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IMPLEMENTATION OF NATIONAL FOOD SECURITY ACT 2013 IN TELANGANA

AN EVALUATION
REPORT



Implementation of National Food Security Act 2013 in Telangana

An Evaluation Report

Prepared by



Centre for Child and the Law (CCL)

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Centre for Child and the Law (CCL) is a specialized multi-disciplinary research centre of National Law School of India University (NLSIU). The centre was established on 1st of April 1996 with a vision to integrate research, direct field action and teaching on child rights law. The centre uses law and socio-legal strategies as tools for transformative social change in order to enable children to live with dignity. The specific aim of CCL is to ensure social justice, human rights and quality of life for all children in India, with special focus on right to food, equitable quality education, care, protection and justice for marginalized and excluded children.



Telangana State Food Commission was constituted in June 2017 vide G.O.Ms.No.02, Dtd: 10/04/2017, by Consumer Affairs, Food & Civil Supplies Department, Government of Telangana. The Commission comprises of Mr. Kommula Thirimal Reddy as the Chairperson, Mr. Voriganti Anand, Mr. Banoth Sangulal, Mr. Kontham Govardhan Reddy, Ms. Rangineni Sharada, and Ms. Mulukuntla Bharathi as members. The Commission is supported by a Member Secretary and Administrative Officer.

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Acronyms

AAY	Antyodaya Anna Yojana
AFSC	Antyodaya Food Security Card
ANC	Ante Natal care
AWC	Anganwadi Centre
AWW	Anganwadi Worker
BPL	Below Poverty Line
DCSO	District Civil supplies Officer
DEO	District Education Officer
DGRO	District Grievance Redressal Officer
DMCS	District Manager Civil Supplies
DM&HO	District Medical & Health Officer
DWACRA	Development of Women and Children in Rural Areas
DWO	District Welfare Officer
FPS	Fair Price Shop
FSC	Food Security Card
GO	Government Order
GP	Gram Panchayat
GPS	Geo Positioning Satellite
DRDO	District Rural Development Officer
GRM	Grievance Redressal Mechanism
HQ	Head Quarters
ICDS	Integrated Child Development Services
I GRM	Internal Grievance Redressal Mechanism
LM	Lactating Mothers
MAM	Moderate Acute Malnourishment
MBS	Maternity Benefit Scheme
MDMS	Midday Meal Scheme
ME	Maternity Entitlement
MLS	Mandal Level Stocklist
MSP	Minimum Support Price

NFHS	National Family Health Survey
NFSA	National Food Security Act
NIN	National Institute of Nutrition
NRC	Nutrition Rehabilitation Centre
PMMVY	Pradhan Mantri Matru Vandana Yojana
PVTGs	Particularly Vulnerable Tribal Groups
PDS	Public Distribution System
PHH	Priority Household
PW	Pregnant Women
RDO	Revenue Divisional Officer
SAM	Severe Acute Malnourishment
SHG	Self Help Group
SMC	School Monitoring Committee
SFC	State Food Commission
SNP	Supplementary Nutrition Programme
SSFP	Supervised Supplementary Feeding Programme
TSMSIC	Telangana State Medical Services Infrastructure Corporation
TPDS	Targeted Public Distribution System
UNICEF	United Nations International Children's Emergency Fund
VC	Vigilance Committee
WDCW	Women Development & Child Welfare

Background of Evaluation Study

National Food Security Act (NFSA) 2013 is a landmark law in the legislative history of food security in India. Enacted with a vision to provide for food and nutritional security in human life cycle approach, by ensuring access to adequate quantity of quality food at affordable prices to people to live a life with dignity and for matters connected therewith or incidental thereto this law marked a paradigm shift from welfare to rights-based approach to food security. The NFSA was an outcome of endeavours of civil society movement, judicial interventions and legislative action. This law embodied not only the elements of prevailing programmes and schemes but also several of the judicial pronouncements. Despite some of its limitations, it was expected of NFSA to make a significant dent in the problem of hunger and malnutrition in the country.

With the completion of almost a decade of its existence, it is important to review and assess its impact on the expected right holders. While the law defines specific responsibilities for central and state governments, operationalization of most of the schemes and their implementation is to be done by the state governments. Many states rolled out its implementation immediately while others took a couple of years in the identification of the right holders. The Hon'ble Supreme Court of India had to intervene and direct the states to strengthen the implementation of the NFSA, 2013 and provided a milestone judgment as in the case of Swaraj Abhiyan Vs. Union of India.¹

Telangana was one of the forerunners in implementation of NFSA and also notified a comprehensive set of Rules for the implementation of provisions in the law in 2016. The Telangana State Food Commission came into being in the year 2017. There have been several milestones and challenges in the way of implementing NFSA. The first independent State Food Commission of Telangana, after the internal discussions and reflections with the stakeholders decided to commission an evaluation of NFSA implementation in the state and engaged National Law School of India University (NLSIU), Bangalore to conduct the evaluation of NFSA in the state, considering that the Centre for Child and the Law (CCL) of NLSIU has been engaged in research, teaching,

¹ Writ Petition (C) NO. 857 of 2015

capacity building and advocacy for progressive reforms in the legal framework, especially the delegated legislation under the law.

The evaluation was conducted during December 2021 and March 2022, and benefited from multi stakeholder discussions and inputs from a range of academics, researchers, government officials and most importantly, the rights holders themselves.

Introduction

Brief history of state²

During Indian independence, the Telugu-speaking Andhra region became part of what was then Madras State (now mainly Tamil Nadu State), but the people of Andhra demanded separate statehood. The union government acceded to the people's request by creating, on October 1, 1953, Andhra state from the northern portion of Madras. In 1956, during a major reorganization of Indian states, Hyderabad state was split up, and on November 1, the Telugu-speaking districts of Telangana were joined to Andhra state to form the new state of Andhra Pradesh. At the time of Andhra Pradesh's creation, a regional committee for Telangana was also established as a special feature of the state government. The committee was intended to ensure that issues in the region, which was economically and educationally less advanced than the coastal areas of the state, were adequately considered. However, it became widely believed in the Telangana region that the disparities between the two parts of Andhra Pradesh were not improving, and that gave rise at the end of the 1960s to public agitation demanding that Telangana be established as a separate state.

Calls in Telangana for separation from Andhra Pradesh had grown dramatically by the start of the 21st century, leading to the establishment of the Telangana Rashtra Samithi (TRS) in 2001, a political party dedicated to creating the new state. Years of discussions followed, particularly on the disposition of Hyderabad, by far the most populous and economically important city in Andhra Pradesh. Ultimately, it was agreed that Hyderabad would serve as capital of both states for 10 years, after which it would be the capital

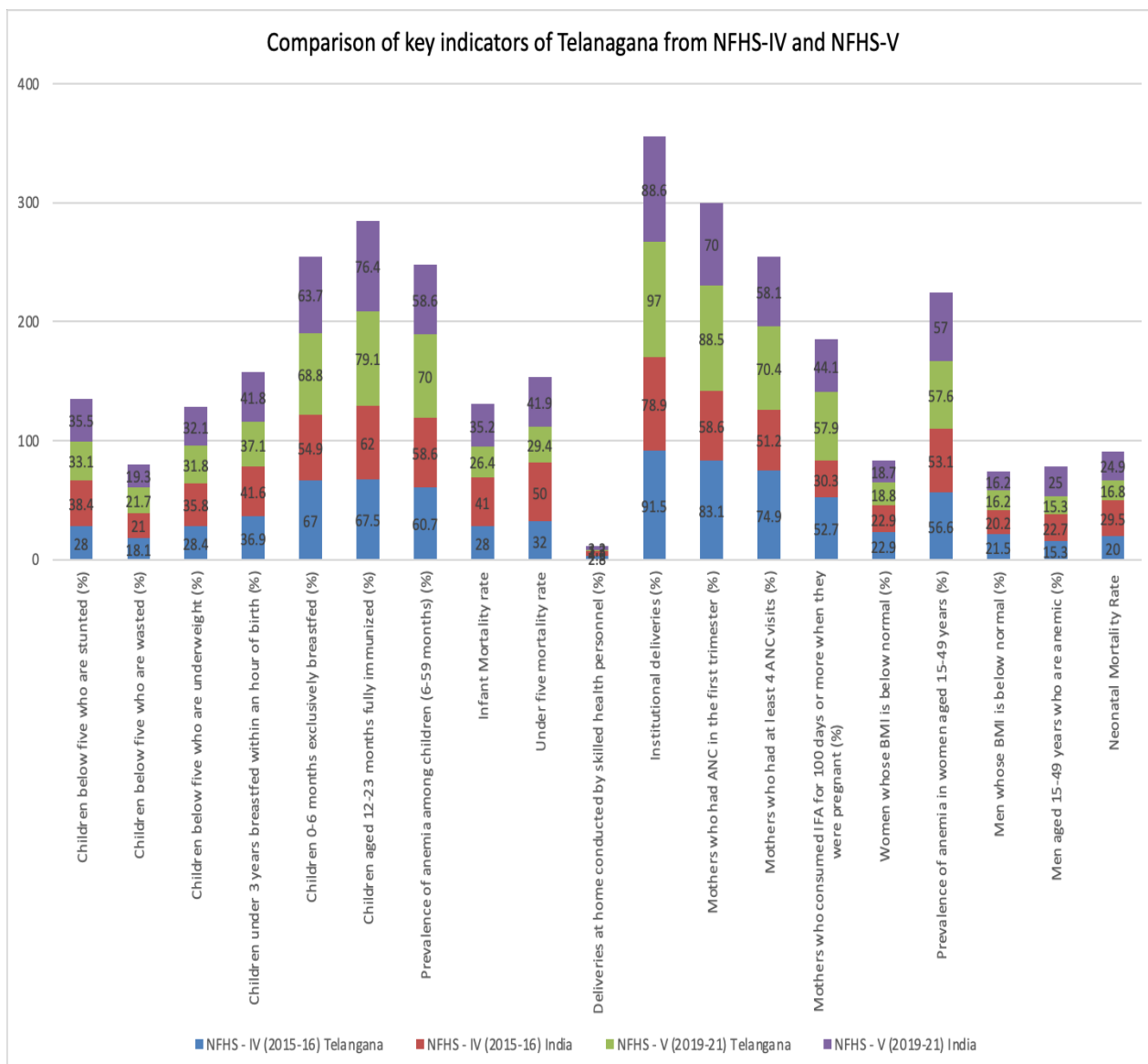
² Source: Britannica Encyclopedia: <https://www.britannica.com/place/Telangana/History>

solely of Telangana. Approval for the creation of Telangana was passed by both houses of the Indian parliament in February 2014, and on June 2 Telangana achieved statehood. K. Chandrasekhar Rao, leader of the TRS, was named the state's first chief minister.

Table 1: State at a Glance

Area	1,12,077 sq. km
Population	3,50,03,674
Capital	Hyderabad
Number of Parliamentary Constituencies	17
Number of Assembly Constituencies	119
Geographical Regions	Dry deciduous forests, hilly areas, mountain ranges and thick dense forests
Sex Ratio	988
Literacy Rates (M:F)	74.95% : 57.92%
Population Projections beyond 2011	3,77,25,000 (2021)
Per Capita Income	228,216 per annum
Cultivable land	1.06 crore acres
Drought Occurrence	
Date of Implementation of NFSA	October 2015
Total Population to be covered under TPDS	326.41 lakh

Figure 1: Status of food insecurities and malnutrition in Telangana (as per NFHS data)



About the evaluation

Although evaluation of NFSA implementation in different states is being undertaken by the central government, for the most part, the scope has been limited to either only one scheme, i.e., the Targeted Public Distribution System (TPDS), or falls short of covering all the major provisions relating to entitlements, monitoring and grievance redressal, and other important aspects such as budgetary provisions, and advancing food and nutrition security. Against this backdrop, an evaluation of NFSA 2013 has been undertaken in the state of Telangana with the following objectives in view:

Objectives:

- To undertake an overall assessment of all the components of four schemes that are part of NFSA
- To understand the current status and key bottlenecks in implementation
- To suggest recommendations for better and effective implementation of NFSA in the State

Scope and Methodology

Brief Methodology: An empirical study was conducted in two districts - Hyderabad and Vikarabad using mixed methods. Respondents were identified on the basis of predetermined criteria and approached using purposive sampling techniques. Evidence was gathered based on a structured questionnaire using direct interview methods and participant observation. Quantitative and qualitative data gathered through the field study were evaluated using thematic analysis to determine specific indicators such as accessibility, availability, adequacy and awareness of the entitlements provided under four schemes mandated by the NFSA, 2013. The sampling framework is provided as under:

Table 2: Sampling framework

Scheme	Hyderabad	Vikarabad	Total
Targeted Public Distribution System (TPDS)	25	25	50
Integrated Child Development Services (ICDS)	25	25	50
Mid-Day Meal Scheme (MDMS)	27	36	63
Maternity Benefits Scheme (MBS)	25	25	50

Rationale: Hyderabad (urban area) and Vikarabad districts were selected to represent the urban, rural and tribal population in the state, and accordingly primary data collection was undertaken in these districts. Hyderabad district (Urban), is a city-district in the state of Telangana which includes a part of the metropolitan capital city area of Hyderabad, the capital of Telangana State. It is one of the oldest and the smallest in terms of area, among all the districts in the state, but has the highest human density and developed in all aspects. The average literacy rate as per 2011 Census is 83.25%.

According to NFHS-5, amongst children under 5 years, 30.4 % are stunted, 17.7 % are wasted, 18.9% are underweight and 63.6 % children aged 6-59 months are anaemic in Hyderabad district. 52.7 % of women between 15-49 years are anaemic in Hyderabad district.

Vikarabad district is the newly formed district (2016) of Telangana with rural (86.52%) and tribal population (13.01%). Its average literacy Rate is 57.91% (2011 Census). Although Vikarabad is approximately 75 kms from Hyderabad city, the forest of Vikarabad district, with main water source for Osmansagar and Himayathsagar is considered as one of the dense forests in Telangana region.

In Vikarabad district, as per NFHS-5, 32.1% children under 5 years are stunted; 20% are wasted; 37.1% are underweight and 70% of children between aged 6-59 months are anaemic. 62% of women aged between 15-49 years is anaemic in Vikarabad district.

Analysis framework: In terms of the themes, the evaluation primarily reflected on the following aspects:

- Analysis of the State Rules under NFSA 2013: The analysis was undertaken from the point of view of assessing the role of state government in ensuring implementation of the provisions under NFSA.
- Implementation of all four schemes: Targeted Public Distribution System (TPDS), Mid-Day Meal Scheme (MDMS), Integrated Child Development Services (ICDS) and Maternity Entitlement (ME) Scheme, are the major central schemes that provide for the institutional support for the provision of entitlements as

mentioned in NFSA. In light of the provisions in these schemes, measures taken by the state governments were evaluated.

- Functioning of the monitoring and grievance redressal mechanisms – including internal grievance redressal mechanism, District Grievance Redressal Officer (DGRO), State Food Commission, social audit, transparency, etc., was also undertaken in order to draw comparison with the provisions in NFSA.
- Implementation of section 8 – food security allowance was also attempted.

The evaluation exercise was conducted using a combination of quantitative data from the stakeholders, including rights holders and the functionaries; as well as official data available from the Central and State Governments. Interviews were conducted with the key experts, government officials and civil society organizations. The framework for analysis incorporated the three major aspects and other relevant provisions of the law. The three major aspects of the analysis were: Entitlements, Monitoring mechanisms and grievance redressal.

Assessment was undertaken at two levels. First, assessment included comparison between provisions as per NFSA and measures taken by the State. Second level of analysis included inquiry into the prevailing status of implementation and gauging whether the provisions as mentioned on paper (in State Rules and several GOs) are being implemented on the ground or not.

Table 3: Sampling framework for data collection from all respondents (Hyderabad and Vikarabad districts)

Sl. No.	Respondents	Departments	Schemes	Sample Size
1.	State Level officials	Department of Women Development and Child Welfare (WDCW)	ICDS	8
		Department of Health, Medical & Family Welfare	MBS	

		Department of Consumer Affairs, Food and Civil Supplies	TPDS	
		Department of School Education	MDMS	
2.	Internal Grievance Redressal Officers – State	Department of Women Development and Child Welfare (WDCW)	ICDS	4
		Department of Health, Medical & Family Welfare	MBS	
		Department of Consumer Affairs, Food and Civil Supplies	TPDS	
		Department of School Education	MDMS	
3.	DGROs	Department of Panchayat Raj and Rural Development	TPDS	
4.	District level officers (Nodal officers)	Department of Health, Medical and Family Welfare; Department of School Education; Department of Consumer Affairs, Food and Civil	MBS, MDMS, TPDS	7

		Supplies		
5.	Rights holders identified and receiving benefits under TPDS			50
6.	Rights holders identified and receiving benefits under ICDS			50
7.	Rights holders identified and receiving benefits under MDMS			63
8.	Rights holders identified and receiving benefits under MBS			50

Status of implementation of NFSA in Telangana

General

Despite being a new state, Telangana took immediate measures to implement NFSA on 1st October 2015 and the Telangana Food Security Rules were notified on 12.4.2017³. It is important to note that Telangana is one of the very few states that have notified a comprehensive set of Rules under NFSA that deal with most of the aspects of the law. Most of the other state governments have either not notified the complete set of Rules or have not notified them as an integrated document. Having a comprehensive set of Rules that include the provisions related to identification of priority households under TPDS, designation of the District Grievance Redressal Officers (DGROs), Internal Grievance Redressal System (IGRM), establishment and functioning of the State Food

³ Published vide Notification No. G.O.Ms. No. 4, Consumer Affairs, Food & Civil Supplies CS.I-CCS), dated 12.4.2017.

Commissions (SFCs), formation and functioning of the Vigilance Committees (VCs), conducting social audits, and transparency/keeping records in public domain. The State Rules also indicate that the state government may issue guidelines for roles and responsibilities of local authorities, and reforms in the TPDS. In addition to a few other miscellaneous provisions, the Rules also provide that the state government shall bear from its exchequer all the expenses as per the cost sharing with the central government.

Identification of Priority Households (sections 9 and 10 with reference to section 3)

The identification criteria for both AAY and priority households (AFSC) is provided in the Rules. To be eligible as a priority household, an income ceiling of Rs. 1.50 lakhs and below per annum is fixed for households in rural areas. An enhanced income of Rs. 2.00 lakh and below per annum is the annual income limit for households in urban areas. Apart from this income ceiling, there is a land ceiling limit of 3.50 acres and below and 7.5 acres and below fixed for wet land and dry land respectively. However, the mere possession of land shall not be the sole criteria for deciding the eligibility and the income from the land prescribed above shall also be taken into consideration. The family shall be an eligible household if the income from the land is less than the income ceiling prescribed above⁴.

Eligible Households are provided with Food Security Cards. The objective of providing Food Security Cards is to essentially help the poor with subsidized food grains and shall not be linked to other schemes except food grains. These Food Security Cards shall be sanctioned to eligible households as identified in the intensive household survey and through a process of verification by the Tahsildars. A set of guidelines are issued for identification of eligible households⁵.

Besides, families having stable income and those who do not fall under any of the aforementioned categories are entitled for the issue of Food Security Cards (FSC). Possession of a valid FSC lets the household purchase the rationed goods at minimal

⁴ Tracking the Implementation of NFSA 2013 and status of state rules: Focus on southern states, Pg 114, Available at <https://ccl.nls.ac.in/wp-content/uploads/2017/01/Tracking-the-implementation-of-NFSA-and-status-of-state-rules-focus-on-southern-states-1.pdf>

⁵ Tracking the Implementation of NFSA 2013 and status of state rules: Focus on southern states, Pg 115, Available at <https://ccl.nls.ac.in/wp-content/uploads/2017/01/Tracking-the-implementation-of-NFSA-and-status-of-state-rules-focus-on-southern-states-1.pdf>

prices. In addition to 1.91 crore right holders who are being covered under NFSA, 95 lakh rights holders are being covered by the state government of Telangana.

Entitlements

Table 4: TPDS Entitlements by Telangana State

Category	Entitlements	Benefits
PHH Card holders	6 kgs of rice/unit at Rs. 1/kg is provided with no ceiling limit on the number of units/family members. Wheat is provided in places where there is demand @ Rs.7/Kg, in Hyderabad district 5 kg/card, in Municipal corporations 2 kg/card and in Municipalities 1kg/card.	Kerosene is being provided to those cards with no LPG connection or Deepam cards (Govt. LPG Scheme where the LPG deposit is paid by the Govt.) Small cylinders are being provided in ration shops at subsidized prices at few places (on pilot basis).
Antyodaya Card holders	35 kgs of rice/card at Rs. 1/kg is provided. Wheat is provided in places where there is demand @ Rs.7/Kg, in Hyderabad district 5 kg/card, in Municipal corporations 2 kg/card and in Municipalities 1kg/card and 1 kg of Sugar at Rs.13.5/Kg/card.	
Annapurna card holders	10 kgs of rice free of cost is provided. Under Annapurna Scheme, senior citizens/disabled/destitute/single persons are allotted with ration. No new cards are being issued	

	currently, but entitlements are being delivered to the registered card holders.	
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Figure 2: Fair Price Shops in Circle 8, Begumpet, Hyderabad



Figure 3: FPS in Mujahidpur GP, Vikarabad district



Concerns: As part of TPDS, the state does not provide coarse grains as provided in Schedule I of NFSA. There has been a demand to include red gram and other essential food items at subsidized prices in TPDS. It is also to be noted that the supply chain gets interrupted at times such as during COVID-19 lockdown, recent floods in 2022, affecting right holders' access to the entitlements. It was noted that the farmers do not get MSP for the produce on time, leading to delays in procurement and consequently supply to TPDS. Issues with the quality of rice were also noted. In the Medchal district, non-procurement owing to the transportation issues affect availability of rice in time at FPS. As regards the portability of the cards, under One Nation One Ration Card, intra and inter-state portability has been executed in the states from August 2019. However, according to the State level Food Officer, Department of Consumer affairs, Food and Civil supplies, cardholders covered under the State Food security programme (TPDS) do not receive ration in other states as these are not included in the central NFSA card system.

Figure 4: Display of DGRO number in FPS in Mujahidpur GP, Vikarabad district



The field study indicated that amongst the 50 respondents who were interviewed as part of this evaluation study, 100% of them in Hyderabad were aware of the NFSA, 2013, as against 56% of them in Vikarabad.

All the respondents in Hyderabad and Vikarabad, except one, agreed that the Fair Price Shop is easily accessible in terms of distance and approach. However, in terms of digital access, issues related to Aadhar based biometric authentication, 24% of the respondents in Vikarabad faced problems whereas none of them from Hyderabad reported any such incidents. A small percentage of respondents also reported problems such as lack of cooperation of the dealer of the FPS and irregular opening of the FPS. The field-based assessment indicated that while the FPS is open for 15 days in a month in both the districts, it was only for an hour a day.

The respondents were enquired about the nature, quality and quantity of entitlements that are provided as part of the TPDS. 80% of the respondents in Hyderabad received 6 kg rice, dal, salt and sugar every month. The remaining received 35 kg rice and coarse grains. 100% of the respondents in Vikarabad received only 6 kg rice. They did not receive dal, salt, sugar or coarse grains. Majority of the respondents in both the districts received the same type of entitlements every month. However, only 68% of the respondents in Vikarabad received the same quantity every month as against 100% of them in Hyderabad. 92% of the respondents were satisfied with the quantity of entitlements they received. Contrastingly, only 28% of the respondents in Vikarabad were satisfied. 72% of the respondents were unhappy with the quantity of entitlements stated so due to non-availability of wheat and coarse grains.

The respondents were also asked to elaborate on the nature and quantity of entitlements received during COVID-19. 100% of respondents in Hyderabad and 56% of them in Vikarabad received 10 kg of rice per family member from April 2020 to June 2022. The remaining respondents in Vikarabad received 10 kg of rice per family member along with 1 kg sugar and 1 kg Dal from April 2020 to June 2022.

Figure 5: Rightholders under NFSA, 2013 in Hyderabad district



Entitlements through ICDS: Realizing that ICDS alone is insufficient to improve the nutritional status of women and children in the state, the government has introduced Supplementary Nutrition Programmes such as Arogya Lakshmi for pregnant and lactating women at the Anganwadi - spot feeding of one full meal consisting of rice, dal, oil, vegetables for 25 days; 200 ml. milk, and 1 boiled egg for 30 days along with administration of Iron & Folic Acid tablets (100+ during pregnancy), with improved nutritive values in all the 149 ICDS projects covering 31,711 Main AWCs and 3,989 Mini AWCs.

Balamrutham (weaning food) consists of roasted wheat, bengal gram, milk powder, sugar, and oil @ 100 gms every day for 25 days in 2 ½ KG pack distributed on first day of every month and 16 eggs per month to provide improved supplementary nutrition to children between 7 months and 3 years.

Balamrutham Plus formula (newly formulated calorie and protein dense fortified supplementary mix) is prepared by National Institute of Nutrition (NIN) on the request of Department of Women Development and Child Welfare for children below 5 years identified with Severe Acute Malnutrition (SAM)/Moderate Acute Malnutrition (MAM) without medical complications. It is administered in the communication setting under the Supervised Supplementary Feeding Program (SSFP). The program was initially started in KB Asifabad and J. Gadwal districts as a pilot with technical support from UNICEF and NIN. The product is being supplied through Telangana Foods, Nacharam, Hyderabad to

pilot districts; active screening is in progress for children below 5 years of age to know their nutritional status. (Ref: Document from WDCW, ICDS). Mini Hot Meal For 3-6 years old children consists of rice, dal, oil, vegetables and snacks along with an egg per day for 30 days is served every day in AWC. Section 6/Schedule II requires identification and special provisioning for malnourished children. However, there is no special provision for identification of malnourished children and management of malnutrition.

Figure 6: Anganwadi Centre, Mujahidpur GP, Vikarabad district



Figure 7: Anganwadi Centre, Mujahidpur GP, Vikarabad district



Concerns: It was found that most of the AWCs in Hyderabad and Vikarabad districts are being run in old buildings with frail structures, and inadequate space for children. Most AWCs have no separate cooking and storage rooms. There is also a lack of hygiene and sanitation facilities. Committees for the monitoring of AWCs/ICDS have either not been established or are defunct. A lack of transparency was also experienced in the functioning of AWCs and implementation of ICDS as rights holders are not fully aware of benefits under ICDS. Accessibility to AWCs seems to be an issue in some regions such as Vikarabad and pregnant women and lactating mothers complained about difficulty in reaching AWCs and they seem to be more interested in taking home food/ration rather than spot feeding. There are also delays in release of funds and payments that adversely affect the administration of schemes. Insights from the field study indicated that the nature of entitlements remained more or less similar across both the districts, for all children below six years of age. The food provided, under the Balamrutham scheme, largely consisted of eggs, milk and Balamrutham (weaning food composed of wheat, channa dal, milk powder, oil and sugar, provided as supplementary nutrition to children aged 7 months to 3 years). Children between three and six years, in addition to eggs and milk, receive biscuits/snacks. All respondents in Hyderabad were satisfied with the quantity and quality of supplementary nutrition provided at AWCs whereas only 80% in Vikarabad agreed to the same. The respondents were asked to share information on the nature of entitlements received from AWCs during the first and second waves of COVID-19. A majority of them in both Hyderabad and Vikarabad stated that they received 3kg rice, oil, dal, and milk and all the respondents were satisfied with the quality and quantity of additional entitlements provided during this period.

Figure 8: Zilla Panchayat Primary and High School, Mujahidpur GP, Vikarabad district



An assessment of the services provided at AWCs indicated that a larger percentage of respondents in Hyderabad were aware of IFA tablets being given. 100% of the respondents in Hyderabad were aware as compared to only 76% of the respondents in Vikarabad. In terms of growth monitoring of children, only 76% of the respondents in Vikarabad were aware of growth monitoring charts as compared to 100% in Hyderabad. The field assessment indicated a rather poor and irregular system of growth monitoring. Only 80% of the respondents in Hyderabad and 76% in Vikarabad indicated that children are weighed every month and their weight is documented on a monthly basis in the MCP card. In cases where children are undernourished, the information is promptly provided to the parents and they are informed of the same in Hyderabad. However, dismal percentages (36%) in Vikarabad are informed about the undernourished status of their child. Consequently, the referral system where undernourished children who are in need of clinical treatment are referred to the Auxiliary Nurse Midwives (ANMs) or Nutrition Rehabilitation Centres (NRCs) is extremely poor in Vikarabad. Only 36% of them indicated that the referral system is in place as compared to 100% of them in Hyderabad.

Entitlements through MDMS: In addition to the provision of MDMS to the students of classes 1 to 8 as per NFSA, Mid-Day Meals are also extended to children studying in classes 9 and 10 in Government and Government aided schools in the state by Telangana Government. Children are also provided eggs thrice a week. An indicative menu is provided by the state government and schools are allowed to devise variations. Mid-day meal is being served with super fine rice to all the students in the State, from 1st January 2015 onwards.

Centralized Kitchens: Manna Trust, Hyderabad city is providing hot cooked meals to 3- 6 years old children, pregnant women and lactating mothers catering to 914 Anganwadi centres in Charminar, Khairabad, Golkonda, Nampally in Hyderabad city and Secunderabad & to 1009 Government and aided primary and high schools. Akshaya Patra is reaching out to 1, 45,593 children in 1198 Government and Government aided schools in 4 districts (Kandi, Narsingi, Nawabpet & Warangal) from its centralized kitchens⁶.

⁶ <https://telangana.akshayapatra.org/our-reach>

100% of the respondents interviewed as part of this study are aware of the nature of entitlements being provided under MDMS. These meals are made available through different sources, largely comprising non-governmental organizations, operating through centralized kitchens. While 43% of the respondents received it from Manna Trust, 22% of them received it from Akshaya Patra foundation. 35% of the respondents indicated that the food is not prepared in the school premises; however, they did not mention the specific source.

The mid-day meals provided at school comprises rice, dal, sambhar and curry. 86% of the respondents stated that they also receive eggs thrice a week, in addition to Baghara rice on Saturdays. 14% of them indicated that they do not receive eggs as part of their meal. In terms of quantitative and qualitative adequacy, 92% of the respondents were satisfied while 8% of them were dissatisfied. 100% of the respondents were happy with the variety of food provided as part of the meals. The respondents were also asked to share information on the additional entitlements during COVID-19. 81% of them indicated that they received 10 kg of rice per person.

Figure 9: Centralized Kitchen at Manna Trust



Concerns: Although the state has been providing eggs as well as part of the MDMS menu, it was found that the budget for provisioning of eggs has not been revised for the past many years and only Rs 4/- have been allocated for the same, whereas the price of eggs has been increased to Rs 6/- per unit. Most of the kitchens in schools are old without proper infrastructure facilities and without LPG facility. Schools are supposed to

buy firewood for cooking as noticed in the Zilla Panchayat Primary and High School in Mujahidpur.

During the visits, it was found that the utensils being used are old and dented and have not been changed in a long time. Cooks and helpers are paid a meagre amount of Rs 1000/- as salary. In Vikarabad district there are 1032 cook cum helpers. They always complain about less remuneration. It was also found that in schools where the strength of children is less than 100, cooking agencies do not come forward to provide meals as they do not find it financially viable. The bills are not being released on time due to which the payments to Cooking agents are being delayed. This also has implications for the quality as quality norms cannot be insisted upon the cooking agents due to untimely payments. Further, Rs. 5/day is being provided for lunch under MDMS which is not sufficient and so there is a need for revising the cost norms. Akshyapatra, where it is distributing MDMS, is substituting egg with banana, this might cause deviation from the nutritional norms. The nutritional value in banana fruit may not be equivalent to that of nutritional value available in egg. Also, selection of cooking agents, especially in urban areas is a challenging task because people are not much interested in taking up the duty as the payment is very meagre.

Maternity Benefit Scheme (MBS): Section 4 (b) of NFSA provides for not less than Rs 6000 per pregnancy to be paid to all pregnant women. State of Telangana has extended the quantum of these benefits significantly. A Special Postnatal care kit, the KCR Kit and a cash benefit of Rs. 12,000 for boy baby and Rs. 13,000 for baby girl is provided immediately after delivery to mothers. KCR Kit scheme intends:

- To provide quality healthcare throughout pregnancy and post-delivery
- To encourage public/government institutional deliveries
- To ensure full immunization for the new-born
- To reduce Maternal Mortality Rate and Infant Mortality Rate
- To compensate for wage loss

First instalment of Rs. 3000/- is paid after the registration of Pregnancy at Public Health facility, at least 2 ANC Check Ups by a Medical Officer with IFA tablets and TT injection.

The 2nd instalment of Rs 5000 is paid for female child and Rs. 4000 for male child after the delivery in Public Health Institution. The child has to receive BCG, OPV dose and Birth dose of Hepatitis B. KCR Kit also is given. The 3rd instalment of Rs 2000/- is paid after the child has received OPV 1, 2 & 3 doses and IPV 1 & 2 doses. The child has to receive Pentavalent 1, 2 & 3 doses at the age of 3 1/2 months. The 4th instalment of Rs 3000/- is paid after the child has received Measles, Vitamin A and JE 1st dose at the age of nine months.

Apart from the cash benefits, soaps useful for mother and child; Baby oil – Baby bed; Mosquito net; Baby Dresses; Sarees; Handbag; towel and napkins; Powder; Diapers; Shampoo; Toys for children are also provided as part of the kit. 88% of the respondents in Hyderabad and 76% of them in Vikarabad were aware of the Amma Vodi Scheme.

The KCR kit is quite popular amongst the respondents in Hyderabad as compared to Vikarabad. 100% of them in Hyderabad were aware of the kit whereas 76% of them in Vikarabad stated that they are aware. In terms of cash benefits, of those who have registered, 72% (8 out of 11 respondents) of them in Hyderabad and 100% (11 out of 11 respondents) of them in Vikarabad received the entitlements. The respondents received Rs. 12,000 (for boy child) and Rs. 13,000 (for girl child) in three instalments of Rs. 4,200 each.

Extension of KCR Kit benefits to Particularly Vulnerable Tribal Groups (PVTGs): The Government of Telangana vide G.O. Rt.No. 448, Health, Medical & Family Welfare (D1) Department, dated: 02.08.2018 extended the benefits of KCR Kit to PVTGs - Chenchu, Kolam (Incl. Mannervarlu), Thoti and Konda Reddy of three districts (ITDA, Bhadrachalam, Utnoor and Mannanur) beyond the second child i.e., 3rd/4th child etc., in relaxation of norms/guidelines for the maternal and child health, as their population is already dwindling due to various socio- economic factors and inborn genetic problems. Additionally, Amma Vodi Scheme provides free transport facilities in an ambulance to diagnostic services for regular check-ups and tests for pregnant women in Telangana. The vehicle will then drop the pregnant women back to their homes.

While the NFSA does not impose any conditionality for accessing the maternity cash entitlements, the state of Telangana has retained some of the conditionalities mentioned in the central rules (Pradhan Mantri Matritva Vandana Yojana Rules). Telangana is not claiming any funds under PMMVY from Gol.

Maternity benefits being provided in the state have had a direct impact on the nutritional indicators in the state. The percentage of deliveries in Government facilities before the introduction of KCR Kit was around 30%, but after the introduction of KCR Kit scheme, the percentage of deliveries in Government facilities increased to 55%. The percentage of registrations in the first trimester increased from 17% to 88%.

There is a State Level Committee under Telangana State Medical Services Infrastructure Corporation (TSMSIC) that takes care of the implementation of the Scheme in the state. The committee calls for tenders for procurement of kit material and arranges for distribution of the kits to various facilities in the state. The cost of each kit is around Rs. 2,267/- with inclusion of tax. So far, 10, 90,000 kits have been distributed since the inception of the scheme benefiting around 13, 29,951 beneficiaries.

Monitoring Mechanisms

Social Audit: Rule 22 of Telangana State Food Security Rules mandates the State Government to issue detailed guidelines for conduct of social audits as per Section 28 of the National Food Security Act, 2013. On 31.08.2016, a set of guidelines were issued by the Department of Food and Civil Supplies, according to which, social audits were to be conducted by the Social Audit Committee that consists of 10 percent of all cardholders in the Fair Price Shop. This was set aside by the guidelines issued on 12.04.2017, which require the Department of Consumer Affairs, Food and Civil Supplies to enter into a MoU with Society for Social Audit, Accountability and Transparency (SSAAT) and the cost of social audit is to be borne by the Department. While it is commendable that the guidelines require SSAAT to be involved in the social audit, the requirement of public hearing at higher level for instance, block and follow up measures are not clearly mentioned. Further, these guidelines mention TPDS alone, despite it pertaining to social audit of all welfare schemes under the Act. Society for Social Audit, Accountability and

Transparency, Department of Rural Development, Telangana conducted audit in 2017-18. As per Hyderabad District Food & Civil Supplies Department, social audits were conducted for fair Price Shops: 109 shops in 2020; 317 shops in 2021 and⁷ 83 shops in 2022.

Concerns: The social audit rules do not provide for the budgetary provisions to be made for conducting social audit. There is also a lack of understanding about the desired methodology of social audit of schemes in the state. For most of the schemes social audits are not being conducted and even when conducted, it is devoid of participation by the people/community and local representatives. Social audit function has not been assigned to any specific agency leading to confusions.

Vigilance Committees: According to Section 29 of NFSA and Rule 20 of Telangana Food Security Rules, vigilance committees are to be constituted/revamped at various levels. The Rules also provide for the members who are to be a part of these committees at various levels. The Rules are silent on how the members apart from those designated are to be appointed. In addition to the reports shared with the DGROs, the Vigilance Committee members are to send monthly reports to the Tahsildar, RDO/Sub collectors, Joint Collector, Collector and Commissioner of Civil Supplies. While the Rules mention that Vigilance Committees are to perform all the functions mandated under the Act, which requires monitoring other schemes as well, it can be seen that this comprehensive approach doesn't get amply reflected in the composition of the Committee. Except at certain levels, it is the officials from the Civil Supplies Department who are mostly occupying the key positions in the committees. The officials who represent their respective departments in the District level Vigilance Committees:

- PDS: District Civil supplies Officer (DCSO) as the convener of the committee & District Manager Civil Supplies (DMCS)
- MDMS: District Education Officer (DEO)
- MBS: District Medical & Health Officer (DM&HO)
- ICDS: District Welfare officer (DWO)

⁷ The State Government issued revised rates for the schemes post a budget session in March 2022

Challenges: The interviews of VC members expressed lack of supportive supervision. There is also a lack of transparency in the functioning of VCs. Mandal and GP level committees have not been set up. There are no VCs to monitor the functioning of the AWCs. Those functions also do not meet regularly to review the status of schemes. Only the state and district level VCs have been formed but not functioning regularly.

District Collector, District Revenue Officer (convener), ZP chairman (co-convener) are yet to be constituted in many districts or strengthened wherever formed. At the Mandal level, Tahsildar, Revenue Divisional Officer, Mandal Panchayat Chairman, but these committees have not been constituted.

Grievance Redressal Mechanism

Internal Grievance Redressal Mechanism

Section 14 of NFSA and Rule 13 of Telangana State Food Security Rules provides for a robust and efficient internal system of grievance redressal to be set up by the state government for disposal of complaints relating to the Act. This internal system may consist of a Call center with toll free number, web-based grievance redressal portal, and designation of District Supply Officers as nodal officers for public distribution system. Following systems have been put in place to enable IGRM for TPDS:

- Toll Free number: 1967
- NFSA Gram online: <http://nfsagrams.telangana.nic.in/>
- Whatsapp No.: 7330774444

None of the respondents in both the districts were aware of any officer in charge of monitoring the functioning of the FPS. A higher percentage of respondents in Vikarabad (44%) were aware of social audits as compared to those in Hyderabad (20%). Of those who are aware, only 8% of them, in each district, have participated in social audits. 48% of the respondents in Hyderabad and 40% of them in Vikarabad are aware of DGRO. 52% of them in Hyderabad and 48% of them in Vikarabad are aware of SFC. Although some of the respondents reported facing problems associated with availing their entitlements, they

were not aware of the institutions/officers that they could approach to file their grievances.

For MDMS, State Level, District Level and Mandal Level Steering-cum-Monitoring Committees have been set up. It was reported by the state officials that if any issue comes it has to be resolved within a week. At school level, School Management Committees (SMCs) have been constituted to review and resolve the issues. Helpline number is available but at present it is not functional. The website grievance registration module is being improved but at present is not responsive enough. The provision of fine quality rice in MDMS led to reduction in the number of complaints. It was found out that at district level, no such mechanism exists for other schemes. Aggrieved people directly contact Mandal/district level officers.

There have been instances wherein the District Grievance Redressal Officer (DGRO) has cleared the disputes between SHGs and DWACRA agents, who are employed as the Cook-cum-Helpers.

KCR Kit & MBS: Public/Beneficiaries have no access to the portal to raise any query/complaint. The beneficiary is supposed to raise a query with the local ASHA or ANM who in turn updates in the portal and the higher authorities review and resolve the issues periodically.

District Grievance Redressal Officer: As per Section 15 of NFSA, the state government is to appoint or designate an officer as the District Grievance Redressal Officer. The District Rural Development Officer is designated as the District Grievance Redressal Officer as per Rule 4(1) of Telangana Food Security Rules, 2017. Rule 5 explains the procedure for registering complaints. Rule 6 provides the procedure for disposal of complaints. It is laudable that the rules are comprehensive. Rules clearly specify that DGRO should look into all the complaints arising under NFSA and set a timeline for disposal of grievances.

District Rural Development Officers (DRDOs) have been designated as DGROs in the state. For MDMS, District Education Officers (DEOs) have been designated to perform

similar functions. Similar responsibilities have been assigned to Mandal Education Officers (MEO) at mandal level and Head Masters at school level.

Concerns: In order to facilitate effective functioning, there should be provision for staff and allocation of resources. Lack of human resources, dedicated staff for effective monitoring dampen the efficacy of DGROs. The need for appointing full time DGROs under NFSA has been expressed by many. The status of monitoring and grievance redressal mechanisms is quite poor, like the TPDS and ICDS. While all the respondents were aware that the headmaster is responsible for the supervision of cooking and serving of the meals for all children, only 8% of them were aware of the School Management Committee. 92% of them were completely unaware. There were no call helpline numbers displayed or complaint boxes installed in the school premises.

State Food Commission (SFC): The State Food Commission was constituted on 17th April 2017 with a chairperson and 5 members including 2 women and 2 persons belonging to SC and ST categories. The appointment of SFC has been provided for in Section 16 of NFSA. While the 2017 Rules do not provide expressly as to the procedure for appointment of the Commission, the 2015 Rules had mentioned about the Selection Committee. The procedure for registering complaints and appeals is given in Rule 15.

Composition of the SFC complies with NFSA; however the commission has felt a shortage of financial resources and administrative support.

Concerns: Less than 50% of respondents across all the four schemes are aware of the roles and responsibilities of the SFC. A dismal percentage of the respondents were aware of the procedure to approach the SFC and file their grievances.

Others

Role of local authorities (Rules 24 and 25)

Rule 24 of Telangana Food Security Rules suggest that the State Government may choose to assign such duties at district, mandal and village level to respective

Panchayats, which in its opinion, cannot be conveniently carved out by existing arrangements of service delivery. Sub Rule 2 of

Rule 24 further states that the State Government may choose to assign such duties in municipal areas to the urban local bodies which in its opinion cannot be conveniently carded out by existing arrangement of service delivery. However, the state government has not made use of these Rules and detailed guidelines for local authorities have not been issued.

Recommendations

The State Government may consider the following recommendations to strengthen the implementation of NFSA, 2013. The recommendations have been organized as per specific themes and stated hereunder:

A. Entitlements (Access, Adequacy)

• TPDS:

- In terms of the distribution of food security cards, the State must ensure coverage for the needy, especially those affected by COVID pandemic
- There has been a demand to include red gram and other essential food items at subsidized prices in TPDS. Coarse grains such as locally grown/available millets, essential food items at the subsidized prices must be provided regularly in FPS
- Ensure uninterrupted supply chain in case of natural disasters and also adequate quantity and quality of food grains available to the rights holders
- Relaxation or simplification in digital authentication especially for elderly, people with different abilities and for the rights holders in remote areas.
- With regard to procurement, it is appreciable that decentralized procurement of rice from local farmers is being done by the State which enables supplying fresh food grains at FPS. However, our sample study revealed that there are occasions where the rights holders tend to sell rice bought at FPS for good quality of rice for their satisfaction. Hence,

diversion of food grains can be avoided if a better variety of rice is supplied as people tend to sell PDS rice for buying super fine rice for consumption

- **ICDS:**

- Construction of new child friendly Anganwadi buildings with essential infrastructure including child friendly functioning toilets, safe drinking water needs to be considered on top priority. Environmental sanitation has to be maintained in and around AWCs
- Funds for purchases and payments should be released well in un-interrupted advance - Green channel

- **MDMS:**

- All children of school going age must be brought within the purview of the MDMS scheme
- Although there seems to be no major issue with accessibility, the quantity and quality of entitlements may be improved further
- Breakfast must be provided for the children as most of them attend the government schools without any nutritious breakfast
- Consumption of egg has been proved to have sufficient nutrient value per day that is needed for the growth of the child. Therefore, egg supply for MDM and consumption by the child has to be strongly recommended and made part of every meal in school

- **MBS:**

- KCR Kit and *Amma Vodi* schemes are popular and accessible to pregnant and lactating mothers in urban areas. However, more awareness and monitoring are required in the rural areas to ensure these schemes are effectively reaching out to all rights holders

B. Monitoring

- **Social Audits:**

- As for most of the schemes, social audits either are not being conducted or have less community participation. Social audits should be made participatory and ensure transparency

- The rules should provide specific budgetary provisions to conduct social audits for all schemes governed by the NFSA, 2013 in a periodic manner
- The standard structure and methodology should be in place and educate the stakeholders for conducting social audits
- **Vigilance Committees:**
 - Vigilance Committees must be constituted at all levels, on a priority basis. Efforts must be directed towards strengthening the existing committees, wherever they are in place
 - The state level vigilance committee must be activated for overall monitoring and policy reviews
 - A state level committee may be constituted by the District Collectors to review meetings of all vigilance committees and to ensure supportive supervision
 - Constitute Mandal and GP level vigilance committees; stimulate and strengthen VCs at school (SDC), FPS and Anganwadi levels
 - Periodic training sessions may be organized for the Vigilance Committees at all levels to strengthen their knowledge and awareness of their roles and responsibilities

C. Grievance Redressal Mechanism

- **IGRM:**
 - Awareness programmes on the rights-based components of NFSA 2013, monitoring & grievance redressal mechanism, SFC, welfare schemes for the communities through workshops, information education and communication materials, display boards and TV advertisements must be organized for rights holders and duty bearers at all levels
 - With regard to KCR Kit and MBS access to portals and websites must be facilitated to the rightsholders so that they may lodge their complaints/grievances
 - Unverifiable dependency on the technology-based tools for IGRM in GRM may lead to deprivation of rights of citizens. Access to IGRM for those who do not have access to the internet at the community level must be ensured

- Helpline numbers and complaint boxes must be made available in the school, FPS and AWC premises
- Contact numbers of concerned DGRO, Nodal officers (VC) should be displayed prominently in FPS, schools & in AWCs
- **GRM:**
 - DGRO position at present is on deputation from the Department of Rural Development. This needs to be replaced by a full-time officer for DGRO position under NFSA. This needs to be supported by appointment of requisite staff and allocation of resources for effective functioning
 - Periodic trainings must be organised for DGROs to strengthen their role in the effective implementation of NFSA, 2013
- **SFC:**
 - Awareness and extensive coverage on the roles of SFC and accessibility should be made through regular visits and meetings with rights holders and all stakeholders
 - Capacity building and exchange of strategies and practices between SFCs of other states may be considered to facilitate mutual exchange of information, good practices and further contribute to the strengthening of the capacities of SFC members

D. Others

- **Allocation of Resources:** There have been delays observed in the release of funds and payments that adversely affect the administration of schemes. This must be avoided to ensure smooth functioning and implementation of the Act
- **Capacity building of Community:** Communication and education on all the components of NFSA through various channels is the first and foremost action must be undertaken collectively by the concerned departments and State Food Commission to empower the community to realize their rights in full potential
- **Operational Issues:**
 - Procurement of food grains: The study revealed that although the procurement is being decentralized the farmers do not get Minimum Support Price for the produce on time, leading to delays in procurement

and consequently supply to TPDS. Hence, the payments to farmers and procurement must be ensured on time and procurement on time

- Kitchens/ cooking space under MDMS: Most of the kitchens in schools are old without proper infrastructure facilities and without LPG facility. Schools are supposed to buy firewood for cooking as noticed during the field study. Proper kitchens with LPG facility, good ventilation, safe drinking water and sufficient quantity of hygienic utensils should be provided wherever cooking in the schools take place
- The payment for cooking agencies should be enhanced to make it financially viable
- The working conditions for district and Mandal level officers need to be improved to enable them to discharge their duties efficiently. Equip district and Mandal level officers, with infrastructure, special staff and computer operators adequately to strengthen monitoring and vigilance mechanism; at Mandal and school level, separate computer operators with equipment is necessary

E. Rules

A comprehensive analysis of the Telangana Food Security Rules, 2017 was undertaken to suggest areas in the policy and rules framework that can be further strengthened. The analysis provided for a detailed understanding of specific provisions, rationale for improvement and examples from other states where such practices have proved useful.

Specific recommendations to the Rules are stated hereunder:

- **Chapter II:** Identification of eligible households: The procedure for displaying the list of eligible households should be made clear. It should not be limited to an online portal list but should also be displayed at the service delivery centres, including FPS, schools and AWCs. This is also in practice as per Rule 18, Kerala Rules; Publication of the final list. —(1) *The final list prepared as provided in this Chapter shall be published immediately on the State web portal and on the web portal of the Civil Supplies Department and on the notice boards of the Taluk Supply Office, offices of the local authority concerned, Village Office and fair price shops*

- **Chapter III: Grievance Redressal Mechanism:**

- There is a need for full time District Grievance Redressal Officer with all necessary infrastructures, human and financial resources for effective functioning
- An option for verification of complaint by email should be available if the complainant has sent the complaint using the same platform
- There can be a notified list of public places such as FPS, Anganwadis, Schools and public offices where the grievance boxes for written complaints would be placed. These boxes must only be accessible to the DGRO Office only. This would reduce the confusion regarding the same and make the boxes more accessible. Additionally, exclusive access to DGRO would ensure that it is kept different from IGRM
- "Immediate action" can be a mechanism to acknowledge the receipt of the complaint. This would posit more accountability of the redressal mechanism and update the complainant of the status of her complaint and can be done within a day of receiving the complaint. This is also in practice as per Punjab Rules, 11(5) all complaints shall be acknowledged by a receipt in writing or through electronic means, within one day of receipt of the complaint, specifying date and unique grievance number
- The reasons for acceptance or denial of the complaint in the verification process should be maintained in a written record by the DGRO. This would make the entire process more transparent and record keeping would make the officer more vigilant. This is already in place as per Rule 27(2)(c) provision of the Kerala Rules; "reasons of rejection should be expressed in writing and communicated to the complainant". These reasons should be maintained with the DGRO too in the records
- In case of absence of the complainant or the respondent, the procedure followed should be the same. The appeal should be decided on merits via ex parte proceedings. Absence of a complainant should not mean automatic dismissal of appeal. This is an arbitrary power given to DGRO impacting the complainant more than the respondent. This has to be viewed in light of already unequal footing of complainant and respondent.

This is already reflected in Andhra Pradesh State Rules for this. Rule 6 (7) (d) and (e)

- In addition to the Secretary / Principal of Secretary Civil Supplies Department, SFC Chairman should be responsible for the monitoring of disposal of complaints. The hierarchy of grievance redressal should be followed to ensure transparency
- In case of appeals, extend the period of time in case of extraneous circumstances. It is supposed to be a beneficial legislation, applying a time limit without accounting for the delay caused due to justifiable reasons would defeat the purpose
- A copy of the same should be submitted to the State Food Commission. SFC should collate all the reports, organize the scheme -wise, and submit them to the nodal Ministry with request to share the complaints with the relevant ministries. The hierarchy of grievance redressal should be followed to ensure transparency and provide an opportunity to the SFC to give informed, objective and independent advice to the state government. Submission of reports to relevant departments will also streamline the follow up actions by the central government
- Notice of the meetings to members should be provided at least 3 days in advance. Scheduling regular meetings and advance notice would ensure better attendance
- An additional provision of grievance redressal drop box should be made. This would make offline access for eligible households with no devices easier. A drop box can be placed in front of FPS or the Anganwadis, similar to what is stated in Rule 5(1) (a) of the AP Rules
- Analytical reports including the number, types, sources and redressed complaints must be prepared and submitted by the respective state departments to the State Food Commission, with a copy to the DGROs on a quarterly basis. This practice will make the system efficient, responsive and accountable and will eventually lead to the resolution of recurring problems and follow ups

- In case of absence of the complainant or the respondent, the procedure followed should be the same. The appeal should be decided on merits via ex parte proceedings. Absence of a complainant should not mean automatic dismissal of appeal. Automatic dismissal would be an arbitrary power, similar to what is stated in Andhra Pradesh State Rules for this. Rule 6 (7) (d) and (e)
- **Suggestions for Composition of vigilance committees:**
 - All levels should include representation from all Political parties. Names and contact details of Vigilance committee members should be made available in the public domain. Example can be drawn from Chapter V from Kerala Rules
 - Keeping in view the preference and reservations provided: the actual number of members from the marginalized classes should be specified at each level. This would ensure due representation and not leave it up to an arbitrary number decided by a prejudiced person in position of power. Reference can be drawn to Schedule 3 of Punjab State Rules
- **Social audits:** Social audits should be conducted for all the schemes - TPDS, MDMS, ICDS, Maternity cash entitlements should be on the website and updated regularly. This should be alongside the authorities that are responsible for these entitlements
- **Chapter IV: Role of Panchayats and Urban local bodies:** The procedure for allotting duties at district, Mandal and village level to respective Panchayats should be enlisted in the rules. This would remove any ambiguity in the process of assigning work and the conditions under which the same can be done
- Right to surrender under Rule.14 must be made applicable to all schemes
