA[xlv]. Instances of leakages in the system at the last mile of delivery, pilfering and diversion to open markets by underselling to beneficiaries have been well documented in various

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studies.[22] The delivery architecture under PDS has recently been computerised from end-to-end, with the objective of reducing such leakages in the supply chain[xlvi]. However, infrastructural limitations such as server issues, network-connectivity issues and power outages are common occurrences which complicate food grain delivery. This is in-addition to the legacy issues related to non-compliance by FPS Officers. This section explores the exclusionary factors that emerged from the complaints in our sample using the 'PDS exclusion framework' detailed below.

Table 7: PDS Exclusion Framework

Stage / Scheme	Pre-Entry Stage (E1)	Entry Stage (E2)		Benefit Processing (E3)[23]	Endpoint (E4)		
PDS	Targeting Methodology and Eligibility Rules*	Documentation Requirements		Supply Chain Issues	Accessibility	Distance	
						Crowding	
						Erratic Hours	
		Application Processing		AePDS Back-end	Authentication Failures	POS Device Error	
						Biometric	
						Network Error	
		Details in Ration Card	Addition/Deletion of Family Members		Non-Compliance	Overcharging	
			Name/Spelling/Minor Errors			Quantity Fraud	
						Discretionary Denial	

Given the high number of complaints pertaining to ex-gratia PDS transfers under PMGKY in our sample, our analysis differentiates between two types of complaints: those pertaining to such ex-gratia transfers[24] and those pertaining to the usual monthly PDS entitlements. The differences in

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[22] See Overbeck, D. (2016), Gulati, A. and Swaini, S. (2015), and Dreze, J. and Khera, R. (2011).

[23] For our PDS analysis, the lack of evidence for exclusions originating from *Benefit Processing (E3)* does not necessarily indicate that the back-end processes in the system are well-functioning. Given the nature of these backend issues, beneficiaries are less likely to identify and cite them as sources of exclusion.

[24] In cases where the caller does not explicitly refer to the COVID-19 in-kind relief measures, we identify recordings about the same from indications the caller expects free allotments of grain/pulses. While this assumption may not divulge perfect results, it ensures consistency in our data.

the sources of exclusion across these two categories demonstrates how exclusionary factors present in long-standing programmes can spillover into relief measures when emergency situations arise.

Within the sample, there is an even distribution of calls pertaining to the monthly PDS entitlements well as COVID-19 PDS ex-gratia transfers. The fact that there are as many complaints regarding a temporary relief measure spanning a few months as there are complaints regarding the long-standing PDS system is a striking concern. It re-affirms what we know about many of the temporary efforts taken to support families severely impacted by the lockdown – they were often fragmented and did not always reach the citizen[xlvii]. The following section analyses the differences in exclusion in both these types of interventions.
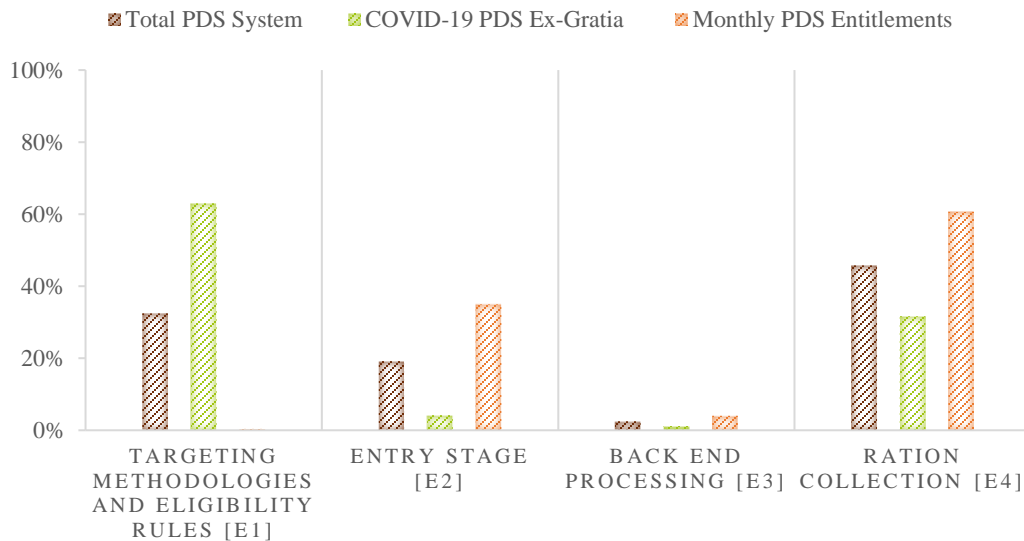
Figure 24: Comparing Sources of Exclusion
(COVID-19 PDS Ex-Gratia Transfers vs. Monthly PDS)

60% of all complaints pertaining to COVID-19 ex-gratia in-kind transfers are about exclusion at the Pre-Entry (E1) stage. 60% of all exclusions from monthly PDS entitlements pertain to Ration Collection (E4).

Targeting Methodologies and Eligibility Rules as a Source of Exclusion in PDS:

Figure 24 shows us that nearly 60% of all complaints pertaining to COVID-19 ex-gratia in-kind transfers are about exclusion at the *Pre-Entry (E1)* stage. This is because many of the in-kind relief announcements (Centre or State) were targeted at only those already onboarded into the PDS,

excluding citizens who required in-kind assistance only because they did not have a ration card[xlviii]. Given the extent of financial distress caused by the pandemic, a broader targeting strategy should have been used to identify recipients of these emergency measures. Many complaints involved callers explicitly questioning as to why they were ineligible for in-kind assistance from the government despite being in need.

Another issue that could lead to exclusion at *Pre-Entry (E2)* is that of list-based targeting. Often, the eligibility of households to obtain ration cards is determined by lists compiled from surveys which can sometimes be outdated. Households who are newly eligible may not find their details on the said lists, and hence may be unable to access benefits through the PDS. For instance, volunteers in Uttar Pradesh say that the upper limit on the number of ration cards allowed for the region is determined by the SECC survey that was conducted in 2011, and that more cannot be issued as required due to NFSA quotas that are based on outdated population estimates from 2011.

While such targeting issues do not arise in large number within our dataset for the monthly PDS entitlements, there are some relevant cases, as the quotes below demonstrate.

> "*The lockdown has made life very difficult for us. I have lost my job and do not have any money to support my family. I don't have a ration card. The government has announced that those with ration card will receive free ration, what about the rest of us? How will we support our families?* "*

*Transcribed and translated version of the original audio recording.

> "*Ration cards have not been issued in my village for 20 years nor have surveys happened in that time. The village head is unresponsive to our issues.*"*

*Transcribed and translated version of the original audio recording.

Entry Stage as a Source of Exclusion in PDS:

Entry Stage (E2) of the PDS forms another exclusionary layer. Approximately 20% of all PDS complaints highlighted issues during this stage. These issues include either the inability to meet documentation requirements for enrolment, problems with ration card details, or pendency of ration card applications. Figure 25 provides a snapshot of these issues for both the monthly PDS

entitlements as well as COVID-19 ex-gratia PDS transfers together. It indicates that many people who, although eligible under PDS, are unable to procure for themselves or their family members a ration card, and hence cannot access their entitlements. The exclusion at enrolment stage can be a contributing factor for the exclusion that happened at the pre-entry stage of COVID-19 ex-gratia PDS transfers. Multiple other sources also confirm that such undue delays in obtaining ration card are common across the country[xlix,l].

Within the Entry Stage, most problems pertain to Application Processing (81%) for the Total PDS System.
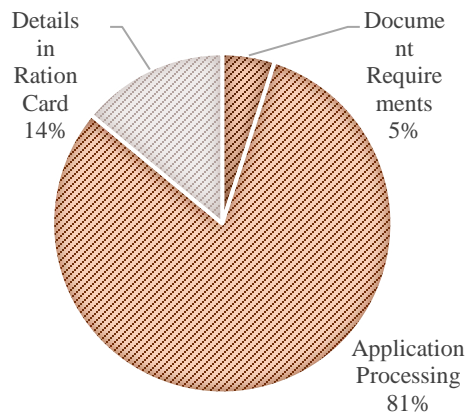
Figure 25: Details within Sources of Exclusion at Entry Stage (Total PDS System)

Figure 25 shows that within the Entry Stage, most problems pertain to *Application Processing* (81%) wherein an individual may have submitted the requisite documents and forms but has not obtained the ration card itself for reasons unknown. This might occur due to typical procedural delays by government departments or application rejection, the latter not being communicated to applicants awaiting a response. Our conversations with volunteers delineate some specific cases where issues have arisen during the *Application Processing* stage, which contributes greatly to our understanding of local contexts.

For instance, our interviews with volunteers from Bihar tell us that during the COVID-19 crisis, existing applications were processed but new ones were stalled. This would have resulted in the exclusion of individuals who newly found themselves requiring food assistance during the crisis. The Sub-Divisional Officer (SDO) of Samastipur, Bihar confirms that many applications made in 2013 for PHH cards were only processed in 2020, due to the government's focus on de-duplicating

beneficiaries and applications during the time.[25] Volunteers from Tamil Nadu also confirm that delays in issue of ration cards are common, though the government has fixed a time limit for passing orders on applications for new ration card as 60 days from the date of application[li].

Another interesting insight comes through from the volunteer interviews, again pertaining to the issuance of ration cards. Volunteers in Bihar inform us that since there is a limit on the amount of grain disbursed by the Centre to the State, the Supply Officer or Marketing Officer cannot create additional ration cards as may be required (since there may be a shortfall of grain). Correspondingly, the Food and Consumer Protection Minister of Bihar had requested an additional 75,000 metric tons of grain for 3 million new ration card beneficiaries after the state Census was updated.[lii] This implies that the creation of ration cards is determined by the supply of grain, rather than the actual demand for ration cards. This issue may be prevalent in other states as well.

In Uttar Pradesh, one reason for the delayed processing of ration card applications is specific to when the application is made online. After an online application, proof of the application has to be submitted to the FPS Officer, who would then collate all such proofs and submit at the block level for digital verification. While delays may occur at any of the collation/verification stages, they may also arise when citizens are simply unaware that the simple process of online application requires the additional steps of physical submission. We explore such a case in one of the case studies published[liii]. Volunteers in Uttar Pradesh have also confronted cases wherein the FPS Officer demands a bribe at the time of application acceptance.

Like other schemes, these delays are symptomatic of general opaqueness in the welfare system that makes it difficult for citizens to navigate it. There is no way to obtain information about why an application is not processed, and no effective official mechanisms to put pressure on local access points such as the FPS or the village head to expedite the same.

> *"I am a store owner, struggling in the lockdown for food and money as my shop is closed. I have filled the application form for ration card many times but have never received it despite being eligible for it. I have even told the Block Development Officer about this issue."* *

*Transcribed and translated version of the original audio recording.

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[25] Insights from Stakeholder Interview conducted in December 2020 with the Sub-Divisional Officer (SDO) of Samastipur, Bihar.

The second highest number of complaints (14%) at the *Entry* Stage pertain to issues related to ration card details and their updating (see Figure 25). Often, after a marriage or death, the family ration card must be updated to accommodate a new family member/delete one who has passed away. Issues in not being able to do so can lead to the family receiving an incorrect number of units of ration as per their entitlement.

> "*Only 2 of 4 family member names are on the ration card. All 4 members' Aadhaar cards have been submitted earlier but to no effect. I have approached the pradhan in the past and was told it will be done in 10 days, 1 month etc. But nothing happened and I am unable to add the additional two names.*"*

*Transcribed and translated version of the original audio recording.

Details in Ration Card can be further broken down into two categories: *Addition/Deletion of Family Members* and *Name/Spelling Errors*. We did not find sufficient evidence in our dataset to comment further on these two categories. However, through volunteer interviews we were able to determine that though there are standardised procedures for dealing with addition/deletion of names from a ration card, the submitted forms remain pending with the department for years together and are not prioritised. They also speak to the lack of awareness amongst citizens about how to edit their *Details in Ration Card*.

The third component under the *Entry Stage (E2)* pertains to exclusion caused due to inability to meet documentation requirements. About 5% of all E2 complaints belong to this category. Since PDS requires beneficiaries to prove their eligibility before being able to avail benefits, issues sometimes arise when documents are unavailable to citizens, or they are made to run from pillar to post to obtain various papers and signatures before successful enrolment.

> "*It's been 4 years since i got married. I don't have a ration card. Due to lockdown we are not getting any help for food. We are struggling a lot as we don't have ration card we are getting any facility. For the last 4 years we are applying for ration card in collector office and taluk office. We didn't get any response. They are asking us to get something or the other. They are not helping us. Monthly we are checking online. It's getting cancelled every time. They are asking to change the certificates and keep asking for different documents but not helping us. I have a kid. I am struggling for milk and food. Please help.*"*

*Transcribed and translated version of the original audio recording.

Ration Collection as a Source of Exclusion in PDS:

Ration Collection in PDS forms the *Endpoint* stage of the PDS delivery chain. At this stage, beneficiaries may face various issues including the very accessibility of FPS', authentication failures, and potential non-compliance by FPS officers. Such issues at ration collection exist whether a beneficiary is accessing ex-gratia grain or their regular PDS entitlements. Approximately 32% of all complaints pertaining to ex-gratia transfers and 60% of complaints pertaining to regular PDS entitlements are regarding ration collection issues. Both combined, approximately 46% of all PDS calls pertained to exclusion at the ration collection stage. Figure 26 breaks down the various exclusionary factors that are at play during this stage. Non-compliance is a considerable problem during ration collection with almost 93% of E4 calls belonging to this category. *Non-compliance* can be further disaggregated into issues such as *Overcharging*, *Discretionary Denial*, and *Quantity Fraud*.

Non-Compliance is a considerable problem during ration collection with almost 93% of E4 calls belonging to this category.
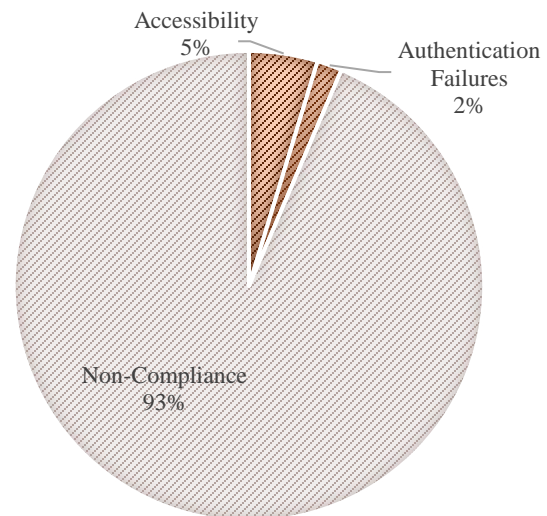
Figure 26: Exclusion during Ration Collection
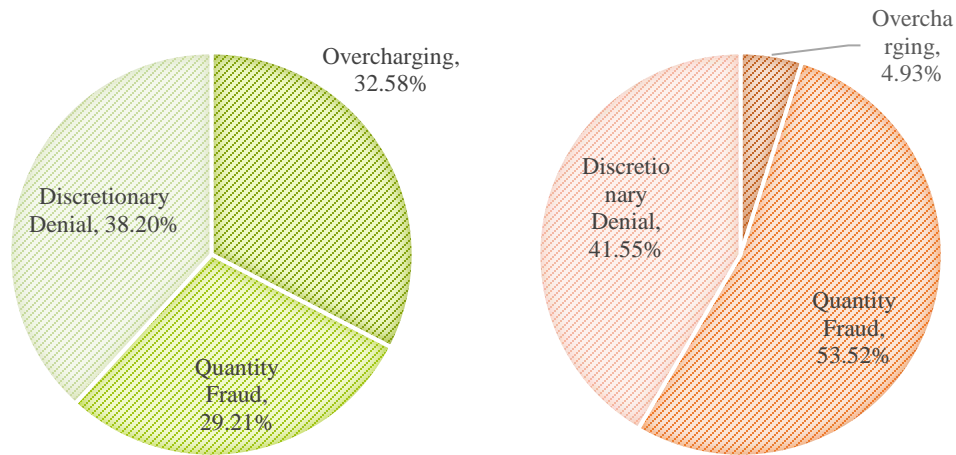
Figure 27 & 28: Exclusion under Non-Compliance

(COVID-19 PDS Ex-Gratia Transfers vs. Monthly PDS)

Discretionary Denial and Quantity Fraud are prominent problems at the Ration Collection stage.

Figures 27 and 2830 show that *Overcharging* is a concern for the in-kind ex-gratia transfers that were disbursed under PMGKY post the pandemic outbreak (and less of a concern for monthly entitlements). Overcharging in the context of the COVID-19 ex-gratia announcements highlights instances wherein the citizen was required to pay in order to obtain grain that should have been distributed for free (as per the announcements under PMGKY and other state-specific announcements as well). It also indicates that crisis situations such as these also provide opportunities for rent-seeking to local functionaries, in the absence of robust delivery mechanisms. It is worrying that citizens were unable to access their free ration without paying for it and indicates the considerable influence local FPS officers continue to exert over the effectiveness of such relief measures.

> "*The government has promised 3 months of ration for free, but it hasn't been distributed for free. My father had to pay for it.*"*

*Transcribed and translated version of the original audio recording.

The issue of *Discretionary Denial* is common to both sections of our PDS analysis, comprising 38 percent of all COVID-19 PDS ex-gratia problems, and 42% of all Monthly PDS entitlement problems. Discretionary denial of ration to citizens indicates that people are stopped from accessing their ration simply because access point functionaries do not function in a proper manner, and choose if, when, and to whom they distribute ration. These allegations are particularly worrying as it indicates that even if every other aspect of the PDS is well-functioning, last-mile delivery is a difficult problem to resolve for policymakers.

Our volunteer interviews show that the issue of *Discretionary Denial* for the COVID-19 PDS ex-gratia benefit surfaced in a problematic manner. While across states, there seemed to be a lack of awareness pertaining to the details of the transfer, FPS officers in Uttar Pradesh would provide deliberately misleading information to beneficiaries. Volunteers state that the FPS officers did not want citizens to be aware of their rights, as it would only imply a greater amount of work for them.

> "*We are not getting free ration that is due to us, the dealer has not distributed anything. We want to know when we will get it.*"*

*Transcribed and translated version of the original audio recording.

> "*The local kotedar is being abusive to citizens. He forces the red card holders away without giving them ration. He threatens that he is related to an MLA so no action can be taken against him. A complaint has been filled on CM portal to no avail. There is huge irregularity in kotedar distributing ration. In 2018, the entire village's ration for the month of May was lost and the kotedar said it had to be donated to a temple. Neither the SDM nor SDO paid heed to our complaints.*"*

*Transcribed and translated version of the original audio recording.

The final component under *Non-Compliance* is *Quantity Fraud.*[26] This category includes instance wherein an FPS officer provides fewer units of ration than a beneficiary is entitled to. It also includes cases wherein some black-marketing of ration has taken place when grains are diverted from PDS to the open market. *Quantity Fraud* comprises 53% of all *Non-Compliance* issues for calls pertaining to the system of monthly entitlements. Even for ex-gratia PDS transfers, nearly

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[26] Our framework also aggregates cases wherein one aspect of entitlements is provided to the citizen, but not others (for instance, wheat but not pulses) under this category.

30% of *Non-Compliance* complaints fall under *Quantity Fraud*. Volunteers inform us that provision of lower units of grain than the individual's entitlement is very common, and that FPS officers often claim that there are supply-side issues.

> ""*We get only 4kg per person as opposed to 5kg, and so 1kg is being cut. We are also being asked to pay for this grain, which is supposed to be free.* ""*

*Transcribed and translated version of the original audio recording.

> ""*There are names of 4 family members on my ration card, but the kotedar gives us ration for only 2 people.* ""*

*Transcribed and translated version of the original audio recording.

Although issues under *Accessibility* and *Authentication Failures* during the Ration Collection stage are present in our sample, they are too few in number to be used for a detailed analysis.

2.6 Key Findings: Distilling Trends in Exclusion

The most prominent source of exclusion that has emerged in the entire sample is the stage of *Benefit Processing* (E3) (see Figure 5). The incidence of high exclusion in this stage is not surprising, given that most of these processes are characterised by a certain degree of opaqueness across schemes. Within the most prominent point of exclusion, *Benefit Processing* (E3) stage, DBT schemes constitute for the highest number of calls - at (approximately) 70% of all E3 complaints. For both the *Entry* (E2) and *Endpoint* (E4) stages, PDS constitutes the highest number of calls, with 46% all E2 and 90% of all E4 complaints belonging to PDS. Such figures reflect the wide relevance of the PDS for the poor.

Trends in DBT Exclusion

1. The most prominent source of exclusion among DBT schemes in our sample is 'Benefit Processing', indicating the high incidence of failure of crediting beneficiary accounts with cash transfers (Figure 12). 84% of the total DBT calls pertained to exclusion in the 'Benefit Processing' stage. The predominance of this issue is quite understandable, given the general level of opaqueness associated with the processing of DBT amounts.

2. The second most prominent source of exclusion in DBT has been the *Enrolment (E2)* stage. 12% of all DBT calls pertain to the same. The highest number of complaints from amongst enrolment-based exclusion calls pertain to the '*Application Processing*' (83%) (see Figure 13).

3. In our sample, only 3.6% of the complaints pertained to issues related to cash-out infrastructure, be it their accessibility, operational issues or instances of overcharging.[27] Although small in proportion, these reflect the need for greater penetration of cash-out infrastructure, financial literacy for citizens to guard against fraud, and grievance reporting avenues to draw attention to these problems.

4. As seen in Figure 14, the highest number of complaints pertaining to enrolment-stage exclusion or E2 belonged to Pension schemes, indicating the relevance of NSAP especially for senior citizens.

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[27] The percentage breakup of sub-categories in cash-out issues has not been provided due to very few recordings under each sub-category.

Trends in MGNREGA Exclusion

1. As Figure 20 demonstrates, exclusion in MGNREGA most often occurs at the *Benefit Processing* stage (E3). 71% of all MGNREGA-related complaints are exclusions at this stage (E3). For this scheme, E3 comprises two primary components: issues in *Work Allocation* and *Wage Payment Processing*.

2. Figure 21 displays in more detail the two forms of exclusion within E3. Both forms see nearly equal representation, with 42.67% of the complaints under E3 pertaining to processing of wage payments, and 57.33% pertaining to issues in work allocation. *Work Allocation* and *Wage Payment Processing* respectively can be divvied up into further sub-categories (Figure 22). Within the first, '*Not being Allotted Work'* is the most prominent point of exclusion, while in Wage Payment Processing, '*Unpaid/Partially Paid'* is the predominant exclusionary factor.

3. About 76.74% of all *Work Allocation* issues are instances wherein jobseekers have been unable to obtain work. While the persistence of exclusion at the stage of work allotment may be attributed to the suspension of MGNREGA work during the lockdown (as some callers explicitly mention having been told), it must be noted that even under normal circumstances, getting work allotted has proven difficult for beneficiaries .

4. The second form of exclusion in the *Benefit Processing stage (E3)* has to do with how MGNREGA wages are processed and transferred to the beneficiary. In 75% of the total cases under Wage Payment Processing, the worker is unpaid or partially paid, whereas in 25% of the cases, the worker experiences an undue delay in payment, or has no knowledge of when the payment might reach them.

5. In 23% of all the MGNREGA-related exclusion complaints, the issue reported by beneficiaries pertains to the entry-stage of the scheme. This includes instances of citizens having been unable to obtain a job card.

Trends in PDS Exclusion

1. Within the sample, there is an even distribution of calls pertaining to the monthly PDS entitlements as well as COVID-19 PDS ex-gratia transfers. The fact that there are as many complaints regarding a temporary relief measure spanning a few months as there are complaints regarding the long-standing PDS system is a striking concern because it indicates that the demand for PDS is quite beyond those who are able to use it.

2. Amongst the COVID-19 ex-gratia complaints, the most concerning source of exclusion is at the *Pre-Entry (E1)* stage (60%) (Figure 27).

3. Approximately 32% of all complaints pertaining to ex-gratia transfers and 60% of complaints pertaining to regular PDS entitlements are regarding ration collection issues. Both combined, approximately 46% of all PDS calls pertained to exclusion at the ration collection stage (Figure 27). *Non-compliance* on part of FPSOs is a considerable problem during ration collection with almost 93% of E4 calls belonging to this category.

4. Figures 27 and 28 show that *Overcharging* is a concern for the in-kind ex-gratia transfers that were disbursed under PMGKY post the pandemic outbreak (and less of a concern for monthly entitlements).

5. The issue of *Discretionary Denial* is common to both sections of our PDS analysis, comprising 38 percent of all COVID-19 PDS ex-gratia problems, and 42% of all Monthly PDS entitlement problems (Figures 27 and 28). Discretionary denial of ration to citizens indicates that people are stopped from accessing their ration simply because access point functionaries do not function in a proper manner, and choose if, when, and to whom they distribute ration.

6. *Entry Stage (E2)* of the PDS forms another exclusionary layer. Approximately 20% of all PDS complaints highlighted issues during this stage (Figure 27). These issues include either the inability to meet documentation requirements for enrolment, problems with ration card details, or pendency of ration card applications.

7. Figure 25 shows that within the *Entry Stage (E2)*, most problems pertain to *Application Processing* (81%) wherein an individual may have submitted the requisite documents and forms but has not obtained the ration card itself for reasons unknown.

8. The second highest number of complaints (13%) at the *Entry Stage (E2)* pertain to issues related to ration card details and their updating (see Figure 25), followed by *Documentation Requirements* (6%).

In Chapter 3, we cover how some of these aforesaid instances of exclusion were resolved by volunteers from Gram Vaani and what insights can those provide to design more inclusive systems.

Annexure 2A: Exclusion from the Employee Provident Fund Scheme

Typology of Exclusionary Factors

The Employer Provident Fund (EPF) is a savings scheme introduced by the Government of India. It functions under the Ministry of Labour and the Employees Provident Fund Organization (EPFO) assists all the Provident Fund (PF) activities. The main purpose is to help the working class, mainly workers in factories/industries to save a little from their earnings. PF not only helps workers to save money for their future as pension, but also helps his/her dependents in the case of early death. PF is an important social security scheme for employees working in the organised sector. It is mandatory that any establishments with over 20 employees must be registered with the EPFO.

EPF is a collective contribution from both employers and employees, where the employee contributes 12% of their monthly earnings and the employer contributes 12% from their end. This employer contribution to an employee's PF is a direct cost to the company, and hence some employers tend to evade their responsibilities of registering their employees in the EPF. This can affect the financial security of employees greatly. During the COVID-19 lockdown, millions of factory employees were left without a penny in their bank account after their employment was suspended. In such a situation, accessing the EPF amount would have been crucial to their financial security.

Exclusion from accessing PF can impact workers in various ways. First of all, the mandatory PF contributions belong to the employee and form a part of their wages. Not being able to access the contributions amounts to not being able to access their full wages. Second, workers further lose the interest accruing on their corpuses. Third, being able to fall back on savings is important for workers to cope with unforeseen circumstances such as unemployment, closure of factory or illness. This is also what happened during the COVID-19 lockdown when loss of jobs meant that many people tried to withdraw their PF amounts.[liv,lv]

To study exclusion from the EPF in a systematic manner, we have developed an exclusion framework (see Table 8).

Table 8: PF Exclusion Framework

Stage / Scheme	Pre-Entry Stage (E1)	Enrolment Procedures (E2)		Benefit Processing (E3)	Withdrawal (E4)	
Provident Fund (PF)	Targeting Methodologies and Eligibility Rules*	Completion of Employee Records	KYC/Basic Details	PF Contribution `by Employer	Fund Withdrawal Issues	Company Closure
			Date of Joining/Exit			
			Transfer			
		Registration Processes	Employer Registration with PF			Company not Cooperating
			Registration of Employee			
			Company Withholding UAN/PF Details			Person not Physically Present

Figure 29: Sources of Exclusion in Provident Fund
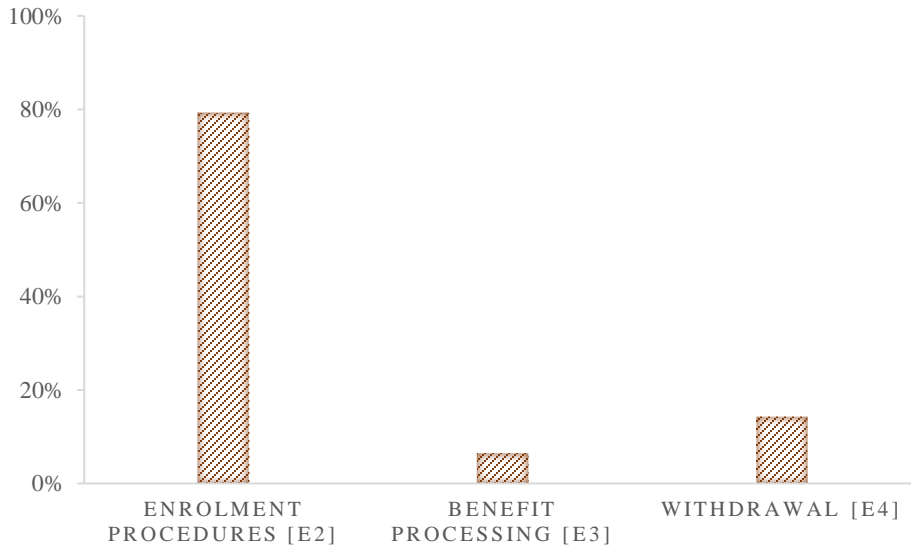
Most exclusions from accessing Provident Fund money occurs at the 'Enrolment Procedures' stage.

Enrolment Procedures as a Source of Exclusion from PF:

From Figure 29, exclusion is most prominent at the *Enrolment Procedures* (E2) stage. Approximately 80% of exclusionary cases in PF represent issues arising during enrolment of an employee into the EPF scheme. Figure 30 clarifies the two components of enrolment: various details related to employee records, and the registration processes involved before an employee is successfully registered under EPF. Clearly, Completion of Employee Records (which comprises 65% of all exclusionary complaints at E2) is the most concerning.
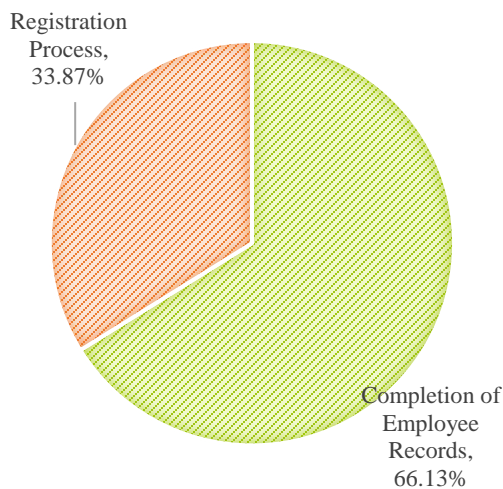
Of all reasons for exclusion from Provident Fund at 'Enrolment', 'Completion of Employee Records' is the most concerning.

Figure 30: Exclusion during Enrolment Procedures

As Table 8 explains, the completion of employee records pertains to the successful completion of an employee's KYC, error-free submission of details (name, address, Aadhaar number, etc.), and accuracy of Date of Joining (DoJ) or Date of Exit (DoE). It also includes certain approvals an employer must make if an employee transfers to a different company. Figure 31 displays the extent to which these issues have persisted in our dataset. 63% of all exclusionary complaints under Completion of Employee Records can be attributed to errors in the *KYC/Basic Details* of an employee. Errors in transfer approvals (20%) and in dates of joining or exit (17%) are less prominent problems.
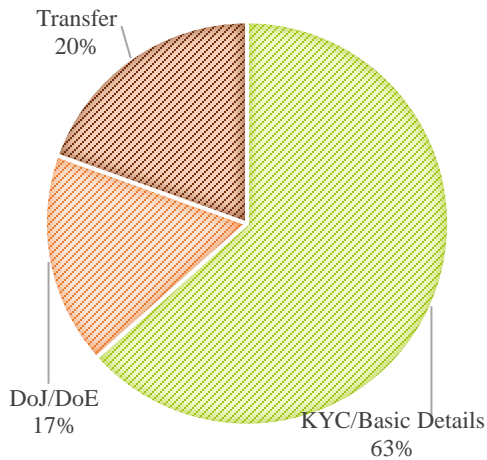
Errors in 'KYC/Basic Details' of employees are most likely to keep them from accessing their PF entitlements.

Figure 31: Exclusion under Completion of
Employee Records

> "*I was working in a company for the past 2 years. I approached the management to claim my PF after quitting, but they did not cooperate. After multiple fruitless visits, a Gram Vaani volunteer helped me visit the nearby browsing center to claim the PF amount online. Upon checking the PF portal, I found that my phone number was not linked with Aadhaar card.*" *

*Transcribed and translated version of the original audio recording.

> "*This caller was working in a mill. When his company insisted he reside in the hostel and work, he quit the company without informing the management. When he later tried to claim his PF through the online PF portal, his Date of Exit had not been updated by the company.*" *

*Transcribed and translated version of the original audio recording.

> "*I first joined X company (name withheld), and then left it to work at Y company (name withheld). I want to close my PF account, but I am unable to. A representative from X company says she cannot help me and I should approach my current employer.*" *

*Transcribed and translated version of the original audio recording.

From our volunteer interviews, we determine that these problems in documentation may arise from either the citizen or the employer. For instance, employees may provide the wrong bank name ('Bank of India' instead of 'State Bank of India') at the time of providing details or provide the name with which they are informally addressed, rather than the official name as per Aadhaar. Employers themselves may commit errors in data entry, even if the submitted details are accurate. Such mismatches which originate at the document submission stage will cause verification errors when the citizen attempts to withdraw their PF money. In order to resolve such issues, the citizen would have to approach the employer to get certain details changed from the company's side. Issues may arise here when the employer refuses to cooperate and may even insist that the individual rejoin the company as an employee before they will make the necessary edits.

Our methodology did not collect enough evidence of exclusion due to errors in *Registration Processes*. Exclusions that are born at this stage can be attributed to a company failing to update their registration with the local PF office or failing to register an employee's application with the PF office. It also entails failures by the employer to provide an employee's UAN number or PF number, which are pre-requisites to claiming the PF benefit. The following transcriptions are examples of exclusions that arise because of procedural complications in registrations.

> "*10 people worked as housekeeping staff for the past 11 years. We were let go by the company and they appointed others for work. When we try to claim our PF money, we are just told it will be given soon. They gave us a number claiming it was the PF number. However, the PF office informed us that it is a fake number. We filed a case with the help of lawyer and sent a notice, but they didn't respond. They deducted Rs.1000 from our monthly salary. We have no proof that says we have worked there, except for our ID cards. We were not given PF bill or pay slips. They said our salary is Rs. 7500 but they gave only Rs.6000 - 6500.*" *

*Transcribed and translated version of the original audio recording.

> *"This individual was working in X spinning mill (name withheld) for 5 years. When she was about to get married, she wanted to withdraw her PF amount. She approached the company, but they did not provide any information. Her PF amount has been deducted regularly from her salary. Her company has not responded to her requests for the UAN number."**

One of the transcriptions above reveals a particularly commonly occurring issue, wherein PF amounts are deducted from monthly pay, but the employers fail to actually deposit the same to the PF Department. Employees may be provided with fake UAN/PF numbers (as has occurred in the case above). When citizens attempt to claim their PF amounts, there would be a mismatch between the name and UAN number provided. Companies also may provide a portion of this deducted wage to the citizen (albeit lower than their entitlement) to appease them.

Benefit Processing as a Source of Exclusion from PF:

The *Benefit Processing (E3)* stage for this scheme is limited to the action of the employer to match the individual's contribution to their provident fund account. Failure to do so properly results in exclusion, especially since the person is under the impression that they have opted for provident fund contributions and a portion of their pay is being withheld for this purpose. These exclusions at E3 may also be due to improper contributions such as the deduction of a lower or higher PF amount. E3 exclusions are particularly problematic as they result in the company directly profiting at the employee's expense. While only 6.3% of our dataset reports exclusions due to problems in the company's contributions, some of the transcriptions below detail such cases.

> *"The caller says that his company used to deduct greater than the requisite PF contribution. He is weary of complaining against the company, out of fear that he may lose his job."**

> *"I have worked in this company for 6 months but the company only deposited PF for 2 months."**

Volunteers in Tamil Nadu have ascertained (through a Right to Information (RTI) request filed in 2020), that many companies across 7 districts of the state pay the provident fund contributions in a highly erratic manner.

Withdrawal as a Source of Exclusion from PF:

Certain issues may arise during the PF claiming process, even if all the preceding steps have been without incident. 14% of exclusionary complaints in PF can be attributed to these problems at the *Withdrawal (E4)* stage. Our framework defines E4 as pertaining to fund withdrawal issues for reasons such as the company not cooperating, the individual being in a different location than the company, and closure of the company. The following cases highlight some of these issues.

> "*I used to work in a company and want to withdraw money from my PF account. However, the company has closed since I left work. Please help me to withdraw, I am struggling during the lockdown.*"*

*Transcribed and translated version of the original audio recording.

> "*This caller was working in an apparel company for three years and PF was deducted as well. She had also claimed half of her PF while working. She is yet to get the remaining half of the PF. She has now shifted to another company. The management of her original employer is asking the caller to re-join them as an employee before they give her the PF amount.*"*

*Transcribed and translated version of the original audio recording.

Volunteers in Tamil Nadu reveal other issues that may occur at the withdrawal stage. For instance, issues arise when a company's name changes. Beneficiaries who attempt to claim their PF amounts under the old name are told that no such company exists. Further, companies sometimes do not cooperate when an employee leaves a company and then tries to access their PF account. That is, the company will wait for 60 days (the maximum number of days within which the company must update employment status) before marking that the individual has left the company. If citizens try to claim their PF benefits in this time frame, they will be told by the PF Department that they are still employed and hence cannot do so.

In conclusion, nearly 80% of the problems that arise in accessing provident fund entitlements arise at the *Enrolment Stage (E2)*, more specifically due to the improper *Completion of Employee Records*. Problems that so arise are usually due to errors in the basic details that workers have submitted to their employers (name, father name, date of birth, bank account number, bank name, etc.) and require approval from the employer before corrections can be made. As we determine from interviews with volunteers, these corrections can potentially be easy (if say, the person's bank KYC must be completed, or Date of Birth in Aadhaar card must be changed). However, they can also be very difficult, when the employer themselves must get involved to make corrections in the details sent to the PF Office. We discuss this in further detail in Chapter 4.

From our qualitative analysis of the dataset, it is worth mentioning that there seems to be a lack of information on part of the employee, and some difficulty in navigating the company's human resources system on their own. There is an inherent imbalance of power between factory workers and their employers, which directly impacts how this aspect of their social protection functions.

3. Resolving Grievances in Social Welfare

3.1 Background

The objective of this project was to learn, not only about the different exclusions that citizens face, but also to identify simple strategies that help resolution of issues for beneficiaries. The centralization of processes and architecture for welfare programs have increased the distance between the state and its beneficiary. The Common Service Center (CSC) model conceptualized under the National E-Governance Plan (NeGP) was introduced with the aim of providing assisted delivery of welfare and other essential services. Due to various factors, the model has not scaled adequately leaving beneficiaries with a need for further assistance. Civil Society Organisations (CSOs) such as Gram Vaani, can play this role of providing assistance to beneficiaries. From the experiences from these volunteers and professionals from other CSOs, it is clear that there is lack of clear apparatus for citizens to seek redressal. These grassroots operators have learnt to navigate the system to seek redress by testing different strategies at a village-level. In this chapter, we document the experiences of volunteers assisting citizens in seeking redress and outline the different pathways for resolution.

The earlier chapter provided a framework to study the factors that lead to exclusion from the welfare schemes studied. With the aggregated database of audio calls collected through IVR system, we constructed a grievance repository which documents the incidence of exclusion across different stages in the welfare delivery process under the existing architecture.

This chapter summarizes the learnings from volunteers and their experiences in helping the beneficiaries resolve their grievances. We develop an Impact Framework (analogous to the previous Chapter's Exclusion Framework) to detail the different pathways for resolution of beneficiary grievances. Volunteers of Gram Vaani regularly reach out to beneficiaries who record their grievances using the IVR facility to help them resolve it. Consequently, these volunteers carefully record their experiences, in the form of an "impact story". These recorded stories elaborating on the different strategies that were employed to resolve these instances of exclusion and the relative success of different strategies in their service area. Each such impact story loosely comprises of the following components: the issue reported by the caller with any additional information obtained since, the actions taken by the volunteer in order to resolve the case, and a

testimony from the citizen that an action has been taken and that their grievance has been resolved. The knowledge acquired in resolving these grievances can help in developing operating protocols for grievance redressal that can be followed by CSOs and government line departments to assist poor and vulnerable populations in accessing welfare. The creation of such repositories of instances of exclusions as well as resolutions, at a local level, serve a two-fold purpose. First, they can help stakeholders learn about the functioning of a system that has so far been characterised with opaqueness. Second, documentation of errors and their resolution pathways will help policymakers make social protection mechanisms work better over iterations. Without these crucial feedback mechanisms, these systems may fail and might become less effective in delivering entitlements to citizens.

3.2 Research Methodology

This chapter provides a description of the various ways in which volunteers from Gram Vaani attempt to resolve grievances of prospective and existing beneficiaries of welfare schemes. We rely on two data sources to identify the key action pathways of the volunteers and proceed to extract insights these may have for grievance redress mechanisms.

1. **Impact Stories Dataset: Understanding Volunteers' Actions**

As the previous chapter delineates, Gram Vaani facilitates the resolution of grievances that citizens report through its IVR facility. Once the volunteer has successfully helped the citizen resolve the issue, they create audio clips, recording the modalities by which resolution was achieved. We tapped into this dataset of impact stories to understand how welfare-related issues are solved. Each such impact story loosely comprises of the following components: the issue reported by the caller with any additional information obtained since, the actions taken by the volunteer in order to resolve the case, and a testimony from the citizen that an action has been taken and that their grievance has been resolved. This dataset provided a clear view regarding how the volunteers functioned when grievances were brought to them. By listening to, and organising these audio clips by the actions taken by volunteers, we were able to create an Impact Framework (analogous to the previous Chapter's Exclusion Framework) that categorized volunteer actions under three broad heads:

- **Information Provision to Citizen** (denoted by *A0* throughout the report)

- **Issue Escalation to Higher Officials** (denoted by *A1* throughout the report)
- **Direct Assistance by Volunteer** (denoted by *A2* throughout the report)
  - Resolution on Citizen Behalf (denoted by *A2a* throughout the report)
  - Interaction with Access Point (denoted by *A2b* throughout the report)

2. **Interviews with Volunteers and Local Government Stakeholders**

A substantial part of our understanding of how citizen grievances are resolved were obtained though deep-dive telephonic interviews of volunteers from each state in a semi-structured format. We followed two key steps in this stage:

Vetting the Impact Framework (*Step 1*): The above framework that was created using audio recordings was vetted by volunteers before we proceeded to Step 2.

Using Decision Trees as an Interview Guide (*Step 2*): We created scheme-specific Decision Trees that guided our questioning during the volunteer interviews. The broad format of the interview entailed documenting actions taken by volunteers and understanding their relative efficacy for localized contexts (for example, volunteer actions to resolve pension scheme issues may vary from state to state). Please refer to Appendix 2 for a sample of one such decision tree and the corresponding interview questionnaire.

A secondary aspect of our research methodology involved deep-dive interviews with government officials responsible for the local administration of the welfare schemes. We used some of our preliminary insights from volunteer interviews and fed them into our interviews with relevant officials.

3.3 Glossary of Action Pathways

Table 10 below describes each of the three action pathways in greater detail. We use this impact framework as a guidepost to arrange the evidence we gather through semi-structured interviews of volunteers, the primary data source for this chapter.

Table 9: Glossary of Action Pathways

INFORMATION PROVISION TO CITIZEN (A0)			
Pathway	**Description**		
A0	The Gram Vaani volunteer identifies that the citizen can resolve their own grievance and equips them with the requisite information to do so.		
ISSUE ESCALATION TO HIGHER OFFICIALS (A1)			
Pathway	**Description**	**Specific Features**	**Description**
A1	The Gram Vaani volunteer escalates the grievance to government officials at a higher tier of scheme administration for grievance redress or problem diagnosis.	Channel of Communication	The channel of communication employed by the Gram Vaani volunteer in contacting the concerned local official: Forwarding of voice reports via the IVR, WhatsApp, Facebook.
		Action Taken by Official	The action taken by the concerned local official to resolve the grievance that has been brought to them.
		Local Advocacy	Letters are written to local officials presenting evidence of largescale community distress, based on surveys and transcripts of voice recordings.
		Strata of Official Involved	Whether the concerned official's jurisdiction is at the village, block or district level.
DIRECT ASSISTANCE BY VOLUNTEER (A2)			
	Pathway	**Description**	**Specific Features**
A2	Resolution on Citizen Behalf (**A2a**)	The Gram Vaani volunteer intervenes directly to resolve the issue on the individual's behalf. This pathway is used mainly in cases where the beneficiary may not be able to navigate grievance redressal methods on their own. For example, the volunteer may update the citizen's details on an online portal for them.	Volunteer Action — The action taken by the volunteer to resolve the grievance for the citizen. For instance, filling of online forms or submission of documents at access point.
	Interaction with Access Point (**A2b**)	In cases where the beneficiary is unable to directly interact with access points (because of social or mobility restrictions), the volunteer does so on the citizen's behalf in order to prompt some response from the access point.	Access Point — The access point with which the volunteer has interacted. For instance, bank branch, Business Correspondent, Fair Price Shop.
			Access Point Action — The action taken by the access point in response to the appeal by volunteer

3.4 Action Pathways for Grievance Redress in Direct Benefit Transfers

In our previous chapter, the exclusion stages were common across the DBT schemes. However, the action pathways used by volunteers to resolve DBT issues vary from one scheme to another. Therefore, this section seeks to bring out the differences between action pathways used for PM Kisan and Pension, the two most prominent DBT schemes in our dataset. Although there are significant overlaps of action pathways for issues that are systemic to the DBT architecture (mostly under Benefit Processing stage) shared by all these schemes, there are certain action pathways that are idiosyncratic to characteristics of a specific DBT scheme.

PM Kisan

PM Kisan (PMK) is a DBT scheme under the Ministry of Agriculture & Farmers' Welfare, Government of India. Under PMK, registered farmers who own small and medium-sized landholdings, receive Rs. 6,000 per annum directly into their bank or Post Office accounts in three instalments spread throughout the year. Although new features such as online self-registration, self-correction of beneficiary records set the scheme apart from most of the other government schemes in place, legacy issues related to bureaucratic delays and process opaqueness continue to cause difficulties for prospective beneficiaries. In this section, we cover how volunteers help citizens navigate the PM Kisan delivery system and what implications those insights have on the design of grievance redress mechanisms in DBT.

PM Kisan is a list-based scheme under which state governments are responsible for identifying eligible beneficiaries based on land records and upload the lists online as well as disseminate them in each village through Panchayats. To enroll into the scheme, prospective beneficiaries are required to submit their documents to local officials such as the Village Registrar, any Revenue or Nodal Officer, who are required to verify the documents, upload the details on the online for approval by the Ministry of Agriculture and Farmers' Welfare. Once the verification is successfully completed at the backend, beneficiary can start receiving the quarterly payments.

Enrolment (E2)

The most frequently used action pathway for PM enrolment (E2) issues is issue escalation (**A1**) to relevant higher officials in the scheme's administrative machinery. In many enrolment-related cases, we also see a mix of two action pathways. As stated above, the village registrar, or the

patwari[28] as he or she is locally called, is usually the first point of access for most enrolment issues, especially in Bihar and MP. For UP, it is usually the *Kisan Salahakar* (Farmer Consultant[29]) who is the first point of access. Broadly, grievance resolution in PM Kisan follows a typical hierarchy. In case the grievance is not resolved through interaction with these local functionaries (**A2b**), the volunteers escalate the issue (**A1**) to the next tier, i.e., to the block level. Failing which, escalation to the district-level is resorted to. In some cases, where even district-level officials are unable/refuse to help the person get enrolled, the citizen is directed to submit a fresh application.

Regarding interaction with officials at the lowest tier, they are usually those who are easily accessible within the village itself (village registrar or farmer consultant). In Madhya Pradesh, we find that there is a special provision in place that camps are supposed to be set up every Monday and Friday by village registrars at the Panchayat level. These camps are meant to facilitate grievance resolution at the local level and provide assisted access to the PM Kisan online portal. However, such a provision is yet to be implemented. Since such simple mechanisms (which if implemented can fundamentally improve beneficiary experience) have not been routinized, volunteers must mediate on behalf of citizens and interact with the village registrar. However, this does not necessarily imply resolution. As stated above, in many cases, the issue is escalated to the block or the district level. This usually happens in two scenarios:

1. Village Registrar/Farmer Consultant is not cooperating or is demanding a bribe to resolve the issue/assist the citizen in enrolment.
2. The correction required is not within the functional capacity of the Village Registrar/ Farmer Consultant.

Village Registrars play a key role in the enrolment process wherein they are required to assess the legitimacy of the application using the land documents submitted by a given citizen. However, lack of agility on their part to complete the verification stalls many applications. The village registrar also forms a crucial point of contact for most citizens. Volunteers in Madhya Pradesh stated that citizens who are unaccustomed to digital interfaces for enrolment, submit applications/raise grievances manually to the registrar. However, many times the village registrars refuse to cooperate or are unwilling to tell people where their applications are stuck[lvi]. Even if they

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[28] In many states, including Uttar Pradesh, the village registrar is locally known as the '*lekhpal*'.
[29] Transliterated phrase.

choose to assist citizens, they demand extra money in many cases (the issue seems to be quite prevalent in Madhya Pradesh). When the amount demanded is relatively low (say Rs.100), citizens find it agreeable given their lack of comfort/familiarity with the alternatives in the form of digitized channels. But volunteers from Madhya Pradesh told us that instances of such petty corruption by village registrars have been increasing in their state since the state government announced a top-up to the existing PM Kisan amount.[30] To deal with such complaints by citizens, the volunteers attempt to have a conversation with the concerned registrar (**A2b**) who obviously denies the claims. In case the demand for extra money continues on part of the registrar even after this, the issue is escalated to the Sub Divisional Magistrate (**A1**) to ensure that the registrar complies.

Volunteers in Uttar Pradesh stated that the farmer consultant (analogous to the village registrar in MP) is responsible to inform the citizens the reason their application under PM Kisan has been delayed. However, the failure of information provision on their part compels people to approach third party intermediaries such as the volunteers themselves who then either talk to the farmer consultant (**A2b**) or escalate the issue to the Block Agricultural Officer (**A1**). In addition to A1 and A2b, we also see instances of information provision (A0) to citizens in these cases, although relatively fewer in number. In the absence of any clear communication (online/written/verbal) by the various governmental departments and local functionaries, many citizens raise complaints stating that they haven't received money, when in fact, the enrolment process is itself yet to be completed. Having seen many such cases, the volunteers have now started teaching the modalities of checking one's status online to many citizens. This may not directly solve the issue, but it equips the citizen with enough information to approach the right type of access point for grievance redress (government departments in case of eligibility issues, banks or Aadhaar Seva Kendras in case of Aadhaar seeding or spelling issues respectively, etc.).

For the second scenario (*the correction required is not within the functional capacity of the Village Registrar/ Farmer Consultant*), we see that issues or corrections related to bank account linkage, back-end validation checks of applicants usually remain unresolved even after interacting with these local officials. The main reason, notwithstanding the lack of cooperation or the rent-seeking

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[30] In September 2020, due to the economic distress caused by the COVID-19 outbreak, the Madhya Pradesh state government announced an additional benefit of Rs. 4,000 per annum over and above Rs. 6,000 that are provided annually by the Central Government under PM Kisan.

described above, is that many of these issues require actions that are not within the official powers and duties of village-level government officials such as the registrar or the consultant. We covered one such case in detail through an in-depth interview of a beneficiary whose PM Kisan record had somebody else's bank account number. Despite resubmission of Aadhaar and bank passbook copy at three different levels (village, block, and district) to rectify the error, he remained excluded from the system because none of the officials he visited could validate the correction in the MIS, an action that only the state government has the authority to execute.[lvii]. In many cases, these officials (given the top-down nature of the scheme) may not even know the reason for application pendency. Such a fragmentation of such functions leads to citizens running from one government department or bank branch to another. This is where volunteers assist citizens – in escalating the issue to the relevant department or in enquiring with the Block Agriculture Officer (BAO) about the exact reason for enrolment failure **(A1)**.

In sum, we see that the hierarchy of action pathways (A2b followed by A1) for resolving enrolment issues in PM Kisan is common across different states.

Benefit Processing (E3)

Exclusion at the *Benefit Processing* stage is the most common form of exclusion in PM Kisan as seen in Chapter 1. This includes instances wherein registered beneficiaries have either not received any instalments or their instalments have been stopped without any prior notice. There are wide-ranging reasons for such failures. These may include incorrect bank account details, frozen/blocked bank accounts, issues with Aadhaar seeding on National Payment Corporation of India's mapper[31], spelling/data-entry errors in Aadhaar details, etc. We see that the most frequently used action pathway to rectify such issues for PM Kisan is *Resolution on Citizen Behalf (A2a)*, followed by *Issue Escalation (A1)*. Like enrolment issues, we find that action pathways of volunteers may follow a hierarchy, although rudimentarily:

- The volunteers first check beneficiary status online, ascertain the nature of the issue, and try resolving it through action pathway A2a. These may include correction of beneficiary

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[31] For more details, refer to Appendix 1.

details online (by volunteers themselves), filing an application at the relevant bank branch[32] or at the BAO or District Agriculture Officer (DAO) on behalf of the citizen. It must be noted that application filing at BAO was seen mostly in Bihar where PM Kisan payment mode is 'Account' and not 'Aadhaar'. In case someone's account number is wrong (a common issue), an application must be filed at the BAO for correction, which then leads to the clearance of the payment. However, this amount is released to the beneficiary only in the next cycle of transfers that the government initiates and this amount does not include any arrears of payments the beneficiary may have missed because of the payment mode issue.

- In some cases, checking beneficiary status online may not be enough, as the reasons for transaction failure on the portal are not granular. It sometimes may even be as vague as 'Payment stopped by state on request of districts'. For many such cases, the exact reason for delay/rejection of payment can only be checked at the block level **(A1)**. Once this is information is obtained, volunteers can proceed with any of the aforesaid actions described under the previous point. In Ghazipur district of UP, volunteers stated that they we have built a rapport with relevant PM Kisan officials at the block level. Whenever there is a problem, volunteers directly take it to the computer operator in the BAO, who corrects/adds the information (Aadhaar number, bank account details etc.) required.

- In some cases, resolution on citizen behalf might not suffice due to three reasons:
  - For some issues, especially those related to bank accounts, A2a or solving the problem on behalf of the citizen might not be possible – bank procedures mandate that only the said beneficiary can get the changes made. In these cases, volunteers may simply choose to accompany the beneficiary to the bank branch, help them navigate the system, and to interact with bank officials to explain the issue **(A2b)**.
  - There might be beneficiary details that cannot get corrected online. For such issues, issue escalation **(A1)** as an action pathway is needed. Issues might be escalated to block or district-level officials depending on their nature. In a few instances in

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[32] This can be done for cases in which the beneficiary account has been frozen due to lack of account activity/fewer number of transactions. Please note that this is a deviation from the Ministry of Finance notification that can be found here.

Chhindwara district of MP, volunteers stated that they have also used Twitter/WhatsApp for issue escalation.

- o Resolution on citizen behalf **(A2a)** might be rendered ineffective if there is lack of clarity about whom the volunteers (on behalf of the citizens) should approach for resolution in the first place, or if certain access points are not functioning properly. In one instance, a beneficiary from Uttar Pradesh has had to make multiple visits to the bank branch for resolving a seeding issue. However, bank officials always turn him away saying that there is no linkage issue. Volunteers stated that the main issue is that his Aadhaar card itself does not work, an issue that pertains to UIDAI. But volunteers stated that Uttar Pradesh has very few Aadhaar Seva Kendras, which makes it difficult to resolve such issues. Since the COVID-19 outbreak, even these few centres have not been working at full capacity for prevention of infection through biometric equipment.

Cash Withdrawal (E4)

As discussed in Chapter 1, even when beneficiaries successfully get enrolled and receive the amount into their bank account, they may face challenges in withdrawing it. We saw a spike in many cash-out issues during the COVID-19 lockdowns when not only general public services were adversely affected but overcrowding at banking points was reported in many parts of the country. In addition to providing stop-gap solutions to prevent overcrowding during this period, the volunteers have also assisted welfare beneficiaries in accessing their entitlements at cash-out points. The most prominent pathway for cash-out problems is *Issue Escalation (A1).* This is mostly because most cash-out issues pertain to fraudulent activities occurring at Customer Service Points (CSPs), a common problem faced by many DBT beneficiaries. In such cases, volunteers escalate the issue and bring it to the notice of officials at the principal bank branch. In Uttar Pradesh, in some cases, voice recordings of aggrieved beneficiaries are forwarded to them. In Madhya Pradesh, volunteers aired many such stories on their Mobile Vaani platform. One such news story was on CSP operators who were visiting homes of PM Kisan beneficiaries, taking their thumb prints but only disbursing a part of the instalment due to them. This broadcasted story caught the attention of the District Collector who in turn warned the operators in the district to immediately discontinue the practice or else face strict action. Volunteers from Madhya Pradesh also stated that CSPs run by public sector banks or rural regional banks functional relatively better as compared

to CSPs run by private contracted parties because the former are monitored well and are accountable to the bank managers directly. In Uttar Pradesh, volunteers have also written letters to the District Magistrate (DM) regarding issues related to cash-out. In one such instance, the letter and the resultant response of the DM led to the bank sending CSP operators house-to-house to make payments. In some of these resolved cases, CSP operators have also returned the money to the beneficiaries.

In addition to issue escalation, in a few cases, we find that volunteers also directly interact with CSP operators **(A2b)** and apply pressure tactics to ensure they comply. These include tactics such as giving warnings of filing a police complaint or issue escalation to principal bank branch the agent/CSP operator reports to. In cases where bank managers have been found to indulge in fraudulent activities, volunteers in Uttar Pradesh have, although rarely, filed complaints with the Regional Manager or filed a complaint on the bank's online portal. One of the last resorts is to escalate even some cash-out issues to BAO, or DM, the latter having the authority to take up action/investigation for any department or scheme **(A1)**.

The following flowchart summarises the sequence of action pathways that volunteers used:
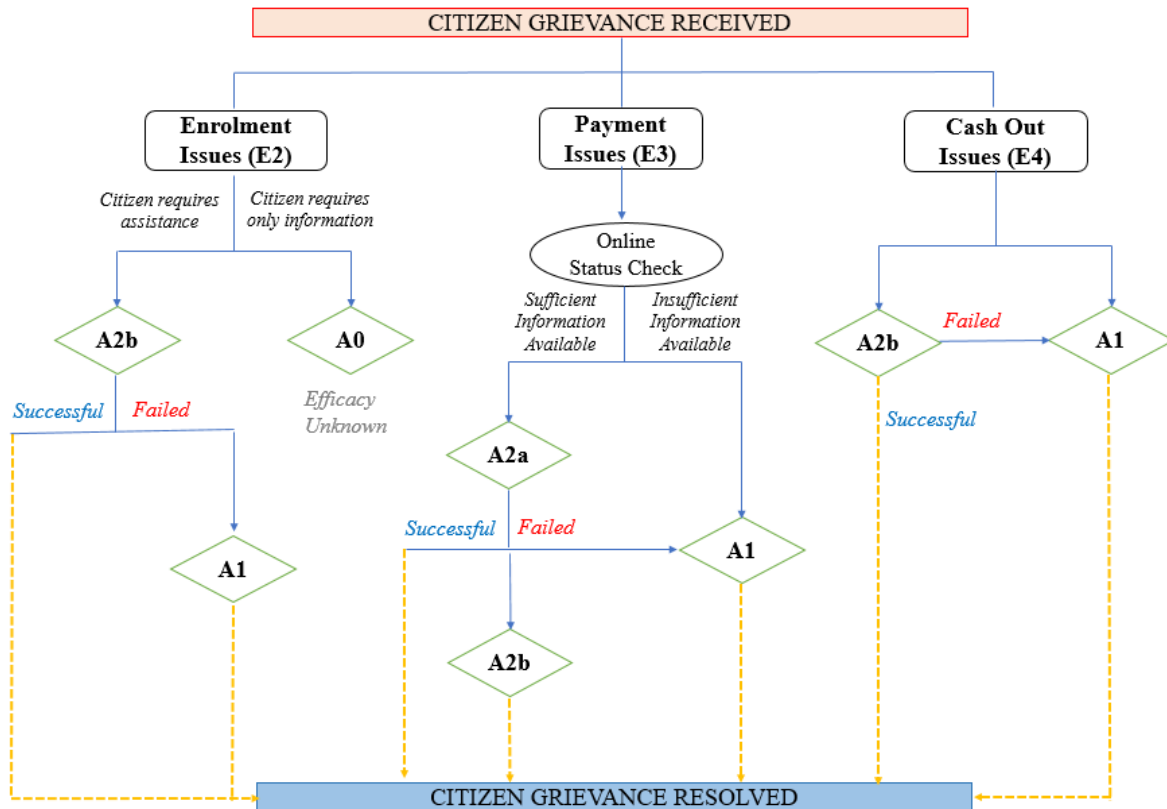
Figure 32: Flowchart of Action Pathways (PM Kisan)

Legend for Action Pathways

A0	Relevant information is provided to citizen to enable self-resolution
A1	Issue is escalated to higher officials
A2a	Direct intervention on citizen behalf through form filling/complaint filing, etc.
A2b	Negotiation/Interaction with Local Access Points

Pension Schemes

The flagship government social pension programme is the National Social Assistance Programme, a Centrally Sponsored Scheme[33] that provides monthly financial assistance to the elderly, widows, and persons with disabilities. Many state governments have their own social pension schemes for vulnerable groups, some of which had been started even before the Central Government pension schemes. This has led to a wide variance in guidelines, eligibility conditions and assistance norms among different states/UTs[lviii]. The plurality of the pension schemes, both within NSAP[34], and across states also made it difficult for us to ascertain the exact pension sub-scheme that was being referred to by citizens.[35] Therefore, this section discusses the Pension scheme as one encompassing all the constituent sub-schemes and state government schemes.

Enrolment (E2)

Pension application forms can be submitted at multiple enrolments across states, including the local panchayat office. In Bihar, pension applications can be submitted at the Right to Public Service (RTPS) centres. Most cases related to pendency of pension applications are resolved through issue escalation to the BDO **(A1)**. In Bihar, issues related to difficulty in tracking application (especially when filed at the RTPS centre) are resolved by escalating the case to the relevant department where the volunteers try to understand the reasons for pendency and help citizens accordingly.

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[33] Centrally Sponsored Schemes (CSS) are schemes that are implemented by state governments of India but are largely funded by the Central Government with a defined State Government share.

[34] There are five sub-schemes within NSAP: Indira Gandhi National Old Age Pension Scheme, Indira Gandhi National Widow Pension Scheme, Indira Gandhi National Disability Pension Scheme, National Family Benefit Scheme, and Annapurna Scheme.

[35] In most cases, both citizens and volunteers made a broad reference to 'pension' as an all-encompassing scheme rather than mentioning the name of the specific sub-scheme.

One of the most common issues that volunteers help citizens resolve during enrolment into pension schemes is incorrect age details. Many pension applications are rejected when the age on the Aadhaar card and the application form they submit do not match. Many people are unaware of their exact age and may have provided a rough estimate of it during Aadhaar enrolment.[36] Such a practice by citizens results in different documents showing different dates of birth. For these cases, volunteers suggest the citizens to get their Aadhaar details corrected **(A0)** and if they feel a given citizen requires assistance (especially old persons) they get the correction done on their behalf **(A2a)**. In Uttar Pradesh, age details on the Aadhaar Card were being corrected at the post office for a brief period in early 2020, and volunteers got them corrected on behalf of around 17-18 people who were in dire need of money but could not get enrolled into a pension scheme. Such corrections can also be done at the Block Development Office (BDO) **(A1)**.

Benefit Processing (E3)

Most benefit processing issues are similar across DBT schemes. They might relate to closing/freezing of bank accounts, Aadhaar seeding, etc. Unlike PM Kisan, action pathways of volunteers for pension schemes seem to differ from one state to another. Bihar, unlike Uttar Pradesh and Madhya Pradesh, has an online interface that allows volunteers to use A2a (i.e. direct intervention on behalf of citizen) as the first step in grievance resolution in most cases (analogous to what we saw for PM Kisan). In Bihar, volunteers' main point of contact is the RTPS centre which can forward request to the relevant government department. Some issues can also be directly solved through the Social Security Pension MIS portal in Bihar by volunteers **(A2a)**. However, for volunteers in UP, the first action pathway is to escalate the issue in the absence of any online portal that allows correction of beneficiary details **(A1)**. They stated that even this process is quite reiterative. Many officials in Uttar Pradesh are not aware of the exact reason for failure of pension transfer to beneficiary accounts and hence are unable to solve it. In such a scenario, volunteers approach other officials who might be able to. This entails some research that volunteers must do to (i) diagnose the reason for transfer failure and (ii) identify the appropriate official who will be able to rectify the problem. This is reflective of the plurality of pension schemes that we discussed previously which results in a system that is not streamlined.

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[36] According to UIDAI, proof of age is not mandatory during Aadhaar enrolment. A valid proof is only required during correction of the date of birth information.

Cash Withdrawal (E4)

Cash withdrawal issues are scheme-agnostic in most cases. Issues and pathways discussed previously for PM Kisan apply to the rest of the DBT schemes. However, one issue that is quite typical to the demand and supply side of pension schemes appears to also affect their beneficiaries disproportionately in the cash-out stage. Unlike PM Kisan, which has a fixed schedule of instalment disbursement (notwithstanding other issues related to benefit processing), crediting of pension amounts seems to be quite erratic in nature. This issue is further exacerbated for the scheme's beneficiary cohort which mostly consists of citizens who have limited mobility, either physical or social or both. Beneficiaries with active phone numbers that are linked to their relevant bank account get an SMS when the amount is transferred while others who are able to visit bank branches may be able to find out whether their pension has come or not. But many beneficiaries continue to be deprived of such a simple type of communication in the cash-out stage. Further, this issue has reportedly worsened after the COVID-19 outbreak, as many banking points did not function during lockdown. Pension beneficiaries found it very challenging to get their passbooks updated during visits to the branch to find out if they had received their PMGKY ex-gratia transfers.
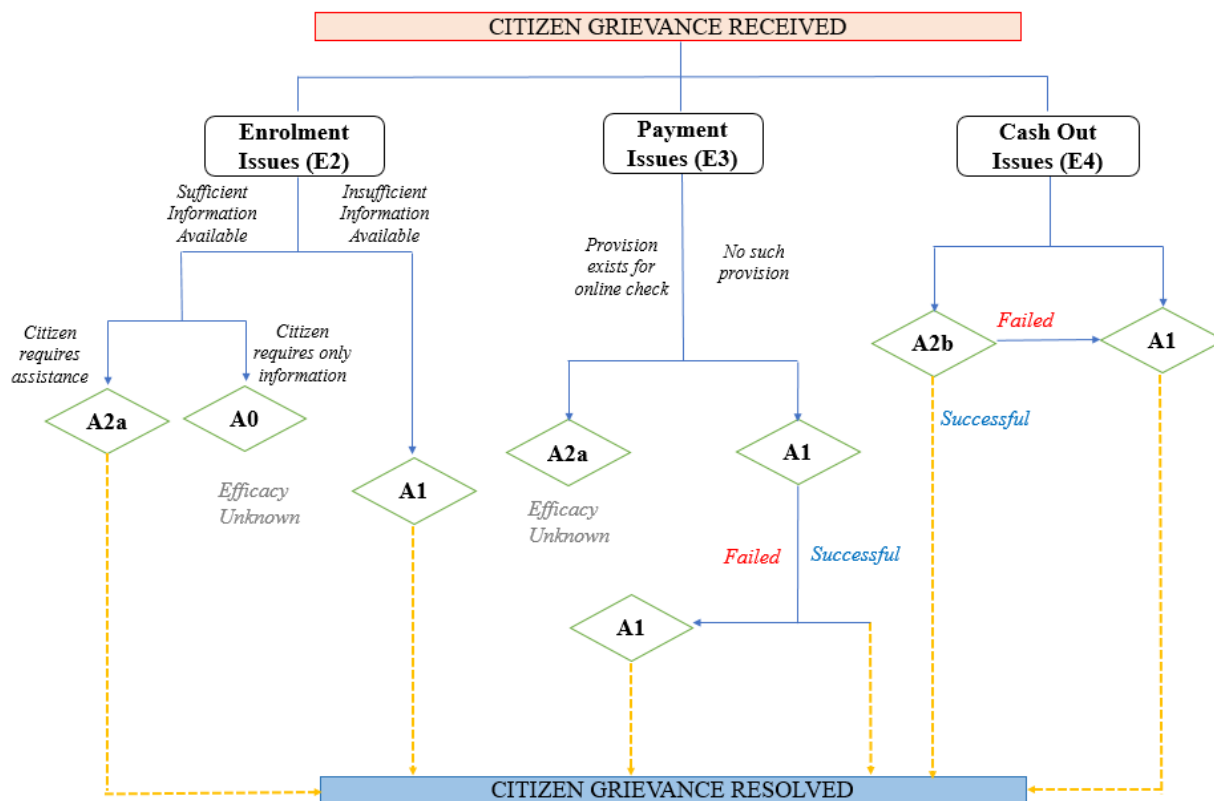
Figure 33: Flowchart of Action Pathways (Pension)

Legend for Action Pathways

A0	Relevant information is provided to citizen to enable self-resolution
A1	Issue is escalated to higher officials
A2a	Direct intervention on citizen behalf through form filling/complaint filing, etc.
A2b	Negotiation/Interaction with Local Access Points

Key Insights

The predominance of issue escalation as an action pathway by volunteers in any given scheme's enrolment process is indicative of a top-down mechanism of scheme implementation. In such a design, most crucial functions are not in the jurisdiction of local-level officials (such as those at the Panchayat-level), who, if not more effective, are usually more accessible to ordinary citizens. For both PM Kisan and Pension schemes, local officials in many cases have struggled to effectively provide redressal to citizens even when they were willing to listen to their issues. Centralised mechanisms of data rectifications also seem to delay the process of grievance resolution, given the

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time it takes to notify higher-level officials and in waiting for them to take suitable action. Even in cases where issues could have been resolved at the local level without escalation **(A1)**, there is a certain degree of local-level bureaucratic inertia/lack of cooperation that impedes grievance redress unless the local functionaries are threatened by the possibility of issue escalation. The latter is reflective of the lack of social accountability in the last mile, a thematic area that has emerged as a key pivot for recent advocacy efforts in welfare.[37] The monitoring deficit in the last mile seems to be a recurring theme across all welfare schemes. For benefit processing stage, which primarily entails issues pertaining to backend processing of DBT, PM Kisan, unlike other schemes, has an online interface that allows volunteers to make the due corrections. This is the reason why resolution on behalf of the citizen **(A2a)** forms a prominent action pathway for that scheme, wherein volunteers simply log in to the portal and solve citizen grievances. However, as discussed above, this may not be enough in many cases, occasionally leading to issue escalation as the pathway. It is relevant to note here that the availability of such online correction modalities for DBT schemes does not directly result in grievance resolution for many citizens. We derive two key insights from our aforesaid analysis of this action pathway:

1. The very use of direct resolution on behalf of citizens **(A2a)** as an action pathway by volunteers in many cases shows that citizens are unable to access online portals directly due to the lack of familiarity with digitized interfaces and the lack of capacity to navigate online systems on one's own. Therefore, they approach civil society organisations to help them access a digitized system that is exclusionary as it was not designed to cater to their needs and capacities.

2. Second, the possible inefficacy of direct resolution **(A2a)** and the inevitable issue escalation in some cases is indicative of the top-down mechanism of scheme implementation that we discussed for the enrolment stage as well.

These insights have significant implications for design principles underlying the creation of citizen-facing architecture in schemes as well as their grievance redress mechanisms. We discuss these in detail in Chapter 5.

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[37] See Not Status Quo: A Campaign to Fix the Broken Social Protection Systems in India and Length of the Last Mile.

3.5 Action Pathways for Grievance Redress in MGNREGA

This section provides a description of the various ways in which Gram Vaani attempts to resolve citizen grievances related to MGNREGA specifically. We identify the key action pathways taken to do so specifically for the stages of exclusion *Entry Stage (E2)* and *Benefit Processing (E3).* One of the flagship action pathways used by the volunteers in MGNREGA across both stages of exclusion pertains to the routinization of the Employment Guarantee Day or Rozgar Diwas[38] provision. We discuss this in detail at the end of the section.

 It must be noted that this section does not feature the *End Point (E4)* stage. It may be fair to assume that *End Point (E4)* problems (regarding access to and functioning of banking infrastructure), may be broadly similar across most schemes involving some cash transfer. Hence, the analysis in the DBT section should apply to all *Endpoint (E4)* issues in MGNREGA as well.

Entry Stage (E2)

Exclusion at the entry stage pertains to applications for job cards not having been accepted by panchayat-level officials[39], or not processed correctly after submission (resulting in delays). It may also happen because of poor implementation of the Rozgar Diwas provision. We discuss this in detail at the end of the section. The general strategy adopted by volunteers seems to be to determine the nature of the issue first, and then follow up according to the information obtained about the case. For instance, volunteers in Bihar and Uttar Pradesh first communicate to the *Gram Rozgar Sahayak* (GRS), the primary enrolment point for job cards, on behalf of the citizen **(A2b).** As per a circular issued by the Ministry of Rural Development in 2014, it is the GRS' responsibility to oversee the distribution of job cards, maintain MGNREGA-related records, and update details of all eligible households in the scheme's management information system (MIS).[lix] These responsibilities allow the GRS to clarify what the issue at the application stage may be. The pathway of direct intermediation with the GRS **(A2b)** also allows volunteers to employ some pressure tactics in cases where the GRS is not cooperating in the application processing stage. In cases wherein the volunteers are provided with clarity about the issue, they would then take the appropriate pathway to resolve it. For example, when complaints of expired/inactive job cards

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[38] The Rozgar Diwas, or Employment Guarantee Day is an important avenue through which workers can obtain their job cards/work/payment in an environment designed to assist them through the process.
[39] These include officials from the Gram panchayat and the appointed Gram Rozgar Sahayak.

were received in Bihar, volunteers intermediated with the GRS and were informed that certain forms had to be submitted at the Panchayat Bhavan. Volunteers then filled and submitted these forms on behalf of citizens **(A2a)**.

In cases wherein the required information is not provided by the GRS, either because they are unable to find out the issue or they refuse to cooperate, volunteers rely on issue escalation **(A1)** as their next step. This issue escalation raises the grievance to the notice of officials at the block level (specifically the Program Officer in Bihar, and the Block Development Officer in Uttar Pradesh and Madhya Pradesh).

Finally, an important issue that comes up during the application for job cards is that of application requests being made verbally, or informally. Across states, volunteers confirm that such a problem does exist. In such cases, volunteers would provide information to citizens **(A0)** that they must approach the enrolment points with written requests (as in Uttar Pradesh) or directly intervene to write the application letters **(A2a)** on the behalf of citizens who would struggle with written formats (as in Bihar). As in the earlier section, if these approaches fail, volunteers escalate the issue to scheme officials at the block level.

Benefit Processing (E3)

The benefit processing stage of the scheme is defined to include three key aspects: the demand for and allocation of work, and payment processing of wages after completion of work. Exclusion at this stage may also occur because of poor implementation of the *Rozgar Diwas* provision. This section describes the various action pathways volunteers take in resolving grievances that pertain to these aspects. The section opens with a discussion of action pathways for grievances pertaining to demand for work and work allocation, followed by an analysis of pathways for payment related problems.

Work Allocation

To resolve issues about the demand for work and work allocation, volunteers follow a broadly similar format to the process followed in *Entry Stage (E2)*. They first attempt to gather as much information as they can at their level. They may verify whether the individual indeed holds a job card before demanding work, has worked under MGNREGA before, etc. After verifying the

legitimacy of the grievance, volunteers proceed to raise a formal demand for work, file a complaint, or file for unemployment allowance, according to what the problem was **(A2a).** For instance, if individuals have been applying for work verbally rather than on a written basis, volunteers would demand work in written. In such cases, mere interaction with access points **(A2b)** is not effective. As in the *Entry Stage (E2)*, this is a common issue for work demand as well. Volunteers may also provide information to citizens, permitting them the opportunity to seek resolution on their own either by raising formal work demand or by demanding unemployment allowance when not allotted work **(A0)**. The role of volunteers to mediate is key to this issue – since citizens do not have the requisite awareness and officials avoid the additional work required – the system would not change without it.

Notably, issue escalation **(A1)** is not particularly prominent for issues of work demand and allotment, as most of the responsibilities have been decentralized and are carried out by panchayat-level officials. However, volunteers in Madhya Pradesh do highlight that they may approach the Block Development Officer for some grave/persistent problems in work allotment **(A1)**. For instance, when the work is being done with the help of machines, or if there is discrimination in how work is allotted.

Wage Payment Processing

Moving now to payment related issues, which includes cases wherein individuals have either not been paid/have been partially paid or are facing undue delays in the receipt of their wages. The volunteer's first attempt is to understand the underlying reason through interaction with panchayat-level officials, including the Village Head and the GRS **(A2b)**. Volunteers in Bihar and Madhya Pradesh both confirm that the intermediation with the GRS is important for payment related issues as the official is answerable for unresolved payments. In Madhya Pradesh, the GRS directly updates the MIS, which would also reflect any reasons for delay.

In case that interaction provides the volunteers with enough information, they proceed to resolve the issue through relevant pathways. For instance, if it is revealed by panchayat-level officials that linking of the Aadhaar card and bank account to the job card is the reason for non-payment, volunteers accompany citizens to the bank and assist them through the seeding process **(A2a)**. This is true in both Bihar and Uttar Pradesh. If the reason for stalled payments is that details on the

individual's job card need updating, volunteers would go to the Village Head to get those changes made **(A2a)**. Sometimes, if volunteers (in Bihar) decide that an official complaint is to be filed, they may draft written complaints on behalf of the citizen and submit to GRS **(A2a)**.

However, *Direct Interaction with Access Points (A2b)* as a pathway can be inadequate in the following instances:

1. Paucity of information provided by the panchayat officials.
2. Lack of cooperation by the panchayat officials.
3. The resolution is not in the official capacity of the panchayat officials.

In all the cases above, volunteers pursue *Issue Escalation (A1)*. In Uttar Pradesh, the volunteers forward the issue to the BDO or in some particularly complicated cases, the District Magistrate. They write emails with the names and details of each affected citizen. Usually in Uttar Pradesh, the BDO can resolve payment related issues, but in some cases (such as when MGNREGA work is done under the Public Works Department and hence the BDO cannot influence payment), it can fail. In Bihar, volunteers would escalate issues to the Program Officer on the behalf of citizens.

The type of official the issue is escalated to depends on the level at which the wage payment is stuck. We came across a case in which volunteers were able to identify that wage payments have been delayed due to pending verification on the part of the Technical Assistant (TA). The TA is responsible for verifying the work completed before the fund transfer orders (FTOs) can be generated by the Block Development Officer. Since these TAs (who supervise an entire block) are often overburdened by work from multiple panchayats, delays often originate here. As a result, volunteers directly approach them to request expedition of the pending verification process. However, TA may exercise a considerable amount of discretion and in some cases, may even invalidate the request, resulting in rejection of payments.

Local Advocacy in MGNREGA

Finally, as mentioned earlier, we discuss the significance (and potential exclusion occurring without) of the *Rozgar Diwas* and a key action pathway that highlights the significance of local advocacy efforts. The *Rozgar Diwas*, or *Employment Guarantee Day* is an important avenue through which workers can obtain their job cards/work/payment in an environment designed to

assist them through the process. The non-occurrence of *Rozgar Diwas* could potentially be a contributing factor to exclusions at both the *Enrolment (E2)* and *Benefit Processing (E3)* stages. The scheme's Operational Guidelines call for regular organisation of *Employment Guarantee Day* (or *Rozgar Diwas*). Every Gram Panchayat is expected to earmark at least one day per month for the purpose of *'registering demand for work, issue of job cards, allocation of work, disclosure of information, payment of wages, payment of unemployment allowance, etc. and to generate awareness about the programme'*.[lx] The Employment Guarantee Day also gives citizens the opportunity to raise complaints and request their immediate resolution. It would be difficult to overstate the importance of such a provision under the scheme. Unfortunately, across all the locations studied, the implementation of the same is spotty at best. In Bihar, the GRS and Program Officer were unaware that there was such a requirement under the scheme. In Uttar Pradesh, the Gram Pradhan claims the paucity of work and funds to be the reason why the Employment Guarantee Day is not properly implemented. Volunteers have identified that prompting the occurrence of the Employment Guarantee Day can be an important step towards resolving exclusion from both having a job card **(E2)** as well as from work allocation and subsequently timely wage payment **(E3)**. Volunteers in Bihar emphasise the importance of regularly held *Employment Guarantee Days* in resolving issues at the *Work Allocation* stage. When job cardholders make requests for work, they often do so verbally, making it difficult to track their applications or hold officials responsible for any delay. At the *Employment Guarantee Day*, they are assured of a receipt and hence their requests for work are more likely to be heeded.

To bring about this change of regularising the *Employment Guarantee Day*, volunteers primarily reach out to block level officials by written letter requesting the same. For instance, in Uttar Pradesh letters were addressed to the Block Development Officer, and similarly to the Block Program Officer in Bihar **(A1)**. These concerted efforts fall within the ambit of the 'Rozi Roti' campaign, an advocacy effort by Gram Vaani organised with the objective of providing job cards and work to those excluded for a variety of reasons. Once the *Employment Guarantee Days* were organised every Wednesday, volunteers used the forum to assist citizens further directly. For instance, they would use the opportunity to help them fill the requisite forms **(A2a)** and ensure that the GRS is able to take the appropriate action. The focus on conducting the *Employment Guarantee Day* provides a unique opportunity for volunteers to resolve complaints for entire communities together, as opposed to handling one grievance at a time. Such group-based redressal is not only

efficient, but also is key in mobilising community-wide awareness about the issues faced by job cardholders in the area. This pathway was used by the Gram Vaani volunteers to help more than 400 people get job cards and demand work.

Key Insights

In Figure 34, we deconstruct the various pathways that volunteers have taken to resolve issues across the various stages of exclusion in a flowchart format. While there are some differences in the approaches taken by volunteers across the two stages of exclusion discussed above, a broad pattern in their actions can be discerned. Volunteers first try to attempt resolution with the knowledge they have about MGNREGA, or specific problems in the scheme that are rooted in the local context. In the initial stage of resolving MGNREGA complaints, they also use *Issue Escalation to Higher Officials (A1)* as a tool to obtain information regarding why a problem may have arisen. This indicates that while volunteers do have a strong understanding of the scheme's functioning, they also sometimes require informational support from within the system. It also speaks to the opaqueness of scheme mechanisms, which do not allow citizens to easily gather such information which would permit them to seek resolution on their own.

Next, bridging the awareness and informational gap seems to be a key outcome of volunteer mediation for MGNREGA issues. They do so by both providing information to citizens, as well as by assisting them in application or work demand-related tasks that they may not have the capacity to fulfil.

Finally, volunteers' success in organising *Employment Guarantee Days* is an interesting case of how formalised provisions for grievance redress within schemes, can allow external parties (in this case, civil society) to demand accountability from within the system.
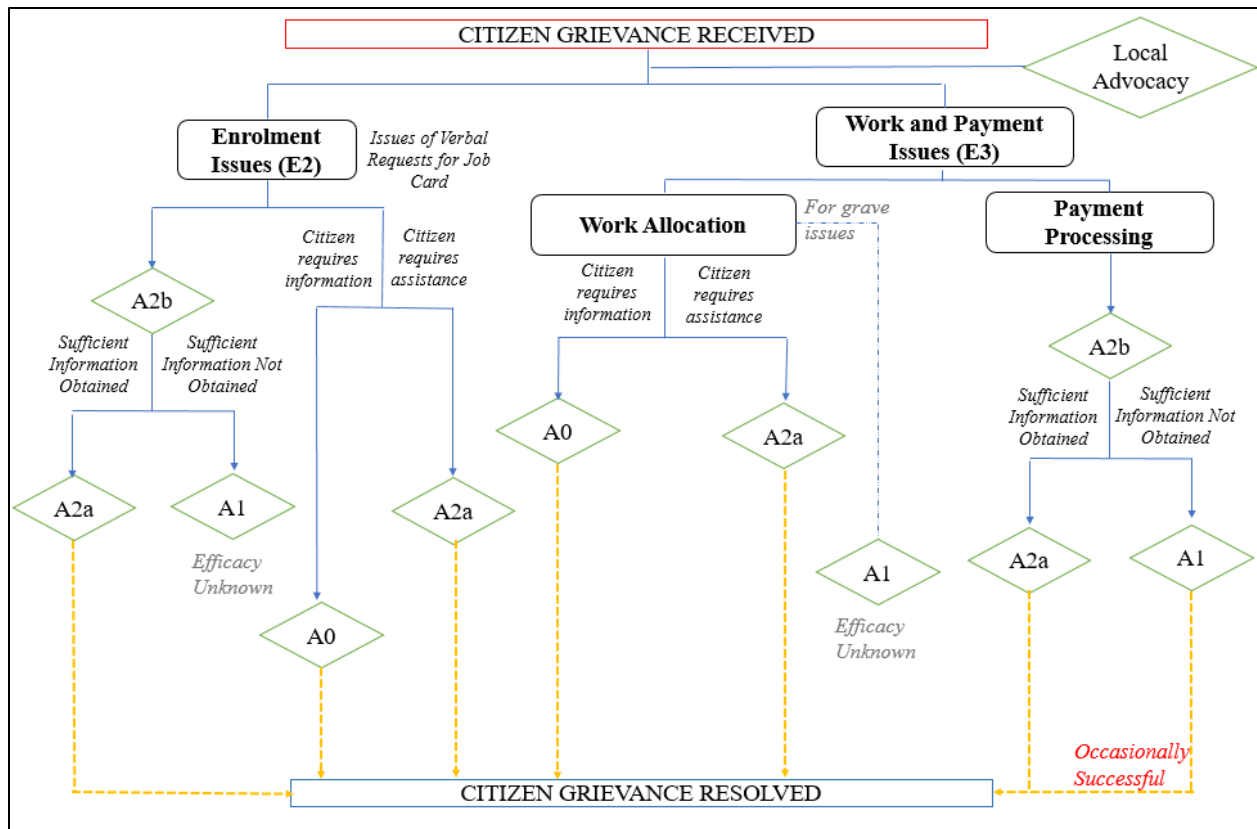
Figure 34: Flowchart of Action Pathways (MGNREGA)

Legend for Action Pathways

A0	Relevant information is provided to citizen to enable self-resolution
A1	Issue is escalated to higher officials
A2a	Direct intervention on citizen behalf through form filling/complaint filing, etc.
A2b	Negotiation/Interaction with Local Access Points

3.6 Action Pathways for Grievance Redress in PDS

Our analysis on impact pathways for PDS-related grievances is limited to the two stages of exclusion for which we collected the most evidence: *Entry* and *Endpoint* stages. It must be noted that within the *Entry Stage*, we discuss how volunteer grievance resolution functions for its key components of *Application Processing and Addition/Deletion of Family Members*. Within the *Endpoint* stage, *Non-Compliance* on part of operators who run fair price shops is the most prominently occurring point of exclusion.

Next, while complaints at the *Pre-Entry (E1)* Stage were heavily represented in the earlier chapter, they do not appear in this present analysis. Such issues were not always handled as complaints specific to the PDS, but rather as instances of food distress which required a more immediate kind of intervention on part of the volunteers. This segment of complaints is deserving of its own analysis and is discussed next.

COVID-19 Outbreak and Food Distress

A considerable number of the complaints on the Mobile Vaani channel since March 2020 were distress calls by individuals, families (among these many were migrant workers) unable to access the necessities of survival such as food, cash, and transportation. A June 2020 policy brief by Gram Vaani and researchers from the University of Montreal identified that in 48% of the audio recordings received on the COVID-19 Response Network, callers reported the inability to access food. The COVID-19 Impact on Daily Life Survey report by Dvara Research also collates primary and secondary evidence of households skipping meals and reducing food intake as an indicator of distress[2]. Some of these issues are particularly worrying and reflect the extent to which the COVID-19 lockdown impacted specific groups within the country, especially those from the informal sector[3].

Our previous chapter underscored that the Central Government's Pradhan Mantri Garib Kalyan Yojana (PMGKY) relief announcement targeted only a subsection of the population who required food-related assistance, given that possession of a valid ration card was one of the prerequisites to avail its benefits. Given the wide exclusion of people who were without a ration card, some state governments reacted through Self Help Group (SHG) networks for emergency provisioning of

ration cards. For instance, the Bihar state government enlisted the JEEViKA SHGs (Bihar Rural Livelihood Promotion Society) to conduct surveys and assess the number of households eligible for, and in need of, ration cards. It took a couple of months, but lakhs of cards were made and dispatched across various states. However, we came across many cases where the new ration cards were not accepted by the FPSO due to the lag in reconciliation of the expanded beneficiary list with the amount of stock lifted by the FPSO. Therefore, even with these emergency measures, it took several months for such people to get ration benefits.

Volunteers responded in a variety of immediate ways to calls related to food distress. They would work with non-governmental organisations (NGOs), independent donors, and sometimes local officials (in either their official or personal capacity) to provide food or cash to those affected. Alternatively, broadcasting the distress calls on Mobile Vaani platforms also sometimes led to the organic mobilisation of efforts to provide ration to the distressed. A more purposeful tactic adopted in some cases by volunteers was to identify cases of distress wherein the citizen would be eligible to avail PDS benefits and provide information regarding how they may do so. This approach may have emerged in response to citizens' lack of access to information and awareness, which is emerging as a theme through this report. Gram Vaani volunteers in Uttar Pradesh confirm that public awareness about the PMGKY provision was limited, and misinformation would (in some instances) be propagated by the FPS officer. They inform us that the FPS officers were reluctant to clarify questions about the entitlements, as their work would only increase once they did so. When access to an essential service like food is left up to philanthropic efforts, citizens are seldom guaranteed continued and reliable access (as they may through the PDS itself).

The following sections analyse the action pathways adopted by Gram Vaani volunteers in tackling the complaints of exclusion at the *Entry (E2)* and *Endpoint (E4)* stages of PDS.

Entry Stage (E2)

All issues wherein an individual is unable to obtain their ration card, are classified within this section. As per the PDS exclusion framework narrated in the earlier chapter, we define exclusion at the *Entry Stage (E2)* to include issues during the *Application Processing* of ration cards, the

Documentation Requirements at the time of application, or the *Details in Ration Card* which may be wrong and require some correction.

Volunteers employ a variety of approaches when they confront grievances regarding *E2*. Across geographies, there is a reliance on escalation of the issue to higher officials **(A1)**. This indicates that resolution of PDS grievances requires the involvement of officials from within the system. This escalation of grievances to functionaries at the appropriate levels is an important tool for volunteers and permits them to bring issues to the notice of officials within the scheme machinery, a conduit that is otherwise mostly unavailable to many ordinary citizens. In Uttar Pradesh, volunteers would approach the Supply Inspector or the Sub Divisional Officer for issues pertaining to ration cards and the addition/deletion of names from the ration card. In Madhya Pradesh, volunteers instead bring issues to the notice of the Sub Divisional Magistrate or the Tehsildar, who would instruct the FPS Officer to investigate the concerned issue. In Bihar, the first point of contact for volunteers is usually the FPS Officer. Though issue escalation **(A1)** is a commonly used pathway, the officials who are approached differ across states.

Volunteers also have the option of directly intervening to assist the citizen in the grievance faced by them **(A2).** For instance, in Uttar Pradesh, they would approach the Jan Seva Kendra on behalf of the citizen to apply for a ration card or even edit details on the ration card **(A2a)**. The volunteer would then submit a printout of the same to the FPS Officer, who would verify the application before processing it. It is confounding that a supposedly online method of application requires supplementation by an offline procedure. Any supposed efficiency and ease of access that digital systems of applying for one's ration card through a website at the Jan Seva Kendra is lost when proof of the online application must be physically signed and submitted. Without a civil society organisation to intermediate in this situation, it would be challenging for a beneficiary to ascertain the correct method of application. One of the case studies we have published explores this very problem, and how difficult it becomes for citizens to pursue resolution of any issues they may face, on their own[4]. In Bihar as well, we see that volunteers may exercise the action pathway of directly intervening on behalf of the citizen. When applications for ration cards have been rejected or delayed inordinately, they file formal complaints at the *Lok Shikayat Nivaran Pranali[40]* **(A2a)**.

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[40] Bihar's Public Grievance Redressal System has been established as a forum for welfare-related complaints.

This is broadly in keeping with the culture of grievance redressal mechanisms in Bihar where there are provisions and forums to formally raise and resolve complaints pertaining to welfare schemes.

Finally, volunteers may provide useful information to citizens **(A0)**, particularly in cases where they believe the citizen themselves can pursue resolution and may not require additional support. A volunteer may inform a caller of how they may obtain a ration card. Citizens may be provided with clarifications regarding their entitlements which they had previously misunderstood. We have come across such a case, wherein the individual has been wrongly told that only those holding a MGNREGA job card are entitled to free ration under the PMGKY announcement. Volunteers may also inform citizens of which officials would be able to assist them in resolution, so citizens can escalate issues on their own.

Ration Distribution (E4)

The other source of exclusion prominent in our sample **(E4)**, non-compliance issues at the disbursement stage are common across all states in this study. It is common for FPS officers to be discretionary and self-serving during ration distribution. Volunteers across states approach different officials to resolve such issues. In Uttar Pradesh, the Food and Supply Officer can be approached in case of any fraudulent behaviours by FPS officers **(A1)**. In some instances, volunteers also make use of the toll-free numbers to register an official grievance. They highlight that the FSO or the Supply Inspector can exert a great deal of influence over the FPS Officer and act against them as required. In Bihar, written complaints are filed with the Sub-Divisional Officer (SDO), who is bound by the RTPS Act (2011) to respond within 60 days **(A1)**. In most instances, the action taken by the SDO is to serve notices to the accused or (in extreme cases) suspend licenses. Upon interviews with the SDO, we learn that harsher actions against FPS Officers such as fines and judicial action is not taken.

A particular case that arose in Madhya Pradesh was of PDS dealers selling portions of the grain allotted to their ration shop on the black market. The dealer would obtain the fingerprint of the beneficiary for biometric authentication at withdrawal but tell them the authentication failed and not provide them any grain. Volunteers tackled this issue by escalating the issue to the concerned

officials **(A1)**, post which the dealer personally ensured that he distributed ration amongst all those missed out.

In some cases, volunteers may even provide some information to citizens, about which officials they may approach to seek resolution **(A0)**. However, our conversations with Gram Vaani volunteers reveal that the success of information provision **(A0)** as an action pathway depends to a great extent on the willingness of the FPS Officer[5] to assist complainants directly with their problems.

Volunteers also note that when issues are aired on the local Mobile Vaani network, it can mobilise pressure against improperly functioning access points. This would improve the chances that the access point would comply with requests when the volunteer appeals to them **(A2b).** For instance, making public the news of a non-cooperative FPS officer refusing to accept applications for ration cards can increase their tendency to comply when volunteers approach them.

Note here that, while the resolution methods involved by Gram Vaani are only on a case-by-case basis, larger reforms to accountability structures in place for the officials who interact with beneficiaries on a daily basis is key to any long-lasting reform. Volunteers themselves do acknowledge this to an extent. Representatives from Madhya Pradesh tell us that even after complaints are filed against FPS Officers, they only begin extorting others who are yet to complain. The non-compliance itself does not stop.

Key Insights

In conclusion, the broad purpose of the issue escalation approach for grievance resolution is its effectiveness. By engaging those officials who can exert some influence over scheme execution, volunteers see a higher chance of success. The escalation of issues to higher officials **(A1)** is important for its effectiveness in covering three key gaps:

1. The Accessibility Gap: Citizens usually find it difficult to approach the officials at some of the higher tiers of scheme administration for resolving their grievances. *A1* helps create a bridge between citizens, especially those residing in villages with poor connectivity, and the officials who are based out of the relatively distant block and district-level offices.

2. <u>The Information Gap</u>: The action pathway reveals key information to volunteers who often use it as a first exploratory step to identify the root cause of a complaint. For PDS related grievances, this is particularly important for the Entry Stage *(E2)*.

3. <u>The Accountability Gap</u>: Concerned officials to whom the issue is escalated, exert some top-down pressure on local functionaries or access points to investigate and correct the said issue. Such a mechanism is practically non-existent in situations not intermediated by civil society members. While this is important to both stages of exclusion here discussed, it is the most important outcome for issues at the *Endpoint (E4),* as such pressure is often the only way to keep FPS Officers in check.

Now, issue escalation **(A1)** is important for all the states but may be even more so for those states where there is no established forum for easy resolution of some issues. In states like Bihar, which has the Right to Public Service (RTPS) system[6], or Uttar Pradesh which has the network of Jan Seva Kendras[7], *Resolution on Citizen Behalf (A2a)* may be more effective than in other states. This is because Bihar's RTPS system and the Jan Seva Kendras in Uttar Pradesh allow volunteers to quickly rectify issues in ration card related details online. In comparison, Madhya Pradesh and Tamil Nadu do not have systems that permit volunteers to quickly intervene on their own.

Finally, it is important to note that many of the channels of communication used by volunteers are not official in nature. That is, when a volunteer escalates an issue to a local official, they are not utilising an official grievance redressal mechanism to do so. In fact, official grievance mechanisms such as helpline numbers and online portals do not work or are poorly designed. Hence, the need for civil society organisations who can leverage their network and explore alternative pathways towards grievance redress. For instance, Bihar has a Right to Public Service portal, wherein complaints may be lodged against various welfare schemes. However, the section related to PDS grievances is not functioning on the website. When our team then attempted to call the state's PDS helpline number, we ascertained that PDS related queries can indeed be registered via phone. However, the supporting documents must be submitted only on a digital medium. This betrays the use of helpline numbers as a low-technology alternative that citizens who may not be digitally adept can rely on. A similar exercise in Uttar Pradesh revealed that once issues are raised via a helpline number, they are quickly marked as resolved when higher officials acknowledge the issue and pass them on to the block level/FPS Officer. After this point, it becomes difficult for citizens

to track the same. Hence, it is no wonder that volunteers prefer the use of social media and other networks facilitated by Gram Vaani's technology to leverage pressure on the concerned officials. Despite such unofficial methods of escalation, officials still do respond positively in most instances.

3.7 Key Findings: Resolution Pathways in Social Welfare Schemes

In this chapter, we have set out the different ways in which grievances are redressed in accessing public services in India. This section summarises the key findings from our analysis across schemes:

- *Issue Escalation (A1)* to officials at the block or district level, by forwarding the voice reports directly to them, is the most prominent action pathway used by volunteers across schemes for a variety of citizen grievances. Our analysis shows that this action pathway is primarily used by volunteers when any one or more of the following contexts characterizes citizen complaints:

  - The delivery mechanism of the scheme follows a top-down structure in which most crucial functions are not in the jurisdiction of local-level officials (such as those at the Panchayat-level), who, if not more effective, are usually more accessible to ordinary citizens. This necessitates that the complaint is escalated to officials at higher tiers who have the official capacity to address grievances.
  - In schemes which may follow a more decentralized implementation mechanism (such as the PDS) but there is prevalence of petty corruption or lack of cooperation on part of local-level officials.
  - There are inadequate or cumbersome official grievance redress mechanisms in place that make issue escalation either a more effective pathway towards quicker redressal or a necessary mechanism to gain more information.
  - All other action pathways have proven to be unsuccessful.

- Local advocacy efforts by writing letters to raise widespread issues of distress that many members in a community may be facing, were found to be used by volunteers to demand systemic action such as a process simplification that could help the entire community.

- *Resolution on Citizen Behalf (A2a)* as an action pathway has been prominent for schemes (and certain stages within the scheme) that have some front-end mechanisms in place for complaint filing, application tracking, data correction, etc., which are not easily accessible to the citizens directly.

- *Interaction with Access Point (A2b)* as an action pathway has been prominent for those cases in which there is lack of cooperation/non-compliant behaviour on part of local-level officials, individual banking agents, or operators of Fair Price Shops. Such an interaction may sometimes also entail warnings given by volunteers, citing possibility of issue escalation in case the said local functionary does not comply/address the grievance.

Our findings, at the outset, also seem to be aligned with the existing literature on the subject. Robinson (2013) identifies several ways in which citizens may seek grievance redress, namely, political, administrative, and legal modes of redress. Of these, the most common mode is administrative redress, where officials in the local administration interact with citizens directly to resolve grievances. Robinson further notes that where administrative or legal methods are ineffective, citizens may resort to collective action or to "level jumping," where complaints are escalated to higher officials[lxi]. The same is supported by our finding that issue escalation is the predominant pathway for grievances which either have no official redress pathway or are characterised by ineffective ones. Even when forums of grievance redress exist, they are often not directly available to citizens. A study by Kruks-Wisner[lxii] in 2015 notes that citizens must often resort to intermediaries, such as NGOs, to aid them in the process of grievance redress, as seen throughout this chapter.

Annexure 3A: Resolving Grievances in the Employee Provident Fund Scheme

Glossary of Impact Pathways

A0	
Pathway	**Description**
General Information (A0a)	The volunteer shares key information regarding the process of resolution with the citizen and informs them to revert to Gram Vaani in case they are unable to resolve the issue alone. This information is general in nature, regarding document requirements, which officials to approach, etc.
Guiding Employer/Officials Interaction (A0b)	When the volunteer identifies that resolution of the Provident Fund exclusion can only be achieved by approaching the employer, or officials at the local Provident Fund office, they equip the citizen with advice about how to pursue that interaction. For instance, which office to approach for approvals, formats of letters requesting information from employers, etc.
A2	
Pathway	**Description**
Direct Mediation with Employer (A2a)	When the individual is unable to resolve the issue on their own, the Gram Vaani volunteer steps in to play a more active role. The community manager would interact with the employer on behalf of the employee, either to obtain more information on the case or to pursue resolution. This is especially important in cases wherein the citizen is no longer an employee and hence is not permitted on company premises. Another pathway used is when labour unions (in partnership with Gram Vaani), write letters to the Human Resources (HR) department of the concerned company.
Direct Mediation with PF Office (A2b)	The Gram Vaani volunteer may directly approach the PF Office with the citizen's details (such as Aadhaar number, UAN number) to further enquire about, and resolve the problem.
Other Direct Assistance (A2c)	A1c is the pathways used in cases wherein some action is required from the citizen that they are unable to perform (such as linking of Aadhaar to bank account, updating phone number, checking of status online etc.). The volunteer intervenes directly to complete the requisite steps on the citizens behalf. This pathway is prominent in cases where the beneficiary may not be able to navigate grievance redressal methods on their own.

Action Pathways for Provident Fund (PF)

Our conversations with volunteers reveal that the rate of resolution for provident fund related issues is not as high as for other schemes. This may be because of the level of discretion employers are provided through the entire process.

There are still, however, some key pathways that emerge. First, issues regarding the *Completion of Employee Records (E2)* are easily resolvable when the error is on the citizen's part. For instance, when the issue has arisen due to a mismatch of some details provided by the worker, volunteers can quickly assist them to correct errors such as non-linking of Aadhaar to bank account, updating of phone number, date of birth etc. **(A2c).** Volunteers inform us that there are four key items that must be correctly provided at the enrolment stage for a citizen to be able to withdraw the PF amount from their account: the bank account number, Date of Birth (DoB), name and bank name. If there is a mismatch in any of these details provided at the time of enrolment compared to later when citizens may seek withdrawal, then problems will arise. It is easy enough to correct most of these errors which may have arisen during the completion of employee records. For instance, correction of most Aadhaar related problems is simple as long as the phone number linked to one's Aadhaar card is correct. A commonly occurring problem is when workers have joined the company by submission of their school transfer certificate (as Aadhaar was not in place). They would have been enrolled into PF using their transfer certificate and corresponding date of birth. Later, after Aadhaar-based enrolment became the norm, there was a mismatch between the date of birth in the initially submitted transfer certificate and Aadhaar from later on. This was easily solved by editing the date of birth associated with one's Aadhaar card.

Another prominent pathway is the provision of information **(A0a)** to citizens to equip them with the information they may need to pursue resolution on their own. Volunteers note that this action pathway is used for many of the informational enquiries that come their way. For instance, citizens may request clarification on the minimum balance in their PF account before they can request withdrawal. They may enquire about procedures such as how to check their PF balance, or how to request withdrawal of the amount. This pathway is also important when approvals have to come from the company side **(E2)**. Volunteers would instruct citizens on how to approach their employers **(A0b)**, and in some cases accompany them as well **(A2a)**. However, they seem to prefer the use of A0b rather than direct mediation with the employer **(A2a)**, as employers do not respond in the presence of an external party. Alternatively, when volunteers identify that there is some issue originating from the employer's side, they provide citizens with guidance regarding how to approach their employer to request changes **(A0b)**. This may take the form of providing written letter formats to citizens or instructing them on what details to request.

If neither of these pathways gives way to resolution, volunteers find other methods to escalate the issue. They may submit Right to Information (RTI) requests as per the RTI Act of 2005. For instance, in Tamil Nadu, an RTI filed for 7 districts provided a list of factories and the number of employees for whom PF is being paid regularly. Volunteers were able to ascertain that many employers do not properly contribute to workers' PF accounts in a regular manner.

Another option is to approach legal clinics that may be set up from time to time, and even file formal complaints at the *Public Grievance Days Meetings* which are organized at the district level in many areas of Tamil Nadu. Volunteers are confident that these complaints can usually result in resolution, as they are often dealt with in an official and formal manner. If this does not occur, volunteers may also sometimes approach the media to shed public light on issues. This is particularly true for issues wherein the employer is not contributing properly to the workers' PF account **(E3)**.

Key Insights

In conclusion, majority of issues that arise while workers' attempt to access their PF contributions are due to how the procedure is set up and a lack of understanding by workers' about the procedure. We propose the following recommendations as a way of bettering the provident fund system:

1. The institution of a worker-initiated system, wherein the worker can apply for provident fund contributions on their own to the provident fund office, rather than having the employer do so on their behalf. When the worker initiates the request, the PF Office would then have to request a layer of approval from the employer. Employers may respond better when the request comes from a government institution than from their employee or former employee, and result in fewer delays and instances of discretionary behaviour. Such a system would also permit tracking of how long employers take to process requests, as well as the number of rejections they make, which could force some accountability on their actions.

2. We propose a system wherein SMS notifications about monthly contributions to an employee's PF account are made at no cost to the employee. This would help preclude situations wherein employers set aside a portion of an employee's monthly wages (supposedly as a PF contribution) but actually do not deposit the money into a PF account.

3. Workers' UAN numbers should mandatorily be mentioned on their monthly pay slip, along with a notification indicating how they can check their PF status online.

4. Drawing from volunteers' experiences, we propose that a defaulter list of all employers (within a district) who do not regularly make PF contributions for their eligible workers be made public.

4. Standard Operating Procedures for Civil Society Organisations

This chapter recapitulates the various action pathways followed by the volunteers that we have found to be most effective in resolving beneficiary grievances. To do so, this chapter draws from Gram Vaani's experiences in resolving issues of exclusion captured through the volunteer interviews and the repository of impact stories, The aim is to provide concise Standard Operating Procedures (SOPs) that can be followed by Civil Society Organisations (CSOs) to resolve a variety of cases that fall under the exclusion framework discussed in previous chapters. While several systemic changes may be required before India's social protection architecture is equipped to significantly reduce exclusion errors, the below SOPs are good starting points to assist communities and strengthen their relationships with the state.

In reading these operating procedures, CSOs may choose to either undertake the steps on citizens' behalf or provide the relevant information to citizens to empower them to pursue resolution on their own.

Pradhan Mantri Kisan Samman Nidhi (PM Kisan)

PM Kisan has a standardised process for grievance redressal across states. Instead of multiple state-wise websites for grievance submission and tracking, there is a [common portal](#) (online) where application or payment status may be tracked. This enhances the ability of citizens to pursue resolution themselves, in some cases. CSOs may decide to provide direct assistance based on the citizens' access to information and required digital infrastructure.

Online applications for enrolment into PM Kisan may be submitted on the [scheme website.](#) The process entails submission of documents such as a copy of the Aadhaar Card, the Family Card, Land Records, Proof of Identity (Voter ID, PAN Card, Driver's License etc.). Once the application has been submitted and processed, the Village Registrar would conduct a physical verification of the land holding. Alternatively, if farmers are not able to apply by themselves, they may approach the CSP centre and fill the application form with the Village Registrar at the CSP Centre, Krishi Salahkar, Panchayat Secretary, or at the Block Agriculture Office. After the verification is done, the MIS is updated and enrolment is complete, and benefit processing for the next installment begins.

We discuss operating procedures for three stages of exclusion: *Enrolment (E2), Benefit Processing (E3),* and *End Point (E4).*

	Entry Stage (E2)
	Document Requirements
Step 1 (a)	To check current status of the application, CSOs or the beneficiaries themselves can approach the PM Kisan portal. On the 'Farmers' Corner', enter the beneficiary's Aadhaar Number or Bank Account Number. The application status will appear. *Alternatively, pursue Step 1 (b).*
Step 1 (b)	Approach the CSP centre and provide Aadhaar details of the applicant to the Krishi Salahkar. The Krishi Salahkar will then login to the PM Kisan portal using the same procedure as described in Step 1 (a) and provide information about the application status. Understand the reason behind rejection. The Block Agriculture Officer (BAO) provides information about what documents are required if rejection is due to documentation.
Step 2	Help the beneficiary collect the required documents (Aadhaar Card, Land Documents, Proof of Identity i.e. Voter ID, PAN Card etc.)
Step 3	Submit a new application online and submit required documents at the CSP centre with the help of the Village Registrar, or at the Block Agriculture Office. Ensure to collect application receipt.
	Application Processing

	Case I: Village Registrar not Conducting Physical Verification or Wrongly Rejecting Eligible Citizen for Registration under PM Kisan	
	After submission of application, the Village Registrar (locally known as Patwari) must conduct a physical verification of the applicant. Often, delays originate at this stage, and the concerned officials may not conduct their duties duly.	
Step 1	Interact with the relevant Village Registrar, either face-to-face or through the phone, and convey the grievance about physical verification not being done. *If step 1 yields no result, proceed to Step 2.*	
Step 2:	File a written complaint about physical verification not being conducted, or wrongful rejection by the Patwari. Submit the complaint letter to the Block Agriculture Officer at the block office and collect a receipt for the submitted complaint. *Block Agriculture Officer is likely to instruct the Village Registrar to conduct due verifications and warn against wrongful rejection during the verification process.* *If step 2 yields no result, proceed to Step 3.*	
Step 3	File a written complaint about the grievance and submit the complaint letter to the Agriculture Development Officer at the District Agriculture Office and collect a receipt for the submitted complaint.	
	Case II: Application Rejected Due to Mismatch in PM Kisan and Aadhaar Details	
Step 1 (a)	Check current status of application by accessing the [PM Kisan portal](). On the 'Farmers' Corner', enter the beneficiary's Aadhaar Number or Bank Account Number. The application status will appear. *Alternatively, pursue Step 1 (b).*	

Step 1 (b)	At CSP centre, provide Aadhaar details of the applicant to the CSP operator who will log in to the PM Kisan portal using the same procedure described in Step 1A, and provide information about the application status.
Step 2	If the application status says 'Rejected', approach the Block Agriculture Office (BAO) to enquire about the reason behind rejection. The BAO will provide information if there are discrepancies in the information filled in the application form or the details on the Aadhaar number provided. *If Details on Application form were wrong, proceed to Step 3 (a). If details on the Aadhaar card are wrong, proceed to Step 3 (b).*
Step 3 (a)	Submit a new application along with required documents to the designated Krishi Salahkar and collect application receipt.
Step 3 (b)	Access the Aadhaar portal, enter beneficiary's Aadhaar details and identify information that needs to be corrected. *If the beneficiary has access to Aadhaar registered phone number, proceed to Step 4 (a), else proceed to Step 4 (b).*
Step 4 (a)	If minor changes such as change in spelling of name, date of birth, or gender are required, access the Aadhaar portal and make required changes.
Step 4 (b)	Approach a government bank with a special Aadhaar desk, the post office, or an Aadhaar CSP. Submit copies of documents such as Proof of Identity (Voter ID, PAN Card etc.) or Proof of Date of Birth (Birth Certificate, Marksheet issued from any government recognised education board/university, Voter ID etc.) and ask the operator to make desired changes.
Benefit Processing (E3)	

Failures in benefit transfers under PM Kisan are a common occurrence. Often, they are attributed to frozen bank accounts or Aadhaar-Bank linkage issues.

Step 1 (a)	To check current status of the payment approach the PM Kisan portal. On the 'Farmers' Corner', enter the beneficiary's Aadhaar Number or Bank Account Number. Payment status appears as either Credited or Pending. *Alternatively, may pursue Step 1 (b). Once payment status has been determined, follow procedures under Case I or Case II as applicable.*
Step 1 (b)	Approach the CSP centre and provide Aadhaar details of the applicant to the Krishi Salahkar, who will then log in to the PM Kisan portal using the same procedure as described in Step 1 (a) and provide information about the payment status. *Once payment status has been determined, follow procedures under Case I or Case II as applicable.*

<center>

Case I: Payment Credited - Frozen Bank Accounts

</center>

Step 1	Approach the bank where beneficiary holds the bank account linked to PM Kisan. Beneficiary's presence is mandatory. Provide bank account information to the bank official/Bank Manager and check for issues with the bank account.
Step 2	If the account is frozen, draft a written request on behalf of the beneficiary to unfreeze bank account and submit it to the Bank Manager. Collect a receipt for the request submitted.

<center>

Case II: Payment Pending - Non-Transfer Due to Aadhaar Not Being Linked with Bank Account or Unknown Reason

</center>

Until recently, DBT transfers were routed through bank account numbers. This process is now being changed, and payments are being routed through Aadhaar Cards in several states already.

This implies that payments would be transferred to accounts linked with the Aadhaar Card number using which the citizen has enrolled for benefits under PM Kisan. Since the rollout of payment through Aadhaar is still underway, many payments have been halted after the initial installments. If the bank account registered while enrolling for the scheme is not the same as the one linked with the Aadhaar Card, payment processing fails.

Step 1	Approach the Block Agriculture Office (BAO) and understand the reason behind rejection of payment. The BAO provides information about whether there is an issue of Bank-Aadhaar seeding, or if the reason is unknown. *In case the payment rejection is for an unknown reason, proceed to Step 2 (a). In case the payment rejection is due to issues in bank-Aadhaar seeding, proceed to Step 2 (b).*
Step 2 (a)	Approach the Agriculture Development Officer at the District Agriculture Office and draft a written complaint about the PM Kisan application being rejected for unknown reasons. Ensure to collect complaint receipt.
Step 2 (b)	Access the [Aadhaar portal](), enter beneficiary's Aadhaar details and check for discrepancies between details on Aadhaar portal and beneficiary's bank passbook. *If the beneficiary has access to Aadhaar registered phone number, proceed to Step 2 (aa), else proceed to Step 2 (ab).*
Step 2 (aa)	If minor changes such as change in spelling of name, date of birth, or gender mentioned on Aadhaar Card are required, access the [Aadhaar portal]() and make required changes.
Step 2 (ab)	Approach a government bank with a special Aadhaar desk, the post office, or an Aadhaar CSP. Submit copies of documents such as Proof of Identity (Voter ID, PAN Card etc.) or Proof of Date of Birth (Birth Certificate, Marksheet issued from any

	government recognised education board/university, Voter ID etc.) and ask the operator to make the desired changes.

End Point (E4)
Issues after the crediting of PM Kisan benefits became prominent during the lockdown, when the government announced DBT transfers will be made door to door through independently contracted CSP agents or those hired by banks. These agents would either not approach the houses of the beneficiaries at all, overcharge them for services, or disburse only partial payments while pocketing a portion. While grievance redressal is relatively easy if the CSP agent is hired by a bank, it becomes quite difficult in case of an independently contracted CSP agent.

Case I: CSP Agent is Hired by Bank	
Step 1	Approach the bank with which the CSP agent has been employed. Draft a written complaint about the CSP agent and submit it to the Regional Manager. Collect a receipt for the complaint filed.

Case II: CSP Agent is Hired by Independent Agency Contracted by the Government	
Step 1	Visit the Block Agriculture Office and meet with the Block Agriculture Officer. Draft a written complaint about the CSP agent and submit it to the BAO. Collect a receipt for the complaint filed. *The BAO is likely to warn the CSP agent of formal or legal action if money is not returned to the beneficiaries.*

Pension and PMGKY Pension

The pension system covers multiple kinds of pensions, namely the Old Age Pension, Widow Pension, and the Disability Pension. According to Gram Vaani volunteers, pension related complaints were prominent during the lockdown, perhaps owing to the ex gratia PMGKY pension announcements. Eligible beneficiaries are most often excluded from availing their pension benefits

due to frozen bank accounts, or the wrong age mentioned on the Aadhaar Card (in case of Old Age Pension.

Entry Stage (E2)	
Application Processing Like PM Kisan, the status of application or payment can be tracked on the state pension websites. However, one must approach the pension office to understand the reason behind held up payments.	
Step 1	Access the state's respective pension portal (Uttar Pradesh, Bihar) and verify where the application status is stuck.
Step 2	If the portal displays that an application has been rejected, approach the local pension office with the beneficiary's pension details and Aadhaar card and try to enquire the reason for rejection.
Step 3	Access the Aadhaar portal, enter beneficiary's Aadhaar details and identify information that needs to be corrected. *If the beneficiary has access to Aadhaar registered phone number, proceed to Step 4 (a), else proceed to Step 4 (b).*
Step 4 (a)	To change the Date of Birth, access the Aadhaar portal and make required changes.
Step 4 (b)	Approach a government bank with a special Aadhaar desk, the post office, or an Aadhaar CSP. Submit copies of documents such as Proof of Identity (Voter ID, PAN Card etc.) or Proof of Date of Birth (Birth Certificate, Marksheet issued from any government recognised education board/university, Voter ID etc.) and ask the operator to make desired changes.

	Benefit Processing (E3)
Step 1	Access the state's respective pension portal ([Uttar Pradesh](), [Bihar]()) and verify where the application status is stuck. *If payment status indicates that amount has been credited, proceed to Step 2.*
Step 2	Approach the bank where the beneficiary holds the bank account linked to pension scheme. Beneficiary's presence is mandatory. Provide bank account information to the bank official/Bank Manager and check for issues with the bank account. *If it is determined that bank account is frozen, proceed to Step 3 (a). If it is determined that account KYC is pending, proceed to Step 3 (b).*
Step 3 (a)	Approach the bank along with the beneficiary and draft a written request on behalf of the beneficiary to the bank to unfreeze bank accounts. Submit it to the Bank Manager and collect a receipt for the request submitted.
Step 3 (b)	Approach the bank along with the beneficiary. Carry a copy of the beneficiary's Aadhaar Card, two passport size photos. Submit the said documents and fill the KYC form. Collect the receipt given on submitted the form.

Jan Dhan Yojana

Before the pandemic, Jan Dhan accounts were used only for pensions or Ujjwala Yojana transfers. Since many people never enrolled for these schemes, their accounts became inactive due to low volume of transactions or were inadvertently converted into savings accounts. When the ex-gratia Jan Dhan benefits were rolled out, several eligible beneficiaries faced issues in accessing the same. To comprehend the reasons why Jan Dhan accounts were not functioning in a proper manner, one must approach the relevant bank and request the bank officials to provide information regarding account status.

Benefit Processing (E3)	
Case I: Account is Frozen	
Step 1	Approach the bank along with the beneficiary and draft a written request on their behalf for the bank to unfreeze the Jan Dhan account. Submit it to the Bank Manager and collect a receipt for the request submitted.
Case II: Account KYC is Pending	
Step 1	Approach the bank along with the beneficiary. Carry a copy of the beneficiary's Aadhaar Card and two passport size photos. Submit documents and fill the KYC form. Collect the receipt upon submission of the form.
Case III: If Jan Dhan Account Has Been Converted into Savings Account This case is state-specific. While in Uttar Pradesh and Bihar, savings accounts can be converted back to Jan Dhan Accounts, the same cannot be done in Madhya Pradesh. Beneficiaries in Madhya Pradesh will have to open a new Jan Dhan Account to avail any benefits.	
Step 1	Update beneficiary's bank passbook and verify transaction amount in the past one year.
Step 2	If the transaction amount is less than Rs. 10,000, approach the bank where the beneficiary is an account holder and request bank officials for the form to convert a savings account into a Jan Dhan Account.
End Point (E4) During the lockdown, many citizens queued up at banks to access their cash transfers. To avoid crowding and to maintain social distancing, some state governments employed CSP agents to	

ensure door-to-door availability of banking services. Some complaints emerged about corruption and non-compliance on part of the CSP agents. While there is some accountability mechanism for those agents hired by banks, no such structure exists for others.

Case I: CSP Agent is Hired by Bank	
Step 1	Approach the bank with which the CSP agent has been employed. Draft a written complaint about the CSP agent and submit it to the Regional Manager. Collect a receipt for the complaint filed.
Case II: CSP Agent is Hired by Independent Agency Contracted by the Government	
Step 1	Constant the relevant CSP agent and convey the grievances put forward by the beneficiaries. Give a strict warning that formal action would be taken unless the agent complies. *If Step 1 yields no result, proceed to Step 2.*
Step 2	File an FIR against the CSP agent in question at the local police station.

Ujjwala Yojana

A structured grievance redressal mechanism for Ujjwala Yojana does not exist. Most grievances arise from citizens having limited awareness about how to avail their entitlements under the scheme. It is mandatory for the gas cylinders to be booked via the Ujjwala website, or using the IVR system (the beneficiary needs to call the IVR number from their registered mobile number and follow the instructions thereafter). Only then will the benefit amount be transferred to the account of the Ujjwala Card holder. It is important the CSOs provide this information to the beneficiaries who want to avail benefits under the scheme.

Benefit Processing (E3)

	In situations where the correct medium has been used to book the gas cylinder, yet the benefits are not transferred to the beneficiary's account, the beneficiaries or the CSOs can:
Step 1	Approach District Officials such as the District Nodal Officer or the Circle Officer about non-transfer of benefits. Write a written complaint about not having received benefit transfers and collect a receipt for the submission of a complaint.

End Point (E4)

Examples of end point issues in Ujjwala Yojana would cover gas cylinders not being delivered by the gas agency, or the delivery agent being discretionary in the distribution of gas cylinders.

Step 1	Approach the relevant gas agency or request the relevant delivery agent not to indulge in fraudulent activities.
Step 2	Connect with district-level officials such as the Block Development Officer, District Nodal Officer, Circle Officer, Food Supply Officers, or the Marketing Officer. Write a written complaint about not having received transfers and collect a receipt after submission of complaint.

Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA)

Most MGNREGA complaints arise at the *Entry Stage (E2)*, when job cards are applied for and processed, and the *Benefit Processing Stage (E3)*, where work is allotted, and wages subsequently paid. We accordingly limit the recommended operating procedures to certain situations that may arise within these stages.

Entry Stage (E2)

Case I: Job Card Application Not Accepted by Gram Rozgar Sahayak

The MGNREGA program guidelines have a provision for Employment Guarantee Day (or Rozgar Diwas). At least once a month, in every ward, the Gram Rozgar Sahayak (GRS) and the

Pradhan are responsible for organising the Rozgar Diwas where citizens can apply for job cards, file work demands/grievances, and obtain any clarifications from the GRS. Several volunteers across states mentioned that Rozgar Diwas are rarely organised. Exclusion at the *Entry Stage (E2)* is exacerbated if the GRS, who is responsible for providing dated receipts against job applications and overseeing the registration process including organization of the Rozgar Diwas, does not cooperate with citizens.

Step 1	Contact the relevant GRS via face-to-face interaction at the Panchayat Office, or through a phone call, and convey the grievance about Job Cards not being accepted. *Additional steps can be taken to ensure that the phone number of the GRS and the Program Officer (PO) are available at the Panchayat Office, accessible to the citizens, so that beneficiaries find it easier to take self-action.*
Step 2	Approach the Block Office and file a written complaint with the Block Development Officer/Program Officer/Chief Executive Officer (BDO/PO/CEO) and collect complaint receipt. In case Rozgar Diwas is not being organized regularly, mention that in the complaint letter. *The PO holds a great degree of authority and responsibility in MGNREGA for several functions such as work demand approval, Fund Transfer Order (FTO) generation, ensuring the Management Information System (MIS) is updated, dealing with grievances related to job card application, work demand, payment processing etc. While the MGNREGA guidelines assigns these functions to the PO, in some states people may also approach the BDO (in UP) and the CEO (in MP).* *If Step 2 yields no result, proceed to Step 3.*
Step 3	*If Rozgar Diwas is not being organised in several villages, or several people are facing issues due to discretionary acceptance of job card applications, complaints can be filed before proceeding to this step.*

	Initiate conversation regarding the grievance with the BDO/PO/CEO either face-to-face at the Block Office or via phone. Submit complaint receipt collected in Step 2 to said officials. File a new written complaint and collect a new complaint receipt. *At the back end, BDO/PO/CEO instructs the GRS to accept Job Card applications or face disciplinary action.*
Step 4	Submit new Job Card application[41] to GRS and ensure to collect application receipt. Documents required would include Aadhaar card, any other Proof or Address and Proof of Age along with 2 passport size photos. If the CSO identifies that the complainant can submit the Job Card application on their own, they can guide the citizen accordingly. Otherwise, CSOs may adopt *Direct Assistance (A2a)* and *Interaction with Access Points (A2b)* to take this further.
**Case II: Job Card Not Received Despite Filing an Application** Processing of applications for all villages in a block is done at the block office, which may lead to delays in the process. Some applications can stay unprocessed for a long time. It is also possible that some mandatory documents are missing from an application or there may be a mismatch in the details filled out in the application form and those in the submitted documents. These can cause the application to be rejected. The applicant, however, may not know where the application process is stuck.
Step 1	Interact with the GRS, either face-to-face at the Panchayat Office or through the phone to convey the grievance about job card not received despite filing a written application. Submit application receipt if available.
Step 2	File a written complaint with the GRS and collect complaint receipt. *If Step 2 yields no result, proceed to Step 3.*

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[41] A template of the job card application form can be accessed here.

Step 3	Initiate conversation regarding grievance with BDO/PO/CEO either face-to-face at the Block Office or via phone. Submit complaint receipt collected in Step 2 to said officials (PO/BDO/CEO). File a new written complaint and collect a new complaint receipt.
Step 4	If the BDO/PO/CEO highlight an issue in the documents attached, help file a new Job Card application. Documents required would be a copy of the Aadhaar Card, two passport size photos, and any government documents that serves as Proof of Address (for example: Ration Card, Voter ID) and a Proof of Identity (Class 10 marksheet, Ration Card, Voter ID etc.)

Benefit Processing Stage (E3)

Work Allocation

MGNREGA is a demand-driven program, implying that demands raised by people must be provided for. The regular occurrence of a Rozgar Diwas facilitates ease of raising work demand, as they are a community platform where citizens may interact directly with the GRS.

Every year, the Village Heads of all the villages in a block, the GRS, PO and BDO together formulate a Block Work Plan. This plan defines what works shall be provided under MGNREGA in the block. This plan is then sent to the district Panchayat for approval. Further, for any project under MGNREGA to be initiated, the Village Head needs to send a proposal to the district Panchayat for its approval. Job Card holders may end up not being allotted work or allotted only limited/ad-hoc work if the Village Head is not proactive in sending project proposals.

Step 1	Raise a work demand by writing a written application for work to GRS or Village Head. Collect the receipt as a proof that an application has been filed.
Step 2	If work is not allocated within 15 days from the date of application, initiate conversation regarding grievance with BDO/PO/CEO either face-to-face at the Block

	Office or via phone. Submit receipt collected in Step 1 to said officials (BDO/PO/CEO). *Alternatively, Step 3 may also be pursued.*
Step 3	If work is not provided within 15 days of filing work demand, approach the GRS and file an Unemployment Allowance claim. Collect a receipt for the claim filed.

Wage Payment Processing

Case I: Unpaid or Partially Paid

Ideally, all payments transfer for works done are supposed to happen within 15 days of completion of work. Workers must be encouraged to ensure proper attendance marking in the Muster Roll for the work being done. If the measurements of the work done are not verified and uploaded by the TA, or the attendance marked in the Muster Roll by the GRS is inaccurate, the workers receive partial payments; and little can be done to resolve this. The volunteer interviews suggest that payments often get stuck when the Technical Assistant does not conduct timely verification of the worksite, complete the mandatory geo-tagging, and update the MIS to process workers' payments. In such a case, the CSOs can follow the below steps.

Step 1	Approach the MGNREGA portal, enter the worker's job card number. Details such as previous payments made, number of days of work done, whether any current payment is being processed or not etc. are displayed.
Step 2	If the worker says that they have not received the amount that they should have received based on official wage rates or if no payment is being processed as per their online status, interact with the relevant GRS, either face-to-face at the Panchayat Office or through the phone and convey the grievance about partial/no payments having being transferred.
Step 3	File a written complaint with the GRS and collect complaint receipt.

	GRS instructs the Technical Assistant to verify the worksite and upload details on the MIS for the payments process to initiate. *If Step 3 yields no result, proceed to Step 4.*
Step 4	Initiate conversation regarding grievance with BDO/PO/CEO either face-to-face at the Block Office or via phone. Submit complaint receipt collected in Step 2 to said officials (PO/BDO/CEO). File a new written complaint and collect a new complaint receipt. *At the backend, GRS instructs the Technical Assistant to verify the worksite and upload details on the MIS for the payments process to initiate. The PO then accesses the FTO generation portal and generates the FTO. The FTO is forwarded to the beneficiary's bank, and the payment is transferred to the beneficiary's account.*
	Case II: Unaware of Payment Date/Delay
	As mentioned in the earlier sections of the report, there are instances where beneficiaries experience undue delays in wage payments and have no knowledge about when the wages might be credited. On receiving such grievances, the CSOs may pursue resolution using the following steps.
Step 1	Approach the bank in where the beneficiary is an accountholder and speak with the bank officials. Provide bank account number and request them to check the bank account linkage with job card, and whether the passbook is updated to help verify whether the wages have been transferred or not. The bank official will provide information if the account has frozen or the KYC is pending. *If account is inactive or frozen, proceed to Step 2 (a). If bank account KYC is pending, proceed to Step 2 (b).*

Step 2 (a)	If the bank account is frozen, draft a written request on behalf of the beneficiary for the bank to unfreeze bank accounts and submit it to the Bank Manager. Collect a receipt for the request submitted.
Step 2 (b)	If KYC is pending, fill the KYC form and submit a copy of the beneficiary's Aadhaar Card along with 2 passport size photos. Collect a receipt from the bank for filing said application.
Step 4	If wages have not been transferred, interact with the relevant GRS, either face-to-face at the Panchayat Office or through the phone and convey the grievance about undue delay in wage transfers. Try to understand by when the wages would be transferred.
Step 5	If GRS is not aware, file a written complaint with the GRS and collect complaint receipt. *If Step 5 yields no result, proceed to Step 6.*
Step 6	Initiate conversation regarding grievance with BDO/PO/CEO either face-to-face at the Block Office or via phone. Submit complaint receipt collected in Step 2 to said officials (PO/BDO/CEO). File a new written complaint about undue delay in wage transfers and collect a new complaint receipt.

Case III: Non-Transfer of Wages due to Mismatch in Details on Aadhaar Card and Bank Account

Minor discrepancies in the Aadhaar Card and bank account, such as mismatch of spelling of the name or date of birth can result in payment failures. In such cases, direct assistance by way of resolution on citizen behalf as well as information provision to beneficiaries for them to take self-action can prove to be particularly helpful.

Step 1	Access Aadhaar portal, enter beneficiary's Aadhaar details and check for discrepancies between details on Aadhaar portal and beneficiary's bank passbook. *If beneficiary has access to Aadhaar registered phone number, proceed to Step 2 (a). Else, proceed to Step 2 (b).*
Step 2 (a)	If minor changes in details on Aadhaar card are required (such as change in spelling of name, date of birth, or gender) access Aadhaar portal and make required changes.
Step 2 (b)	Approach a government bank with a special Aadhaar desk, the post office, or Aadhaar Customer Service Point (CSP). Submit copies of documents such as Proof of Identity (Voter ID, PAN Card etc.) or Proof of Date of Birth (Birth Certificate, Marksheet issued from any government recognised education board/university, Voter ID etc.) and ask the operator to make desired changes.

Public Distribution System (PDS)

Entry Stage (E2)	
Application Processing Here we look at various points in the application process that are a cause for concern for citizens wanting to claim their PDS and PMGKY entitlements but are unable to do so. As mentioned above, the PDS system is quite opaque. Figuring out the exact point where the application is stuck or why it is not being processed is not always possible. The delay can be on part of the Village Head or the Fair Price Shop Officer (FPSO) if they collected applications but never forwarded them to the Block Office; at the block office where all village-level applications are collated; or at the FPSO when verification does not occur in a timely fashion. There are some measures that are taken to ensure eligible beneficiaries are correctly enrolled into the PDS.	
Case I: Application Submitted but Not Processed	
Step 1	Contact the Village Head at the Panchayat Bhawan or the FPSO and try to understand the reason behind the beneficiary not having received the ration card. If hold up is at the village level, ask them to forward the application to the block office. *If delay is not due to the FPSO/Village Head; or Step 1 fails to yield result, proceed to Step 2.*
Step 2	Access the state's online portal (ex: for [Bihar](#)) or a physical grievance redressal facility (Jan Seva Kendra in UP, or RTPS in Bihar) and register a grievance about application not being processed. Ensure to collect a receipt of the grievance filed. *If Step 2 yields no result, proceed to Step 3.*
Step 3	Approach the Block Office and interact with the Marketing Officer or the Food Supply Officer. Raise concern about the ration card application not being processed

	and file a written grievance. Submit a copy of the grievance receipt collected at Step 1 and collect a receipt of the grievance filed. *If step 3 yields no result, proceed to Step 4.*
Step 4	Approach the BDO or the District Office and file a written grievance with the District Magistrate about the ration card application not being processed. Submit a copy of the grievance receipt collected at Step 1 and collect a receipt of the grievance filed.

Case II: FPSO Does Not Verify the Proof of Residence	
Step 1	Approach the Block Office and interact with the Marketing Officer or Food Supply Officer. Raise concern about a non-cooperative FPSO who refuses to verify the Proof of Residence of the applicant or takes a long time in doing so. File a written grievance and collect a receipt of the grievance filed. *If Step 1 yields no result, proceed to Step 2.*
Step 2	Approach the District Office and file a written grievance with the District Magistrate about the issue. Submit a copy of the grievance receipt collected at Step 1 and collect a receipt of the grievance filed.

Details in Ration Card
Case I: Addition or Deletion of Members on Ration Card
Names of family members may need to be added or deleted from ration cards. The process to get these changes made is long, and several documents are required. The steps to be followed:
Addition of Names to Ration Card

Step 1	Approach the Food Supply Officer along with documents such as Birth Certificate and parents' ID proof.
Step 2	For addition of name after marriage, carry a no-objection letter written by the ration cardholder (approving the deletion of the daughter's name from their Ration Card and addition to the Husband's family Ration Card). Ask the Food Supply officer to delete the name.
Step 3	Once the name is deleted from the old ration card, approach the Food Supply Officer with the original ration card of husband, name deletion certificate of bride (from parents' ration card) and the Marriage Certificate. Ask the FPSO for the name addition form and submit it along with the mentioned documents.
Deletion of Names from Ration Card	
Step 1	Approach the Food Supply Officer along with requisite documents such as Birth Certificate or Divorce certificate. Ask the Food Supply Officer for the name deletion form, fill and submit it along with the mentioned documents.
Case II: Discrepancy in Information on Ration Card and Aadhaar Card Although this issue seldom arises, some FPSOs refuse to disburse ration if there is even a minor discrepancy in the information mentioned on the Ration Card and that mentioned on the Aadhaar Card.	
Step 1	Access the [Aadhaar portal](), enter beneficiary's Aadhaar details and check for discrepancies between details on Aadhaar portal and beneficiary's ration card. *If the beneficiary has access to Aadhaar registered phone number, proceed to Step 2 (a), else proceed to Step 2 (b).*

Step 2 (a)	If minor changes such as change in spelling of name, date of birth, or gender mentioned on Aadhaar Card are required, approach the [Aadhaar self-correction portal](#) and make required changes.
Step 2 (b)	Approach government bank with a special Aadhaar desk, the post office, or an Aadhaar CSP. Submit copies of documents such as Proof of Identity (Voter ID, PAN Card etc.) or Proof of Date of Birth (Birth Certificate, Marksheet issued from any government recognised education board/university, Voter ID etc.) and ask the operator to make desired changes.

Ration Collection (E4)

The end point or the final disbursement stage of PDS is populated with factors that can lead to exclusion, from the ration shop being too far away for some beneficiaries, to the FPSO indulging in quantity fraud. Some of these cases and their SOPs are discussed below.

Accessibility and Authentication

Accessibility issues include a variety of situations such as ration shops being inaccessible, extensive crowding outside shops or even erratic hours of functioning. The inclusion of authentication failures extends this list to include technical failures and glitches in the PoS device or network errors in the region. Another cause for concern is that many people, especially those who are old or do intensive manual labour, have faded fingerprints, which leads to their biometrics being unverifiable by the machines. There is no definite remedy for these issues, but the issues can be raised in the following ways:

Step 1	Approach the ration shop and interact with the FPSO about the issues such as erratic hours or technical glitches that are not allowing people to claim their due benefits. *If the FPSO cannot help or refuses to cooperate, proceed to Step 2.*

Step 2	Approach the Marketing Officer or the Food Supply Officer at the Block Office. Raise grievances of people such as erratic functioning hours or technical issues hindering ration disbursement. File a written grievance and collect a receipt for the grievance filed.

Non-Compliance

Non-compliance issues arise from the FPSO failing to fulfill their responsibilities of ration disbursement. An FPSO may indulge in quantity fraud, overcharge beneficiaries for their ration, or not disburse ration at all.

Step 1	Approach the ration shop and interact with the FPSO about grievances being raised by people about his non-compliance. Warn FPSO about a formal action that may be taken if such issues persist. *If Step 1 does not yield results, proceed to Step 2.*
Step 2	Approach the Marketing Officer or the Food Supply Officer at the Block Office. Raise grievances of people regarding the FPSO making arbitrary decisions in disbursement or overcharging beneficiaries. File a written grievance and collect a receipt for the grievance filed.

5. Final Recommendations

As we have discussed in the previous chapters, systemic changes are needed to solve for several reasons for exclusion as well as failures when the stated SoPs for CSOs may also not work. We briefly outline some recommendations to improve the overall architecture for delivery of social protection benefits to citizens.

The lack of /limited systematic documentation of citizen complaints in the public domain by relevant government departments also leads to a missing feedback loop (for government officials) who do not have enough data to understand the scale of localised issues. The resounding conclusion from our research is that until state-citizen interfaces in welfare schemes are redesigned to become more citizen-centric and ergo effective, CSOs and social workers will remain a critical cog in the last mile. Therefore, in addition to recommending a set of systemic improvements that need to be set in motion using policy levers, we also provide a detailed set of standard operating procedures that can be used a ready reference by other CSOs involved in resolving citizen grievances in welfare. We also note that given the hyper-local expertise of such organisations, government departments may choose to embed them as part of their official grievance redress system or alternatively, may adopt similar simple technological innovations to ensure more accessible and transparent grievance redress systems. We provide certain scheme-specific recommendations below:

Recommendations for Direct Benefit Transfer Schemes

Infrastructure and Capacity Building

1. Improving existing Common Services Centre (CSC) Architecture: We recommend the speedy implementation of the objectives that have been laid down in the Memorandum of Understanding between the Ministry of Panchayati Raj and CSC e-governance Services India Limited. Under the MoU that was signed in 2019, the State governments have been enabled to setup a CSC in each panchayat. Such a CSC is to be responsible for regular updation of scheme-level data across all governmental schemes. This is an important set-up that is a prerequisite for streamlining scheme delivery in the last mile. However, in addition to the setting up of new CSCs, issues pertaining to low financial viability and weak

monitoring of existing centres must be addressed through changes in the current CSC model.^{lxiii}

2. An institutional partnership with CSOs, or mobilizing a cadre of community volunteers, can provide further capacity at the last mile to assist citizens.^{lxiv}

Transparency and Accountability

1. Addition of more specific details to existing online portals. Live tracking of the application along with the specific reason for application pendency/rejection must be added to the beneficiary's online record. The web portal should show the cumulative number of days that have passed between application submission and the date of logging in for status check. Beneficiary record should also include the next step the beneficiary can follow to resolve the issue in case (i) the application has been rejected (ii) the cumulative number of days has crossed the temporal limit established under certain Public Service Acts.[42] While the PM Kisan portal has some of these transparency-enabling features in place, it can be a point of reference for other schemes for which online dashboards are yet to be introduced.

2. SMS notifications and IVR calls by the relevant Ministry updating all DBT scheme applicants on the status of their application. In case of rejection, the same must be relayed via SMS or IVR call to the applicant to ensure they do not incur inordinate costs while attempting to track their status. The communication, preferably in the local language based on beneficiary location, must also include information on the next step the beneficiary can follow to resolve the issue. Additionally, scheme specific helpline numbers can be set up that can be dialed by citizens to enquire about application status, by keying in the Aadhaar number of the beneficiary. A prerequisite of such a functionality would be to enforce the provision that at the time of application submission, each applicant is given a paper receipt displaying the application number that facilitates tracking.

3. In addition to the above, the relevant government department must periodically release lists of successfully registered beneficiaries, or failed registrations, at the Panchayat level.

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[42] A few states in India (Bihar, Odisha, Uttar Pradesh, among others) have passed the Right to Public Services Act that guarantees time-bound delivery of services for various G2C public services and provides an accountability enforcing mechanism as well.

Reasons for failure should be published and the Panchayat officials should be asked to proactively assist the beneficiary to resolve the problems.

4. The specific reason for credit failure of a beneficiary's account must be added to the online record of DBT beneficiaries along with information on the next step they can take to resolve the issue. For example, in case of payment rejection due to Aadhaar spelling error, the beneficiary record can include: Please visit your nearest Aadhaar Seva Kendra to rectify the issue (in the appropriate local language).

5. The same reason must be communicated to the beneficiary (in case of inaccessibility of online portals) through an SMS notification or an IVR call by a designated governmental entity within the DBT architecture which must be assigned this particular task. The communication, preferably in the local language based on beneficiary location, must also include information on the next step the beneficiary can follow to resolve the issue. In the current system, multiple agencies are involved in pushing the Fund Transfer Order from the relevant Ministry to the beneficiary account. A clear allocation of responsibility of G2C communication must be instituted instead of relinquishing this duty to the banks.

6. Periodic disclosure of all Aadhaar-enabled Payment System (AePS) transaction failures and underlying reasons for the same by NPCI. This can help understand emerging issues and detect anomalies, such as at specific banks or bank branches, or at specific villages or panchayats or blocks or districts.

Establishment of Robust Grievance Redress Mechanisms

1. Creation of a common Grievance Redress Cell for all DBT schemes across tiers: State, District, and Block. A cell at each tier must be assigned with the task of collating and live tracking all complaints generated at its sub-tiers and ensure timely redressal of grievances. It should also be responsible for assigning the duty of grievance resolution to the relevant entity (either a bank, local government officials, etc.) for each complaint depending on its nature. Appointees for a state-level cell should belong to all the agencies involved in the DBT system: the relevant Ministry/Department/Implementing Agency, Ministry of Finance, National Payment Corporation of India (NPCI), Unique Identification Authority of India (UIDAI), and State Level Banker's Committee (SLBC) Convenor Banks and Lead Banks.

2. Mandate the monthly assembly of a Panchayat session specifically for facilitation of grievance redress for DBT schemes at the village level. Although certain schemes such as MGNREGA have a provision of organising an *Employment Guarantee Day* (although with poor enforcement), no such mechanism currently exists for DBT schemes that are not backed by a legislation. Such monthly sessions can be presided over by relevant officials responsible for scheme execution. This will also help operationalise one of the guidelines issued by the Department of Administrative Reforms and Public Grievance (Ministry of Personnel, Public Grievances and Pensions) wherein one day of the week should be designated for public hearing of grievances. Such sessions should be used to officially register citizen grievances online in a public repository proposed below.

3. Setting up of a Complaints Management System:
   a. Backend of such a proposed system must be integrated into the IT systems of departments administering the DBT schemes, or other stakeholders such as banks, NPCI, etc. This should not just be a routing system to direct complaints to departments and various stakeholders, but it should track the complaint until its final closure. Complaints should be closed/marked as resolved only after a confirmation by the citizen.
   b. The root cause analysis of the problem must be conveyed to the citizen. Aggregate statistics on the type of grievance and root cause of failure, along with the number of beneficiaries and details of benefits transferred, should be made available through dashboards in the public domain. The data shared publicly must be anonymised.

Recommendations for MGNREGA

Infrastructure and Capacity Building

1. Periodic training of the Gram Rozgar Sahayak by officials from higher tiers (block level) on how to facilitate grievance redressal at the local level.
2. Regular organisation of the *Rozgar Diwas* or the Employment Guarantee Day across panchayats that facilitates job card application, work allocation, and complaint registration.

3. Simple technology systems such as IVR for MGNREGA job card holders to register demand for work. Such a system can also facilitate a quarterly or six-monthly campaign-based assessment for work demand to make budget allocation estimates, by pushing outbound calls to job card holders to indicate how many days of work they may require.

Transparency and Accountability

1. Periodic information dissemination by the top-level tiers to local functionaries (who are citizens' first point of contact) on status of payments and FTOs raised by them (G2G communication).
2. Reason for failure of wage payment (even if they pertain to budgetary constraints) must be specifically added to the beneficiary's online record.
3. The same reason must be communicated to the beneficiary (in case of inaccessibility of online portals) through an SMS notification or IVR by the designated Ministry/ Department/State Department/Implementing Agency. The IVR system should also facilitate access to the online record by keying in the Aadhaar number of the beneficiary, linked to their MGNREGA job card.
4. Periodic performance monitoring of Gram Rozgar Sahayak and other panchayat officials to enhance accountability of local functionaries. This should not only include the number of job cards issued, work allocated, but also the number of Employment Guarantee Days organised.

Establishment of Robust Grievance Redress Mechanisms

1. Expanding the scope of social auditing to include auditing of grievance redress procedures. This should include auditing for every gram panchayat, the number of complaints raised, number of complaints resolved, time taken in resolution. A public repository of complaints is a prerequisite for this recommendation. <u>All data of any such public repository must be anonymised before sharing in the public domain</u>.
2. Social audit should also include an assessment of the number of people who did not receive any work despite having raised demand for it. Currently it only verifies the entitlements

after the enrolment and work allocation process. Such an assessment can only be facilitated if demand registration is systematised, replacing the ad-hoc provisions currently in place.

3. Technology such as simple IVR systems can be adopted for scaling up social audits in two ways. First, whenever wage disbursements or work verification or other updates are made to the online record of a MNGREA Job Card holder, an automated IVR call can be placed to them to verify the payment amount. If the worker disagrees, they can immediately register a dispute.[lxv] Second, mass outbound calls can be made to a randomly sampled set of MNGREA Job Card holders to verify the number of days they worked, the payment they received, and other details.[lxvi] In both cases, such rapid generation of citizen-validated data can help build aggregate indicators to identify locations with a high degree of discrepancy where a physical social audit may be commissioned.

General Recommendations for Cash Accessibility for all Cash Transfer Schemes

1. Increasing the number of cash-out points in underbanked villages with immediate effect. This process of activation of banking points must be expedited by making data on the Find My Bank portal public, which would enable both private and public service providers (such as banks and BC Kiosks/CSCs) to update verifiable numbers of cash-out points in real-time as well as help them identify districts and villages that are underbanked. This would ensure optimization of catchment areas under each bank.

2. The above infrastructural changes must be accompanied by revision of current incentive structures of individual banking agents. The Reserve Bank of India (RBI) must create additional incentives for agents who provide services in underbanked areas, which usually have higher concentration of recipients of social welfare entitlements.

3. SLBC Convenor Banks and Lead Banks must undertake a periodic auditing of DBT transactions under all schemes of all the banking points empanelled for the delivery of DBT payments within their jurisdiction.

4. Establishment of clear accountability rules in case of embezzlement of welfare transfers by banking intermediaries, including CSPs. Any such rule should entail compensation of the beneficiary by the liable entity. The PoS machine design can also be done in a way to empower beneficiaries, for instance, by having banking correspondents make a verbal

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recording in the presence of the citizen in case of authentication failures or other reasons claimed by the banking correspondent because of which a cash-out may have failed.[lxvii]

Recommendation for PDS

Infrastructure and Capacity Building

1. Commissioning of routine surveys to identify the number of households in need of ration cards. Such surveys must be conducted at the panchayat level. These surveys should also identify family members who may not be registered as part of their family's ration card or those who might want their names deleted and be issued a separate ration card.

2. Enhancement of the capacity of existing G2C service centres or any other such assisted models for scheme delivery (such as Right to Public Service counters in Bihar) and setting up of one such centre at the panchayat-level in addition to the extant block-level architecture.

3. An institutional partnership with CSOs, or mobilizing a cadre of community volunteers, can provide further capacity at the last mile to assist citizens.[lxviii]

Transparency/Information Disclosure and Accountability

1. Addition of more specific details to existing online portals. Live tracking of the application along with the specific reason for application pendency/rejection must be added to the beneficiary's online record. The web portal should show the cumulative number of days that have passed between application submission and the date of logging in for status check. Beneficiary record should also include the next step the beneficiary can follow to resolve the issue in case (i) the application has been rejected (ii) the cumulative number of days has crossed the temporal limit established. This online record should also be accessible through simple systems like IVR, upon keying in the Aadhaar number of the beneficiary.

2. Every time a fair price shop receives fresh stock of ration, it must be relayed to the community members that food grains are now available. This can be done through public notices at the Panchayat office or through SMS and IVR updates. Such systems have been known to lead to greater community empowerment to hold the FPSO accountable.[lxix]

3. Build in localised mechanisms for periodic monitoring of Fair Price Shop Officers. Creation of dashboards that give the number of beneficiaries, number of units for which registered, and units withdrawn, available at different geographic levels, organized optionally by FPSOs. Coverage and utilization indicators can be defined as well on such dashboards.

4. Eliciting routine feedback from PDS beneficiaries chosen randomly through IVR systems. Such feedback must include any instances of non-availability of ration or discretionary denial, non-compliance/overcharging, and confirmation about issuance of receipts during collection.

Establishment of Robust Grievance Redress Mechanisms

1. The NFSA has a rich grievance redressal architecture but it is not well implemented or utilized. This needs an immediate correction, including the expansion of scope and effectiveness of helpline numbers that currently are either non-responsive/ineffective. Randomised performance evaluation of helpline numbers through mystery shopping strategies can also be undertaken to identify the key issues that reduce their efficacy as a grievance redress channel.[43]

2. Expanding the scope of social auditing to include auditing of grievance redress procedures. This should include auditing for every gram panchayat, the number of complaints raised, number of complaints resolved, and time taken in resolution. A public repository of complaints is a prerequisite for this recommendation. All data of any such public repository must be anonymised before sharing in the public domain.

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[43] As part of a study by the National Stock Exchange - IFMR Financial Inclusion Research Initiative, researchers used a "mystery shopping" approach to document the barriers low-income customers faced in accessing banking services. For more details, see Mowl, A. and Boudot, C (2014).

Appendix 1: Process Flow of Direct Benefit Transfers

❖ **Process 1**: Under DBT, the enrolment process consists of two key sub-processes:

- **Proof of Eligibility and Application Submission**: Citizens must first enroll into a DBT scheme to avail any benefit. First, at the application stage, a citizen approaches the nearest enrolment point and submits the necessary documents along with the application form. At this stage, account details and biometrics (*stated to be optional*) are captured by the front-line staff at the access point and forwarded to the DBT Scheme Management Software (SMS) of the respective Ministry/Department which runs the scheme[lxx].

- **Application Processing and Beneficiary On-Boarding:** According to standard operating protocols[lxxi], the second step in this process is the eligibility check and the necessary approvals which are to be carried out by the Central Ministry/Department and/or State Department/Implementing Agency (varies across schemes). The database management tools used for information transmission within DBT are the PFMS and the optional state-level Financial Management System (e-FMS).[44] Another critical cog in this system is the NPCI's Aadhaar mapper. It is used for the purpose of routing all APB transactions to the destination banks. The mapper plays a key role in both the registration as well as verification of scheme beneficiaries during enrolment and access to benefits transferred therein. According to the standard operating protocols, only once the approval has been granted by the concerned government department, can the beneficiary records (such as bank account details, Aadhaar number) be digitised and entered into the DBT SMS or onto the PFMS directly.

❖ **Process 2**: This process involves the generation and transmission of payment files for beneficiaries who have been successfully enrolled under Process 1. The process flow of delivering DBT benefits to citizens' accounts is illustrated below. Markers n1 to n6 denote all the nodes involved in the flow of DBT funds, from the Consolidated Fund of India to beneficiaries' accounts. The flow of funds has been illustrated using green arrows, whereas the orange dotted lines depict the transmission of information between the Central Ministries/Departments, State Departments, and destination entities.

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[44] The Central Government mandates that the state e-FMS must be compatible with PFMS to ensure establishment of a reverse feedback loop.

Table 10: Back-end Transmission of DBT Payment Files

| Detailed Steps in Processing of DBT Payment Files	Entities Involved
Generation of payment file instructions by the relevant Ministry, either in DBT SMS (then PFMS) or in PFMS directly.	Central/State Ministry
Payment file is pushed to the sponsor bank using an NPCI switch (either through APB or NACH).	Sponsor Bank
	NPCI
NPCI pushes the payment instruction to Destination Bank, which in turn credits the beneficiary's account.	Destination Bank
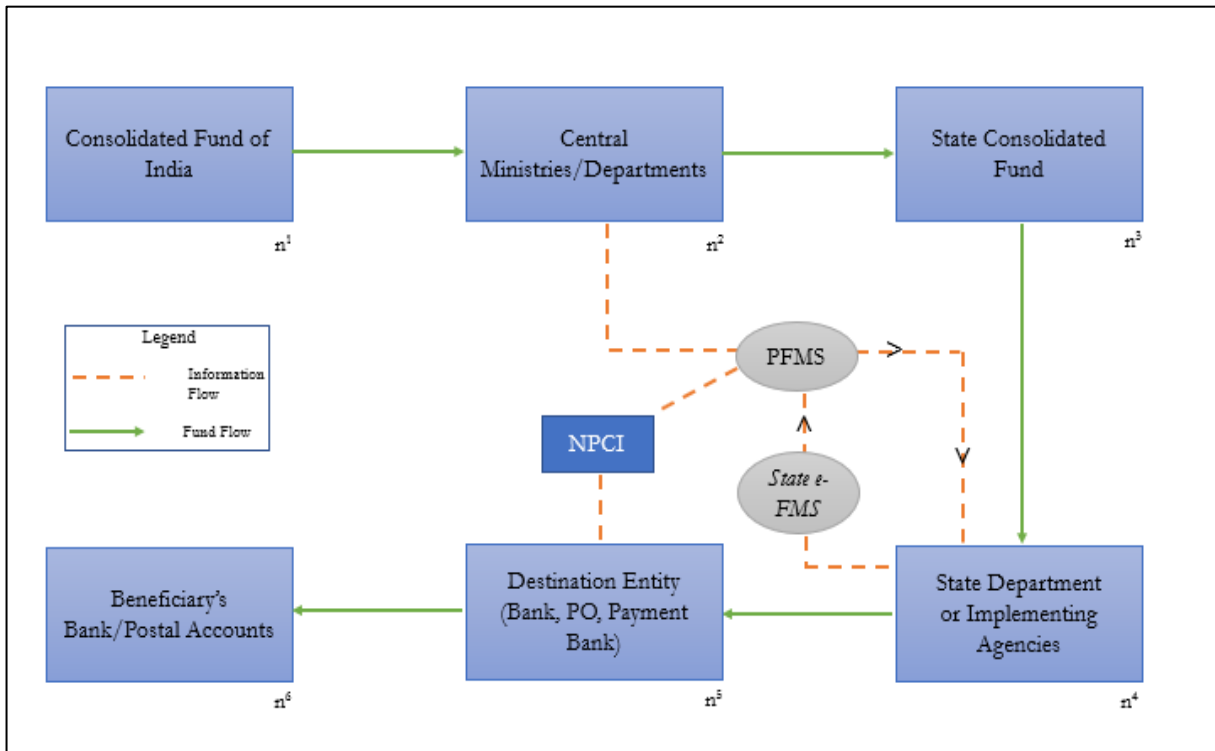
Figure 35: DBT Fund Flow

❖ **Process 3**: The last process in the delivery of DBT benefits is the withdrawal of cash by the beneficiary. This process requires access to cash-out infrastructure including bank branches, ATMs, Business Correspondents, etc. and includes the modalities used by the beneficiary to withdraw money such as use of passbook, biometrics, debit card and/or identity verification through Aadhaar.

Appendix 2: Decision Trees used in Volunteer Interviews

Sample Decision Tree[45] used in Volunteer Interviews for MGNREGA grievances

1. Given that MGNREGA has in-built resolution mechanisms, how do you decide for which cases you must let the beneficiary self-resolve or intervene to assist directly or escalate issue? (decision #D0)

2. What are the other factors that affect #D0 decision of a volunteer?

3. What affects the decision #D1 between Direct Assistance vis a vis Issue Escalation?

4. In case it is Direct Assistance:

   a. How do you decide between Resolution on Citizen Behalf vis a vis Interaction with Access Point (decision #D2)?

   b. What factors affect #D2?

5. How do you determine modalities of issue escalation, key official, group vs individual (#D3)?

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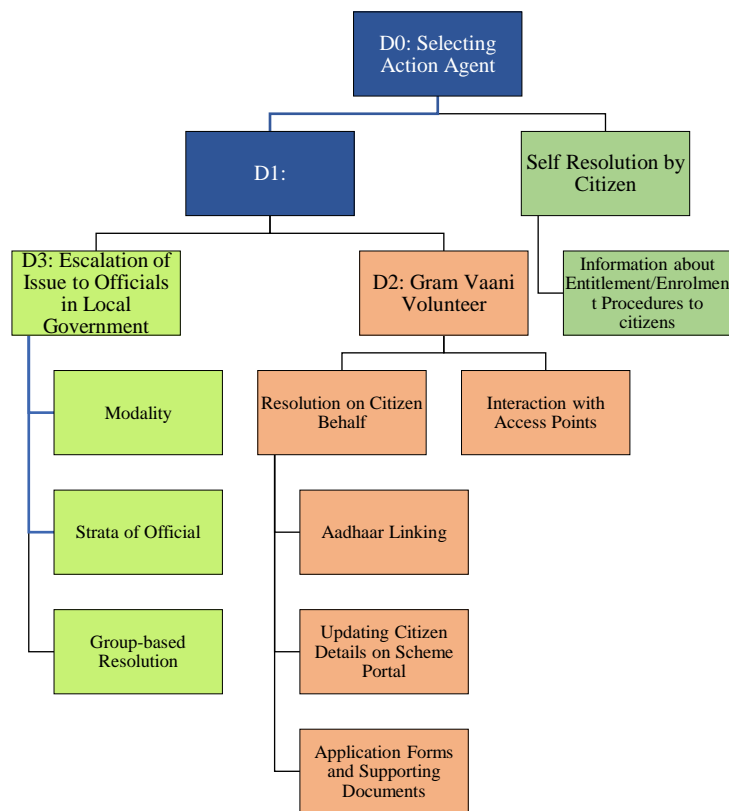
45 Similar Decision Trees were created for other schemes which were used during volunteer interviews.

Appendix 3: Details of Gram Vaani Volunteers

S. N	State	Volunteer Name	Profession	Volunteer Since
1	Bihar	Ranjan Kumar	Teacher and Social Worker	March 2018
2	Bihar	Abodh Thakur	Teacher, Journalist, and Social Worker	March 2018
3	Bihar	Rajni Kumar Singh	Journalist and Social Worker	December 2013
4	Bihar	Lakshman Kumar Singh	Businessman and Social Worker	May 2015
5	Bihar	Bipin Kumar	Teacher and Social Worker	January 2014
6	Bihar	Naresh Anand	Social Worker and Journalist	August 2016
7	Bihar	Nand Kumar Chaudhry	Social Worker and Journalist	January 2019
8	Bihar	Rahul Ranjan	Student and Social Worker	November 2018
9	Bihar	Archana Kumari	Student and Volunteer with *Jawahar Jyoti Bal Vikas Kendra*	January 2020
10	MP	Dinesh Singh Lodhi	Social Worker and Farmer	December 2015
11	MP	Shyamlal Lodhi	Social Activist and Farmer	September 2016
12	UP	Pramod Verma	Teacher and Social Worker	August 2018
13	UP	Upendra Kumar	Teacher and Social Worker	August 2018
14	UP	Panna Lal	Social Worker	August 2018

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