



**Report of the
Comptroller and Auditor General of India
General and Social Sector**

for the year ended March 2017



**Government of Tamil Nadu
Report No. 8 of 2017**

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PREFACE

This Report for the year ended March 2017 has been prepared for submission to the Governor of Tamil Nadu under Article 151 of the Constitution of India.

The Report contains significant results of the Performance Audit and Compliance Audit of the departments of the Government of Tamil Nadu under the General and Social Services including departments of Backward Classes, Most Backward Classes & Minorities Welfare, Co-operation, Food & Consumer Protection, Finance, Health & Family Welfare, Higher Education, Home, Prohibition & Excise, Municipal Administration & Water Supply and Revenue & Disaster Management.

The instances mentioned in this Report are those, which came to notice in the course of test audit for the period 2016-17 as well as those which came to notice in earlier years but could not be reported in the previous Audit Reports; instances relating to the period subsequent to 2016-17 have also been included, wherever necessary.

The audit has been conducted in conformity with the Auditing Standards issued by the Comptroller and Auditor General of India.

CHAPTER I

INTRODUCTION

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INTRODUCTION

1.1 About this Report

This Report of the Comptroller and Auditor General of India (CAG) on Government of Tamil Nadu (GoTN) relates to matters arising from Performance Audit of selected programmes and activities and Compliance Audit of Government departments and Autonomous Bodies.

The primary purpose of the Report is to bring important results of audit to the notice of the State Legislature. Auditing standards issued by the CAG require that the materiality level for reporting should be commensurate with the nature, volume and magnitude of transactions. The audit findings are expected to enable the Executive to take corrective actions as also to frame appropriate policies and directives that will lead to improved financial management of the organisations, thus, contributing to better governance.

Compliance Audit refers to examination of transactions relating to expenditure, receipts, assets and liabilities of audited entities to ascertain whether provisions of the Constitution of India, applicable rules, laws, regulations and various orders and instructions issued by the competent authorities are being complied with.

Performance Audit examines the extent to which objectives of an organisation, programme or scheme are achieved economically, efficiently and effectively.

This Chapter provides profile of audited entities, planning and extent of audit and synopsis of audit observations. Chapter II of this Report deals with findings of Performance Audit and Chapter III deals with findings of Compliance Audit of various departments and Autonomous Bodies.

1.2 Profile of Audited Entities

There are 37 departments in the State at the Secretariat level, headed by Additional Chief Secretary/Principal Secretaries/Secretaries who are assisted by Commissioners/Directors and Subordinate Officers. Of these, 23 departments including 16 Public Sector Undertakings and 1,550 Autonomous Bodies/Local Bodies, falling under these departments, are under the audit jurisdiction of the Principal Accountant General (General and Social Sector Audit), Tamil Nadu.

A comparative position of expenditure incurred by the Government during the year 2016-17 and in the preceding four years is given in **Table 1.1**.

Abbreviations used in this report are listed in the Glossary at Page 117

Table 1.1: Comparative position of expenditure

(₹ in crore)

Disbursements	2012-13	2013-14	2014-15	2015-16	2016-17
Revenue expenditure	97,067	1,09,824	1,28,828	1,40,993	1,53,195
General services	31,652	35,729	41,655	45,512	51,452
Social services	38,623	45,276	50,349	54,806	55,297
Economic services	17,628	19,644	26,843	29,943	33,980
Grants-in-aid and contributions	9,164	9,175	9,981	10,732	12,466
Capital expenditure	14,568	17,173	17,803	18,995	20,709
Loans and advances	4,769	2,242	4,319	2,331	26,046
Repayment of public debt	5,015	4,977	6,488	6,605	8,200
Contingency fund	Nil	19	Nil	19	Nil
Public account	1,33,101	1,44,022	1,59,384	1,77,442	1,73,007
Total	2,54,520	2,78,257	3,16,822	3,46,385	3,81,157

(Source: Finance Accounts for the respective years)

1.3 Authority for Audit

The authority for audit by the CAG is derived from Articles 149 and 151 of the Constitution of India and the Comptroller and Auditor General's (Duties, Powers and Conditions of Services) Act, 1971. The CAG conducts audit of expenditure of the departments of GoTN under Section 13¹ of the CAG's (DPC) Act, 1971. The CAG is the sole auditor in respect of 33 Autonomous Bodies which are audited under Sections 19(2)², 19(3)³ and 20(1)⁴ of the said Act. Audit of Government companies is also conducted under Section 19(1) of the CAG's (DPC) Act. In addition, the CAG conducts, under Section 14⁵ of the Act, audit of other Autonomous Bodies which are substantially funded by the State Government. The CAG also provides technical guidance and support to the Local Fund Audit for audit of Local Bodies. The principles and methodologies for various audits are prescribed in the

¹ Audit of (i) all transactions from the Consolidated Fund of the State (ii) all transactions relating to the Contingency Fund and the Public Account and (iii) all trading, manufacturing, profit & loss accounts, balance sheets & other subsidiary accounts.

² Audit of the accounts of Corporations (not being Companies) established by or under law made by the Parliament in accordance with the provisions of the respective legislations.

³ Audit of the accounts of Corporations (not being Companies) established by or under law made by the State Legislature at the request of the Governor.

⁴ Audit of accounts of any body or authority on the request of the Governor on such terms and conditions as may be agreed upon between the CAG and the Government.

⁵ Audit of (i) all receipts and expenditure of a body/authority substantially financed by grants or loans from the Consolidated Fund of the State and (ii) all receipts and expenditure of any body or authority where the grants or loans to such body or authority from the Consolidated Fund of the State in a financial year is not less than ₹ 1 crore.

Auditing Standards and the Regulations on Audit and Accounts, 2007 issued by the CAG.

1.4 Planning and conduct of audit

Audit process starts with the risk assessment of the Departments/organisations as a whole and that of each unit based on expenditure incurred and its type, criticality/complexity of activities, level of delegated financial powers, assessment of internal controls, concerns of stakeholders and the likely impact of such risks. Previous audit findings are also considered in this exercise. Based on this risk assessment, the frequency and extent of audit are decided. An Annual Audit Plan is formulated to conduct audit on the basis of such risk assessment.

After completion of audit of units, Inspection Reports (IRs) containing audit findings are issued to the Heads of the audited entities. The entities are requested to furnish replies to the audit findings within one month of receipt of the IRs. Whenever replies are received, audit findings are either settled or further action for compliance is advised. Important audit observations pointed out in these IRs are processed for inclusion in the CAG's Audit Reports, which are submitted to the Governor of Tamil Nadu under Article 151 of the Constitution of India for being laid before the State Legislature.

1.5 Response to Audit

1.5.1 Draft Paragraphs and Performance Audit

Ten Draft Paragraphs and one draft Performance Audit were forwarded demi-officially to Additional Chief Secretary/Principal Secretaries/Secretaries of the departments concerned between July and November 2017, requesting them to send their responses within six weeks. Departmental replies for five Draft Paragraphs have been received. The replies received have been suitably incorporated in the Report. In respect of draft Performance Audit, Exit Conferences were held with representatives of the Government in December 2017. The views expressed by the representatives of the Government during Exit Conferences were considered while finalising the Report.

1.5.2 Pendency of Inspection Reports

A review of the IRs issued up to 30 September 2016 revealed that 17,718 paragraphs relating to 4,800 IRs remained outstanding at the end of March 2017 as detailed in **Appendix 1.1**.

Large pendency of IRs was indicative of the fact that Heads of Offices and Heads of Departments did not initiate appropriate and adequate action to rectify the defects, omissions and irregularities pointed out in the IRs.

1.6 Audit observations on Performance Audit

This Report contains one Performance Audit. The focus has been on auditing the specific programmes/schemes and offering suitable recommendations with the intention to assist the Executive in taking corrective action and improving service delivery to the citizens. Significant audit observations are discussed below:

1.6.1 Encroachments on Government lands

The Government and Local Bodies exercise the powers vested with them through Tamil Nadu Land Encroachment Act, 1905 and other statutes to prevent and evict encroachments on Government lands and lands vested with Local Bodies. It is the policy of Government to remove all objectionable encroachments and prevent new encroachments. The present Performance Audit on 'Encroachments on Government lands' brought out the following significant audit findings:

- A total of 2.05 lakh hectare or seven *per cent* of the Government land was under encroachment as of June 2017.
- The encroachment data was found to be unreliable due to non-booking of fresh 'B Memo', which served as the first information from Village Administrative Officer to the Tahsildar for checking encroachments.
- Rampant encroachment of road margins in Chennai, with an average of 3.4 incidences of encroachments per kilometre of road length, went largely unchecked due to inaction on the part of Greater Chennai Corporation.
- Encroachments on water bodies accounted for 49 *per cent* of the total objectionable encroachments. Jurisdictional issues and lack of coordination between Revenue and Water Resources Departments contributed to the rise in encroachments on water bodies.
- Instead of alienating or acquiring suitable land, several Government agencies took recourse to encroaching water bodies and grazing lands for constructing public buildings.
- Systems put in place to monitor clearance of encroachments did not function as the High Level Committee at the State level did not meet after February 2010.

(Paragraph 2.1)

1.7 Audit observations on Compliance Audit

We observed several deficiencies in critical areas, which had adverse impact on effective functioning of Government departments/organisations. Key audit findings of compliance issues are as under:-

Construction of Godowns and their utilisation

The Government sanctioned construction of godowns in rural areas through Primary Agricultural Cooperative Credit Societies (PACCS) and Agricultural Producers Cooperative Marketing Societies to help farmers in avoiding distress sale of produces during peak harvest seasons.

Planning for construction of godowns was not comprehensive, leading to creation of inadequate capacity in rural areas for storing agricultural produce. Delayed release of funds led to Godowns remaining incomplete after more than two years of sanction. Deficiencies in design and execution of works were noticed in construction of godowns. Constructed godowns were not utilised optimally. The performance of PACCS in terms of issuing Produce Pledge Loan was dismal, defeating the very objective of the scheme.

(Paragraph 3.1)

Imparting education through Kallar Reclamation Schools

Kallar Reclamation Schools were established by the Government for upliftment of Piramalai Kallars, a de-notified community. The quality of education in Kallar Reclamation Schools, suffered due to inadequate staff and infrastructure, leading to poor performance in comparison with the Government aided schools. In the absence of proactive action by Joint Director, Kallar Reclamation, hostels lacked adequate infrastructure. Despite earlier audit findings and clear proposal by the Commissioner, Most Backward Classes and De-notified Community Welfare, the Government of Tamil Nadu did not take a final decision on the proposal of merging these schools with School Education Department.

(Paragraph 3.2)

Social Security Pension Schemes

The Government implements various social security pension schemes. Audit noticed huge disparity amongst districts in the number of beneficiaries as a proportion to the targetted population, indicating excess coverage due to inclusion of ineligible pensioners and also possible under-coverage of eligible pensioners. The scheme guidelines were substantially stringent and impractical in comparison with the norms stipulated by GoI. Despite a 100 *per cent* verification of pension eligibility in 2014, Audit came across 118 ineligible beneficiaries receiving pension and 934 eligible beneficiaries not receiving pension, indicating the need for continuing periodical verifications.

(Paragraph 3.3)

Inflated requirement of medicines by Rajiv Gandhi Government General Hospital, Chennai and failure to exercise control by Director of Medical Education and Tamil Nadu Medical Services Corporation Limited resulted in excess procurement of medicines and consequent loss of ₹ 16.17 crore due to expiry of these medicines.

(Paragraph 3.4.1)

Deficiencies in planning and contract management in executing the interior works of the Stem Cell Research Centre and failure to provide required basic infrastructure in time resulted in wasteful expenditure of ₹ 2.70 crore, besides non-availing of research grant of ₹ 5.77 crore and an additional committed liability of ₹ 5.49 crore.

(Paragraph 3.4.2)

Failure to ensure financial resources before commencement of construction of a multi-storeyed building resulted in stoppage of work by the contractor due to non-payment of bills, rendering ₹ 22.79 crore spent on the construction of the building unfruitful.

(Paragraph 3.5.1)

Undue priority given to Tamil Nadu Small Industries Corporation Limited for procurement of furniture resulted in avoidable extra expenditure of ₹ 13.92 crore.

(Paragraph 3.5.2)

Inordinate delay in procurement of jammers for central prisons led to avoidable additional expenditure of ₹ 81.36 lakh. Besides, the number of jammers was restricted to 12 instead of the required 15, making it potentially ineffective to disable usage of cell phones in prisons.

(Paragraph 3.5.3)

Failure of the Government and the Director General of Police to revise the police guard/escort/bandobust charges as and when they became due resulted in short collection of revenue of ₹ 97.92 crore.

(Paragraph 3.6.1)

Even after three years of implementation of “Chief Minister’s Comprehensive Health Insurance Scheme”, Government hospitals across the State did not perfect a system to file the insurance claims free of deficiencies, resulting in rejection of insurance claim of ₹ 17.94 crore during January 2015 to July 2017 and a consequent avoidable additional burden of ₹ 10.82 crore on Government towards expenditure on drugs, consumables and hospital infrastructure.

(Paragraph 3.6.2)

1.8 Recommendations

This Report contains specific recommendations on a number of issues involving non-observance of the prescribed internal procedure and systems, compliance with which would help in promoting good governance and better oversight on implementation of departmental programmes and objectives at large. The State Government is requested to take cognizance of these recommendations and take appropriate action in a time bound manner.

CHAPTER II
PERFORMANCE
AUDIT

CHAPTER II

PERFORMANCE AUDIT

This chapter contains findings of Performance Audit on Encroachments on Government lands.

REVENUE & DISASTER MANAGEMENT, PUBLIC WORKS, MUNICIPAL ADMINISTRATION & WATER SUPPLY, HIGHWAYS & MINOR PORTS AND ANIMAL HUSBANDRY, DAIRYING & FISHERIES DEPARTMENTS

2.1 Encroachments on Government lands

Executive Summary

Government and Local Bodies exercise the powers vested with them through Tamil Nadu Land Encroachment Act, 1905 and other statutes to prevent and evict encroachments on Government lands and lands vested with Local Bodies. It is the policy of Government to remove all objectionable encroachments and prevent new encroachments.

The present Performance Audit on 'Encroachments on Government lands', revealed that the Government and Local Bodies were not able to check this menace successfully. The following are the significant findings of the Audit:

A total of 2.05 lakh hectare or seven per cent of the Government land, was under encroachment as of June 2017. The efforts to evict encroachments did not yield significant results as total extent of land retrieved from encroachers during the five year period from 2011 to 2016 was only 5,302 hectare (9.8 per cent) against 54,401 hectare under encroachment as of July 2011 in the eight sampled districts.

Shortcomings in the enabling statutes and non-adherence to the established systems in management of Government lands hampered the efforts to prevent and evict the encroachments.

The encroachment data was found to be unreliable due to non-booking of fresh 'B Memo', which serves as the first information from Village Administrative Officer to the Tahsildar for checking encroachments.

Rampant encroachment of road margins in Chennai, with an average of 3.4 incidences of encroachments per kilometre of road length, went largely unchecked due to inaction on the part of Greater Chennai Corporation.

Encroachments on water bodies accounted for 49 per cent of the total objectionable encroachments. Jurisdictional issues and lack of coordination between Revenue and Water Resources Departments contributed to the rise in encroachments on water bodies.

Instead of alienating or acquiring suitable land, several Government agencies took recourse to encroaching water bodies and grazing lands for constructing public buildings.

Systems put in place to monitor clearance of encroachments did not function as the High Level Committee at the State level did not meet after February 2010.

2.1.1 Introduction

The Government lands are held by various departments of Government of Tamil Nadu (GoTN) and vested with Local Bodies. It is the responsibility of the departments and Local Bodies to protect and use the lands under their control. The Revenue Department is the custodian of all Government lands. Government lands are broadly classified as Poramboke and Other Government lands. In the Revenue records, based on their usage, Government lands¹, are classified as Natham², Poramboke³, Waste⁴, Water Course Poramboke⁵, Meikkal⁶, Road, Cart track, etc.

As a policy, while encroachment on lands which are not earmarked for specific purposes are treated as *prima facie* unobjectionable, occupation of lands classified as Poramboke, including Water course, Meikkal, Road, Cart track, Forest, etc., are considered objectionable.

2.1.2 Organisational set up

The Additional Chief Secretary-cum-Commissioner of Land Administration (CLA) heads the land administration of the State and administers all Government lands through District Collectors, who are responsible for care and control of Government lands under their jurisdiction. Commissioners of Local Bodies and heads of various departments are responsible for management of land under their charge. Enforcement of various Acts that empower removal of encroachments are carried out either by District Collectors or authorised officers of other departments *viz.*, Water Resources Department, Highways, Local Bodies, etc. The District Collector is assisted by District Revenue Officer, Revenue Divisional Officers and Tahsildars of Revenue Department.

¹ Section 2 of Tamil Nadu Land Encroachment Act, 1905 defines Government property as public roads, streets, lanes and paths, rivers, streams, nullahs, lakes and tanks, backwaters, canals and water-courses and all standing and flowing water and all lands, wherever situated, except lands of registered holder, of a person holding land under grant of the Government and temple site, owned as house-site or backyard.

² Lands assigned for dwelling purpose.

³ Lands reserved for State or Communal purposes or lands which are not available for private occupation.

⁴ Non-cultivable lands.

⁵ Lands in the margins of water bodies (like tanks, rivers, channels, canals and drains) that are meant to protect the water bodies.

⁶ Grazing lands.

2.1.3 Audit objectives

Audit objectives were to assess whether:

- an adequate system was in place to prevent encroachments on Government lands;
- detection and eviction of encroached Government lands were effective; and
- internal control mechanism was effective to ensure detection, prevention and eviction of encroachments.

2.1.4 Audit criteria

The following were taken as the criteria to assess the performance of public functionaries in handling encroachment of Government lands:

- The Tamil Nadu Land Encroachment Act, 1905;
- The Tamil Nadu Public Premises (Eviction of Unauthorised Occupants) Act, 1975;
- The Tamil Nadu Protection of Tanks and Eviction of Encroachment Act, 2007;
- The Tamil Nadu District Municipalities Act, 1920;
- The Tamil Nadu Panchayat Act, 1994;
- The Tamil Nadu Highways Act, 2001;
- The Tamil Nadu Parks, Playfields and Open Spaces (Preservation and Regulation) Act, 1959; and
- Revenue Standing Order (RSO) and Government Orders issued from time to time.

2.1.5 Scope of audit and methodology

The Performance Audit covering the period 2012-17 was conducted between May 2017 and September 2017 by scrutiny of records in Secretariat, Heads of departments, eight sampled districts⁷, 15 taluk offices, 18 Divisions/sub-Divisions of Water Resources Department, Highways Department and Animal Husbandry Department and 10 Local Bodies (**Appendix 2.1**). Audit findings and evidence collected in District Collectorates and offices of other land user departments were verified with revenue records available in taluk offices coming under respective jurisdiction. Besides studying records, the Audit teams undertook physical verification of encroachments in sampled districts and bus route roads in urban areas.

An Entry Conference was conducted on 12 May 2017 with the Secretary to Government, Revenue Department to discuss the Performance Audit's objectives and methodology. Exit Conferences were held with the Principal Secretary to Government, Public Works Department and Principal Secretary to

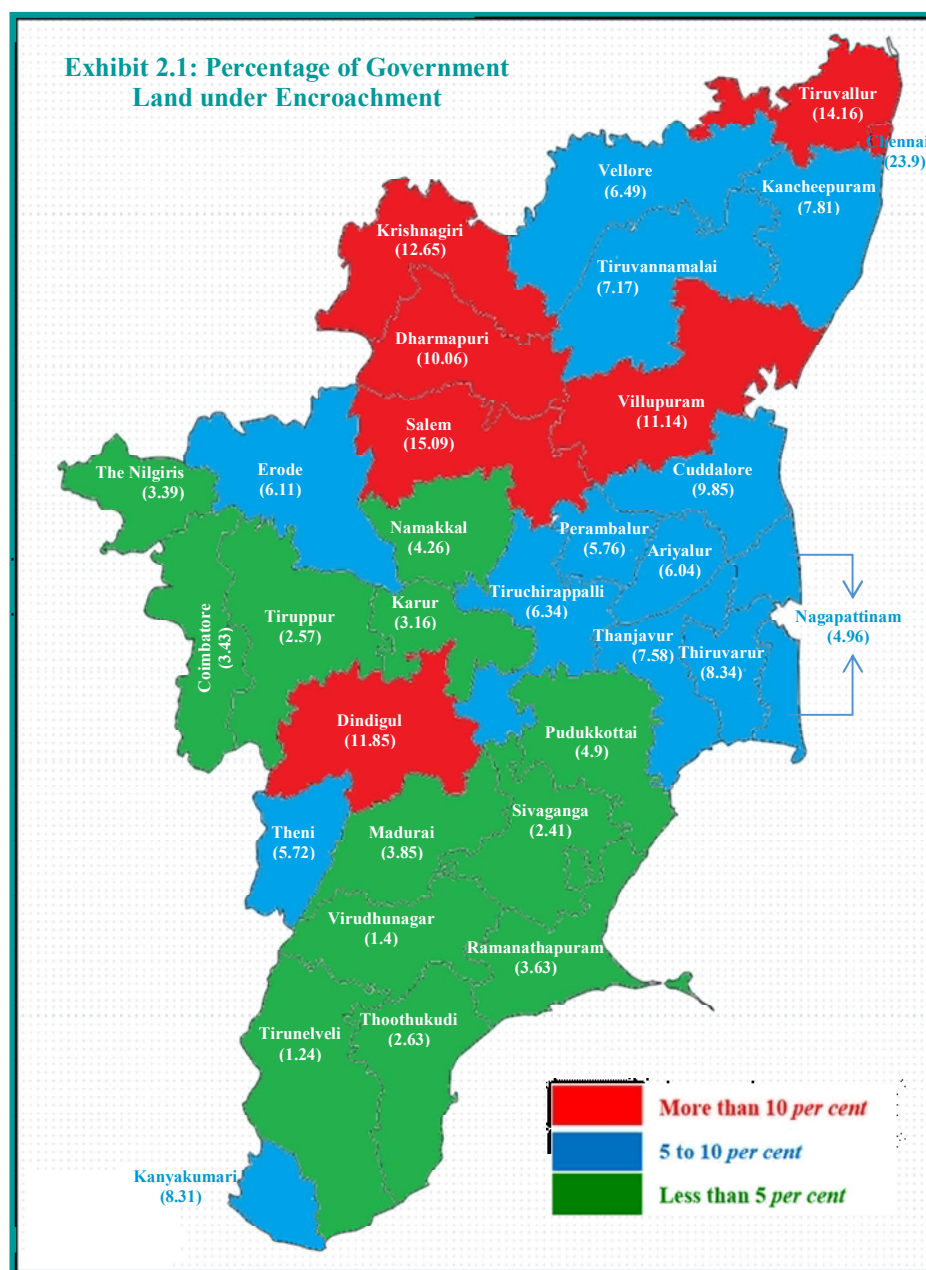
⁷ Chennai, Coimbatore, Madurai, Pudukottai, The Nilgiris, Tiruchirappalli, Tiruvallur and Vellore.

Government, Municipal Administration & Water Supply Department to discuss findings relating to the respective departments.

2.1.6 Nature and extent of encroachments

Total extent of encroachment

As of June 2017, the total extent of Government land in the State was 29.03 lakh hectare⁸ (Ha), out of which 2.05 lakh Ha (seven *per cent*) of Government land was encroached⁹ (**Appendix 2.2**). Out of the total available Government land, the percentage under encroachment ranged from 1.24 in Tirunelveli District to 23.9 in the fully urban Chennai District (**Exhibit 2.1**).



⁸ This does not include Reserve Forests under Forest Department

⁹ Includes both objectionable and unobjectionable encroachments

Table 2.1: Nature of encroachments

Classification	Area in Ha
Permanent Residential	26,471
Permanent Non-Residential	13,846
Temporary Crops and Trees	1,46,062
Temporary Others	17,557
Total	2,03,936*

* Excluding 1,520 Ha of Government land encroached in Chennai District for which utility classification was not available.

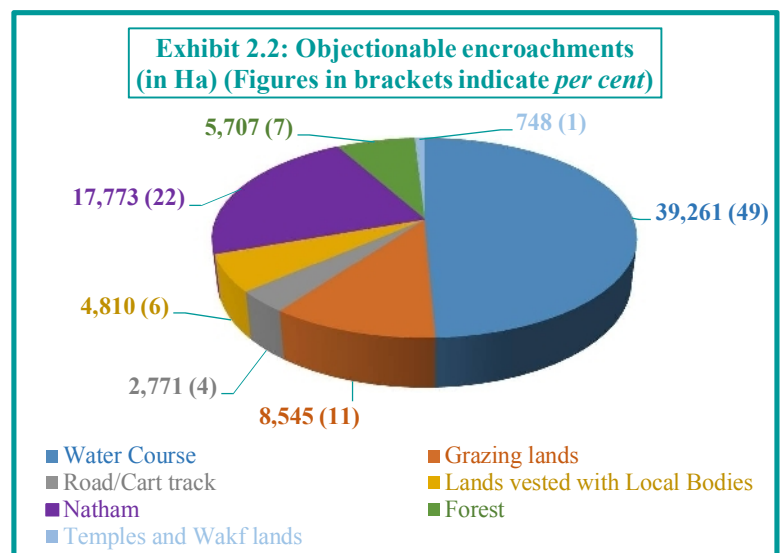
(Source: Government Land Registry, CLA)

Out of the 2.05 lakh Ha encroached, 40,317 Ha were encroached by permanent structures and the remaining 1.64 lakh Ha were temporary encroachments including crops (Table 2.1). District-wise details of different kinds of encroachments as on 1 June 2017 are given in Appendix 2.2.

Objectionable encroachments

In the revenue records, encroachments are classified as ‘objectionable’ and ‘unobjectionable’, based on the nature of land and the purpose of encroachment. As a policy, encroachment of Government lands, which are earmarked for specific purposes such as water ways, grazing lands, public paths, Forest and other community use, etc., which are called ‘poramboke land’, are treated as ‘objectionable’. Encroachment of other Government lands not earmarked for any specific purpose are treated as *prima facie* ‘unobjectionable’ subject to payment of assessed charges.

As of March 2016¹⁰, 79,615 Ha of Government lands categorised as water course poramboke, grazing lands, road, natham, forest, etc., (Exhibit 2.2) were under unlawful encroachment. A vast majority of these objectionable¹¹



encroachments, totalling 39,261 Ha (49 per cent of total objectionable encroachments), were on water courses which impact storage capacity of tanks and hydrology of streams, causing floods and depletion of ground water.

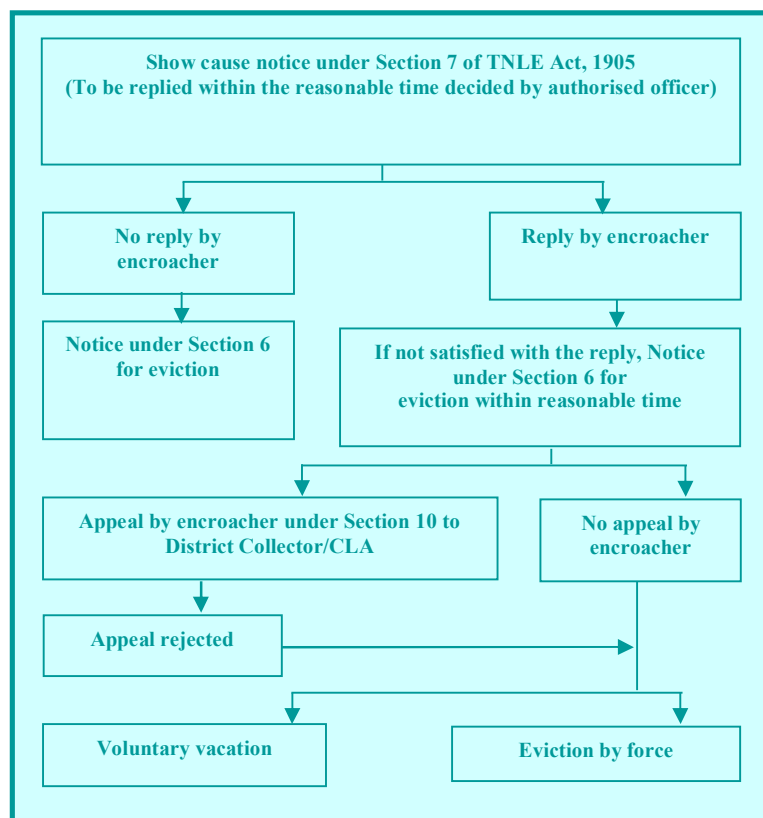
¹⁰ Data on objectionable encroachments as of March 2017 was not compiled.

¹¹ Based on nature of land (reserved for a purpose), person who occupies the land and future needs of the Government.

2.1.6.1 Statutes and powers to protect Government lands

In order to check encroachments on Government property, GoTN enacted the TN Land Encroachment (TNLE) Act, 1905. Under the Act, Tahsildars in Revenue Department and specified officers in other departments are empowered to act against the encroachers. Urban and Rural Local Bodies have powers under TN District Municipalities Act, 1920, TN Panchayat Act, 1994, etc., to proceed against encroachers of Local Body lands. The TN Highways Act, 2001 and the TN Protection of Tanks and Eviction of Encroachment Act, 2007 provide statutory powers to Highways Department and Water Resources Department (WRD) respectively to act against encroachments on highways and WRD tanks. The stages of eviction are depicted in the flow chart (**Exhibit 2.3**).

Exhibit 2.3: Encroachment eviction process



Although departments having lands under their control have statutory powers to act against encroachments, the ultimate task of surveying and marking boundaries of Government lands, a crucial stage in eviction of encroachments, rested with Revenue Department. Therefore, the Revenue Department had a pre-eminent role in eviction of encroachments. Encroachments identified by the Village Administrative Officer (VAO) are formally booked in 'B Memo', an intimation of encroachment by VAO to Tahsildar and all the identified

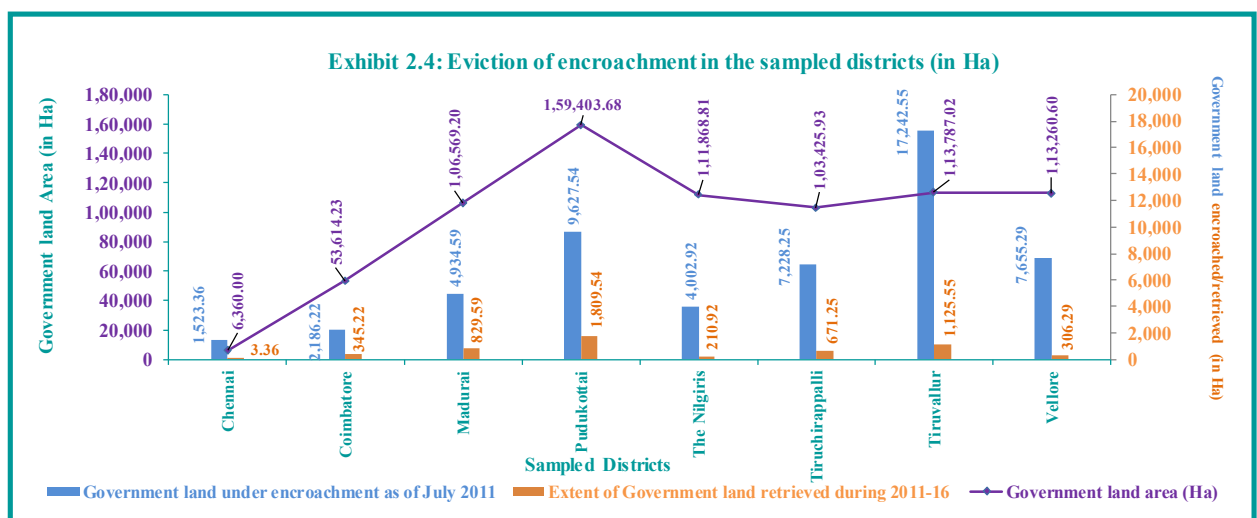
cases are then included in ‘Village Adangal’¹². The deficiencies in booking ‘B Memo’ are discussed in **Paragraph 2.1.7.3**.

2.1.6.2 Poor achievement in eviction of encroachment

The details of eviction of encroachments during 2011-16 in the sampled districts are given in **Table 2.2** and depicted in **Exhibit 2.4**.

Table 2.2: Achievement on removal of encroachments in the sampled districts (in Ha)

District	Total Government land under encroachment as of July 2011	Extent of Government land retrieved during 2011-16	Government land under encroachment as of July 2017	Percentage of eviction to total land under encroachment as of July 2011
Coimbatore	2,186.22	345.22	1,841	15.79
Madurai	4,934.59	829.59	4,105	16.81
The Nilgiris	4,002.92	210.92	3,792	5.27
Pudukottai	9,627.54	1,809.54	7,818	18.80
Tiruchirappalli	7,228.25	671.25	6,557	9.29
Tiruvallur	17,242.55	1,125.55	16,117	6.53
Vellore	7,655.29	306.29	7,349	4.00
Chennai	1,523.36	3.36	1,520	0.22
Total	54,400.72	5,301.72	49,099	9.75



(Source: Data obtained from CLA)

While Coimbatore, Madurai and Pudukottai districts achieved substantial progress in clearance of encroachments, Chennai and its suburban district of Tiruvallur and Vellore districts achieved very little in clearance of encroachments, indicating inadequate efforts on the part of the District Collectors.

¹² Annual statement of occupation and cultivation of land with details of the landholder and remarks of the VAO.

2.1.7 Systemic issues in detection and eviction of encroachments

2.1.7.1 Inadequacies in statutory powers

Mention was made in CAG's Audit Report (Revenue Receipts) for the year 1986-87, and again reiterated in the Report for the year 2002-03 (Paragraphs 3.2.4 to 3.2.11) on the inadequacies and ineffective measures adopted by the Revenue Department in dealing with encroachment of Government land. The Secretary to Government admitted that eviction of encroachment suffered due to problems in enforcement and assured (2014) the Public Accounts Committee (PAC) that the TNLE Act, 1905 would be amended. It was, however, found that no amendment was made to TNLE Act, 1905, after 1996. The amendment in 1996 made judicial intervention possible only at the level of the Hon'ble High Court.

It was further observed that:

- In 2007, GoTN brought out the Tamil Nadu Protection of Tanks and Eviction of Encroachment Act covering tanks coming under the purview of WRD. The Act had inherent limitations as it did not cover encroachments on smaller irrigation tanks and ooranis¹³ coming under the purview of Local Bodies. Although the Act provides for surveying and placing boundary stones to prevent encroachment, river margins and boundaries of smaller tanks and ooranis were left out of these surveys.
- The TNLE Act, 1905, provides for an appeal process within the departmental framework and judicial intervention is possible only at the High Court level. Other Acts concerning clearance of encroachment, however, did not provide for any appeal process within the departmental framework before approaching the judiciary. This led to proliferation of litigations at lower courts, causing delays in removal of encroachments.
- Both Andhra Pradesh and Kerala, the neighbouring States of Tamil Nadu which had adopted the Madras Land Encroachment Act, 1905, brought out Land Encroachment Rules, under their respective Acts to amplify the statutory provisions. GoTN, however, did not frame any Rules under TNLE Act, 1905, but continued with the Revenue Standing Orders, which were framed long back.

2.1.7.2 Incomplete data on Government land

The *Adangal* Register of every Revenue village shows the details of survey number, cultivation/occupation, name of holder, remarks of VAO, etc. An Encroachment Register (Village Account number 7) showing details of survey number, unlawful occupation, fine imposed, etc., is also maintained at village level.

¹³ Traditional water bodies created to harvest rainwater for drinking and other purposes

CLA ordered (June 2016) a state wide *Azmoish*¹⁴ of Government lands at village level and created a register *viz.*, Government Land Registry (GLR), incorporating details extracted from the computerised village records.

A comparison of encroachments on Government lands, as compiled from the village level Encroachment Register and as per GLR compiled through the State-wide *Azmoish* of Government lands are shown in **Table 2.3**.

Table 2.3: Statistics on encroachment on Government Lands (in Ha)

Sl. No.	Classification	Encroachments as of March 2016	Classification of encroachments as per GLR as of June 2017	
1.	Water Course Poramboke	39,261	Permanent Residential	26,471
2.	Grazing lands	8,545	Permanent Non-Residential	13,846
3.	Road/Pathai	2,771	Temporary Crops and Trees	1,46,062
4.	Vested with Local Bodies	4,810	Temporary Others	17,557
5.	Natham and Others	17,773		
6.	Forest Poramboke**	5,707		
7.	Temples and Wakf lands	748		
Total		79,615		2,03,936*

* Does not include 1,520 Ha of Government land encroached in Chennai District for which utility classification was not available.

** Does not include Reserve Forest land which is dealt separately by the Forest Department.

(Source: CLA and Government Land Registry)

The difference between the encroachment figures of 2.05 lakh Ha as of June 2017 as per GLR and the figures of 0.80 lakh Ha as per the data compiled in the previous year, was too huge to be reconciled as the classification was changed in 2016.

It was further observed that:

(i) The Revenue Standing Orders stipulated that unauthorised occupation on Government land was treated either as ‘objectionable’ or ‘unobjectionable’ based on the type of land and usage. However, CLA compiled (2016) GLR in a different form which did not indicate the extent of ‘objectionable’ and ‘unobjectionable’ encroachments.

(ii) Non-booking of ‘B Memo’, as discussed in **Paragraph 2.1.7.3** below, also contributed to the huge difference between the 2016 and 2017 data on encroachments.

(iii) The breakup for lands under the control of Highways, WRD, Local Bodies, etc., were also not available in CLA. The data on encroachment available with CLA was, thus, incomplete.

2.1.7.3 Non-adherence to RSO provisions on ‘B Memo’

‘B Memo’, an intimation of unauthorised occupation of Government land, is prepared by the VAO and sent to Taluk officers to decide the next course of action, *viz.*, eviction of encroachment, levy of penalty, etc. From the

¹⁴ *Azmoish* means inspection of lands in a village by VAO on irrigation/wet/dry lands and their current status.

'B Memo', the details of encroachment of Government lands are captured in '*Village Adangal*'. Revenue authorities review the '*Village Adangal*' and decide on the course of action to be taken on the encroachments.

In April 1992, CLA had opined that the 'B Memo' were used as proof of holding of that piece of land by unscrupulous persons for illegal sale of Government lands. Therefore, CLA had reasoned that booking of 'B Memo' did not result in the desired effect and had instructed to issue notices under the TNLE Act, 1905. By wrong interpretation of above instructions, the field officials stopped booking 'B Memo'. In the test-checked villages, Audit noticed that 'B Memos' were not booked for the past several years and consequently, the '*Village Adangals*' were not updated to include fresh encroachments. CLA, in November 2000, clarified that all existing encroachments should be brought into '*Village Adangal*'. The field officers, however, did not start booking 'B Memo', for which no specific reasons were available.

Test check in the 70 sampled villages revealed that 7,845 'B Memo' booked were routinely renewed, year after year, during the Audit period of 2012-17 (**Appendix 2.3**). The routine renewal of 'B Memo', without any critical review for initiating action on levy of assessment/penalty or eviction did not serve any purpose.

Thus, the failure in booking of fresh 'B Memo' and renewal of existing 'B Memo' without critical review, made the whole system ineffective in handling the issue of encroachments.

2.1.7.4 Encroachment not brought into records

Test check by Audit in Coimbatore District revealed that a land to an extent of 0.08 Ha in a water course¹⁵ was encroached by a private educational university viz., Karunya University. The District Revenue Officer, Coimbatore (April 2016) also confirmed this in his report submitted to the Hon'ble Madras High Court in a case filed by the University against the orders of the Town and Country Planning Authority.

Audit, however, noticed that the above encroachment was not recorded by the VAO in the '*Village Adangal*' and no 'B Memo' was booked to initiate further action.

2.1.7.5 Non-maintenance of Prohibitive Order Book

RSO prescribed maintenance of a special register called 'Prohibitive Order Book' (POB) in all Revenue offices. POB exhibits the details of lands that should not be disposed of by assignment or alienation. This system was envisaged to protect critically important lands lying adjacent to school, road, railway station, places of archaeological importance, etc., and to ensure availability of lands for Government projects.

It was observed that lands included in POB, which were earmarked for special purpose, were encroached as given in **Table 2.4**.

¹⁵ Survey numbers 583/2 etc., in Mathuvarayapuram Village.

Table 2.4: Encroachments on important lands included in POB

Taluk	Village	Extent of encroachment (in Ha)	Remarks
Coimbatore District			
Coimbatore South	Uppilpalayam	0.49	Residential encroachment. Encroacher approached Hon'ble High Court against eviction order. Tahsildar did not contest the case.
	Sowripalayam	0.57	Residential buildings. 'B Memo' renewed routinely. No action was taken.
Pollachi	Pollachi Town	0.05	Encroached by houses. No action was taken by Tahsildar.
The Nilgiris District			
Udhagamandalam	Five villages ¹⁶	37.19	Encroached by houses, temple, etc. No action was taken to evict encroachments.
Madurai District			
Madurai North	Kulamangalam	0.10	'B Memo' renewed routinely. No action was taken.

(Source: Data collected from respective Taluk records)

Non-adherence to the established system of maintaining POB and absence of periodical review by higher authorities rendered the system of POB, which was there to ensure availability of critically important lands for future development, an ineffective tool.

2.1.7.6 Poor progress in survey of WRD tanks

The Tamil Nadu Protection of Tanks and Eviction of Encroachment (TNPTEE) Act, 2007, provided for survey of all tanks under WRD to mark the boundaries. Considering the fact that 49 *per cent* of the total objectionable encroachments were on water bodies and the threat posed by these encroachments, GoTN banned (January 1987) regularisation of these encroachments.

Although survey by Revenue authorities was the starting point for protecting the tanks under WRD, the achievement in surveying the tanks during the last 10 years, since notification of the Act in 2007, was very poor as given in Table 2.5.

Table 2.5: Achievement in survey of WRD Tanks

Name of the District	Name of the WRD Division/ Sub-Division	Total tanks	Tanks surveyed	Tanks with encroachments
Pudukottai	South Vellar Basin Division, Pudukottai	961	0	0
Madurai	Periyar Vaigai Basin Division, Madurai	210	197	138
Tiruchirappalli	Ariyaru Basin Division, Tiruchirappalli	100	91	61
Tiruvallur	Kosasthalaiyar Basin Sub-Division, Tiruvallur	82	2	2
Coimbatore	Irrigation Sub-Division, Coimbatore	31	14	2
Total		1,384	304	203

(Source: Water Resources Department)

¹⁶ Udhagamandalam - Rural, East, West, Naduvattam and Sholur.

In the sampled Divisions/Sub-Divisions of WRD, only 304 out of the 1,384 Tanks (22 *per cent*) were surveyed over the last 10 years and nearly 67 *per cent* of the tanks surveyed were encroached. Further, no effective action was taken to complete the survey or to evict the identified encroachments. In the Exit Conference (November 2017) the Engineer-in-Chief, WRD attributed the shortages of surveyor in Revenue Department for the delay in conduct of tank survey.

Thus, the system envisaged in the Act to protect the tanks from encroachments did not help in protecting the tanks as WRD did not fix boundaries for all the water bodies through survey, which was the first step in prevention of encroachments and eviction of already existing encroachments.

2.1.8 Encroachments in urban areas

2.1.8.1 Encroachments on lands of Greater Chennai Corporation

(i) Poor/Inadequate maintenance of land records

The Land & Estate Department in Greater Chennai Corporation (GCC) handles matters which *inter alia* included preservation of land records and removal of encroachments. Subsequent to decentralisation (November 2014) of functions of Land & Estate Department, the task of maintaining records on land and buildings was entrusted to the Division offices of GCC. All Zonal Officers were instructed (2014) by Land & Estate Department to create records of all assets (buildings, vacant land, roads, canals, drains, lakes, etc.,) and details of encroached lands for computerisation. Audit observed that the property details, which included extent of land, usage, encroachment details, etc., were compiled only by 4 (Zones 7, 11, 13 and 14) out of the 15 Zones as of May 2017.

Thus, in the absence of clear records on the landed property held by GCC, the Corporation was not in a position to protect its lands, more so because the Revenue Department was not directly involved in protection of lands owned by or vested with Local Bodies.

(ii) Lack of data on road margin encroachments

The Madras City Municipal Corporation Act, 1919, prohibits building of any wall, fence or other obstruction or encroachment in and over any street or any public place, the control of which is vested with the Corporation. The Commissioner of GCC may by notice require the owner or occupier of any premises to remove or alter any projection, encroachment or obstruction situated in or over any street.

GCC did not maintain any updated data on encroachments, obstructions and projections on its streets/roads and public places. The Audit teams undertook field inspection in 24 out of the 211 bus route roads of sampled zones of GCC during October 2017 and noticed rampant encroachments on 18 roads as summarised in **Table 2.6** and detailed in **Appendix 2.4**.

Table 2.6: Details of encroachments on road margins in the sampled zones of GCC

Name of the Zone	Number of roads inspected	Total length of roads inspected (in Kms)	Number of encroachments noticed								Total
			Permanent				Temporary				
			Religious Structures	Commercial	Residential	Others	Religious Structures	Commercial	Residential	Others	
Zone - IV	4	8.18	6	30	10	0	0	6	0	0	52
Zone - V	7	7.00	3	0	0	3	0	21	1	0	28
Zone - VIII	5	10.43	1	8	0	2	0	10	0	0	21
Zone - IX	8	12.00	5	0	0	0	0	23	0	0	28
Total	24	37.61	15	38	10	5	0	60	1	0	129

(Source: Field Inspection by Audit teams)

It was further observed that 126 of the encroachments listed in **Table 2.6** were occupying the footpaths blocking pedestrian movements and three were occupying footpath as well as the carriageway affecting pedestrian movement and vehicular traffic (**Appendix 2.4**).

As the GCC was vested with powers to summarily remove the temporary encroachments, there was no reason as to why these were not removed. From the above, it is evident that on an average Chennai's bus route roads had 3.4 incidences of encroachments per kilometre of road length pointed to the inaction on the part of GCC in identifying and evicting them.

Instances (**Exhibits 2.5 to 2.8**) of road margin encroachments which narrowed the available road width for pedestrians and motorists are shown below. **Exhibits 2.7 and 2.8** show encroachment of road margins by the civic body itself, for which, power connections were also provided, indicating the public authorities themselves encroached road margin with impunity.

Exhibit 2.5: Temple and Bus Shelter, Choolai High road, GCC



Exhibit 2.6: Shop, Durga Devi Nagar, GCC



**Exhibit 2.7: Public convenience,
Sivananda Salai, GCC**



(Source: Photos taken during field inspection)

**Exhibit 2.8: Amma Canteen, Anna Nagar II
Avenue, Thirumangalam, GCC**



2.1.8.2 Encroachments on Open Space Reservation lands

The Area Development Master Plans and Development Control Regulations for buildings envisaged earmarking of lands for Open Space Reservation (OSR). These lands should not be utilised for any purpose without the consent of the Government.

(a) Scrutiny of records in the test-checked Zone VIII of GCC disclosed that OSR lands taken over through gift deeds by the Zonal Officer were encroached as detailed in **Table 2.7**.

Table 2.7: Encroachments of OSR lands in Zone VIII of GCC

Sl. No.	Division	Location	Revenue Survey Number	Extent of OSR lands (Sq.m.)	Details of encroachment
1.	100	Part 7 th Main Road, OSR land in between TNHB MIG Flats	64	1,250	Gym and Amma Unavagam (GCC)
2.	105	Arumbakkam, Kalki Nagar 2 nd Street	157/1 & 162	214.7	Huts (Private)
3.	105			288	Temple (Private)
4.	105	SBI Staff Colony 6 th Street	63	130.5	Amma Unavagam (GCC)

(Source: Records of GCC)

It is seen from **Table 2.7** that OSR lands were not utilised for the specified purposes as envisaged in the Act. The GCC which was the designated authority to ensure proper utilisation of OSR lands not only failed, but also misused the lands for implementing its own schemes. Details of encroachments (period/extent, etc.) and action taken to evict the encroachments on OSR lands could not be furnished by the Zonal Officer, indicating inaction of GCC in these cases.

(b) During scrutiny of records at Zonal Office, Ponmalai, Tiruchirappalli City Municipal Corporation (TCMC), Audit noticed that a piece of land¹⁷ (0.25 Ha) set aside as a playground for children was encroached by two temples. A case was filed (2016) in the Hon'ble Madras

¹⁷ Survey Numbers 118/1-2, 119-2 and 120-1 in J.K. Nagar, Ponmalai Zone, TCMC

High Court - Madurai Bench by an Association¹⁸ praying for directions to remove the encroachment within a time frame fixed by the Court. The Court instructed (March 2017) the Commissioner, TCMC, to conduct proper survey of the entire layout, with the assistance of revenue records and to remove the encroachment, if any, in common places under due process of law within a period of three months.

TCMC issued (April 2017) show cause notices to the encroachers and followed up with eviction notices in May 2017. Though the deadline fixed by the Court for eviction had ended, the encroachments were yet to be removed (July 2017). The Government replied (December 2017) that eviction of places of worship being a sensitive matter, the TCMC was handling the matter tactfully to remove the encroachments.

In this connection, it was observed that the Local Bodies' inaction in protecting the OSR land by developing play ground, constructing boundary wall etc., had facilitated encroachment which was not evicted immediately.

2.1.9 Non-detection of encroachments on water bodies

Government, in its policy notes, stressed the importance of evicting encroachments from water bodies with a view to protect them and also issued (1987) ban orders on the regularisation of such encroachments. Instances of encroachments in water bodies and lack of effective action by the authorities concerned are discussed in the succeeding paragraphs.

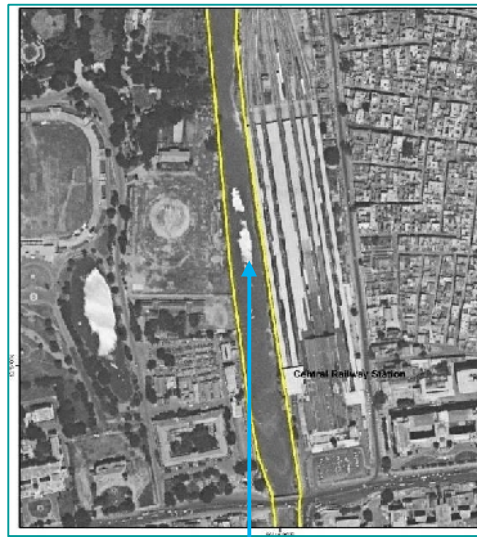
2.1.9.1 Encroachment in WRD water course

As per the Permanent Land Records of Purasaiwakkam Taluk, the Buckingham Canal, a man made navigational canal constructed in the 19th century, had an approximate width of 160 feet in Vepery village close to the Central Railway Station. A site inspection by Audit revealed that the width of the Buckingham Canal running adjacent to the main building of Central Railway Station in Chennai was reduced to less than 70 feet. It was evident from the Taluk records that the encroachment was neither recorded nor any action taken in this regard by the Revenue authorities.

A satellite imagery sourced through Institute of Remote Sensing, Anna University, pertaining to October 1965 and March 2016 disclosed large scale encroachment on the canal by the Railways as given in **Exhibit 2.9**.

¹⁸ J.K. Nagar Kudiyiruppor Vizhipunarvu Sangam.

Exhibit 2.9: Satellite photo of Buckingham Canal near Central Railway Station



Original width 160 feet of Buckingham Canal (October 1965)



Reduced width 70 feet of Buckingham Canal (March 2016)

(Source: Institute of Remote Sensing, Anna University)

From **Exhibit 2.9**, it was apparent that the actual width of the water body was reduced by more than half when compared with its original width due to encroachment by Railways. The encroachment on the water body, which serves as a drain in urban limits of Chennai, indicated that the WRD did not take steps to protect the water body while Railways built additional lines.

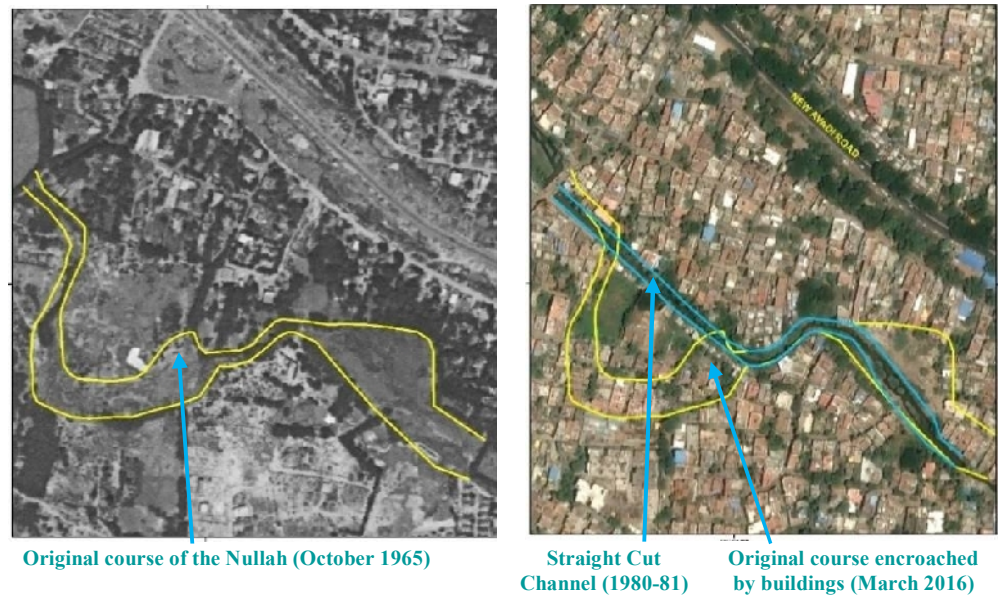
2.1.9.2 Encroachments in drainage channel

During scrutiny of records at Chennai Collectorate, it was observed that improvement works were carried out to Otteri Nullah¹⁹, passing through western and northern parts of Chennai City, during 1980-81. The WRD provided a 'straight cut' (**Exhibit 2.10**) in the nullah after the stream took a new course during 1976 floods. It was also seen from the taluk records²⁰ that prior to formation of 'straight cut', the drain was flowing through Survey number 54 of Ayanavaram village. Through satellite map and field inspection, Audit noticed that the original course of the nullah was encroached after the 'straight cut' work (**Exhibit 2.10**). While the Town Survey Register of Ayanavaram village continued to classify this survey number as Odai (stream), the land was fully encroached.

¹⁹ A natural stream draining into the Buckingham Canal.

²⁰ Block map No. 13 of Ayanavaram village.

Exhibit 2.10: Satellite photo of Otteri nullah



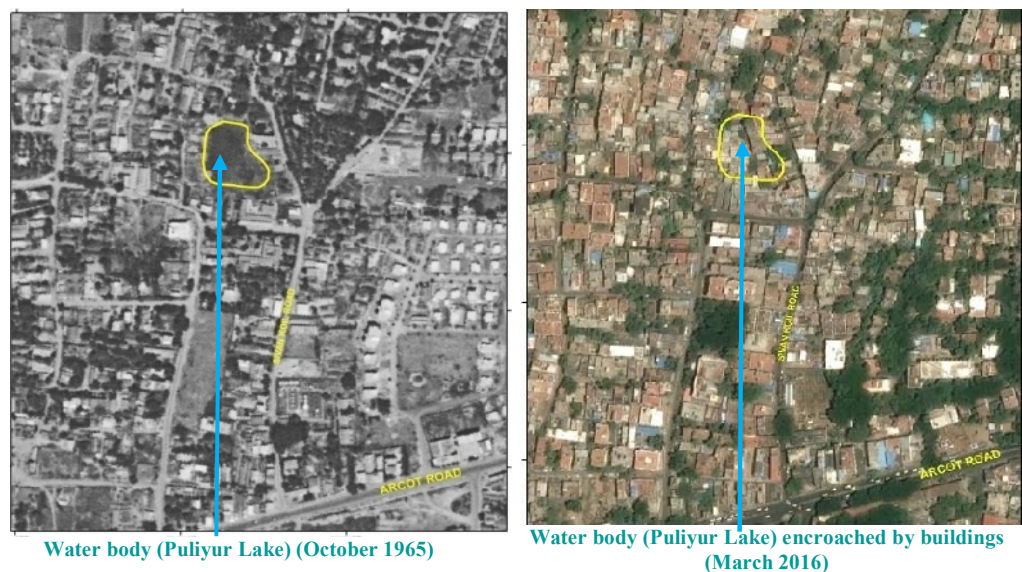
(Source: Institute of Remote Sensing, Anna University)

It was observed in audit that the original course should have been maintained and protected from encroachments to function as a water retention body or for any other public purposes. WRD, however, did not take any action on this encroachment.

2.1.9.3 Encroachments in a lake

Revenue records of Puliur village, Egmore Taluk, maintained at Chennai Collectorate, classify Survey numbers 33 to 47 (except Survey numbers 38 and 42) in Block 9 as a water body (lake) spread over an extent of 1.45 Ha. However, a comparison of this area using satellite imagery (**Exhibit 2.11**) for the periods October 1965 and March 2016 revealed that the entire lake was encroached by buildings, etc., indicating inaction of Revenue Department in detecting and evicting the encroachments in time.

Exhibit 2.11: Satellite photo of Puliur Lake



(Source: Institute of Remote Sensing, Anna University)

2.1.9.4 Belated request for survey of encroached water bodies

Scrutiny of the records produced to audit by Periyar Vaigai Basin Division, WRD, Madurai, revealed that encroachments in water bodies were not evicted as detailed in **Table 2.8**.

Table 2.8: Details of encroachment in water bodies of WRD, Madurai

Sl. No.	Name of the Kanmai/ Taluk	Survey No.	Number of encroachers	Extent of encroachment	Type of encroachment	
					Government/ Local Bodies	Private
1.	Madakulam Kanmai/ Thiruparankundram	374/2A, 374/2E	203	2.06 acres	School and Community hall	Houses and Temple
2.	Poolangulam Kanmai/Usilampatti	138	4	9.02 acres	Burial ground	..
3.	Poruppumettupatti Kanmai/ Usilampatti	20	5	0.70 acres	Community hall, Anganwadi Centre, Toilets and e-Seva Centre	Temple

(Source: Water Resources Department)

Joint inspection (September 2017) by Audit along with WRD officials confirmed the encroachments. Though the above encroachments were in existence for more than 15 years, requests for survey was sent (September 2016 to July 2017) to the Revenue Department belatedly.

To an Audit query (September 2017), the Executive Engineer (EE), WRD, replied (September 2017) that in Madakulam tank, the encroachments occurred in deep outskirts near patta lands. Therefore, the encroachments were not visibly noticed and came to be known only on receipt of a petition on Agriculture Grievance Day Meeting during 2016. Regarding the e-Seva Centre in Poruppumettupatti Kanmai, the EE replied (September 2017) that no request was received from the Village Panchayat, seeking permission to construct the e-Seva Centre and notice would be issued to the Village Panchayat.

The above reply demonstrated that no periodical inspection was conducted to identify new encroachments in the water bodies to initiate prompt action for eviction.

2.1.10 Deficiencies in eviction of identified encroachments

After identification of encroachments, the authorised officer was to issue notices and take necessary action to evict the same after considering the explanation given by the encroacher or on completion of the notice period.

In the sampled offices, Audit observed several instances of failures in taking further action after identifying the encroachments, as discussed in the succeeding paragraphs.

2.1.10.1 Lack of co-ordination in eviction of encroachments on water bodies

(i) River margin encroachment, Madurai District

Records of the Periyar Vaigai Basin Division, WRD, Madurai revealed that an educational institution²¹ encroached 0.73 Ha on the margins of Vaigai river in Sathamangalam Village, Madurai North Taluk for more than 70 years. A joint inspection (September 2017) by audit along with WRD officials confirmed the objectionable encroachment and the WRD did not issue any notice under Section 6 of TNLE Act, 1905 to evict the encroachment.

To an audit enquiry (July 2017), the EE replied (August 2017) that the Tahsildar, Madurai North Taluk was requested (December 2016) to survey and report on the current status of encroachment and necessary notice be issued to remove the encroachment on receiving the report. The Tahsildar, Madurai North Taluk replied (September 2017) that instructions were already issued to the Surveyor concerned to conduct field survey. It was, however, observed that no action was taken till date (September 2017) and the WRD and Tahsildar were passing on the responsibility to others, while encroachments continued unabated.

(ii) Tank encroachment, Madurai District

During a joint inspection (September 2017) of Kosakulam tank in Tallakulam Village of Madurai North Taluk, it was noticed that it was partially encroached (4.5 Ha) by about 300 tiled/asbestos sheet/tin sheet/concrete houses (Exhibit 2.12) for more than



(Source: Photos taken during joint inspection)

15 years. All these houses were provided with power and water connections. Besides this, an overhead water tank was also constructed by Madurai Corporation on the water body. Based on a Public Interest Litigation (PIL), the Hon'ble Madras High Court - Madurai Bench issued (September 2016) directions to the authorised officer to pass appropriate orders and take action against the encroachers in accordance with law.

Scrutiny of records revealed that WRD had addressed (November 2016 and February 2017) the Tahsildar, Madurai North Taluk and the Revenue Divisional Officer, Madurai, to carry out survey of the water body and mark boundaries to facilitate eviction of encroachments as per the directions of the Court. In response to an audit query, while the EE replied (August 2017) that notice would be issued to evict the encroachment after receipt of the survey report from the Tahsildar, the Tahsildar replied (September 2017) that instructions were already issued to the Surveyor of the Madurai North Taluk to

²¹ Thiagarajar College of Engineering

conduct field survey. This was yet another case of non-fulfilling the responsibilities by the respective officers and lack of co-ordination between Revenue Department and WRD. Thus, despite passage of a year, the directions of the Hon'ble High Court were not complied with.

(iii) *Samy Iyer Kulam tank encroachment, Pudukottai District*

Samy Iyer Kulam was an irrigation tank spread over 4.82 Ha in Pudukottai South Village of Pudukottai Taluk. The tank was under the control of Pudukottai Panchayat Union.

In January 1998, the Tamil Nadu Housing Board (TNHB) sought alienation of this tank for implementing a housing scheme. Simultaneously, based on request (November 1997) from persons who were already illegally occupying a portion of the tank, Government declared (February 1998) the tank as abandoned and changed its classification from 'Water Body' to 'Natham' on the grounds that agricultural activities were not carried out in the irrigated area of the tank for the past 10 years and that the whole irrigated area had been converted into residential plots. After Government's order for reclassification of the land and before its alienation to TNHB, the body representing the encroachers filed (2000) a case against alienation of the land to TNHB. The Hon'ble Madras High Court passed (July 2000) an interim order to maintain *status quo*. The stay order was made absolute in December 2002.

In the meantime, the Revenue authorities stated (December 2000) that the Government Order reclassifying the land as 'Natham', could not be implemented as 0.78 Ha of wet land was still being cultivated with the help of this tank. Ultimately, the Court directed (April 2009) the Government to implement the order of February 1998 after considering the representations of the encroachers who were occupying this land for long period by assigning the land through pattas in favour of them. Necessary changes were also made (September 2015) in the records of the Pudukottai South Village reclassifying Samy Iyer Kulam as 'Natham'.

While the Revenue Department was taking action to issue patta to all the 240 encroachers, a resident of a nearby colony filed (2017) a case in the Hon'ble Madras High Court - Madurai Bench, seeking directions to the respondents to maintain Samy Iyer Kulam as a water body and to forbear the Revenue authorities from granting patta to the encroachers, as the water in the tank served as a ground water source to the neighbouring localities. The Court ordered (June 2017) to maintain the land as a water body forever.

Audit observed that district authorities and GoTN failed to carry out due diligence as discussed below:

- As the wet lands were still being cultivated using water from this tank, GoTN issuing orders in February 1998 for reclassifying the land as 'Natham' was irregular.

- Planning a housing scheme on tank bed, showed that TNHB and GoTN were trying for an easier solution for housing, rather than a sustainable one.
- Though there were ban orders (January 1987) on regularisation of encroachments on water bodies, GoTN and the district authorities were unmindful of the hydrological and ecological impact of their decision to convert a tank bed for residential use.
- In their quest to convert the land for residential purpose, GoTN and the district authorities extended unintentional help to the encroachers to continue their unlawful occupation of a part of the tank bed.

(iv) *Andakudi Kanmai encroachment, Pudukottai District*

A PIL filed (January 2016) in the Hon'ble Madras High Court - Madurai Bench revealed encroachment of Andakudi Kanmai, a water body of 29 Ha, in Yembal village of Avudaiyarkoil Taluk of Pudukottai District.

Scrutiny of documents revealed the following:

Based on the PIL, Revenue authorities inspected the water body and found (March 2016) 12 permanent encroachments (houses, rice mill and agricultural land) on 0.27 Ha by 35 individuals. The encroachment had reduced the storage capacity and had affected 80 agriculturists dependent on the tank. The Court while passing judgement, directed (April 2016) the District and Taluk Administrations to act against encroachments which affect the in-flow of water or the storage capacity of the Tank.

Accordingly, the Tahsildar, Avudaiyarkoil served notices (May 2016) to the encroachers and requested (July 2016) the Electricity Board authorities to disconnect electricity supply given to the encroachers, for enabling removal of encroachments. The encroachers approached (2016) the Court, stating that the notices were served under the wrong Act i.e., under the TNLE Act, 1905, instead of the TNPTEE Act, 2007. The Court found fault with the procedure followed and directed that the petitioners shall not be evicted, till an appropriate order is passed under Section 6 of the TNLE Act, 1905.

Subsequently, the Block Development Officer (BDO), Arimalam, served a eviction notice (October 2016) under Section 6 of TNLE Act, 1905, and under TNPTEE Act, 2007, directing the encroachers to vacate the encroached lands within 15 days of the issue of the notice. The notice was again contested by one of the encroachers and the Court quashed the notice on the ground that the BDO acted without any authority. Audit observed that even a plain reading of TNPTEE Act, 2007 would show that the BDO had no jurisdiction under the Act to issue such a notice.

Subsequently, the Revenue authorities, after carrying out a fresh survey, served show cause notices under Section 7 of the TNLE Act, 1905, (March 2017) on the encroachers and notices under Section 6 of TNLE Act, 1905, for eviction of encroachments (March 2017). The encroachers,

declining to vacate, went on appeal to the District Collector on the ground that land occupied was wrongly classified as 'Water Body'. After the District Collector rejected (June 2017) the appeal, the encroachers preferred (June 2017) an appeal with the CLA and the encroachments were yet to be evicted (August 2017). Thus, due to lack of understanding of the due legal process, the authorities delayed the eviction of encroachments.

(v) *Water body poramboke encroachment, Coimbatore District*

It was noticed from the records of Collectorate, Coimbatore and Taluk Office Pollachi, that in Kottur Village, out of 1.55 Ha of a water body, 1.20 Ha was encroached by a private institution²². The institution had constructed (2001) a building on the encroached land which was lying between lands owned by the Institution. The Tahsildar, Pollachi, served (July 2014) a show cause notice on the encroacher under the TNLE Act, 1905.

In response, the Institution offered (September 2015) 0.91 Ha of its own land *in lieu* of the encroached water body. While processing this offer, the Chief Engineer, WRD, Coimbatore advised (September 2015) the Government, against this land exchange offer citing existing orders. The District Revenue Officer, however, again sought report from WRD, in May 2017, on the lands offered for exchange.

Considering the stringent instructions (July 1997) of GoTN banning regularisation of encroachments in water bodies, Audit observed that the proposal of the Institution for exchange of land, ought to have been rejected at the very first instance. Instead, the Revenue authorities lacked due diligence and continued to process an unlawful proposal while allowing the encroachment to continue.

(vi) *Channel encroachment, Coimbatore District*

Scrutiny of records in Coimbatore South Taluk revealed that the survey numbers 586/1 and 586/2 of Uppilipalayam Village, lying inside the city limits of Coimbatore, were classified as 'Channel' and 'Government wet land' respectively.

As seen from the 'B Memo' booked by the Tahsildar, the Coimbatore Stock Exchange (CSE) encroached 0.75 Ha of Government land and constructed building on these lands. The encroachment was present for the past 18 years.

It was noticed that the Department was collecting competitive rent from the CSE for encroaching the water body. In 2016, the Revenue Divisional Officer (RDO), during annual verification of village records observed that a competitive rent arrear of ₹ 36.59 lakh was to be collected from CSE and also instructed to revise the rent once in three years on the basis of market value of the land. The RDO simultaneously directed to initiate action for eviction since it was an objectionable poramboke.

²² Vethathiri Maharishi Kundalini Yoga and Kayakalpa Research Foundation, Pollachi.

As the building was encroaching a water body, the Revenue Department and WRD should have evicted the encroachment after following due process. Audit, however, found that the Revenue authorities levied competitive rent and allowed the encroachment for 18 years. Further, the orders of the RDO itself was self-contradictory as it directed for collection of rent and simultaneously instructed eviction.

Thus, due to mishandling of the case by the Revenue Department, the CSE continued to occupy the water body.

2.1.10.2 Encroachments by religious structures

(i) Non-implementation of policy on encroaching religious structures

On a Special Leave Petition filed by Government of India²³, the Hon'ble Supreme Court of India directed (September 2009 and February 2010) all State Governments to formulate a comprehensive policy for removal, relocation and regularisation of religious structures encroaching public places. Based on that, GoTN formulated (September 2010) the following policy:

- Time bound survey of all existing religious structures;
- Total prohibition/restriction on construction of new religious structures; and
- Eviction of existing religious structures on public places, in a time bound manner through persuasion and motivation of public.

In order to implement the policy, CLA instructed (2009) district authorities to initiate action based on the policy and prescribed a fortnightly report on the status of removal/relocation of religious structures.

The surveys conducted (2009-10) by the Revenue Department found 81,130 religious structures encroaching on Government land in the State. The Revenue authorities of districts took action by demolishing, regularising and relocating 22,447 out of the identified 81,130 structures (28 *per cent*) during the five year period from August 2010 to September 2015.

Scrutiny of records in the test-checked districts revealed that no progress was made in removal/relocation/regularisation of religious structures on Government land during the period from September 2015 to August 2017. The District Revenue Officer, Coimbatore, stated (September 2017) that the encroachments by religious structures were in existence for many years and any hasty action would result in law and order problem. The reply was untenable as the district authorities stopped this work without attempting persuasion, motivation and involvement of public as contemplated in the policy of GoTN.

²³ Challenging the order of Hon'ble Gujarat High Court to remove 1,200 temples and 260 Islamic religious structures encroaching on the roads of Ahmedabad City.

(ii) Non-eviction of religious structure in water body

In the case of encroachment of WRD tanks, the authorised officer of WRD shall issue a notice under the TNPTEE Act, 2007, calling upon the occupier to remove the encroachment before the date specified in the notice.

A joint inspection (September 2017) of Sathangudi Kanmai (Tank) in Sathangudi Village, Madurai District by Audit with WRD authorities, disclosed encroachment of 3.35 Ha of the water body by a temple



(Source: Photos taken during joint inspection)

(**Exhibit 2.13**). Audit observed that after issuing a show cause notice (May 2012) demanding eviction, the WRD authorities did not take any further action.

On this being pointed out (September 2017) by Audit, the Executive Engineer, WRD replied (September 2017) that even though notice was issued for eviction, the eviction was kept under abeyance since it was a sensitive religious issue and that the local village people also raised objection. The fact, however remained that Audit did not find any efforts made to engage the public by means of a dialogue to evict encroachments, during scrutiny of records.

(iii) Encroachment by religious structures on highway land in Tiruvallur District

As per Section 28(2) of Tamil Nadu Highways Act, 2001, the officers of the Highways Department are authorised to remove any immovable structure, encroaching the highway or in the area vested with the Government, after issuing a show cause notice, returnable within a period of seven days from the date of receipt thereof.

Scrutiny (August 2017) of records in Highways Division, Tiruvallur, revealed that there were 93 encroachments by religious structures on State Highway lands. Audit inspected six encroachments during field visit and found that those were structures of permanent nature. Field visit (August 2017), further revealed that taking advantage of the presence of religious structures, several shops and commercial establishments abutting the religious structures, had also come up. No action was taken to remove these encroachments.

The Government replied (December 2017) that 6 out of 93 encroachments were removed and action was being taken to remove the remaining encroachments. The Government also assured that no compromise would be made while clearing encroachments. The fact, however, remained that the failure of the Department in dealing with identified objectionable encroachments in a timely manner compromised road safety.

(iv) Non-execution of court order on eviction of encroachments

Based on a PIL, the Hon'ble Madras High Court - Madurai Bench ordered (February 2011) eviction of encroachments on Highways land²⁴ in Thekkatur village of Pudukottai District, after adhering to due process.

In September 2011, the Highways authorities informed the District Collector that all the 89 encroachments would be evicted as per the directions of the Court. Audit, however, noticed from the records in the District Collectorate that the Highways authorities, after a delay of more than five years requested (April 2017) the Tahsildar, Thirumayam to determine the boundaries of the Highways land. Through a joint inspection, Audit confirmed that the encroachments continued (September 2017). The Government replied (December 2017) that action was being taken to evict the encroachment.

Thus, it is observed that despite Court directions, the encroachments were not evicted (September 2017) by the Highways authorities due to non-adherence to the due process in carrying out the eviction.

2.1.10.3 Encroachments by public buildings

To protect the water course lands such as Channel and other catchment areas and to avoid encroachments on such lands, the Government issued (January 1987) ban orders for regularisation of such encroachments.

Audit, however, noticed cases of ineptness in addressing this issue. Instances of encroachment by public buildings on water bodies, given in **Table 2.9**, highlight the self-defeating nature of the Government in preventing encroachments by its own departments.

Table 2.9: Details of encroachments on water bodies by public buildings

Sl. No.	Nature and location of the land	Details of public building
1.	Tank at Survey number 344/1 Illupur village, Pudukottai District	Sub Registrar's Office, Inspection Bungalow (WRD) and Community Hall (Town Panchayat). The community hall was constructed on the Tank bed though permission was given to construct it on a different piece of land - occupied from 2013 (0.24 Ha).
2.	Tank at Survey number 163-3, Asoor village, Tiruchirappalli District	Panchayat Office, Community Hall, e-Service Center and Veterinary Dispensary - occupied from 2017 (extent encroached not available).
3.	Tank at Survey number 7, Puthagaram village, Tiruvallur District	Sewage pumping station of CMWSSB - occupied from 2015 (0.16 Ha).
4.	Tank at Survey number 2/1, Parasurampatti village, Madurai District	Ration shop, Anganwadi centre, Village Administrative Office - occupied from 2002 (0.01 Ha).

Audit observed that in all the above cases, the Revenue Department had not given any permission for the constructions.

²⁴ Namanasamudram-Ponnamaravathi Highways under the control from 9/4 to 12/0 km of Thirumayam Highways Division

Thus, the Government departments themselves set a bad precedent in grabbing water bodies and contributed to the menace of encroachments.

2.1.10.4 Encroachments in grazing lands

As per Government Orders (December 2001 and May 2007), Meikkal and Mandaiveli Poramboke lands (grazing lands) should not be generally alienated to other departments. If necessity arises, equal extent of alternative land should be identified by the District Collector and proposal for land transfer was to be sent to the Government after obtaining a 'No Objection Certificate' (NOC) from the Animal Husbandry Department. Further, development charges of ₹ 6,000 per acre was to be remitted by the requesting department to the concerned local body for development of the alternative land as grazing land.

Scrutiny of records by Audit and joint inspection with officials of the Revenue and Animal Husbandry departments revealed encroachments on grazing lands to a total extent of 73.80 Ha both by private individuals as well as by Government departments in four²⁵ of the test-checked districts (**Appendix 2.5**). Audit observed that in these cases neither the mandatory NOC was issued by the Animal Husbandry Department nor the land was compensated by equal extent of other land.

Thus, the plan of the Government to protect grazing lands for the livestock was not achieved.

2.1.11 Monitoring and internal control mechanism

2.1.11.1 Non-functioning of High Level Committee

While delivering its judgement on a writ petition on a water body encroachment, the Hon'ble Madras High Court directed (June 2002) GoTN to constitute a High Level Committee²⁶ (HLC) to take action on encroachments on water bodies. Accordingly, Government constituted (December 2006) a HLC under the Chairmanship of the Hon'ble Revenue Minister with the mandate to (i) take action against unlawful encroachments, (ii) quarterly review of the report of Commissioner of Land Administration (CLA) on the performance of Steering Committees functioning in Districts, (iii) decide on encroachments by permanent buildings for over 20 years and (iv) decide on the cases of eviction of encroachments, where consensus was not reached in the District Committees.

Against the envisaged four meetings to be held each year only three meetings (in February 2007, December 2007 and February 2010) between February 2007 and February 2010 were held and the HLC never met till date. It was noticed that even the basic data on encroachments in existence for more than

²⁵ Madurai, The Nilgiris, Tiruchirappalli and Tiruvallur

²⁶ The HLC included the Chief Secretary, Secretaries to Government of Revenue, Home and the Highways departments, the CLA and elected representatives of Local Bodies.

20 years in various categories of poramboke lands in which the question of eviction had to be decided by the HLC, were not made available to the Committee by CLA.

When reasons for non-convening of HLC was called for (July 2017), CLA replied (August 2017) that Government was addressed (July 2017) for reconstituting the HLC.

As no meeting took place after February 2010, the Court mandated monitoring at apex level, did not take off.

2.1.11.2 Monitoring by *Jamabandi* officers

During the annual exercise for verification of village accounts of land records, which is called *Jamabandi*, the officer conducting the verification, records his remarks on encroachments in a Check Memo²⁷.

Scrutiny of the Check Memos in two test-checked districts²⁸ revealed that though *Jamabandi* Officers recorded instructions to evict objectionable encroachments, they were not followed up subsequently. There was no system to monitor action taken on them. This made the monitoring through the system of *Jamabandi* ineffective.

2.1.12 Conclusion

Encroachment of seven *per cent* of Government land at State level, which went upto 24 *per cent* in the State capital, has serious consequences with private individuals grabbing Government land. Non-availability of reliable data on encroachments, inadequacies in enabling statutes and non-adherence to the established systems for management of Government lands dented the efforts to protect the lands from encroachment. Lack of co-ordination between Revenue and other line departments, coupled with laxities on the part of field level officers caused difficulties in evicting the encroachers. Environmentally sensitive water bodies became easy targets for encroachment as the Revenue Department and WRD failed in discharging their legally mandated duties to survey and mark boundaries of tanks. Instead of seeking alienation of suitable land and totally unmindful of the damage, it causes to the environment, various Government agencies took recourse to encroach water bodies to construct public buildings. Monitoring was absent as the High Level Committee at State level did not meet regularly to address the issues connected with eviction of encroachments.

²⁷ A questionnaire for each village prescribed for obtaining information on number of encroachments and action initiated or not initiated for eviction of objectionable encroachment.

²⁸ Coimbatore and Vellore.

2.1.13 Recommendations

- The Government Land Registry may be made capable of capturing 'Objectionable' and 'Unobjectionable' Government lands distinctly so as to ensure better management of Government lands.
- The Government may consider bringing rivers, streams, tanks, ooranis, etc., under the purview of the Tamil Nadu Protection of Tanks and Eviction of Encroachment Act, 2007, and ensure a time bound survey of all water bodies.
- In order to overcome the coordination issues between WRD and Revenue Department in surveying the water bodies, the Government may consider creation of Survey Units in WRD Divisions/Circles, in line with similar Survey Units functioning in Urban Local Bodies.
- Monitoring needs strengthening, by reactivating High Level Committee.

The above points were referred to the Government in October 2017; replies wherever received have been incorporated.

CHAPTER III

COMPLIANCE AUDIT

CHAPTER III

COMPLIANCE AUDIT

Compliance Audit of Departments of the Government and their field formations as well as autonomous bodies brought out several lapses in management of resources and failures in observance of norms of regularity, propriety and economy. These are presented in the succeeding paragraphs.

CO-OPERATION, FOOD AND CONSUMER PROTECTION DEPARTMENT

3.1 Construction of Godowns and their utilisation

3.1.1 Introduction

In order to provide storage facilities for the agricultural produce of farmers, GoTN launched (2011) a scheme for construction of godowns with loan assistance from National Bank for Agriculture and Rural Development (NABARD). The objective of expanding godown facilities in rural areas was to facilitate farmers to store their produce during peak harvest season and sell them when prices are favourable. Farmers who store their produce in the godown would be eligible to avail 'Produce Pledge Loan' (PPL) to avoid distress sale of their produce. Under this scheme, GoTN sanctioned construction of 3,876 godowns¹ during 2011-15 at a total cost of ₹ 487.85 crore.

The godowns were to be constructed and owned by Primary Agricultural Cooperative Credit Societies (PACCS) and Agricultural Producers Cooperative Marketing Societies (APCMS). GoTN, using NABARD loan, provided 100 *per cent* financial assistance for construction of godowns by PACCS and 90 *per cent* assistance for construction by APCMS. Registrar of Cooperative Societies (RCS) was responsible for implementation of the scheme. GoTN was to repay the loan with interest in seven years including a grace period of two years.

Audit test-checked records pertaining to the period 2011-17 at the Secretariat, Office of the RCS and Regional Joint Registrar of Cooperative Societies in four districts² during April to July 2017. The sample godowns were selected using multi-stage sampling method. The four sampled districts had a total of 440 godowns, of which, 45 PACCS and 11 APCMS were selected randomly.

¹ 2011-12: 1,166; 2012-13: 1,104; 2013-14: 1,044; and 2014-15: 562.

² Ariyalur, Namakkal, Pudukottai and Tiruppur.

3.1.2 Defective Planning

The RCS worked out a requirement of nine lakh MT of storage space in two harvest seasons based on 50 *per cent* deferred sale of 60 *per cent* of the estimated production of food grains of 70 lakh MT. After considering the available storage space for two lakh MT, the additional requirement was worked out as seven lakh MT. Against this, during 2011-15, GoTN sanctioned 3,876 godowns with a total capacity of 5.08 lakh MT for PACCS and APCMS. Thus, based on the requirement projected by RCS, there was shortage of 1.92 lakh MT of storage space. GoTN did not contemplate the continuation of the scheme after 2014-15. As of March 2017, 267 out of the total 4,467 PACCS did not own any godown to serve their members. The reason for not proposing godowns for all PACCS was not furnished by RCS. Audit, however, observed that RCS invited proposals for construction of godowns only from those PACCS/APCMS, which had own land. No efforts were made by the RCS to facilitate acquiring of land for construction of godowns in PACCS.

By applying the assumption made by RCS, Audit observed that the requirement of storage space for food grains worked out to 10.5 lakh MT³. Thus, the projected requirement worked out by RCS as nine lakh was insufficient. Further, the estimated agricultural production of 70 lakh MT did not include produce such as cotton, turmeric, copra, red chillies, etc., which are also produced in different districts of the State. Consequently, the planning for creation of storage space was not comprehensive.

On being pointed out by Audit, Government replied that the scheme for construction of godowns and requirement of storage space were considered only based on the prevailing difficulties faced by farmers and assumption of marketable surplus.

3.1.3 Construction of godowns

3.1.3.1 Physical and financial achievements

The details of year-wise sanction and construction of godowns were given in **Table 3.1**.

³ 50 *per cent* deferred sale of marketable surplus of (60 *per cent*) the estimated food grain production of 70 lakh MT (70,00,000 x 60 *per cent* x 50 *per cent* ÷ 2 crop seasons = 10.5 lakh MT).

Table 3.1: Physical and Financial performance

(Amount - ₹ in crore)

Year	Number of godowns sanctioned	Project cost		Grants sanctioned by GoTN	APCMS contribution	Number of godowns completed	Grants released by GoTN
		PACCS	APCMS				
2011-12	1,166	89.36	17.90	105.47	1.79	1,166	105.47
2012-13	1,104	120.16	9.60	128.80	0.96	1,104	128.80
2013-14	1,044	128.74	12.20	139.72	1.22	1,044	139.72
2014-15	562	88.29	21.60	107.73	2.16	362	103.00
Total	3,876	426.55	61.30	481.72	6.13	3,676	476.99

(Source: Data collected by Audit from RCS)

As per the guidelines, godowns were to be constructed within three to four months from the release of funds. Out of 56 test-checked godowns, as of July 2017, construction of 13 godowns were still in progress even after two years of sanction and construction of four godowns took more than one year. Audit observed that main reason for the delay in completion of construction of godowns was due to delay in release of funds by GoTN during 2013-14 and 2014-15 as given in **Table 3.2**.

Table 3.2: Delay in release of funds

Year of Project	Administrative sanction by GoTN		Release of funds by GoTN	
	Date	Amount (₹ in crore)	Date	Amount (₹ in crore)
2013-14	13-11-2013	140.94	28-02-2014	39.73
			16-09-2014	99.99
2014-15	23-01-2015	109.89	29-10-2015	40.00
			22-07-2016	30.00
			15-12-2016	10.00
			06-03-2017	15.00
			30-06-2017	8.00

(Source: Data collected by Audit from RCS)

The delay in release of funds impacted timely completion of construction. The PACCS/APCMS did not have sufficient funds to complete the work without grant from GoTN. Thus, the intended benefits of the scheme could not be delivered to the farmers in time.

On being pointed out by Audit, the Government, while accepting the fact that construction was being done according to the release of funds, stated that at present, the farmers were availing the benefit of the scheme.

3.1.3.2 Building plan not approved

According to the instructions issued by the RCS in September 2012, the Secretary/Managing Director of PACCS/APCMS should obtain approval for building plan from the local authorities concerned to construct godowns under

the scheme. It was also noticed that compliance with all statutory requirements on structural aspects of the godown was a pre-condition for accreditation of godowns under Warehousing (Development and Regulation) Act, 2007.

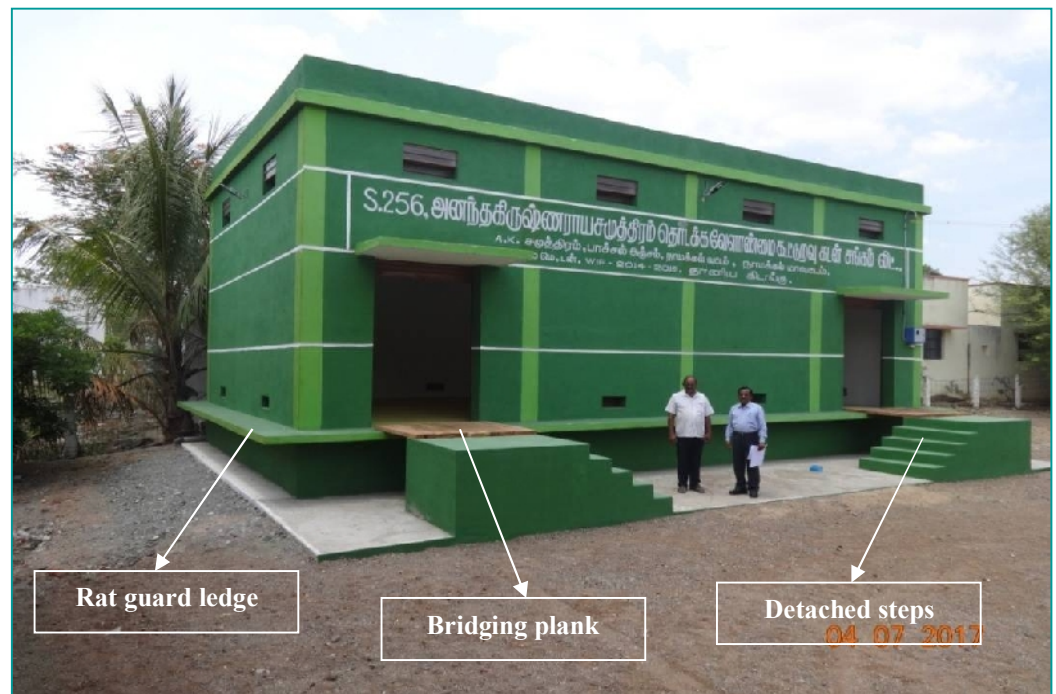
Audit noticed that 13 out of the 56 test-checked godowns did not obtain plan approval from local authorities concerned as given in **Appendix 3.1**. When pointed out by Audit, Secretaries of PACCSs and Managing Directors of concerned APCMSs replied that plan approval would be obtained. None of the above 13 godowns were accredited under Warehousing (Development and Regulation) Act, 2007. Audit observed that it would not be possible to accredit these godowns without building plan approval and consequently farmers storing their produce in these godowns would not be entitled to avail PPL at reduced rate of interest as discussed in detail in **Paragraph 3.1.5.1**.

On being pointed out by Audit, Government replied (November 2017) that necessary instructions were issued to obtain approval for building plan.

3.1.3.3 Deficiencies in construction

The godowns were to be constructed as per BIS Standards (IS 607-1971). The standards stipulated provision of rat guard ledge, detached steps, bridging planks, openings with steel shutters, electrification, approach roads, etc. (**Exhibit 3.1**).

Exhibit 3.1: An ideal 100 MT godown with rat guard ledge, detached steps, two openings with shutters, bridging planks, etc.



(Source: Photograph by Audit Team)

Deficiencies in providing these facilities in test-checked godowns are detailed in **Appendix 3.2** and are summarised in **Table 3.3**.

Table 3.3: Deficiencies in construction

Standard/Approved design	Audit Finding	Impact
As per BIS Standards, internal dimension of 100 MT godown should be 12 m x 7.5 m	Internal dimension as per design was 11.47 m x 6.07 m	This resulted in all the godowns not having the designed storage capacity.
As per BIS Standards, damp proof flooring with five layers should be provided	Not followed in any of the 56 test-checked godowns	Possible contamination/seepage due to dampness. Flooring damages were noticed in two godowns.
Rat guard ledge of 30 cm width at ground level on all four sides	Not provided as per specification in 10 out of 56 test-checked godowns	Entry of rats and other organisms will not be prevented. It could lead to loss/contamination of stored produce.
Detached steps	Not provided as per specification in 16 out of 56 test-checked godowns	
Bridging planks (for connecting detached steps and the ledge)	Not available in 17 out of 56 test-checked godowns	
Approach road for godowns of APCMS	Not provided in 3 out of 11 test-checked APCMS	Affects transportation of produce.
Electrification	Not provided in 5 out of 56 test-checked godowns	Godown will be suitable for operation only in day light.

(Source: Data collected by Audit during inspection of PACCS/APCMS godowns)

On being pointed out by Audit, Government replied (November 2017) that godowns were constructed as per the norms prescribed by National Cooperative Development Corporation (NCDC). The fact, however, remained that despite the original proposal to construct the godowns as per BIS Standards, RCS reduced the size of godowns which was not in accordance with BIS Standards. With regard to flooring of godowns, Government stated that three layers were made which was damp proof, rigid and durable. Audit, however, observed damaged floors in two sampled godowns. In respect of rat guard ledge, detached steps and bridging planks, Government stated that suitable instructions were issued to take corrective measures.

3.1.4 Utilisation of Godowns

3.1.4.1 Non-utilisation of godowns

Test check of utilisation of sampled godowns disclosed that the 100 MT godowns of Pallanganatham PACCS of Ariyalur District and Venthampatty PACCS, Pudukottai District, were not commissioned since completion of the building works in August 2013 and January 2015 respectively. Audit noticed that these two PACCS were functioning only partially, due to ongoing enquiry into alleged malpractices by office bearers of these societies.

RCS had not taken any effective steps to commission these godowns. As a result, these godowns remained idle for more than two years, thereby depriving the intended benefits to the farmers.

3.1.4.2 Poor utilisation of godowns

The objective of the godowns was to help farmers to store their produce during peak harvest season. It was, however, noticed that the capacity utilisation of the sampled godowns was poor as given in **Table 3.4**.

Table 3.4: Utilisation of godowns

Details	Number
Total number of godowns completed	43*
Number of completed godowns utilised	36
Number of godowns with more than 50 per cent of capacity utilisation	14
Number of godowns with 10 to 50 per cent of capacity utilisation	19
Number of godowns with less than 10 per cent of capacity utilisation	3

* Two of them were kept idle for more than a year and five were completed recently
(Source: Data collected by Audit from PACCS/APCMS)

The RCS did not follow any methodology to assess the need for godown in a particular village. The only consideration adopted by RCS was possession of own land by the Society for construction of godown. Neither the societies concerned nor the RCS carried out any assessment/feasibility study for construction of godowns, based on local agricultural production, quantity, marketable surplus, percentage of deferred sale of the marketable surplus and the existing storage space. Further, the RCS observed (July 2015) that the field officers of the Department did not take adequate efforts to propagate the availability of godown facilities in the villages to improve storage. Thus, non-assessing the need for godowns on a scientific manner by RCS and not propagating the availability of storage space resulted in poor utilisation of the godowns.

On being pointed out by Audit, the Government stated (November 2017) that the main reason for poor utilisation of godowns was drought for nearly two years. It also stated that Joint Registrars were instructed to utilise the godowns by private traders during off season. But the fact remained that the utilisation of godowns in 2014-15, which was not a drought year, was also only 37 per cent at State level.

3.1.4.3 Non-fixation of rent by PACCS for storage of agricultural produce

As per the Project Report and proposals for construction of new godowns, PACCS/APCMS were to charge a reasonable rent for storage of produce from the farmers. Scrutiny of records relating to utilisation of godowns in test-checked PACCS/APCMS revealed that 11 godowns constructed under the scheme by PACCS, did not charge any rent for the agricultural produce stored there by farmers (**Appendix 3.3**). Based on rental rates of other godowns at ₹ 2 per bag per month, Audit estimated that these PACCS had forgone rental revenue of ₹ 1.30 lakh (approximate).

On being pointed out by Audit, the Government stated (November 2017) that produce were being pledged and charging rent on pledged produce was not fair and societies fixed rent according to their local conditions. Audit,

however, observed that there was no clarity on levy of rent. Out of the 27 sampled godowns, which advanced PPL, 15 godowns charged rent on produce stored on pledge, 11 godowns did not charge any rent and details were not available in respect of one godown.

3.1.4.4 Collection of utilisation charges

As per Project Report, PACCS and APCMS are allowed to collect rent for the produce stored in the godowns at prescribed rate and interest for PPL advanced to farmers.

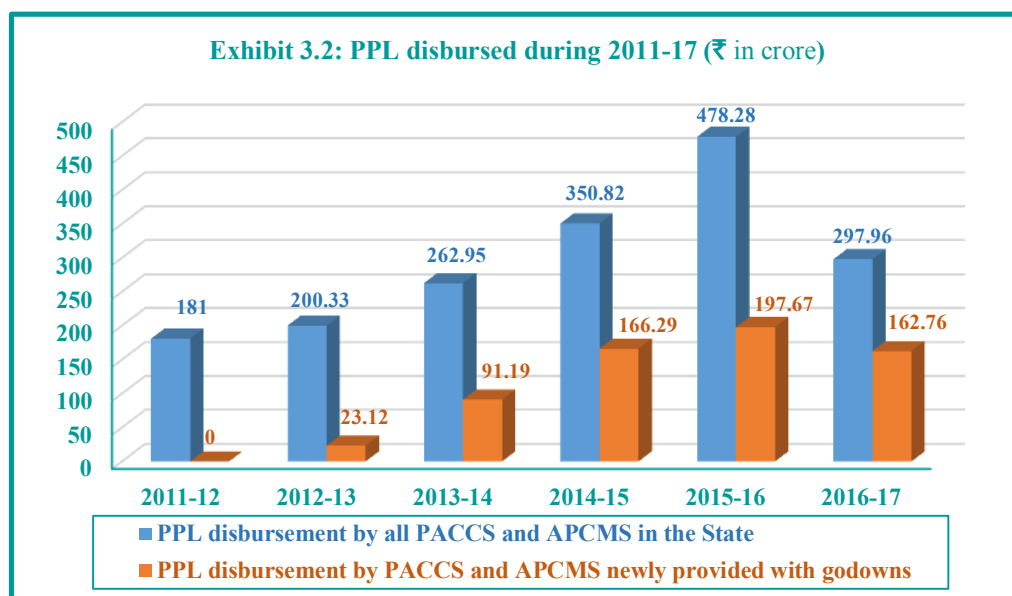
Audit observed that six out of 56 test-checked PACCS/APCMS collected inadmissible charges of ₹ 8.19 lakh from farmers as service charges (₹ 0.72 lakh), releasing charges (₹ 0.21 lakh) and share capital (₹ 7.26 lakh) for storing produce and advancing PPL.

On being pointed out by Audit, the Government stated (November 2017) that any specific complaints received from farmers would be reviewed. Audit, however, observed that collection of these unauthorised charges by PACCS/APCMS would further discourage farmers from storing their produce in the godowns and availing PPL.

3.1.5 Disbursement of Produce Pledge Loan to farmers

Advancing short term loans to farmers on the security of agricultural produce stored in the godowns was one of the objectives of the scheme. During 2011-17, the total amount of PPL disbursed increased from ₹ 181 crore in 2011-12 to ₹ 478.28 crore in 2015-16, before coming down to ₹ 297.96 crore in 2016-17. The decline in advancing PPL, during 2016-17, was attributed to drought during the year.

The PPL advanced by PACCS and APCMS of the State during the period 2011-17 are given in **Exhibit 3.2**.



(Source: Figures furnished by the Department)

After commissioning of new godowns, the disbursement of PPL increased continuously till 2015-16. The disbursement, however, saw a decline in 2016-17. Audit observed that the actual amount of PPL disbursed during 2016-17 stood only at 14 *per cent* of the possible disbursement⁴ if 100 *per cent* capacity utilisation is achieved at least during harvest seasons.

Among the test-checked, only 36 of the 43 completed godowns were utilised for storing agricultural produce of farmers. It was, however, observed that only 27 PACCS/APCMS advanced PPLs to farmers and the remaining nine PACCS/APCMS did not advance any PPL despite storing produce in their godowns. Audit observed that the PPL disbursed by PACCS and APCMS carried interest rates ranging from 11.75 to 14.5 *per cent* during 2012-17. Although NABARD was implementing a GoI funded programme for subvention of PPL interest with effective interest rate reduced to seven *per cent*⁵, none of the test-checked PACCS/APCMS utilised NABARD's interest subvention programme to reduce interest rate of PPL.

Scrutiny of records at RCS disclosed that 1,183 out of 3,314 PACCS in the State, having positive net worth, were eligible to participate in the interest subvention programme of NABARD. The programme involved registration of the godowns with Warehousing Development and Regulatory Authority (WDRA), before claiming of interest subvention. Against the 1,183 eligible PACCS, as of November 2017, only 211 godowns were registered with WDRA. Out of that, only 83 started implementing the interest subvention programme to advance PPL at reduced interest rate.

In the sampled godowns, with a total of 2,65,967 members, the benefit of the reduced interest rate of seven *per cent* per annum was not extended to farmers.

Credit availability for agricultural sector is an issue of far reaching importance. Low capacity utilisation with non-availability of PPL at reduced interest rate resulted in low offtake of PPL, defeating the very objective of the scheme of construction of godowns.

The reply of GoTN was silent on the issue of non-availability of reduced rate of interest.

3.1.6 Maintenance

Maintenance of godowns was the responsibility of the PACCS/APCMS concerned. A joint inspection of godowns by Audit team and the officials of the Cooperative Department disclosed several deficiencies in maintenance as summarised in **Table 3.5** (Details are given in **Appendix 3.4**).

⁴ Assuming reaching of full storage capacity of seven lakh MT at the time of harvest seasons (7 lakh MT x 2 seasons x ₹ 15,000 per MT = ₹ 2,100 crore).

⁵ Under this programme, GoI subsidised PPL.

Table 3.5: Maintenance of godowns

Nature of Deficiencies	Number of test-checked godowns
Termite attack	10
Leakages of rain water	2
Damaged flooring	2

(Source: Joint inspection)

Audit observed that the termite attack and poor condition of godowns indicated the deficiencies in carrying out anti-termite treatment and periodical maintenance.

On being pointed out, Government stated (November 2017) that committees were constituted for the maintenance of newly constructed godowns and the committees had to ensure the maintenance of godowns.

3.1.7 Monitoring mechanism

Non-functioning of Monitoring Committees

RCS issued (June 2013) instructions to constitute a 'Monitoring and Evaluation Committee' at the circle⁶ and district level and the Committee should convene a meeting every month to monitor the utilisation of godowns, sanction of cash credit and to review measures for utilisation of the available godown facilities. RCS reiterated (May 2015) that Joint Registrars should monitor the utilisation of godowns and send monthly reports on utilisation.

Audit observed that the monthly reports on utilisation were compiled and furnished by Joint Registrars every month. However, formal meetings of the Monitoring Committee, to discuss and take action for improving the utilisation of godowns, advancing cash credit, etc., were not convened. As such, the proposed monitoring was not carried out.

On being pointed out by Audit, Government stated (November 2017) that performance on utilisation of godowns were reviewed by RCS during Regional Joint Registrar's review meeting.

3.1.8 Conclusion

Planning for construction of godowns was not comprehensive, leading to creation of inadequate capacity in rural areas for storing agricultural produce. Delayed release of funds led to Godowns remaining incomplete after more than two years of sanction. Deficiencies in design and execution of works were noticed in construction of godowns. Constructed godowns were not utilised optimally. The performance of PACCS in terms of issuing Produce Pledge Loan was dismal, defeating the very objective of the scheme.

⁶ Circle comprising one or two Taluks headed by Deputy Registrar.

BACKWARD CLASSES, MOST BACKWARD CLASSES AND MINORITIES WELFARE DEPARTMENT

3.2 Imparting education through Kallar Reclamation Schools

3.2.1 Introduction

The Government has been running Kallar Reclamation Schools (KR Schools) since 1920 for the educational upliftment of Piramalai Kallar (PK) community, a De-notified Tribes⁷, who are concentrated in Madurai, Dindigul and Theni districts of the State. As of March 2017, there were 292 KR Schools⁸ and 50 KR School hostels with a student strength of 27,227 and 4,852 respectively. These schools are administered by the Joint Director of Kallar Reclamation, Madurai under the overall control of the Commissioner of Most Backward Classes & De-notified Communities Welfare. At Government level, these schools come under the Secretary to Government, Backward Classes, Most Backward Classes and Minorities Welfare Department. The Audit was carried out covering the period from 2014-15 to 2016-17 at the Secretariat, Commissionerate, office of the Joint Director of Kallar Reclamation, 82 schools and 13 hostels (**Appendix 3.5**) selected based on random sampling method.

The KR Schools are funded through the budget grants of Backward Classes, Most Backward Classes and Minorities Welfare Department. During the audit period, the expenditure on KR Schools averaged around ₹ 87 crore per annum.

3.2.2 Absence of data on coverage of PK community children

The Audit Report (Civil) of Comptroller and Auditor General of India on GoTN for the year 2004-05, had pointed out that no data was available with GoTN on the performance of KR Schools. Based on the audit observation, the Public Accounts Committee (PAC) also stressed the need for maintaining suitable data so as to enable the Department to devise alternative policies for the welfare of the PK community people and also would help to make a study of the reasons for the dropouts, from the KR Schools.

Despite these suggestions by PAC, it was noticed that the Department did not compile the dropout data of PK Community children, impact of KR Schools such as higher educational achievement of the students, job placements, etc. Audit observed that in the absence of holistic data, GoTN would not be able to estimate the impact of these schools in improving the conditions of PK community and further devise suitable alternative policies for upliftment of the community. GoTN stated (December 2017) that instructions were issued to maintain data on impact of KR Schools.

⁷ Communities, which were notified as criminal tribes under Criminal Tribes Act, 1871, during British Raj, were de-notified after independence.

⁸ Primary Schools: 214, Middle Schools: 21, High Schools: 22 and Higher Secondary Schools: 35.

3.2.3 Performance of KR Schools

3.2.3.1 Enrolment

Enrolment of students in Government run schools including KR Schools was declining during the past five years as shown in **Table 3.6**.

Table 3.6: Declining trend in enrolment

Year	Enrolment in all Government and aided schools at State level		Enrolment in KR Schools	
	Number of students	Decline over previous year (per cent)	Number of students	Decline over previous year (per cent)
2013-14	1,42,45,758	..	31,463	..
2014-15	1,41,05,134	0.99	30,538	2.94
2015-16	1,32,77,981	5.86	28,790	5.72
2016-17	1,31,71,066	0.81	27,227	5.43

(Source: Policy Note of School Education Department and Joint Director of Kallar Reclamation)

As could be seen from the **Table 3.6**, the fall in enrolment in KR Schools was steeper than that of Government Schools. During 2014-17, while the enrolment in Government Schools declined by 7.54 per cent, the decline was 13.46 per cent in KR Schools. GoTN stated (November 2017) that the enrolment was coming down due to increase in the number of private schools with English medium of instruction. Further, economic upgradation of PK families also reportedly made them to admit their wards in private schools. Audit, however, observed that though the reasons attributed by the Government were equally applicable to Government Schools and KR Schools, the decline in student strength was steeper in KR Schools.

3.2.3.2 Student withdrawals

It was further noticed from the 82 sampled schools that the percentage of students withdrawing from KR Schools was much higher than the State average dropout rate during academic years 2014-15 to 2016-17, as given in **Table 3.7**.

Table 3.7: Higher rate of student withdrawals

Year	Student withdrawal/dropout percentage			
	Primary		Middle	
	SA	KR	SA	KR
2014-15	0.94	4.49	1.58	3.44
2015-16	0.90	4.76	1.55	3.48
2016-17	0.90	4.58	1.50	3.97

SA: State Average of dropout rate; KR: KR School Student withdrawal rate

(Source: Data collected by Audit from sampled schools)

As could be seen from the above, the withdrawal rate in KR Schools was much higher than that of the State level dropout rate due to migration of KR School students to other schools. An analysis of student withdrawals indicated that majority of them headed to nearby Government aided schools,

primarily indicating their preference for Government aided schools over KR Schools. The fact that students of KR Schools migrated to Government aided schools, which also impart free education in Tamil medium, established that the better quality of education offered by Government aided schools might be one of the reasons for the migration. GoTN replied (December 2017) that KR Schools were located in remote areas and hence their student withdrawal rates could not be compared with those of schools run by School Education Department. The reasoning was not acceptable as School Education Department also had schools in remote areas in all districts.

3.2.3.3 Pass percentage

Pass percentage of students in class 12 public examination is an important indicator of academic performance of the schools. While the class 12 pass percentage of KR Schools in Dindigul District during 2014-17 was in the range of 73 to 85, it was in the range of 81 to 87 in Government schools and 95 to 96 in Government aided schools. The KR Schools in Madurai and Theni districts, had performed poorer than Government aided schools, but better than Government schools (**Appendix 3.6**).

The relatively poor performance of KR Schools in terms of enrolment, withdrawals and pass percentage in comparison with other schools indicated the poor quality of education imparted by KR Schools. Audit noticed that issues like shortage/non-availability of teachers and infrastructure could be a factor contributing to the poor quality of these schools as discussed in subsequent paragraphs.

3.2.4 Deficiencies in staffing

Availability of adequate number of suitably trained teachers in schools is critical for ensuring quality education in schools. Deficiencies noticed in staffing are discussed in the succeeding sub-paragraphs.

3.2.4.1 Insufficient number of sanctioned posts

In 1997, Government prescribed the norms for sanction of teacher posts in schools. Audit observed that the number of sanctioned posts of Physical Education Teacher (PET), Physical Director and Post Graduate Teacher (PGT) in the sampled 15 High Schools and Higher Secondary Schools (HSSs) were less than the prescribed norms as given in **Table 3.8**.

Table 3.8: Requirement and sanction of PET and PGT posts

Post	Norms	Requirement as per norms	Actual sanction	Shortfall with reference to norms
PET*	Student strength upto 250: 1 Every additional 250: 1	6	4	2
Physical Director *	Student strength \geq 400: 1	4	0	4
PGT*	Two Groups in HSS: 8 Three Groups in HSS: 10	92	63	29
Total		102	67	35

* As per GO Number 525 School Education dated 29-12-1997.

(Source: Data collected by Audit from sampled schools)

Audit noticed that the Joint Director of Kallar Reclamation (JD, KR) did not correctly work out the requirement of teachers for High and Higher Secondary Schools and seek sanction of additional posts with reference to norms prescribed by GoTN. This resulted in short sanction of 35 posts as given in **Table 3.8**. GoTN replied (December 2017) that necessary action was being taken for the sanction of additional posts.

Audit observed that inadequate sanction of PETs and PGTs would undermine the quality of education in KR Schools.

3.2.4.2 Schools without the minimum number of teachers

The Right of Children to Free and Compulsory Education Act, 2009, prescribed that there should be minimum of two teachers in primary schools with up to 60 students.

Audit observed that as of March 2017, 36 out of the 214 KR Primary Schools functioned with just one teacher against the mandatory minimum of two teachers. The number of single teacher schools declined from 43 in 2014-15 to 33 in 2015-16 and increased to 36 in 2016-17. Among the 58 primary schools sampled for Audit, 10 schools with an average student strength of 15 during 2016-17, were having only one teacher. Although the student strength in these schools were low, it was mandatory to have two teachers as a single teacher would not be able to handle five classes together. Though the JD, KR had a system to depute teachers from neighbouring schools as and when the single teacher went on leave, training, meetings, etc., in the 10 sampled schools, Audit observed in all cases of half a day casual leave or 'On Duty' absence of the single teacher of the school, no substitute was deputed, leaving the single teacher school without any teacher on such days. Further, this system caused disruption in regular functioning of the school from which the teacher was diverted.

The failure of the Commissioner, Most Backward Classes & De-notified Communities Welfare (MBC & DNC Welfare) in recruiting Secondary Grade Teachers (SGT), as commented in **Paragraph 3.2.4.3**, resulted in functioning of 36 schools without the mandatory minimum number of teachers. GoTN replied (December 2017) that the vacancies would be filled up.

3.2.4.3 Vacancy in teacher posts

The details of sanctioned, filled up and vacant posts of teachers in KR Schools, as worked out by JD, KR, were as given in **Table 3.9**.

Table 3.9: Vacancy position of teaching staff

Post	2014-15				2015-16				2016-17			
	Sanctioned	Filled	Vacant	Percentage of vacancy	Sanctioned	Filled	Vacant	Percentage of vacancy	Sanctioned	Filled	Vacant	Percentage of vacancy
SGT	444	362	82	18	418	367	51	12	407	351	56	14
PET	22	11	11	50	22	11	11	50	22	11	11	50
TGT	503	337	166	33	519	466	53	10	504	444	60	12
PGT	207	156	51	25	207	170	37	18	214	180	34	16
Total	1,176	866	310	26	1,166	1,014	152	13	1,147	986	161	14

TGT: Trained Graduate Teacher

(Source: Information furnished by JD, KR)

As could be seen from **Table 3.9**, the vacancy across different posts during the three years period 2014-17 ranged from 10 to steeping 50 percentage.

Audit scrutiny disclosed that vacancies started piling up consequent to the decision of GoTN in March 2011 to transfer out 146⁹ teachers from KR Schools to School Education Department based on the request of the teachers for transfer to their respective native districts. GoTN, while addressing the interest of these teachers, did not protect the interest of KR Schools as no substitutes were simultaneously posted in the place of the teachers transferred out. 119 out of the 146 teachers left the KR Schools. Subsequent to this mass transfer, after a lapse of 16 months, the Commissioner, MBC & DNC Welfare sought (July 2012) approval of GoTN for recruitment of 235¹⁰ teachers against the existing vacancies. Although Government, approved (August 2012) recruitment of 235 teachers, only 36 PGTs were recruited through Teachers Recruitment Board (TRB).

As the vacancies were not filled up, in November 2013, the Commissioner, MBC & DNC Welfare, requested TRB to recruit 382¹¹ more teachers. TRB, however, sponsored only 344¹² candidates, out of which only 275¹³ candidates joined between October 2014 and August 2015. Although 69 of the sponsored candidates did not join service, the Commissioner, MBC & DNC Welfare approached GoTN only in October 2016 for recruitment of 44 teachers. The recruitments were not completed (September 2017).

Thus, due to the decision of GoTN in March 2011 to transfer 119 teachers without providing substitutes and the delay on the part of Commissioner, MBC & DNC Welfare in liaising with TRB and GoTN for filling up the posts, the KR Schools did not have full complement of sanctioned teachers impacting teaching work in these schools.

⁹ PGT: 27 and TGT: 119

¹⁰ PGT: 61, TGT: 67 and SGT: 107

¹¹ PGT: 69, TGT: 249 and SGT: 64

¹² PGT: 59, TGT: 236 and SGT: 49

¹³ PGT: 44, TGT: 195 and SGT: 36

3.2.4.4 Non-posting of nursery teachers in kindergarten classes

In November 2011, GoTN issued orders for introduction of lower kindergarten (LKG) classes in 15 KR Primary Schools from the academic year 2011-12, and sanctioned 15 SGTs for the LKG classes and 15 Ayahs (babysitter). During 2016-17, 491 students were studying in the 15 kindergarten classes of KR Schools. Audit scrutiny of the functioning of KG wings in KR Primary Schools disclosed the following:

As per norms prescribed by the National Council for Teacher Education, GoI, only a nursery trained teacher should be posted in nursery sections and SGTs are to be posted in primary sections. It was also noticed that only nursery trained teachers were posted in nursery sections of schools run by Greater Chennai Corporation. GoTN, however, based on the proposal from the Commissioner of MBC & DNC Welfare, took an incorrect decision to sanction SGTs for LKG classes in 15 KR Primary Schools. As teaching at nursery level requires specific training, sanctioning and posting of SGTs in nursery sections was in violation of the prescribed norms.

Nursery sections in three schools¹⁴, with a student strength of 68 as of July 2017, were functioning without any teacher since the beginning. The SGT posts sanctioned by GoTN were not filled up. As a result, only the Ayahs were in position for the nursery sections.

In November 2011, GoTN accorded sanction for construction of nursery blocks in the 15 KR Primary Schools at a cost of ₹ 10.79 lakh each. Audit, however, observed that the funds sanctioned for four of the nursery blocks were utilised for construction of class rooms in other schools (**Appendix 3.7**), as the schools for which the blocks were sanctioned either did not have land for construction or already had sufficient number of class rooms. The Commissioner, MBC & DNC Welfare did not obtain Government's approval for constructing the buildings in other schools. Therefore, the expenditure of ₹ 42.56 lakh on these four nursery blocks was irregular. GoTN stated (December 2017) that necessary action was being taken to recruit Montessori trained teachers in consultation with School Education Department.

3.2.5 School infrastructure

3.2.5.1 Inadequate infrastructural facilities

As per the Right of Children to Free and Compulsory Education Act, 2009, primary and middle schools should have a minimum of one class room for every teacher, barrier free access and separate toilets for boys and girls, safe and adequate drinking water facility, playground, play materials, library and arrangement for securing the school building by boundary wall or fencing, etc. Further, HSS should have laboratories. Physical verification (July and August 2017) of the 82 selected KR Schools disclosed inadequate basic infrastructure as detailed in **Appendix 3.8** and are summarised in **Table 3.10**.

¹⁴ Chennamanaickenpatti, Kondamanaickenpatti and Thippathupatti.

Table 3.10: Number of KR Schools lacking vital infrastructure

Infrastructure	Number of schools test-checked	Number of schools lacking infrastructure
Playground	82	36
Compound wall	82	21
Library	82	12
Drinking water	82	7
Play material	67	14
Toilet	82	21
Physics laboratory	9	4
Chemistry laboratory	9	4
Botany and Zoology laboratory	9	8
Computer Science laboratory	4	3

(Source: Data collected by Audit from the test-checked schools)

Audit noticed that JD, KR, did not maintain any comprehensive data on available and required infrastructure in respect of playground, play materials, library and water supply in KR Schools. Further, no system was in place for projecting requirement of funds for meeting infrastructure needs of these schools in the Budget Estimates, leading to non-provision of funds for creation of requisite infrastructure. The failure to comprehensively address this issue resulted in inadequate basic infrastructure facilities in these schools. GoTN stated (December 2017) that action was being taken to provide necessary infrastructure. Regarding lack of playground, GoTN stated that these 36 schools did not have sufficient land. Regarding laboratories, GoTN stated that though separate laboratories for each subject were not available, integrated laboratories were provided.

3.2.5.2 Non-construction of school building

During 2011-12 and 2013-14, GoTN approved upgradation of two of the sampled KR Middle Schools as High Schools and accorded administrative approval for construction of additional buildings as given in **Table 3.11**.

Table 3.11: Non-construction of school building

Name of school	Year of upgradation	Date of financial sanction for new building	Amount sanctioned for construction of building (₹ in crore)
KR High School, Vadugappatty	2011-12	September 2011	1.64
KR High School, Pullakkapatty	2013-14	October 2013	1.05

(Source: Data collected from JD, KR)

A piece of land identified for KR High School, Vadugapatty was handed over to Public Works Department in November 2017. Constructions were yet to start (December 2017). It was observed that JD, KR, was in correspondence with the District Collector, Theni for alienation of Government land for construction of school buildings for KR High School, Pullakapatty. The land identified by JD, KR, was found to have been classified as water body in

revenue records and hence, the District Collector declined to alienate those lands. The matter was still under correspondence with Revenue Department.

Exhibit 3.3: Two classes conducted simultaneously in a single class room



(Source: Headmaster, Government Kallar High Schools, Vadugappatty)

Audit observed that classes 9 and 10 were started in these schools without ensuring adequate buildings. Two classes were conducted simultaneously in one class room in KR High School, Vadugappatty (**Exhibit 3.3**). Further, classes were being conducted in dilapidated buildings in KR High School, Pullakkapatty.

3.2.6 Deficiencies in running KR School hostels

GoTN runs 50 KR School hostels in Madurai, Theni and Dindigul districts for the benefit of PK and other Community school children. Sixty *per cent* of the seats in these hostels are reserved for PK Community children and children from other communities would get 40 *per cent* of the seats. These hostels provide free boarding and lodging to children with parental annual income not exceeding ₹ 1 lakh. These hostels were also administered by JD, KR. Audit scrutiny of functioning of these hostels revealed the following:

3.2.6.1 Inadequate provision of basic amenities in hostels

As per the norms of National Building Code of India, 2005, one toilet and one bathroom need to be provided for eight hostellers (boys)/six hostellers (girls). Audit observed that 10 out of the 13 sampled hostels did not have sufficient number of toilets and bathrooms as given in **Appendix 3.9**.

In the hostels at Uthamapalayam, all the 10 bathrooms available were in unusable condition, subjecting the students admitted therein to the hardships. In KR School hostel, Vickkiramangalam, all the six toilets were in unusable condition as the septic tanks for the toilets were constructed above the level of

the toilets. Further, three out of the four hostel rooms in the KR Boys hostels, Thummakundu were found unfit for occupation and the fourth room had no door and the electrical fittings were in damaged condition. GoTN replied (December 2017) that the deficiencies pointed out would be rectified.

3.2.6.2 Shortage of manpower in the hostels

Proper functioning of hostels can be ensured only by providing the required number of Wardens, Cooks, Sanitary Workers and Watchman. The details of vacancies of different cadre of staff are given in **Appendix 3.10**. The percentage of vacancies in different cadres during 2014-17 ranged upto 19 *per cent* in the cadre of Warden/Matron, 23 *per cent* in Watchman, 32 *per cent* in Cooks and 50 *per cent* in Sanitary Workers.

Audit observed that the proposal for recruitment of Cooks, Sanitary Workers and Watchmen was being pursued from September 2015. Despite a preliminary list of candidates was prepared in 2015, the recruitment process did not progress as the JD, KR, and the Commissioner, MBC & DNC Welfare were engaged in correspondence on the mode of recruitment. Thus, the delay on the part of the Commissioner, MBC & DNC Welfare and JD, KR, had resulted in poor functioning of these hostels. GoTN stated (December 2017) that action was being taken to fill up the vacancies.

3.2.6.3 Community and Income certificates not obtained from the students

The PK and other community students seeking admission in KR School hostels were to establish their eligibility by way of Community and Income Certificates issued by Revenue Authorities. Audit scrutiny revealed that community certificates and income certificates were not obtained from 130 out of 191 students admitted in three of the sampled hostels¹⁵. The admissions were made on the basis of applicants' claim in the hostel application forms.

As the hostel admission is based on community and income background of the applicant, admitting students without community and income certificate amounted to non-fulfilling of the essential conditions and the possibility of ineligible candidates availing the benefits of the Government programme could not be ruled out. GoTN, in their reply (December 2017) stated that suitable instructions were issued to the field officers to insist for community certificate. Audit, however, observed that the instruction did not include insisting for income certificate, which was also mandatory to ensure eligibility of students seeking hostel admission.

3.2.6.4 Irregular admissions in hostels

As per the instruction of GoTN, students (Boys), whose residences are within eight km from their school should not be admitted in hostels. Audit scrutiny of records of 13 sampled hostels disclosed that during 2014-17, 34 students who were ineligible as per the distance criteria were admitted in three hostels¹⁶.

¹⁵ Vickkiramangalam, Uthamapalayam and Cumbum.

¹⁶ Thummakundu: 7, Vickkiramangalam: 26 and Vellaimalaipatti: 1.

GoTN replied (December 2017) that 11 out of the 34 students pointed out by Audit were granted admission in hostels as there was no transport facility from their villages to the school despite the distance being less than eight km. Audit, however, noticed that case to case exemptions based on non-availability of transport facilities were not granted.

3.2.6.5 Fictitious attendance of hostelers

The expenditure on food in hostels is allowed based on the number of hostelers taking food in the hostel. In order to work out the allowable expenditure on food, the Wardens mark attendance thrice a day (Breakfast, Lunch and Dinner).

Scrutiny of attendance register of sampled hostels revealed steep fall in attendance in three hostels as given in **Table 3.12**.

Table 3.12: Attendance in hostels (2016-17)

Hostel	Monthly average attendance (2016-17)							
	August	September	October	November	December	January	February	March
Boys hostel, Vatlagundu	111	112	108	102	28	49	48	47
Girls hostel, Thirumangalam	138	139	140	98	82	59	55	54
Boys hostel, Thummakundu	111	112	108	102	28	49	48	47

(Source: Attendance registers of respective hostels)

Audit observed that the average attendance of these hostels had come down drastically after inspection by the JD, KR, during November 2016. Audit, further observed that during 2016-17, 14 Wardens/Matrons of 10 hostels were placed under suspension by the JD, KR, for marking false attendance to claim food charges based on these fictitious attendance. Among the sampled hostels, wardens/matrons of the above three hostels were placed under suspension for false attendance. The sharp decline in attendance after the inspection by JD, KR, indicated that the attendance marked in the previous months were false. The JD, KR, stated (September 2017) that other than the JD, KR, himself, the Educational Officer and officers from Revenue Department carried out inspection of KR School hostels. Audit scrutiny, however, revealed that the attendance register, which was an important document to arrive at the food bill was never attested by any supervisory authority by visiting the hostel premises. The Attendance Register of Girls' hostel, Thirumangalam, was found manipulated to show higher strength of students present.

Thus, inadequate monitoring had resulted in fraudulent claim of food charges through fictitious attendance by the Wardens/Matrons, causing loss to Government.

3.2.7 Lack of rationale for running KR Schools outside the ambit of School Education Department

The CAG's Audit Report of GoTN (Civil) 2004-05, had highlighted poor performance of the KR Schools and suggested for merger of 17 KR Schools having meager attendance with the schools run by School Education Department. In reply to PAC, GoTN stated (September 2012) that these schools aimed at community specific education development and hence, did not agree to merge the 17 KR Schools with schools run by School Education Department.

Subsequently, in April 2015, the Commissioner, MBC & DNC Welfare submitted a detailed proposal to GoTN for merger of all KR Schools with School Education Department so as to minimise the administrative cost and to improve the efficiency of these schools. It was, however, noticed that GoTN did not take a final decision on this proposal (November 2017).

The following observations are made by Audit on the rationale for running these schools within the ambit of School Education Department:

- Unlike 1920, when these free schools were started for PK community students, in the present situation, all children are eligible for free education up to Class 12 in all Government and Government aided schools, irrespective of community and income barriers. Further, all freebies like uniform, bicycle, etc., were also supplied by Government without community barrier.
- As of 2016-17, only 49 *per cent* of the children studying in KR Schools were from PK community and students from all communities were admitted without any discrimination. Similarly, PK community students were also getting admission in other schools. This statistics was against the argument in support of having a separate school under the Commissioner, MBC & DNC Welfare.
- Data collected from the sampled schools disclosed that 20 of the 58 sampled primary schools (Class 1 to 5) were having a total strength of less than 30 students. It was further noticed that 13 KR Schools had other schools run by Local Body or Government aided private management within a radius of one km. Running two schools at such close proximity without adequate strength lacked justification resulting in an estimated avoidable expenditure of ₹ 1.20 crore¹⁷ per annum on teachers' salaries alone.
- GoTN incurred annual average expenditure of ₹ 0.91 crore on separate administrative establishment under JD, KR, for running these schools. As the School Education Department already had a full-fledged establishment at all levels, merging these schools with School Education Department would result in savings of these expenditure.

¹⁷ 20 teachers with an average monthly salary of ₹ 49,800

GoTN stated (December 2017) that it was a policy decision of the Government to run these schools for the welfare of the PK community. Audit, however, observed that running these schools outside the ambit of School Education Department made no difference in the matter of extending educational facilities to PK community.

3.2.8 Conclusion

The quality of education in KR Schools, established to uplift PK community, suffered due to inadequate staff and infrastructure, leading to poor performance in comparison with Government and Government aided schools. In the absence of proactive action by JD, KR, hostels lacked adequate infrastructure. Despite earlier audit findings and clear proposal by the Commissioner, MBC & DNC Welfare, the GoTN did not take a final decision on the proposal of merging these schools with School Education Department.

REVENUE AND DISASTER MANAGEMENT DEPARTMENT

3.3 Social Security Pension Schemes

3.3.1 Introduction

Government of Tamil Nadu launched Old Age Pension Scheme in 1962. Over the years, various social security pension schemes were introduced and the coverage was also increased. Consequent to launching of 'National Social Assistance Programme', a Centrally Sponsored Scheme of Government of India (GoI), a portion of the expenditure on social security pensions is met through central assistance from 2007 onwards.

The various social security pension schemes implemented in Tamil Nadu were as follows:

- Indira Gandhi National Old Age Pension Scheme (IGNOAPS);
- Indira Gandhi National Disability Pension Scheme (IGNDPS);
- Indira Gandhi National Widow Pension Scheme (IGNWPS);
- Differently Abled Pension Scheme (DAPS);
- Destitute Widows Pension Scheme (DWPS);
- Destitute/Deserted Wives Pension Scheme (DDWPS);
- Unmarried, Poor, Incapacitated Women Pension Scheme (UWPS); and
- Chief Minister's Uzhavar Padhukappu Thittam (CMUPT).

While the first three schemes were partially funded by GoI, other schemes were fully funded by GoTN. The funding pattern, scheme benefits and eligibility criteria for each of the above schemes are given in **Appendix 3.11**.

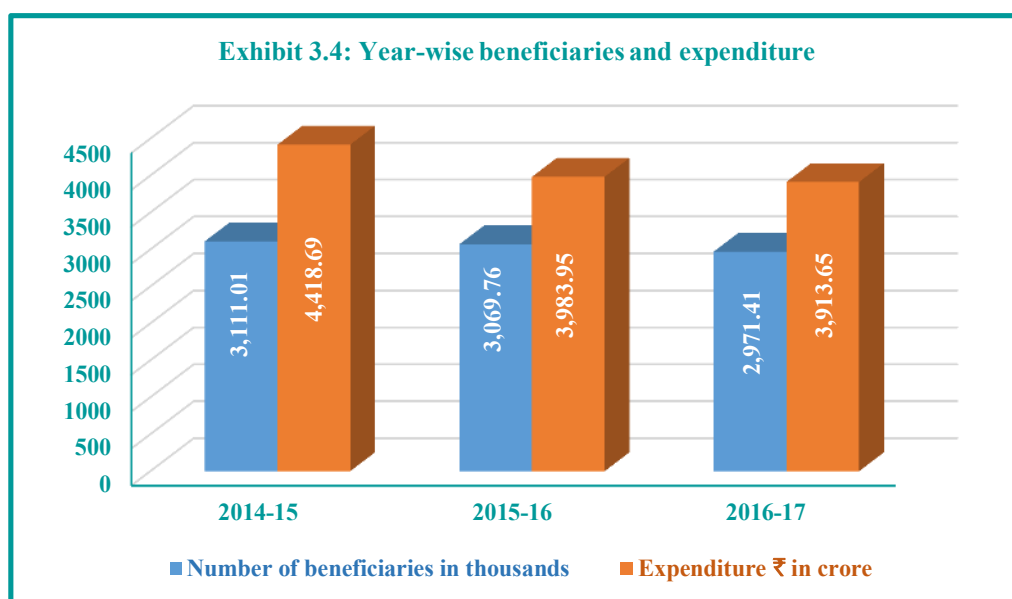
The Commissioner of Revenue Administration (CRA), under Revenue and Disaster Management Department of GoTN implements the social security pension schemes at the State level. At District and Taluk levels, the District Collectors and Special Tahsildar (Social Security Scheme) implement the schemes. As of March 2017, the pension disbursements were made through banks.

The Audit objective was to assess whether pensions were granted only to eligible beneficiaries in timely manner and all the eligible beneficiaries were granted pension. Audit was conducted during May to August 2017 in the office of the CRA and three districts selected on the basis of highest proportion of beneficiaries with reference to targetted population. Within each district, three taluks were selected on the same logic. In each taluk, the Audit team visited three sampled villages to conduct joint verification of eligible pensioners and their related documents. The list of sampled districts, taluks and villages are given in **Appendix 3.12**.

3.3.2 Scheme coverage

3.3.2.1 Physical and financial performance

The scheme-wise and year-wise details of number of beneficiaries covered and expenditure incurred during 2014-17 are given in **Appendix 3.13**. The year-wise total number of beneficiaries and total expenditure are depicted in **Exhibit 3.4**.



(Source: Detailed Appropriation Accounts and data furnished by CRA)

It is evident from **Exhibit 3.4** that the number of beneficiaries decreased from 31.11 lakh in 2014-15 to 29.71 lakh in 2016-17. Scrutiny of the records of CRA revealed that Finance Secretary in a review meeting in September 2013 observed that the total number of social security pensioners increased phenomenally to 33.04 lakh in March 2013 from 23.68 lakh in March 2011. He attributed the sharp increases to “*callous and liberal sanctions*” and opined

that large number of ineligible beneficiaries were being included. Based on that, GoTN ordered (September 2013) 100 per cent verification of eligibility of pensioners to weed out ineligible beneficiaries. On account of the 100 per cent verification carried out between October 2013 and October 2014 by field officers, the number of pensioners came down from 33.04 lakh in March 2013 to 31.11 lakh in March 2015¹⁸. It further declined to 29.71 lakh in March 2017, leading to reduction of ₹ 505.04 crore in the expenditure on social security pensions between 2014-15 and 2016-17.

3.3.2.2 Coverage of pensioners with reference to targetted population

Based on the estimated targetted population in the State, GoI periodically fixes a ceiling for number of beneficiaries under IGNOAPS, IGNWPS and IGNDPS. The ceiling prescribed and the actual number of beneficiaries during 2014-17 were as given in **Table 3.13**.

Table 3.13: Actual number of beneficiaries versus ceiling fixed by GoI - 2014-17

Scheme	GoI ceiling		Number of beneficiaries		
	2014-15	2015-16 and 2016-17	2014-15	2015-16	2016-17
IGNOAPS	6,71,268	12,37,809	13,63,625	13,59,010	13,04,357
IGNDPS	86,400	62,220 ¹⁹	62,337	58,335	56,217
IGNWPS	7,80,236	5,49,084	5,84,413	5,58,073	5,28,794

(Source: CRA)

As could be seen from **Table 3.13**, the number of beneficiaries under IGNOAPS was continuously higher than the ceiling during 2014-17, indicating possible excess coverage of ineligible beneficiaries.

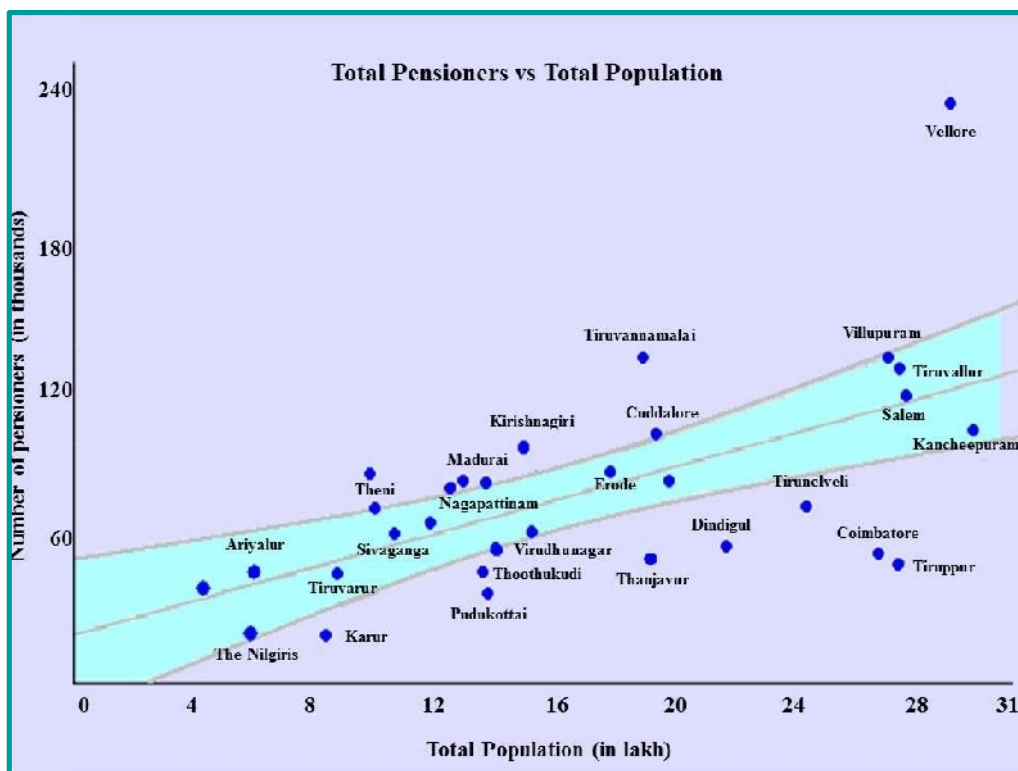
An analysis of data on coverage of social security pension schemes disclosed huge disparity between different districts of the State in terms of number of beneficiaries as a proportion to the targetted population²⁰. **Exhibit 3.5** depicts the relationship between the total number of beneficiaries in the districts as of January 2017 to the total population of districts. A detailed analysis of the number of beneficiaries with reference to targetted population are given in **Appendix 3.14**.

¹⁸ Deletion due to death - 0.26 lakh; deletion due to ineligible beneficiaries - 3.89 lakh and addition due to new/re-issue of cancelled cases - 2.22 lakh.

¹⁹ 62,023 for 2016-17.

²⁰ For IGNOAPS - people living below poverty line in the district. For IGNWPS - population of widows in the district. For IGNDPS - population of physically challenged people in the district above 18 years of age. For CMUPT- population of farmers and farm workers, etc.

Exhibit 3.5: Total number of beneficiaries versus total population



(Source: Analysis of data by Audit)

The Exhibit 3.5 and the detailed analysis in Appendices 3.14 and 3.15 revealed that Tiruvannamalai, Vellore and Villupuram districts were among the top outliers in most number of schemes, indicating possible excess coverage of ineligible beneficiaries. Whereas, Dindigul, Thanjavur and Tiruppur districts were among the bottom outliers, indicating possible under coverage of eligible beneficiaries.

3.3.3 Deficiencies in scheme formulation

3.3.3.1 Divergent and complicated procedure in deciding eligibility

As per GoI's eligibility norms, applicants above 60 years of age and living below poverty line are eligible for pension under IGNOAPS. GoTN, however, based on past practice carried additional conditions that the applicant should be a destitute. Destitute for the purpose of IGNOAPS is defined as a person without any income or income source or fixed assets valuing ₹ 50,000 or more. Further, anyone with son or son's son above 20 years of age who is not below poverty line or living with a relative is not considered as a destitute.

Audit observed that:

- The additional conditions imposed by GoTN created complication in deciding the eligibility as the decision is bound to be discretionary in the absence of accessible data on income of son or son's son of the applicant.

- Estimation of value of property was another factor left to the discretion of the revenue officials. By introducing a criteria on the basis of property ownership, which was not contemplated by GoI, GoTN made the process more complicated and impacted transparency in selection process.
- As per GoTN norms, anyone with a son or son's son who is above poverty line is not considered as a destitute. The Rule, however, did not consider daughter and granddaughter to ascertain the 'destitute' status of beneficiaries. Audit observed that under the Maintenance and Welfare of Parents and Senior Citizens Act, 2007, son, daughter, grandson and granddaughter, above 18 years of age are duty bound to take care of parents and grandparents. The definition of destitute is, thus, ambiguous.
- As per existing orders, if husband and wife, both destitute, living together, both of them are eligible for entitled pensions. The orders are, however, silent on pension eligibility of mother-daughter, mother- daughter-in-law and similar persons living in one house.

3.3.3.2 Non-merger of identical pension schemes

Destitute men or women above 60 years, not owning any property worth more than ₹ 50,000 are eligible for pension under IGNOAPS, a scheme partially funded by GoI. They are also eligible under CMUPT, a GoTN scheme. As the origin of these two pension schemes was different, they continued to be administered separately. Audit found no rationale for continuation of two different pension schemes for the same target population.

Though, the above issue was discussed (September 2013) in the meeting of Secretaries, under the Chairmanship of the Principal Secretary to GoTN, Finance Department, no decision was taken on merging these two pension schemes (November 2017).

Audit observed that two separate pension schemes with identical target population and eligibility criteria created additional administrative work load.

3.3.4 Payment of pension to ineligible beneficiaries

Audit conducted joint verification (May to August 2017) of 1,036 beneficiaries in 27 villages covering three districts and found that 118 (11 *per cent*) of them were not eligible to draw pension as discussed below.

3.3.4.1 Irregular sanction of pension to the beneficiaries with family support

As per the norms stipulated by GoTN, a person is not a destitute, if he/she has a son, son's son or husband/wife or other relatives living together who are not below poverty line and are not continuously missing for more than five years. Being a 'destitute' is a precondition for sanction of pension under social security pension schemes.

During joint verification, it was observed that in 15 cases, sons or relatives with whom the beneficiaries lived were in Government service or receiving Government pension.

Sanction of pension to these beneficiaries under IGNOAPS, CMUPT and DWPS, who were not destitute as per the definition, resulted in avoidable expenditure of ₹ 5.40 lakh²¹ by way of disbursement of pension at the rate of ₹ 1,000 per month during the period 2014-17.

3.3.4.2 Payment of pension to persons in violation of age criteria

All social security pension schemes have age criterion²². Audit scrutinised the Aadhaar card and ration card of beneficiaries and found instances of sanction and continued payment of pensions without considering age criterion as given in **Table 3.14**.

Table 3.14: Pension payments in violation of age criterion

District	Number of beneficiaries verified	Scheme	Number of pensions in violation of age	Remarks
Tiruvannamalai ²³	32	IGNOAPS	1	Below 60 years
Vellore	349	IGNOAPS	24	Below 60 years
		IGNWPS	1	Below 40 years
Total	381		26	

(Source: Audit Team)

Sanction and continued payment of pension in violation of age criterion in respect of 26 out of the 381 test-checked cases (6.82 per cent) indicated the magnitude of the issue of irregular payments of pension.

Audit worked out that the above sanction of pension to the beneficiaries, violating age criterion, resulted in avoidable expenditure of ₹ 9.36 lakh²⁴ by way of disbursement of pension at the rate of ₹ 1,000 per month during the period 2014-17.

3.3.4.3 Sanction of pension to the beneficiaries having fixed assets

One of the eligibility criteria prescribed by GoTN was that the beneficiary should not own fixed assets valuing ₹ 50,000 or more. Information collected, through joint verification conducted in the sampled villages revealed that instances of sanction and continued payment of pensions without considering value of the property owned by the beneficiaries as given in **Table 3.15**.

²¹ 15 beneficiaries x ₹ 1,000 x 36 months = ₹ 5.40 lakh

²² IGNOAPS & CMUPT - 60 years, UWPS - 50 years, IGNWPS - 40 years, DDWPS - 30 years and IGNDPS, DAPS & DWPS - 18 years

²³ Polur Taluk (Padavedu village)

²⁴ 26 beneficiaries x ₹ 1,000 x 36 months = ₹ 9.36 lakh

Table 3.15: Number of beneficiaries who owned fixed assets valuing ₹ 50,000 or more

Sl. No.	Name of District	Name of Taluk	Number of beneficiaries verified	Number of ineligible beneficiaries
1.	Tiruvannamalai	Arni	110	3
2.	Tiruvannamalai	Kalaspakkam	118	5
3.	Tiruvannamalai	Polur	92	6
4.	Vellore	Katpadi	122	6
5.	Vellore	Natrampalli	123	12
6.	Vellore	Tirupathur	104	3
7.	Theni	Theni (Allinagaram village)	37	2
Total			706	37

(Source: Audit Team)

Sanction of pension to the beneficiaries who owned fixed assets valuing ₹ 50,000 or more resulted in avoidable expenditure of ₹ 13.28 lakh²⁵ during the period 2014-17.

3.3.4.4 Sanction of widow and deserted women pension to beneficiaries living with their husband

The main criteria for sanction of pension under IGWPS and DWPS was that the beneficiary should be a widow. Similarly, pension under DDWPS can be sanctioned only to those destitute female beneficiaries who were legally divorced or deserted for not less than five years or obtained legal separation certificate from a competent Court of Law.

On joint verification of 1,036 pensioners, it was observed that 21 pensioners were sanctioned pension irregularly under DWPS, IGWPS and DDWPS even though they were living with their husband. Audit observed that it would not have been difficult for the field officials of Revenue Department to ascertain the marital status of women in villages, grant of widow or deserted women pension to women living with their husband indicated clear foul play in sanction. The district-wise and scheme-wise break up of such ineligible sanctions and continued payments of pensions are given in **Table 3.16**.

Table 3.16: Number of ineligible beneficiaries under DWPS/IGWPS/DDWPS

Sl. No.	District	Number of beneficiaries verified	Number of ineligible beneficiaries		
			DWPS	IGWPS	DDWPS
1.	Tiruvannamalai	320	3	0	10
2.	Vellore	349	4	1	1
3.	Theni	367	1	1	0
Total		1,036	8	2	11
			21		

(Source: Audit Team)

²⁵ 37 beneficiaries x ₹ 1,000 x 36 months = ₹ 13.32 lakh
 (less) Period of stoppage = ₹ 0.04 lakh
Total = ₹ 13.28 lakh

Sanction of pension to such ineligible beneficiaries resulted in avoidable expenditure of ₹ 7.33 lakh²⁶ during the period 2014-17.

3.3.4.5 Sanction of pension to more than one person in a family

As per Rule 5 of Madras Old Age Pension Rule, pension cannot be granted if the beneficiary has son, son's son or husband/wife who are not below poverty line or living with relatives who are not destitutes.

From this explanation, it was observed that the pension sanctioned to more than one person in a family²⁷, is in violation of condition, 'destitute'.

During joint verification of beneficiaries in sampled villages of Tiruvannamalai and Vellore districts, it was observed that the pension was sanctioned to more than one beneficiary in a family who were normally living together thereby violating the criteria 'destitute'. In the sampled villages of Tiruvannamalai and Vellore districts, 19 beneficiaries were sanctioned pension despite their relatives living with them were also receiving pension as given in **Table 3.17**.

Table 3.17: Number of ineligible beneficiaries under DWPS, IGNWPS, IGNOAPS and CMUPT

District	Number of beneficiaries verified	Number of ineligible beneficiaries			
		DWPS	IGNOAPS	CMUPT	IGNWPS
Tiruvannamalai	320	2	4	8	0
Vellore	349	0	4	0	1
Total	669	2	8	8	1
		19			

(Source: Audit Team)

Sanction of pension to these ineligible beneficiaries resulted in avoidable expenditure of ₹ 6.84 lakh²⁸ during the period 2014-17.

3.3.5 Exclusion of eligible beneficiaries

(i) GoTN in November 2016 while issuing orders for the basic services to be provided under Tamil Nadu Maintenance and Welfare of Parents and Senior Citizens Act, 2007 instructed that the residents of Old Age Homes (OAH) should be allowed to draw Government pension and the department should facilitate the same.

With a view to assess the reach of social security pension schemes, Audit collected (October/November 2017) information on grant of pension to eligible inmates of 50 OAH through personal visit and postal survey. It was found that only 29 *per cent* of the eligible beneficiaries living in the OAH were receiving pension as given in **Table 3.18**.

26	21 beneficiaries x ₹ 1,000 x 36 months	= ₹ 7.56 lakh
	(less) Period of stoppage	= ₹ 0.23 lakh
	Total	= ₹ 7.33 lakh

27 Other than husband and wife who are specifically exempted under Explanation 1 under Rule 5

28 19 beneficiaries x ₹ 1,000 x 36 months = ₹ 6.84 lakh

Table 3.18: Number of eligible beneficiaries in OAH receiving pension and not receiving pension

Category	Scheme under which eligible	Number of inmates eligible	Number of inmates receiving pension	Number of inmates not receiving pension	Percentage of inmates availing pension
Males above 60 years	IGNOAPS/CMUPT	411	98	313	24
Females above 60 years	IGNOAPS/CMUPT	250	58	192	23
Widows	IGNWPS/DWPS	513	183	330	36
Unmarried females above 50 years	UWPS	88	29	59	33
Separated/deserted females	DDWPS	52	12	40	23
Total		1,314	380	934	29

(Source: Audit Team)

It was noticed that only 99 out of 934 eligible inmates (11 *per cent*) applied for pension despite the fact that majority of them were aware of the pension schemes. In respect of 59 cases, the Tahsildars (Social Security Scheme) wrongly rejected the applications citing that they were not eligible as they were residing in OAH. In addition, in respect of 24 cases, the OAH requested the District Social Welfare Officer and District Collector to provide an ID proof to apply for pension.

The exclusion of inmates of OAH from Government pension is an omission on the part of CRA/Social Welfare Department.

(ii) Further, scrutiny of records in the Office of CRA revealed that as of September 2017, a total of 46,824 eligible applications were pending sanction of pension, in respect of all the pension schemes for the State as a whole. Of which, 1,197 cases were pending for more than one year, 2,999 cases were pending for 6-12 months and 14,483 cases were pending for 3-6 months. Audit observed that the pension applications were kept pending based on the instructions of GoTN to restrict the new sanctions not exceeding the number of deletions on account of death, etc.

3.3.6 Non-refund of undisbursed pension amounts by banks

As per the system envisaged for disbursement of pension through banks, the pension amount together with bank charges are paid to the banks by the Special Tahsildars (Social Security Scheme). The banks are to disburse the pension to the beneficiaries using biometric enabled Point of Sale machines. The amount of pension remaining undisbursed due to death or migration of the pensioner should be returned by the banks to the Special Tahsildars by 25th of every month.

A scrutiny of disbursements in the selected Taluk Offices of Vellore District revealed that pension amount of ₹ 7.36 lakh released to banks in respect of 446 deceased pensioners were not returned by the banks for periods ranging from 1 to 13 months as detailed in **Table 3.19**.

Table 3.19: Amount to be recovered from the Banks

(In ₹)

Name of Taluk	Number of death cases	Amount to be recovered from Banks
Katpadi	154	1,82,000
Natrampalli	162	2,92,000
Tirupathur	130	2,62,000
Total	446	7,36,000

(Source: Data collected by Audit Team from respective Taluk Offices)

Taluk Offices routinely addressed the banks every month for return of undisbursed amount of pensions in respect of deceased pensioners, without giving the details of pensioners and amount to be refunded. The Department did not put in place a functional system to get the information on demise of pensioners from its own field officers in time to avoid release of pension for deceased pensioners.

3.3.7 Conclusion

Huge disparity amongst districts in the number of beneficiaries as a proportion to the targetted population indicated excess coverage due to inclusion of ineligible pensioners and also possible under-coverage of eligible pensioners. The scheme guidelines were substantially stringent and impractical in comparison with the norms stipulated by GoI. Despite a 100 per cent verification of pension eligibility in 2014, Audit came across 118 ineligible beneficiaries receiving pension and 934 eligible beneficiaries not receiving pension, indicating the need for continuing periodical verifications.

The matter was referred to Government in October 2017; reply had not been received (December 2017).

3.4 Loss/Wasteful expenditure

HEALTH AND FAMILY WELFARE DEPARTMENT

3.4.1 Loss due to expiry of drugs purchased in excess of requirement

Inflated requirement of medicines by Rajiv Gandhi Government General Hospital, Chennai and failure to exercise control by Director of Medical Education and Tamil Nadu Medical Services Corporation Limited resulted in excess procurement of medicines and consequent loss of ₹ 16.17 crore due to expiry of these medicines.

Medical institutions of GoTN source their requirement of medicines through Tamil Nadu Medical Services Corporation Limited (TNMSC), a public sector undertaking of GoTN. TNMSC procures the medicines and stores in its drug

warehouses located at 29 places across the State for distribution to Government medical institutions. TNMSC maintains two lists of medicines, viz., Essential Drug List (EDL) and Speciality Drug List (SDL). Medicines included in EDL are procured by TNMSC based on past consumption pattern and medicines included in SDL are procured based on specific requirements received from medical institutions.

In November 2013, TNMSC called for requirements from the Director of Medical Education (DME) for 45 medicines, which were newly added to EDL. The DME obtained (November 2013) the requirements from all 37 hospitals under its control, consolidated them and sent it to TNMSC on 13 December 2013.

The list of medicines requisitioned by DME included Capsule Tacrolimus 1 mg and Tablet Bromocriptine 2.5 mg. While all 37 hospitals had furnished their requirements for these two medicines, the requirement projected by Rajiv Gandhi Government General Hospital (RGGGH), Chennai accounted for 82 and 99 *per cent* respectively of DME's total requirement of Capsule Tacrolimus 1 mg and Tablet Bromocriptine 2.5 mg. TNMSC procured these medicines between June and September 2014.

The details of requirement furnished by medical institutions, procurements by TNMSC and loss due to expiry of these medicines are given in **Table 3.20**.

Table 3.20: Expiry of drugs purchased in excess of actual requirement

Medicines		Requirement furnished by medical institutions for 2014-15*			Procurement by TNMSC	Actual consumption by medical institutions			Quantity expired due to non-utilisation		
		RGGGH	Others	Total		RGGGH	Others	Total	RGGGH	Others including TNMSC warehouses	Total
Tacrolimus 1 mg	Quantity (in crore)	1.80	0.39	2.19	2.01	0.04	0.09	0.13	1.58	0.30	1.88
	Value (₹ in crore)	10.15	2.19	12.34	10.41	0.21	0.46	0.67	8.19	1.55	9.74
Bromocriptine 2.5 mg	Quantity (in crore)	0.96	0.01	0.97	0.53	0.01	0.02	0.03	0	0.50	0.50
	Value (₹ in crore)	8.70	0.10	8.80	4.78	0.09	0.18	0.27	0	4.51	4.51
Total value (₹ in crore)					15.19	0.94			14.25		

* Requirement furnished in November 2013 for procurement during 2014-15
(Source: Records of DME, TNMSC and RGGGH, Chennai)

Audit scrutiny of the procurement files revealed that medicines worth ₹ 14.25 crore expired between June and September 2016 due to the following lapses in procurement:

- (i) As against the overall previous year consumption of 5.46 lakh capsules of Tacrolimus 1 mg and 7,000 tablets of Bromocriptine 2.5 mg by all the Government medical institutions in the State, the Medical Stores Officer

(MSO), RGGGH alone furnished (December 2013) a requirement of 1.80 crore capsules of Tacrolimus 1 mg and 96 lakh tablets of Bromocriptine 2.5 mg. The Dean, RGGGH admitted in his letter (September 2015) to DME that the quantity indented was far in excess of the requirement and stated that the MSO furnished excess requirement by oversight considering the unit of ordering as the number of tablets/capsules instead of number of boxes of 100 tablets/capsules, resulting in ordering 100 times the requirement. An enquiry by two Professors of RGGGH, instituted by Dean, RGGGH, however, found (January 2017) that the concept of human error was not acceptable and concluded with a recommendation for the matter to be examined in detail. But, no further action was taken on the enquiry findings to fix responsibility on delinquent officials.

(ii) The mandatory approval of the Dean was not taken on file for the requirements projected by the MSO. The requirements furnished by MSO, RGGGH to DME neither had the signature of the Dean nor the MSO. Further, DME also did not insist on the signature of the Dean. This failure of DME in accepting the requirements without the approval of Dean, RGGGH, resulted in accepting the inflated requirements without any check and validation by Dean, RGGGH.

(iii) The value of the requirement of Capsule Tacrolimus and Tablet Bromocriptine, projected by RGGGH amounted to ₹ 10.15 crore and ₹ 8.70 crore respectively. Despite its high value and previous year's low consumption, DME did not analyse the abnormal requirement furnished by RGGGH. This indicated lack of due diligence on the part of DME in consolidating and screening the requirement of these medicines.

(iv) Capsule Tacrolimus was included in the SDL from 2007-08 and in the EDL from 2012-13. Tablet Bromocriptine was included in SDL from 2013-14. Therefore, TNMSC had an opportunity to verify the requirement with reference to past consumption, but failed to exercise its envisaged role in respect of assessing requirement of these medicines in EDL. However, deviating from the established procedure of deciding the quantity of procurement based on past consumptions, TNMSC called for requirements from DME and the process was approved by MD, TNMSC, as a one time measure, which contributed to the excess procurement.

(v) TNMSC placed first purchase order (PO) in June 2014. As per the established practice, second PO, if need be, should be placed only after the stock goes below six months' requirement. However, through a manual process, by overriding the computer based system, TNMSC placed second PO even before the stock went below six months' requirement.

(vi) TNMSC's procurement policy was to restrict the procurement to four months' requirement. The policy, however, was not followed by TNMSC as the entire quantity was procured between June and September 2014, without monitoring the offtake of medicines by Government medical institutions.

It was further observed that other than two medicines discussed, 5 out of 45 medicines newly added to EDL were also procured in substantially higher quantities due to excess requirement furnished by Government medical institutions ranging from 24 to 189 times over previous year's consumption. DME also without verifying the requirement with the consumption pattern forwarded the same to TNMSC, which resulted in expiry of medicines and consequent loss of ₹ 1.92 crore (**Appendix 3.16**).

Thus, inflated requirement of medicines furnished by MSO, RGGGH, Chennai, coupled with the failure of DME in following stipulated procedures and exercising due diligence in screening medicine requirements and failure of TNMSC to verify the consumption pattern and in not restricting the procurement to four months' requirement, had resulted in a loss of ₹ 16.17 crore²⁹.

The Government replied (November 2017) that the drugs were procured by TNMSC as per the requirement furnished by the institutions and comparison with past consumption was not done as no data on past consumption was available with them. The reply was not tenable as state-wide consumption pattern was available with them and TNMSC should have ordered only four months' requirement as per their policy. Further orders should have been placed by TNMSC based on its consumption.

The Government further stated that in order to prevent similar lapses in future DME took measures to create a new Section in his office headed by a technical person and to make it mandatory for heads of medical institutions to furnish authenticated copy of requirement based on previous consumption.

3.4.2 Wasteful expenditure in establishment of Stem Cell Research Centre

Deficiencies in planning and contract management in executing the interior works of the Stem Cell Research Centre and failure to provide required basic infrastructure in time resulted in wasteful expenditure of ₹ 2.70 crore, besides non-availing of research grant of ₹ 5.77 crore and an additional committed liability of ₹ 5.49 crore.

In October 2007, the Head of the Surgical Gastroenterology Department (HoD) of Government Stanley Medical College Hospital (Hospital) proposed to establish a Stem Cell Research Centre (Project) in the Hospital with research grant from the Indian Council of Medical Research (ICMR). Based on the proposal, ICMR accorded (March and August 2008) approval for the project at a cost of ₹ 14.50 crore. The objective of the project was to undertake research work, carry out clinical trials for stem cell therapy and clinical transplantation of liver stem cells to patients. The project was to be implemented over a five year period (01-09-2008 to 31-08-2013) by the HoD in his capacity as the Principal Investigator. As per the approval, while the

²⁹ Two medicines - ₹14.25 crore and five medicines - ₹1.92 crore.

ICMR grant was to fund special research equipment, consumables and salaries of research staff, the basic facilities like building, ordinary laboratory equipment, glassware, etc., for the project was to be provided by the host institution. As per 'National Guidelines for Stem Cell Research' issued by ICMR, the project required construction of additional laboratory space in the hospital along with 'Clean Room Facilities' as per cGMP³⁰ Standards.

GoTN appointed (August 2008) the Tamil Nadu Medical Services Corporation Limited (TNMSC), a State public sector undertaking, as the nodal agency for executing the project. It also instructed that the funds received from ICMR for the project was to be deposited in the Personal Deposit Account of TNMSC and no financial support would be provided by the State Government. As GoTN did not commit funds for creation of required building infrastructure, the HoD mobilised ₹ 3.80 crore through Member of Parliament Local Area Development Fund and Member of Legislative Constituency Development Fund.

The project entailed civil (building), electro mechanical and interior works for creation of clean room environment as per cGMP Standards. TNMSC entrusted (January 2010) the execution of the civil works to Public Works Department (PWD). The PWD finalised the tender and awarded (May 2010) the work to a contractor for completion in three months (i.e. by August 2010). The work was completed at a cost of ₹ 0.93 crore in March 2011, after a delay of seven months. In respect of the interior work, TNMSC finalised tenders and awarded (February 2010) the contract to the successful tenderer³¹ for an agreement value of ₹ 2.71 crore. The contract was for a period of nine months³² and was scheduled to be completed by November 2010. Although the contractor claimed to have completed the interior works way back in September 2012, TNMSC did not accept completion of work by the contractor, as testing and certification of the facility was not carried out. While dispute between the contractor and TNMSC on the status of completion of the works continued, the warranty period ended for several critical components of the 'Clean Room System' such as Air Handling Units, Chiller Plants, etc. Further, even before the interior works were fully complete, several equipment started malfunctioning and the contractor attributed the breakdown of equipment to the erratic power supply.

In the meantime, the research work progressed to the stage of culturing of liver stem cells. The Scientific Advisory Committee of ICMR during its site visits (May 2013, January 2015 and May 2016) pointing out the non-compliance of the interior works to cGMP Standards, which was required for the project to

³⁰ Current Good Manufacturing Practices - A guideline for testing, manufacturing and quality control.

³¹ M/s SRP Enviro Systems Private Limited.

³² In addition, defect liability/Warranty period of 12 months and Comprehensive Annual Maintenance Contract for three years after warranty period.

move to the next level, extended project period by two years (from October 2014 to September 2016).

With a view to establish and validate the facilities conforming to cGMP Standards under the project, GoTN constituted a Steering Committee in August 2015 under the Chairmanship of the Secretary to Government, Health and Family Welfare Department. The Committee decided (January 2016) to go for fresh tenders to upgrade the facilities to cGMP Standards. Accordingly, TNMSC invited (February 2016) fresh tenders and Director of Medical Education (DME) placed (October 2016) work order with the successful bidder for a value of ₹ 5.49 crore³³. In the meantime, TNMSC terminated (September 2016) the earlier contract for interior works, after incurring an expenditure of ₹ 2.49 crore³⁴. The clean room equipment installed by the contractor were dismantled and DME proposed (July 2016) to upgrade the laboratory to cGMP Standards. This work with a project period of four months³⁵ was scheduled for completion in February 2017. The work, however, was under progress even as of September 2017.

Meanwhile, ICMR terminated the project in May 2017 as the project was not completed within the extended project period. Against the originally approved grant of ₹ 14.50 crore, only ₹ 8.73 crore was received³⁶ from ICMR and the hospital utilised ₹ 8.63 crore³⁷ till March 2017 towards laboratory equipment, consumables and salaries.

Scrutiny of records relating to the period 2007-17 in the Hospital, TNMSC, DME and Health & Family Welfare Department in the Secretariat during February-July 2017 revealed the following:

(i) The interior works involving provision of 'Clean Room Environment' conforming to cGMP Standards was first of its kind in the Hospital. Neither the Hospital nor TNMSC had prior experience in carrying out work of this nature. Therefore, through a tender, TNMSC entrusted the design and execution of interior works to a contractor. Audit observed that in the absence of in-house expertise, TNMSC should have appointed a consultant with technical expertise to design and oversee the execution of interior works. But this was not done.

(ii) ICMR nominated the HoD as Principal Investigator at the helm to spearhead this research project, building and other procurement works

³³ Replacement of equipment at a cost of ₹ 4.58 crore and new equipment at a cost of ₹ 0.91 crore.

³⁴ The value of work executed by the contractor was ₹ 2.70 crore.

³⁵ In addition, a defect liability/Warranty period for three years and Comprehensive Annual Maintenance Contract for seven years after warranty period.

³⁶ ICMR did not release the grant earmarked for the second and third year of the project amounting to ₹ 5.77 crore for purchase of equipment and furniture for the next stage i.e., clinical transplantation, as the Hospital did not reach the stage.

³⁷ Research equipment: ₹ 5.94 crore (+) Salaries and other contingencies: ₹ 2.69 crore.

involving multiple agencies such as TNMSC, DME, PWD, etc. This warranted efficient co-ordination. GoTN, however, constituted a Committee under the Chairmanship of the Secretary to Government only in August 2015, after a delay of seven years, to steer the project. This decision was taken only after the project was held up in multiple issues without solutions in sight. The lack of a defined command and control architecture to steer the project right from the beginning resulted in poor project management.

(iii) The HoD and DME failed to assess the availability of adequate power supply while formulating the project. As a result, the dedicated High Tension power connection which was sought for by the contractor in July/November 2010 was provided only in September 2012. Besides, the delayed provision of backup power supply (Diesel Generator sets) resulted in spoilage of costly consumables stored in deep freezers due to frequent power cuts. Further, non-execution of Comprehensive Annual Maintenance Contract due to delayed proposal by DME (January 2014) and sanction (September 2014) by GoTN to allot funds for the purpose resulted in the malfunctioning of costly and sensitive equipment installed in the laboratory.

(iv) There was also ineffective monitoring by TNMSC, the nodal agency, as noticed from several deficiencies in the work executed by the contractor. This also prevented the project from progressing to the next stage i.e., clinical transplantation. Consequently, ICMR did not release the grant earmarked for the second and third year of the project for purchase of equipment and furniture and the Hospital lost out on the opportunity to receive ICMR funding amounting to ₹ 5.77 crore under the project.

To an Audit query, the Principal Investigator replied (July 2017) that though specifications in the tender documents were as per cGMP Standards, the work was not completed by the contractor and the outcome was not cGMP compliant. It was further stated that subsequent upgradation of the laboratory to cGMP Standards arose due to (i) non-completion of work by the first contractor, (ii) non-availability of required power supply and provision of diesel generator sets in time and (iii) aging of equipment installed under the first contract.

Thus, due to the tardy planning, lack of a defined command and control architecture of the project and delayed action of the Hospital and the DME in providing basic facilities for the project coupled with the ineffective monitoring by TNMSC, the objective of the project to carryout liver transplantation using stem cell technology did not fructify. Further, the expenditure of ₹ 2.70 crore incurred on the interior works proved wasteful besides non-availing of ICMR grant of ₹ 5.77 crore and an additional committed liability of ₹ 5.49 crore to upgrade the laboratory to the originally envisaged cGMP Standards.

The matter was referred to Government in September 2017; reply had not been received (December 2017).

3.5 Avoidable/Unfruitful expenditure

HIGHER EDUCATION DEPARTMENT

UNIVERSITY OF MADRAS

3.5.1 Unfruitful expenditure on construction of multi-storeyed building

Failure to ensure financial resources before commencement of construction of a multi-storeyed building resulted in stoppage of work by the contractor due to non-payment of contractor's bills rendering ₹ 22.79 crore spent on the construction of the building unfruitful.

With a view to facilitate research in the sciences and to overcome the problem of water logging in the existing main building located in a low lying area, the University of Madras (University) decided (March 2010) to construct a modern multi-storeyed building³⁸ (Project) with indoor auditorium, conference halls, laboratories, workshops, etc., at its Taramani campus in Chennai. The project was proposed to be self-funded. Accordingly, tenders were invited (September 2012) and the contract was awarded (December 2012) to the lowest tenderer for an agreement value of ₹ 35.90 crore (Civil works: ₹ 24.20 crore; Electrical, Sanitation and Water Supply works: ₹ 11.70 crore³⁹). The work site was handed over to the contractor in December 2012, with scheduled completion of the project by March 2015.

The contractor commenced the work in December 2012 and presented bills for work done from January 2013 onwards. The Syndicate had approved a procedure for expeditious payment of contractor's bills, wherein payments had to be made within five days from the date of approval by the Syndicate. However, analysis of the bills paid to the contractor for this work revealed that the bills were paid with delays ranging from 15 to 907 days, apart from part payment/non-payment (**Appendix 3.17**). The University replied (August 2017) to Audit that contractor's bills could not be paid due to paucity of funds. As a result, after completing 68 *per cent* of the work, the contractor stopped the work in December 2014 due to non-payment of outstanding bills to the tune of ₹ 6.44 crore. As of July 2017, after incurring ₹ 22.79 crore on the project, the building stood incomplete without any further progress for the last 31 months. The University approached (April 2014) GoTN for a one time grant to complete the building, but the Government did not approve (March 2016) the proposal of the University. The status of the building as of July 2017 is given in **Exhibit 3.6**.

³⁸ Ground *plus* four floors with total area of 10,123 square metres.

³⁹ Agreement value - Sanitation and Water Supply: ₹ 4.96 crore, Electrical: ₹ 5.74 crore and Elevation: ₹ 1 crore.

Exhibit 3.6: Physical and financial status of the building



Component	Agreement value	Value of completed work	Payments made to contractor
(₹ in crore)			
Civil	24.20	21.01	19.90
Electrical & others	11.70	3.51	2.89
Total	35.90	24.52	22.79

Scrutiny of records relating to the period 2009-17 in the University during July-August 2017 revealed that the following lapses contributed to the stoppage of work and consequent unfruitful expenditure of ₹ 22.79 crore on the stalled project:

(i) The University's proposal to construct the building did not even include a preliminary assessment of the financial requirement. The Syndicate, however, approved the proposal (November 2009) without assessing the mode of funding for the proposed constructions.

(ii) Under Madras University Act, 1923, the Finance Committee of the University was vested with the powers to scrutinise the financial estimates. Although the decision to construct this multi-storeyed building at an estimated cost of ₹ 35.90 crore had huge financial implication to the University, the proposal was not sent to the Finance Committee for its approval.

(iii) The expenditure on construction of buildings is charged to the Capital Account of the University. Apart from specific grants by GoTN, UGC, etc., for specific building works, the Capital Accounts receive funds transferred from Part I Account (Non-plan) of the University and from the Institute of Distance Education (IDE) Account. Audit observed that during the five years period (2009-14) following the approval of this building (2008-09), while the Part I Account had an annual average negative balance of ₹ 7.84 crore, the IDE Account had an annual average surplus of ₹ 2.70 crore only. This indicated that the University did not have sufficient financial resources to fund this project itself.

(iv) Audit observed that in order to support the building projects, during 2009-15, the University utilised ₹ 33.91 crore from maturity value and interest earned from fixed deposits, which were created mainly to meet its future obligations towards pension and other retirement benefits. Audit also noticed

that as of September 2015, the University had shortage of funds to the tune of ₹ 190 crore in pension fund.

To an Audit query, the University replied (August 2017) that due to non-filling up of the post of Vice-Chancellor (VC) for the past 15 months, decision on this issue was not taken. It was also stated that consequent on the filling up of the post of VC in May 2017, a solution for the issue was under active consideration. The reply of the University was not acceptable as the Syndicate of the University had full powers under Section 19 (b) of the Madras University Act, 1923, to hold, control and administer the properties and funds of the University. Therefore, non-filling up of the post of VC for 15 months was not an acceptable reason for not finding a solution to this issue.

Thus, in the absence of a defined system for according administrative sanction for development projects, the University launched building projects without carrying out even a rudimentary assessment of the financial resources required. This resulted in unfruitful expenditure of ₹ 22.79 crore by way of investment in the project which remained stalled for the past 31 months due to paucity of funds. Further, tapping the fixed deposits to fund Capital Projects would undermine the ability of the University to meet its future obligations on staff pension and retirement benefits.

The matter was referred to Government in August 2017; reply had not been received (December 2017).

FINANCE AND HIGHER EDUCATION DEPARTMENTS

3.5.2 Avoidable extra expenditure on purchase of furniture for colleges

Undue priority given to Tamil Nadu Small Industries Corporation Limited for procurement of furniture resulted in avoidable extra expenditure of ₹ 13.92 crore.

The GoTN enacted the Tamil Nadu Transparency in Tenders Act, 1998 (the Act) to provide for transparency in public procurement and to maximise economy and efficiency. Section 16 (f) of the Act provides for dispensing with tender procedures in respect of spot procurements of agricultural commodities, agricultural produce and livestock from primary producers, cotton by Spinning Mills, animals from shanties, sugarcane from farmers, paddy by Direct Purchase Centres of Tamil Nadu Civil Supplies Corporation,

clothing from Tamil Nadu Handloom Weavers' Cooperative Society and similar goods and services, as may be notified by the Government.

In April 2013 and October 2013, GoTN accorded financial sanction for ₹ 44.50 crore towards procurement of furniture for 93 higher educational institutions in the State by invoking Section 16 (f) of the Act and ordered to procure the furniture from Tamil Nadu Small Industries Corporation Limited (TANSI), a public sector undertaking of the State, without following the tender process.

Accordingly, the Director of Collegiate Education (DCE) procured tables, chairs, desks and blackboards, etc., from TANSI between July 2013 and May 2014, at a cost of ₹ 44.49 crore.

Audit analysis relating to procurement of furniture revealed the following:

(i) In August 2007, with a view to enable TANSI to compete with other Small Scale Industrial units, Government in Finance Department, notified TANSI as a preferred unit for purchase of wooden and steel furnitures by Government departments, etc., under Section 16 (f) of the Act through 'spot procurement'. Audit observed that 'spot procurement' involved procurement of any item on the spot from showrooms or market place and did not involve prior ordering, payment of advance, etc. The bulk procurement of furniture did not qualify for spot procurement as DCE placed orders with TANSI, paid advance and the goods were manufactured and supplied to colleges at different locations after two or three months. As Section 16 (f) of the Act envisaged only spot procurements, the concurrence issued by Finance Department, without ensuring the applicability of the condition was irregular.

(ii) Notification of all procurements from TANSI under Section 16 (f), which was meant only for 'spot procurement', violated the spirit of the Act which envisaged economy in procurement and transparency in tender processing. This facilitated the Higher Education Department to place purchase orders (April and October 2013) directly with TANSI for procurement of furniture without resorting to open tenders.

(iii) In order to ascertain the economy in procurement, Audit sought (May 2017) and obtained (June 2017) corresponding rates of the furniture for items of same dimensions and quality for the relevant years from Tamil Nadu Khadi and Village Industries Board (TNKVIB), another public sector body, which manufactures furniture and supplies them to Government departments. It was observed that the rates of furniture purchased from TANSI were much higher than the rates of TNKVIB. Though TNKVIB was on same footing with TANSI in respect of public procurement and was given priority under Section 16 (c) of the Act, Government in Higher Education Department, obtained the rates only from TANSI and placed orders with them. This

resulted in avoidable extra expenditure of ₹ 13.92 crore (**Appendix 3.18**) due to higher cost of furniture manufactured by TANSI.

Government stated (December 2017) that orders were already issued in August 2007 for procurement of furniture from TANSI under Section 16(f) of the Act and contended that procurement of furniture from TANSI was therefore not irregular. The reply is not tenable as the exemption from tender process under Section 16(f) was applicable only in respect of spot procurement and the current procurement did not qualify as spot procurement.

Thus, the objective of the Act to maximise economy and transparency were defeated as the above procurements from TANSI entailed higher expenditure by the Higher Education Department and bypassing tender process.

HOME, PROHIBITION AND EXCISE DEPARTMENT

3.5.3 Avoidable additional expenditure in procurement of jammers

Inordinate delay in procurement of jammers for central prisons led to avoidable additional expenditure of ₹ 81.36 lakh. Besides, the number of jammers was restricted to 12 instead of the required 15, making it potentially ineffective to disable usage of cell phones in prisons.

Government of India's policy (July 2011) stipulated that on security considerations, cell phone jammers were to be procured only from the two designated Public Sector Undertakings, viz., Bharat Electronics Limited (BEL) or Electronics Corporation of India Limited (ECIL). The Inspector General of Prisons (IGP) proposed (May 2013) to GoTN to procure 15 cell phone jammers for high security blocks in nine central prisons⁴⁰ in the State. Based on the rates quoted by ECIL, the IGP estimated a requirement of ₹ 5.40 crore for the 15 static cell phone jammers⁴¹ at the quoted rate of ₹ 36 lakh per unit, inclusive of delivery and installation charges.

GoTN accorded administrative approval in November 2013 to procure 15 cell phone jammers at a cost of ₹ 5.40 crore. The purchase order, however, was placed with ECIL only in January 2016 at a cost of ₹ 42.78 lakh per unit. The inordinate delay of 32 months in placing purchase order led to cost escalation and consequent procurement of 12 cell phone jammers instead of the proposed 15 jammers as discussed below:

⁴⁰ Central Prisons - Coimbatore (3), Cuddalore (1), Madurai (1), Palayamkottai (1), Puzhal - two prisons (3), Salem (1), Tiruchirappalli (2) and Vellore (3).

⁴¹ Model EC HP3962h with CDMA, GSM, EGSM and 3G jamming facility.

- Though there was clear instructions from GoI to procure cell phone jammers from BEL/ECIL only, IGP did not explain this in his original proposal (May 2013). While replying (August 2013) to the query raised by GoTN on the mode of procurement, notwithstanding the existing GoI instructions, the IGP proposed to go for open tender. After a delay of 18 months, IGP withdrew the proposal to go for open tender and in consultation with the Additional Director General of Police, Technical Cell (ADGP-TC), decided (November 2014) to procure the cell phone jammers from ECIL as was originally proposed in May 2013.
- In the meantime, due to the delay, the funds provided in the budget for procurement of cell phone jammers were surrendered (March 2014).
- Based on the technical specification, IGP approached (November 2014) GoTN with a proposal to procure 12 numbers of ECIL cell phone jammers against 15 jammers as originally proposed in May 2013 at an higher cost of ₹ 45.22 lakh per unit. The unit price of the jammers did not include the cost of 4G module, which would be supplied on demand at extra cost by ECIL. The reduction in the number of cell phone jammers was to restrict the total expenditure within the sanctioned amount.
- Government accorded sanction (August 2015) for the revised proposal after a delay of nine months, consequent to which, GoI's approval was obtained in November 2015 and orders were placed with ECIL in January 2016.
- As of September 2017, installation of cell phone jammers was still in progress in all prisons except Central Prison, Puzhal.

Thus, failure of the IGP to take immediate action to procure the cell phone jammers after administrative approval in November 2013, resulted in procurement of 12 cell phone jammers only instead of proposed 15 jammers. Further, escalation of cost resulted in avoidable additional expenditure of ₹ 81.36 lakh⁴² for 12 cell phone jammers.

The cell phone jammers had an effective coverage area of only 30 metres, which meant that high security blocks in prisons with a length/width of more than 60 metres would require more than one jammer. The escalation in the cost of cell phone jammers and the consequent wrong decision to reduce the number of cell phone jammers, rather than to seek additional funds, had resulted in three prisons⁴³ with high security blocks of over 60 metre length, getting less than the required number of cell phone jammers. This would ultimately render the cell phone jammers ineffective in restricting the usage of cell phones in prison premises. Further, by the time, the installation of cell phone jammers started in prisons, 4G mobile services were launched across

⁴² ₹ 42.78 lakh (-) ₹ 36.00 lakh = ₹ 6.78 lakh x 12 cell phone jammers.

⁴³ Coimbatore, Tiruchirappalli and Vellore.

the country. In the absence of 4G module, which was offered by the vendor at an extra cost, these cell phone jammers would not block 4G signals.

The delay in procurement contributed to continued usage of cell phones by prisoners as evidenced by the confiscation of 688 Cell phones and 431 SIM cards from these nine central prisons during 2014-16 (upto November 2016).

On this being pointed out, Government replied (November 2017) that the cell phone jammers were a new item of procurement and the department procured cell phone jammers after evaluating the technical aspect. It also stated that additional jammers for the remaining areas would be considered and upgradation of existing cell phone jammers to 4G would be taken up after obtaining due permission from GoI. But, the fact remained that the abnormal delay caused an avoidable additional expenditure of ₹ 81.36 lakh on the procurement of 12 cell phone jammers instead of the proposed 15 due to cost escalation. Besides, the possibility of unabated usage of cell phones by prisoners could not be ruled out as the number of cell phone jammers got reduced and the units ordered did not have the capability to block 4G signals.

3.6 Regularity issues

HOME, PROHIBITION AND EXCISE DEPARTMENT

3.6.1 Short-collection of revenue due to non-revision of charges for police guard/escort/bandobust

Failure of the Government and the Director General of Police to revise the police guard/escort/bandobust charges as and when they became due resulted in short collection of revenue of ₹ 97.92 crore.

The Police Department deploys police personnel for regular guard duty, occasional escort duty in banks and other establishments and for security arrangements (Bandobust duty) for private events. The Madras Police Standing Order provided for collection of charges for Guard duty⁴⁴, Escort duty⁴⁵ and Bandobust duty⁴⁶. The Director General of Police (DGP) proposed (November and December 2007) to simplify the claim process by standardising rates for the above mentioned duties. Accordingly, GoTN issued (August 2008) orders and standardised the charges at fixed rates (**Appendix 3.19**) and also directed that the rates were to be reviewed

⁴⁴ Where the services of police personnel were requisitioned by banks and other establishments for the entire month on regular basis.

⁴⁵ Where the services of police personnel were requisitioned for a short period to provide escort for transport of cash and other valuables by banks and other establishments.

⁴⁶ Where the services of police personnel were requisitioned for a short period for security arrangements for private mega events.

once in three years or as and when pay scales of the police personnel were revised. The rates were fixed taking into account the pay scale of different cadre of police personnel, allowances, pension and leave salary, etc. Further, GoTN directed (November 2009) to collect additional charges of 10 *per cent* of the standardised charges towards supervision and another 10 *per cent* towards amenities, to be credited into Government Account and Amenity Fund of Police Department respectively.

Based on Pay Commission⁴⁷ recommendations, GoTN revised the pay scales of police personnel with effect from 01-06-2009. Consequently, the charges for Guard duty, Escort duty and Bandobust duty became due for revision from that date. DGP, however, did not initiate any proposal to revise the charges and the same was pointed out by Audit in February 2013. Subsequently, in May 2013, DGP proposed to revise the charges and after a further delay of 45 months, GoTN notified the new rates with effect from March 2017.

Scrutiny of records relating to the period 2008-17 in the Office of the DGP and the Home, Police and Excise Department in the Secretariat during May 2017 revealed the following lapses:

(i) Despite specific directions to revise the standardised charges once in three years or as and when new scales of pay were announced, the DGP had taken action only after a delay of nearly four years, after being pointed out by Audit.

(ii) The DGP's proposal was further delayed as the Home Department raised several queries over the calculation. Audit found that the delays were avoidable as the calculation of charges was well defined through provisions of Police Standing Order and the Government Order of August 2008.

(iii) The abnormal time taken to effect the revision on account of implementation of new pay scales had a cascading effect and resulted in non-implementing the subsequent periodical revisions (i.e., once in three years) due in June 2012 and June 2015.

(iv) Test check of records revealed that in 10 districts⁴⁸, there was short collection/non-collection of guard/escort/bandobust/supervision and amenities fund charges to the tune of ₹ 97.92 crore (**Appendix 3.20**). In five districts, supervision charges and amenities fund charges were not at all collected.

Thus, the belated action of the DGP in proposing for revision of the charges and further delay in processing the revision by the Government resulted in short collection of revenue of ₹ 97.92 crore to the Government.

The matter was referred to Government in September 2017; reply had not been received (December 2017).

⁴⁷ Consequent on the implementation of the Sixth Central Pay Commission, GoTN notified the Tamil Nadu Revised Scales of Pay Rules, 2009.

⁴⁸ Commissioner of Police, Chennai, Tiruppur; Superintendent of Police, Thoothukudi, Dindigul, Krishnagiri, The Nilgiris, Tiruvarur and Ariyalur; Commandant, Tamil Nadu Special Police, Ulundurpet in Villupuram, Avadi and Poonamallee in Tiruvallur.

HEALTH AND FAMILY WELFARE DEPARTMENT

3.6.2 Additional burden due to rejection of insurance claim

Even after three years of implementation of “Chief Minister’s Comprehensive Health Insurance Scheme”, Government hospitals across the State could not perfect a system to file the insurance claims free of deficiencies, resulting in rejection of insurance claim of ₹ 17.94 crore during January 2015 to July 2017 and a consequent avoidable additional burden of ₹ 10.82 crore on Government towards expenditure on drugs, consumables and hospital infrastructure.

Government of Tamil Nadu launched (July 2011) “Chief Minister’s Comprehensive Health Insurance Scheme” (CM Insurance Scheme) to provide affordable and quality medical care to those with an annual family income not exceeding ₹ 72,000. The scheme provided for medical insurance coverage of ₹ 1 lakh⁴⁹ per family per annum in respect of 1,016 specified ailments⁵⁰. GoTN nominated (July 2011) Tamil Nadu Health System Society (TNHSS), a Government agency, registered under the Tamil Nadu Societies Registration Act, 1975, to implement the scheme through United India Insurance Company (UIIC), a GoI Undertaking, selected through tender process. The insurance premium was worked out based on the number of beneficiaries enrolled under the scheme and GoTN was to bear the entire premium payable to UIIC.

The scheme provided cashless medical and/or surgical treatments, involving over 900 procedures in more than 784 panel hospitals, including 159 hospitals run by GoTN in different parts of the State. The hospitals were to submit their claims online to UIIC, based on the approved cost of the procedure. The payments received by the hospital from UIIC were to be apportioned for meeting the cost of consumables, institutional development and incentives to the staff.

All patients who are enrolled under the scheme shall approach the Ward Managers of the Government hospitals for treatment under the CM Insurance Scheme. The Ward Managers shall seek ‘pre-authorisation’ from UIIC for the treatment by providing patient’s insurance number, diagnosis of the ailment and medical/surgical procedure envisaged, etc., before proceeding with the treatment procedure. In respect of emergency cases, the hospitals were to intimate UIIC over phone and obtain an ‘Emergency Intimation’ number.

Scrutiny of the data obtained from TNHSS on insurance claims by Government hospitals for the period from January 2015 to July 2017 revealed that 6,700 claims for a total amount of ₹ 17.94 crore were rejected by UIIC due to deficiencies in the claims made by the hospitals, in obtaining the ‘pre-authorisation’ approval, responding to queries raised by UIIC and submitting ‘Emergency Intimation’ number as given in **Table 3.21**.

⁴⁹ With provision to pay up to ₹ 1.50 lakh per annum in respect of 113 ailments.

⁵⁰ Such as coronary baloon angioplasty, bypass surgery, etc.

Table 3.21: Deficiencies in preferring insurance claim resulting in non-availing of insurance claim

(Amount - ₹ in crore)

Deficiency	11 January 2015 to 10 January 2016		11 January 2016 to 10 January 2017		11 January 2017 to July 2017		Total	
	No. of cases	Amount	No. of cases	Amount	No. of cases	Amount	No. of cases	Amount
Not responding to UIIC's queries	1,836	6.00	2,305	6.45	860	2.03	5,001	14.48
Non/Delayed application for 'pre-authorisation'	605	1.22	482	0.96	247	0.45	1,334	2.63
Non/Delayed application for 'Emergency Intimation' number	75	0.21	133	0.27	157	0.35	365	0.83
Total	2,516	7.43	2,920	7.68	1,264	2.83	6,700	17.94

(Source: Data obtained from TNHSS)

An analysis of the claims rejected by UIIC revealed the following:

(a) In respect of the requests for pre-authorisation submitted by hospitals, UIIC sought several clarifications on diagnosis and/or treatment procedure and in some cases sought additional documents on the proposed treatment, etc. Audit observed that the hospitals failed to send timely response in respect of 5,001 such cases where UIIC sought additional information/documents, resulting in denial of claim to the tune of ₹ 14.48 crore.

(b) According to the scheme guidelines, the hospitals should submit the pre-authorisation request to the UIIC within 24 hours of admission of the patient. Audit, however, observed that in 1,334 non-emergency cases, the pre-authorisation request was submitted after completion of treatment, resulting in denial of claims amounting to ₹ 2.63 crore.

(c) In respect of surgical treatments of emergency nature, the hospitals failed to obtain 'Emergency Intimation' numbers for 365 cases, resulting in rejection of these claims amounting to ₹ 0.83 crore.

The main reason for rejection of the cases, as attributed by the Stanley Medical Hospital, where a detailed study was conducted by Audit, were (i) non-availability of Ward Managers during night hours for filing requests for 'Emergency Intimation' number, (ii) slow internet speed hampering uploading of documents and (iii) non-submission of required documents by the patients. The reply established the fact that the Department/hospitals had not put in place a functional mechanism to lodge proper insurance claims without deficiencies and to respond to UIIC's queries effectively. Further, TNHSS, the nodal agency, failed to evolve a workable system to resolve huge cases rejected by the UIIC.

Thus, Audit observed that even after three years of implementation of the scheme, the hospitals failed to improve on the system for filing the claim without any deficiencies which resulted in rejection of insurance claims of ₹ 17.94 crore during January 2015 to July 2017 and consequent avoidable additional burden on government to the tune of ₹ 10.82 crore towards expenditure (**Appendix 3.21**) on drugs, consumables and institutional development.

The matter was referred to Government in November 2017; reply had not been received (December 2017).



(R. THIRUPATHI VENKATASAMY)
Accountant General
(General and Social Sector Audit),
Tamil Nadu and Puducherry

Chennai
The 13 February 2018

Countersigned



(RAJIV MEHRISHI)
Comptroller and Auditor General of India

New Delhi
The 15 February 2018

APPENDICES

Appendix 1.1

(Reference: Paragraph 1.5.2; Page 3)

Department-wise details of Outstanding Inspection Reports and Paragraphs

Sl. No.	Name of the Department	Number of Outstanding	
		Inspection Reports	Audit Observations
1.	Adi-Dravidar and Tribal Welfare	204	1,291
2.	Backward Classes, Most Backward Classes and Minorities Welfare	115	401
3.	Co-operation, Food and Consumer Protection	117	264
4.	Finance	54	109
5.	Health and Family Welfare	718	3,240
6.	Higher Education	371	1,533
7.	Home, Prohibition and Excise	378	1,215
8.	Housing and Urban Development	47	156
9.	Labour and Employment	74	164
10.	Law	6	14
11.	Municipal Administration and Water Supply	212	516
12.	Personnel and Administrative Reforms	6	13
13.	Planning, Development and Special Initiatives	22	55
14.	Public	16	39
15.	Revenue	1,475	5,361
16.	Rural Development and Panchayat Raj	78	252
17.	School Education	478	1,534
18.	Social Welfare and Nutritious Meal Programme	220	827
19.	Tamil Development and Information	38	106
20.	Tourism, Culture and Religious Endowments	45	158
21.	Welfare of Differently Abled Persons	100	384
22.	Youth Welfare and Sports Development	24	78
23.	Special Programme Implementation	2	8
	Total	4,800	17,718

Appendix 2.1

(Reference: Paragraph 2.1.5; Page 9)

Details of Offices visited/inspected

Name of the District Collectorate	Name of the Taluk	Name of the Local Body	Names of other Offices viz., WRD, Highways and Minor Ports and Animal Husbandry
Tiruchirappalli	Tiruverumbur	Tiruchirappalli Corporation (Srirangam and Ponmalai zones)	EE, Ariyaru Basin Division; DE, Tiruchirappalli; and Regional Joint Director, Tiruchirappalli
	Srirangam		
Tiruvallur	Tiruvallur	Avadi Municipality	EE, Kosasthalaiyar Basin Division; DE, Tiruvallur; and Regional Joint Director, Tiruvallur
	Ponneri		
Coimbatore	Coimbatore South	Coimbatore Corporation (East zone)	AEE, Irrigation Sub-division; and DE, Coimbatore
	Pollachi		
Chennai	Purasaiwakkam	Greater Chennai Corporation (Zones IV and VIII)	EE, Buckingham Canal Division
	Ayanavaram		
Madurai	Madurai North	Madurai Corporation (Zones II and IV)	EE, Periyar Vaigai Basin Division; DE, Madurai; and Regional Joint Director, Madurai
	Melur		
The Nilgiris	Udhagamandalam	Udhagamandalam Municipality	DE, Udhagamandalam; and Regional Joint Director, The Nilgiris
	Gudalur	Gudalur Municipality	
Pudukottai	Avudaiyarkoil	Pudukottai Municipality	EE, South Vellar Basin Division; and DE, Pudukottai
	Iluppur	Town Panchayat, Iluppur	
Vellore	Arcot	Vellore Corporation	EE, Upper Palar Basin Division; and DE, Vellore

Appendix 2.2

(Reference: Paragraph 2.1.6; Pages 10 and 11)

District-wise details of encroachments as per Government Land Registry

Sl. No.	District	Total Government land area (Ha)	Area of lands under encroachment (Ha)					Lands under encroachment (in per cent)
			Permanent Residential (PR)	Permanent Non-Residential (PNR)	Temporary Crops and Trees (TCT)	Temporary Others (TO)	Total Government land encroached	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1.	Ariyalur	40230.61.1	159.43.01	216.37.55	1809.72.07	246.20.82	2431.73.45	6.04
2.	Chennai	6360.00.0	NA	NA	NA	NA	1520.00.0	23.90
3.	Coimbatore	53614.22.55	378.60.17	318.37.76	898.62.84	245.81.66	1841.42.43	3.43
4.	Cuddalore	69200.73.27	711.20.42	887.6.93	4569.65.49	652.62.61	6820.55.45	9.85
5.	Dharmapuri	101866.8.46	521.83.16	461.42.48	8562.54.12	703.80.5	10249.60.26	10.06
6.	Dindigul	122984.13.83	941.40.8	163.64.38	11678.94.97	1546.21.0	14330.21.15	11.85
7.	Erode	57918.21.53	302.45.89	107.97.5	2959.61.55	170.95.57	3541.0.51	6.11
8.	Kancheepuram	189262.45.88	2897.10.7	1892.92.85	8660.87.72	1330.98.5	14781.89.77	7.81
9.	Kanyakumari	22434.80.12	136.70.06	119.90.5	1446.73.19	163.76.55	1867.10.3	8.31
10.	Karur	42362.56.83	177.18.84	80.60.25	916.33.53	166.55.21	1340.67.83	3.16
11.	Krishnagiri	134475.60.43	2424.78.95	526.45.4	13687.36.52	376.25.0	17014.85.87	12.65
12.	Madurai	106569.19.68	2017.1.53	262.61.66	1492.66.48	333.2.51	4105.32.18	3.85
13.	Nagapattinam	46045.84.22	429.37.99	769.76.95	831.56.08	252.3.06	2283.74.08	4.96
14.	Namakkal	48050.47.58	136.30.48	110.64.85	1767.0.87	32.84.5	2046.80.7	4.26
15.	The Nilgiris	111868.80.96	481.12.22	182.96.86	3033.0.35	95.14.12	3792.23.55	3.39

Appendix 2.2 (Concl'd.)
(Reference: Paragraph 2.1.6; Pages 10 and 11)

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
16.	Perambalur	39588.56.47	150.52.75	103.76.74	1781.7.17	248.82.4	2284.19.06	5.76
17.	Pudukkottai	159403.68.25	762.12.01	440.6.94	5799.31.35	816.53.07	7818.3.37	4.90
18.	Ramanathapuram	102618.78.88	516.24.46	536.23.97	2307.6.46	370.76.58	3730.31.47	3.63
19.	Salem	110461.68.36	898.68.82	867.52.54	11433.44.38	3476.97.45	16676.63.19	15.09
20.	Sivaganga	151470.91.86	386.29.3	424.9.94	1970.94.73	863.51.36	3644.85.33	2.41
21.	Thanjavur	80514.59.14	602.41.42	251.27.73	4583.58.2	665.89.37	6103.16.72	7.58
22.	Theni	100372.30.49	325.74.87	102.88.65	4812.89.0	506.7.32	5747.59.84	5.72
23.	Tiruchirappalli	103425.93.43	1523.55.95	731.38.81	3484.7.7	818.2.88	6557.5.34	6.34
24.	Thiruvarur	31754.97.21	367.63.5	114.4.16	1866.76.07	302.16.95	2650.60.68	8.34
25.	Thoothukudi	75308.76.22	166.96.4	159.36.81	836.42.77	819.55.3	1982.31.28	2.63
26.	Tirunelveli	106113.61.72	488.41.06	195.11.89	429.11.98	200.37.95	1313.2.88	1.24
27.	Tiruppur	48337.99.67	311.73.02	130.84.37	528.38.65	274.15.58	1245.11.62	2.57
28.	Tiruvallur	113787.1.57	5065.65.19	1837.94.73	8427.44.49	786.84.43	16117.88.84	14.16
29.	Tiruvannamalai	133232.22.72	1141.14.59	309.69.42	7871.97.72	233.2.54	9555.84.27	7.17
30.	Vellore	113260.60.15	875.59.22	993.18.27	5318.8.59	162.79.06	7349.65.14	6.49
31.	Villupuram	213487.93.68	1059.64.79	432.94.01	21640.92.34	650.81.09	23784.32.23	11.14
32.	Virudhunagar	66138.94.81	114.32.42	114.75.03	656.27.29	42.96.48	928.31.22	1.40
	Total	2902522.31.07	26471.23.99*	13845.89.93*	146062.44.67*	17556.51.42*	205456.10.01	7.08

* Excluding detailed data in respect of Chennai District; NA: Not Available

Appendix 2.3

(Reference: Paragraph 2.1.7.3; Page 16)

Non-booking of 'B Memos' during the last five years

District	Taluk/Village	Villages test-checked	'B Memo' as of April 2012	'B Memos' as of May 2017
Pudukottai	Illuppur	6	209	195*
Tiruchirappalli	Tiruverumbur	6	612	610*
	Srirangam	10	672	672
Tiruvallur	Ponneri	8	169	166*
	Tiruvallur	4	328	328
Madurai	Madurai North	5	141	141
	Melur	8	578	578
The Nilgiris	Udhagamandalam	5	1,505	1,505
	Gudalur	3	1,612	1,612
Coimbatore	Coimbatore South	5	1,845	1,694*
	Pollachi	8	248	247*
Vellore	Arcot	2	97	97
Total		70	8,016	7,845

* Decrease in numbers was due to eviction of encroachers.

Appendix 2.4

(Reference: Paragraph 2.1.8.1 (ii); Pages 18 and 19)

Road-wise details of encroachments on road margins in test-checked zones of GCC

Name of Road	Total length of roads inspected (in Kms)	Number of encroachments noticed								Total
		Permanent				Temporary				
		Religious Structures	Commercial	Residential	Others	Religious Structures	Commercial	Residential	Others	
ZONE – IV										
Meenambal Salai	1.050	01	-	-	-	-	-	-	-	01
Ennore High Road	4.000	02	30	-	-	-	-	-	-	32
Cochraine Basin Road	1.480	03	-	10	-	-	06	-	-	19
Melpatti Ponnappan Street	1.650	-	-	-	-	-	-	-	-	-
ZONE – V										
Arunachala Street	0.975	-	-	-	01	-	-	-	-	01
Swamy Sivananda Salai	1.150	-	-	-	-	-	01	-	-	01
NSC Bose Road	1.250	02	-	-	-	-	20	-	-	22
Dr. Vijayaraghavulu Street	0.945	-	-	-	01 ⁺	-	-	01	-	02
Adhithanar Salai	0.965	01 [@]	-	-	01 ⁺	-	-	-	-	02
Muthusamy Salai	0.860	-	-	-	-	-	-	-	-	-
Dr. Nair Road	0.860	-	-	-	-	-	-	-	-	-
ZONE – VIII										
M.T.H. Road	2.300	-	08 [*]	-	-	-	10	-	-	18
Anna Nagar IV Main Road	0.900	01	-	-	-	-	-	-	-	01
Anna Nagar 6 th Avenue	1.875	-	-	-	01 ⁺	-	-	-	-	01
Anna Nagar 2 nd Avenue	2.800	-	-	-	01 ⁺	-	-	-	-	01
Anna Nagar 3 rd Avenue	2.550	-	-	-	-	-	-	-	-	-
ZONE – IX										
Valluvar Kottam High Road	1.670	-	-	-	-	-	02	-	-	02
St. Mary's Road	1.920	01	-	-	-	-	04	-	-	05
South Canal Bank Road	0.910	-	-	-	-	-	02	-	-	02
Sir Theagaraya Road	1.550	02	-	-	-	-	01	-	-	03
Thiru Vi Ka Road	2.050	-	-	-	-	-	05	-	-	05
Kodambakkam High Road	1.700	02 [@]	-	-	-	-	09	-	-	11
Dr. BV Narasimhan Salai	0.850	-	-	-	-	-	-	-	-	-
Cathedral Road	1.350	-	-	-	-	-	-	-	-	-
Total	37.61	15	38	10	05	0	60	01	0	129

* Extension of roof over footpath. + Encroachments by GCC.

@ Encroachments over both footpath and carriageway.

Appendix 2.5

(Reference: Paragraph 2.1.10.4; Page 32)

Details of encroachments in grazing lands

Sl. No	District/Taluk/Village	Extent encroached (in Ha.)	Encroached by	Nature of structures	Remarks	
1.	Madurai/Madurai North/Vilangudi I Bit	0.57.5	Private individuals (60)	Houses	As per Revenue records of Faslis 1423 and 1426 (Mandaiveli Poramboke), 'B Memo' were booked by Zonal Deputy Tahsildar.	
2.	Madurai/Melur/Tiruvathavur	4.50.0	Private individuals (8)	Houses, eucalyptus/coconut trees, waste stones	As per Revenue records of Faslis 1422 to 1426 (Meikkal), Tahsildar informed (December 2015) Regional Joint Director, Animal Husbandry Department, Madurai who in turn addressed (April 2016) DC for removing the encroachments. AD, Animal Husbandry Department, Melur, requested (May 2016) RDO in this regard to convert the encroached land into green fodder production farm and RDO in turn asked (May 2016) to evict the encroachments and lay boundary stones.	
3.	The Nilgiris/Udhagamandalam/Naduvattam	29.44.50	Private individuals	Petty shops, houses, temple, tea factory with power and water supply connections and Agricultural activities	Action is pending. As per Revenue records, encroachment details were not recorded in the Adangal for Faslis 1422 and 1426. Though it was indicated in the Adangal for Fasli 1424, 'B Memo' was not booked. The extent of encroachment was also incorrectly shown as 58.60.0 Ha in the Revenue records.	
4.	The Nilgiris/Udhagamandalam/Sholur	8.65.5	Private individuals (26)	Houses (10), Temples (3) with power and water supply connections	As per Revenue records of Faslis 1422 and 1426 (Meikkal), 'B Memo' (Fasli 1425) records the encroachment as objectionable.	
5.	Tiruchirappalli/Lalgudi/2 villages	3.65.0	Private individuals	Houses (10)	As per records of Regional Joint Director, Animal Husbandry Department (Meikkal/Mandaiveli).	
6.	Tiruchirappalli/Lalgudi/3 villages	1.22.0	Government	VAO's office, library, PU school		
7.	Tiruchirappalli/Manachanallur/3 villages	3.06.7	Private individuals	School, Temple, villages (33)		
8.	Tiruchirappalli/Manachanallur/2 villages	2.37.5	Government	Dam, Panchayat office, VAO's office		
9.	Tiruchirappalli/Thuraiyur/3 villages	0.60.0	Private individuals	Well, trees, House (1)		
10.	Tiruchirappalli/Thuraiyur/4 villages	2.25.5	Government	VAO's office, Panchayat office		
11.	Tiruchirappalli/Thottiyam/1 village	0.81.0	Government	Silk Development Board		
12.	Tiruchirappalli/Srirangam/2 villages	0.19.0	Private individuals	Private Occupation		
13.	Tiruchirappalli/Srirangam/1 village	0.40.0	Department	Combined drinking water scheme		
14.	Tiruchirappalli/Thiruverumbur/3 villages	5.44.5	Private individuals	House, Path		
15.	Tiruchirappalli/Thiruverumbur/3 villages	2.38.42	Department	OHT, day care centre, Library, Park, VAO office		
16.	Tiruchirappalli/Manaparai/5 villages	5.37.0	Private individuals	Houses		
17.	Tiruchirappalli/Manaparai/3 villages	0.82.0	Department	National Highway extension, Sewage tank, OHT, Panchayat road		
18.	Tiruvallur/Ponneri/Devampattu	2.00.5	Department	Primary Health Centre, Library, Primary School, Self Help Group Building, Cremation Ground, Road, Public Toilet		As per Revenue records (Meikkal), neither NOC obtained from Animal Husbandry Department nor alternative lands identified. Though house site pattas were issued for 2.27.90 Ha in the Revenue records ('A' Register), the land continues to be classified as Meikkal Poramboke.
Total		73.80.40				

Appendix 3.1

(Reference: Paragraph 3.1.3.2; Page 38)

List of godowns constructed without plan approval

Sl. No.	Name of the PACCS/APCMS	Capacity and year of sanction of godowns
1.	Ariyalur APCMS	2,000 MT/2014-15
2.	Avinashi APCMS, Cheyur Branch	1,000 MT/2011-12
3.	Ramagoundanpudur PACCS	500 MT/2014-15
4.	Dharapuram APCMS	500 MT/2013-14
5.	V.Vellore PACCS	500 MT/2014-15
6.	Ramachandrapuram PACCS	500 MT/2014-15
7.	Kongalnagaram PACCS	500 MT/2014-15
8.	Udumalaipettai APCMS	1,000 MT/2014-15
9.	Palladam Farmers' Service Cooperative Society	1,000 MT/2014-15
10.	Tiruchengodu APCMS	2,000 MT/2014-15
11.	Namakkal APCMS	1,000 MT/2011-12
12.	Namakkal APCMS	2,000 MT/2014-15
13.	Rasipuram APCMS (Namagiripet)	2,000 MT/2011-12

Appendix 3.2
(Reference: Paragraph 3.1.3.3; Page 38)
Deficiencies in construction

(i) Rat Guard Ledge not provided as per specification

Sl. No.	Name of PACCS	Capacity of godown and Year of sanction
Tiruppur District		
1.	Myvadenarasingpuram PACCS	100 MT/2012-13
2.	Vedapatti PACCS	100 MT/2012-13
3.	Ramagoundanpudur PACCS	500 MT/2014-15
4.	Anthiur PACCS	100 MT/2014-15
5.	Ganapathipalayam PACCS	100 MT/2011-12
6.	Kuruncheri PACCS	100 MT/2013-14
7.	Murungapatti PACCS	100 MT/2014-15
8.	Gudimangalam PACCS	100 MT/2014-15
9.	Ramachandrapuram PACCS	500 MT/2014-15
10.	Kongalnagaram PACCS	500 MT/2014-15

(ii) Detached steps constructed not as per specification

Sl. No.	Name of PACCS/APCMS	Capacity of godown and year of sanction
Namakkal District		
1.	Thathaiyangarpatti PACCS	100 MT/2013-14
2.	Rasipuram APCMS (Goundampalayam)	2,000 MT/2014-15
3.	Kurkapuram PACCS	100 MT/2012-13
4.	Palanthinipattipudur PACCS	100 MT/2013-14
5.	Bommapatti PACCS	100 MT/2011-12
6.	Mavureddipatti PACCS	100 MT/2011-12
7.	Koodacheri PACCS	100 MT/2011-12
8.	Namakkal CMS	1,000 MT/2011-12
9.	Namakkal CMS	2,000 MT/2014-15
10.	Patloor PACCS	100 MT/2012-13
11.	Rasipuram APCMS (Namagiripet)	2,000 MT/2011-12
12.	Tiruchengodu APCMS	2,000 MT/2014-15
13.	Pottanam Hindu PACCS	100 MT/2011-12
Tiruppur District		
14.	Gudimangalam PACCS	100 MT/2014-15
15.	Murungapatti PACCS	100 MT/2013-14
16.	Muthoor PACCS	100 MT/2013-14

Appendix 3.2 (Concl.)

(Reference: Paragraph 3.1.3.3; Page 38)

(iii) Name of the godowns where bridging planks not provided

Sl. No.	Name of the PACCS/APCMS	Capacity of godowns and year of sanction
Ariyalur District		
1.	Ariyalur APCMS	2,000 MT/2014-15
Namakkal District		
2.	Thathaiyangarpatti PACCS	100 MT/2013-14
3.	Rasipuram APCMS (Goundampalayam)	2,000 MT/2014-15
4.	Kurkapuram PACCS	100 MT/2012-13
5.	Palanthinipattipudur PACCS	100 MT/2013-14
6.	Bommapatti PACCS	100 MT/2011-12
7.	Mavureddipatti PACCS	100 MT/2011-12
8.	Koodacheri PACCS	100 MT/2011-12
9.	Namakkal APCMS	1,000 MT/2011-12
10.	Namakkal APCMS	2,000 MT/2014-15
11.	Patloor PACCS	100 MT/2012-13
12.	Rasipuram APCMS (Namagiripet)	2,000 MT/2011-12
13.	Tiruchengodu APCMS	2,000 MT/2014-15
14.	Pottanam Hindu PACCS	100 MT/2011-12
Tiruppur District		
15.	Muthur PACCS	100 MT/2013-14
16.	Alampalayam PACCS	100 MT/WIF/2013-14
17.	Moothampalayam PACCS	100 MT/WIF/2013-14

(iv) Name of the godowns without approach road

Sl. No.	Name of the PACCS/APCMS	Capacity of godowns and year of sanction
Ariyalur District		
1.	Ariyalur APCMS	2,000 MT/2014-15
Tiruppur District		
2.	Dharapuram APCMS	500 MT/2013-14
Namakkal District		
3.	Rasipuram APCMS	2,000 MT/2011-12

(v) Name of the godowns without electrification

Sl. No.	Name of the PACCS/APCMS	Capacity of godowns and year of sanction
Tiruppur District		
1.	Dharapuram APCMS	500 MT/2013-14
2.	Muthur PACCS	100 MT/2013-14
3.	Palladam PACCS	1,000 MT/2014-15
4.	Alampalayam PACCS	100 MT/2013-14
5.	Moothampalayam PACCS	100 MT/2013-14

Appendix 3.3

(Reference: Paragraph 3.1.4.3; Page 40)

Non-collection of rent for the period of storage of agricultural produce

Sl. No.	Name of the PACCS/APCMS	Quantity stored (MT)
1.	Mavureddipatti	46.90
2.	Mangarasuvalayapalayam	151.53
3.	Muthur	60.32
4.	Moothampalayam	150.87
5.	Ganapathipalayam	112.00
6.	Ramegoundenpudur	167.64
7.	Pottanam Hindu	46.16
8.	Thathaiyangarpatty	51.19
9.	Vedapatti	217.20
10.	Patloor	204.30
11.	Koodacherry	178.80
Total		1,298.53

Appendix 3.4
(Reference: Paragraph 3.1.6; Page 42)
Poor maintenance of godowns

Sl. No.	Name of the godown
Termite attack	
1.	Namakkal APCMS
2.	Ramachandrapuram PACCS
3.	Vedapatti PACCS
4.	Rasipuram (Namagiripet) APCMS
5.	Mavureddipatti PACCS
6.	Ulkottai PACCS
7.	Keelapalur PACCS
8.	Rasipuram APCMS (Goundampalayam)
9.	Pottanam Hindu PACCS
10.	Kurukapuram PACCS
Damaged flooring	
1.	Keelapalur PACCS
2.	Ulkottai APCMS
Leakage of rain water	
1.	Mavureddipatti PACCS
2.	Koodacherry PACCS

Appendix 3.5

(Reference: Paragraph 3.2.1; Page 44)

Kallar Reclamation Schools selected for test check

Sl. No.	Place of School	District	Type of School
1.	Anaiyur	Madurai	Primary
2.	Duraichampurampudur	Madurai	Primary
3.	Villani	Madurai	Primary
4.	Pasukaranpatti	Madurai	Primary
5.	A.Kokkulam	Madurai	Primary
6.	J.Alankulam	Madurai	Primary
7.	Karuthiveeranpatti	Madurai	Primary
8.	Chokkathevanpatti	Madurai	Primary
9.	Nakkalapatti	Madurai	Primary
10.	Muthupandipatti	Madurai	Primary
11.	Karukapillai	Madurai	Primary
12.	Kannanoor	Madurai	Primary
13.	Kodikulam	Madurai	Primary
14.	Sangampatti	Madurai	Primary
15.	Karumathur	Madurai	Primary
16.	Poochampatti	Madurai	Primary
17.	Ariyapatti	Madurai	Primary
18.	Sithalai	Madurai	Primary
19.	Alangankottaram	Madurai	Primary
20.	Kattathevanpatti	Madurai	Primary
21.	Meyyanampatti	Madurai	Primary
22.	C.Vagaikulam	Madurai	Primary
23.	Thadaiyampatti	Madurai	Primary
24.	Vadakkampatti	Madurai	Primary
25.	Vagurani	Madurai	Primary
26.	Thummakundu	Madurai	Primary
27.	Suliochchanpatti	Madurai	Primary
28.	Kodanginaickanpatti	Madurai	Primary
29.	Meikilarpatti	Madurai	Primary
30.	Vadivelkarai	Madurai	Primary
31.	K.Avarampatti	Dindigul	Primary
32.	K.Utchapatti	Dindigul	Primary
33.	Pattiveeranpatti	Dindigul	Primary
34.	S.Kodangipatti	Dindigul	Primary
35.	Chokkalingapuram	Dindigul	Primary
36.	Krishnapuram	Dindigul	Primary

Appendix 3.5 (Contd.)
(Reference: Paragraph 3.2.1; Page 44)

Sl. No.	Place of School	District	Type of School
37.	Kuttiyapatti	Dindigul	Primary
38.	Nayakkanur	Dindigul	Primary
39.	Veilarichanpatti	Dindigul	Primary
40.	N.Kovilpatti	Dindigul	Primary
41.	Karuthandipatti	Dindigul	Primary
42.	Narasingapuram	Dindigul	Primary
43.	Vilampatti	Dindigul	Primary
44.	Theppathupatti	Dindigul	Primary
45.	Kamupillaichatram	Dindigul	Primary
46.	Arappadithevanpatti	Theni	Primary
47.	Ammapatti	Theni	Primary
48.	Rayappanpatti	Theni	Primary
49.	Odaipatti	Theni	Primary
50.	Pannaipuram	Theni	Primary
51.	Kanniyampatti	Theni	Primary
52.	Uthupatti	Theni	Primary
53.	Perumalgoundanpatti	Theni	Primary
54.	Ramasamynayakkanpatti	Theni	Primary
55.	Muththanampatti	Theni	Primary
56.	Uthampuram	Theni	Primary
57.	Markkaiyankottai	Theni	Primary
58.	Keerapothampatti	Theni	Primary
59.	Keelakuilkudi	Madurai	Middle
60.	Kuppanampatti	Madurai	Middle
61.	Maanoothu	Madurai	Middle
62.	V. Perumalpatti	Madurai	Middle
63.	A. Puthupatti	Madurai	Middle
64.	G.Thummalapatti	Dindigul	Middle
65.	B. Meenakshipuram	Theni	Middle
66.	Kakkivadanpatti	Theni	Middle
67.	Bommayagoundanpatti	Theni	Middle
68.	Meikkilarpatti	Madurai	High School
69.	Perungamanallur	Madurai	High School
70.	Vadugapatti	Madurai	High School
71.	Pullakkapatti	Theni	High School
72.	Narayanathevanpatti	Theni	High School
73.	Kullapagoundanpatti	Theni	High School
74.	Thadaiyampatti	Madurai	Higher Secondary

Appendix 3.5 (Concl.d.)
(Reference: Paragraph 3.2.1; Page 44)

Sl. No.	Place of School	District	Type of School
75.	V. Kallapatti	Madurai	Higher Secondary
76.	Nattamangalam	Madurai	Higher Secondary
77.	Checkanurani (Boys School)	Madurai	Higher Secondary
78.	Vickkiramangalam	Madurai	Higher Secondary
79.	Kondamanaickenpatti	Dindigul	Higher Secondary
80.	Anaipatti	Dindigul	Higher Secondary
81.	Vilampatti	Dindigul	Higher Secondary
82.	Rajadhani	Theni	Higher Secondary

List of selected Hostels

Sl. No.	Name of School
1.	School Boys Hostel, Uthamapalayam, Theni
2.	School Boys Hostel, Kadamaikundu, Theni
3.	School Boys Hostel, Cumbum, Theni
4.	School Boys Hostel, Kamayakoundampatti, Theni
5.	School Girls Hostel, Melagudalur, Theni
6.	School Girls Hostel, Thamaraiikulam, Periyakulam, Theni
7.	School Boys Hostel, Vathalagundu, Dindigul
8.	School Girls Hostel, Dindigul
9.	School Boys Hostel, Vellimalaipatti, Madurai
10.	School Boys Hostel, Vickkiramangalam, Madurai
11.	School Boys Hostel, Vagurani, Madurai
12.	School Boys Hostel, Thummakundu, Madurai
13.	School Girls Hostel, Tirumangalam, Madurai

Appendix 3.6

(Reference: Paragraph 3.2.3.3; Page 46)

**Comparative Statement of Pass percentage of Class XII students
in KR Schools with other schools**

Year	Pass percentage of KR Schools	Pass percentage of Government Schools	Pass percentage of Government Aided Schools
Dindigul District			
2014-15	73	81	95
2015-16	73	83	96
2016-17	85	87	95
Madurai District			
2014-15	91.50	86.81	93.51
2015-16	91.42	86.58	94.14
2016-17	93.36	89.27	93.04
Theni District			
2014-15	88.63	88.68	97.40
2015-16	95.19	92.47	97.17
2016-17	93.13	93.76	96.88

Appendix 3.7
(Reference: Paragraph 3.2.4.4; Page 49)
Shifting of Nursery blocks to other schools

Sl. No.	Name of the school in which LKG introduced	Name of the school in which LKG class room constructed
1.	GKPS, Theppathupatti (separated from GKMS)	GKHS, Theppathupatti (upgraded from GKMS)
2.	GKPS, Chennamanaickenpatti	GKHSS, Chennamanaickenpatti
3.	GKPS, Kondamanaickenpatti	GKHSS, Kondamanaickenpatti
4.	GKPS, Anaipatti	GKHSS, Anaipatti

GKPS : Government Kallar Primary School

GKMS : Government Kallar Middle School

GKHS : Government Kallar High School

GKHSS : Government Kallar Higher Secondary School

Appendix 3.8

(Reference: Paragraph 3.2.5.1; Page 49)

List of sampled schools lacking vital infrastructure

Playground not available		Compound Wall not available/ Partly not available		Clean Toilet not available		Play Materials not available		Library not available	
Sl. No.	Madurai District	Sl. No.	Madurai District	Sl. No.	Madurai District	Sl. No.	Madurai District	Sl. No.	Madurai District
1.	PS, Villani	1.	PS, Villani	1.	PS, A. Kokkulam	1.	PS, Karuthiveeranpatti	1.	MS, V. Perumalpatti
2.	PS, Pasukaranpatti	2.	PS, J. Alankulam	2.	HS, Meikilarpatti (Post Vacant)	2.	PS, Nakkalapatti	2.	MS, A. Puthupatti
3.	PS, Karuthiveeranpatti	3.	PS, Karuthiveeranpatti		Theni District	3.	PS, Alangankottaram	3.	HS, Meikilarpatti
4.	PS, Kodikulam	4.	PS, Kodikulam	3.	PS, Arappadithevanpatti	4.	PS, Meyyanampatti	4.	HS, Vadugapatti
5.	PS, Sangampatti	5.	PS, Vagurani	4.	PS, Ammapatti	5.	PS, Meikilarpatti	5.	HSS, Thadaiyampatti
6.	PS, Karumathur	6.	PS, Thummakundu	5.	PS, Rayappanpatti	6.	PS, Vadivelkarai	6.	HSS, Perungamanallur
7.	PS, Alangankottaram	7.	MS, Kuppanampatti	6.	PS, Odaipatti		Theni District		Theni District
8.	PS, Thummakundu	8.	MS, V. Perumalpatti (PNA)	7.	PS, Pannaipuram	7.	PS, Kanniyampatti	7.	MS, B. Meenakshipuram
9.	PS, Suliochchanpatti	9.	MS, A. Puthupatti	8.	PS, Kanniyampatti	8.	PS, Perumalgoundanpatti	8.	MS, Kakkivadanpatti
10.	PS, Vadivelkarai	10.	HSS, Vickkiramangalam (PNA)	9.	PS, Uthupatti	9.	MS, B. Meenakshipuram	9.	HS, Pullakkapatti
11.	MS, Keelakuilkudi		Theni District	10.	PS, Perumalgoundanpatti	10.	HS, Pullakkapatti	10.	HSS, Kullappagowndanpatti
12.	MS, Maanoothu	11.	PS, Ammapatti (PNA)	11.	PS, Ramasamynayakkanpatti	11.	HS, Narayanathevanpatti		Dindigul District
13.	MS, V. Perumalpatti	12.	PS, Odaipatti (PNA)	12.	PS, Muththanampatti		Dindigul District	11.	HSS, Kondamanaickenpatti
14.	MS, A. Puthupatti	13.	PS, Pannaipuram	13.	PS, Uthamapuram	12.	PS, K. Utchapatti	12.	HSS, Vilampatti
15.	HS, Meikilarpatti	14.	PS, Markkaiyankottai (PNA)	14.	PS, Markkaiyankottai	13.	PS, Karuthandipatti		
16.	HSS, Vickkiramangalam	15.	MS, B. Meenakshipuram	15.	PS, Keerapothampatti	14.	PS, Vilampatti		
	Theni District	16.	HS, Kullapagoundanpatti (PNA)	16.	MS, B. Meenakshipuram				
17.	PS, Ammapatti		Dindigul District	17.	MS, Kakkivadanpatti				
18.	PS, Rayappanpatti	17.	PS, Pattiveeranpatti	18.	MS, Bommayaoundanpatti				
19.	PS, Odaipatti	18.	PS, N. Kovilpatti	19.	HS, Pullakkapatti				
20.	PS, Uthupatti	19.	PS, Vilampatti (PNA)	20.	HS, Narayanathevanpatti				
21.	PS, Perumalgoundanpatti	20.	PS, Theppathupatti	21.	HS, Kullapagoundanpatti				
22.	PS, Ramasamynayakkanpatti	21.	HSS, Kondamanaickenpatti (PNA)						
23.	PS, Markkaiyankottai	Botany, Zoology Laboratory not available		Drinking Water not available		Physics, Chemistry Laboratory not available		Computer Laboratory not available	
24.	MS, B. Meenakshipuram	Sl. No.	Madurai District	Sl. No.	Madurai District	Sl. No.	Madurai District	Sl. No.	Madurai District
25.	HS, Pullakkapatti	1.	HS, Meikilarpatti	1.	PS, Karuthiveeranpatti	1.	HS, Meikilarpatti	1.	HS, Vadugapatti
26.	HS, Narayanathevanpatti	2.	HS, Vadugapatti	2.	PS, Nakkalapatti	2.	HS, Vadugapatti		Theni District
27.	HS, Kullapagoundanpatti	3.	HSS, Thadaiyampatti	3.	PS, Meyyanampatti		Theni District	2.	HS, Pullakkapatti
	Dindigul District	4.	HSS, Checkanurani (Boys School)	4.	PS, Vagurani	3.	HS, Pullakkapatti	3.	HS, Narayanathevanpatti
28.	PS, K. Utchapatti	5.	HSS, Vickkiramangalam	5.	PS, Suliochchanpatti		Dindigul District		
29.	PS, Pattiveeranpatti		Theni District	6.	MS, V. Perumalpatti	4.	HSS, Vilampatti		
30.	PS, S. Kodangipatti	6.	HS, Pullakkapatti		Dindigul District				
31.	PS, Nayakkanur		Dindigul District	7.	HSS, Anaipatti				
32.	PS, Veilarichanpatti	7.	HSS, Kondamanaickenpatti						
33.	PS, Kovilpatti	8.	HSS, Anaipatti						
34.	PS, Karuthandipatti								
35.	PS, Vilampatti								
36.	HSS, Anaipatti								

PS : Primary School , MS: Middle School , HS : High School, HSS : Higher Secondary School and PNA : Partly Not Available

Appendix 3.9

(Reference: Paragraph 3.2.6.1; Page 51)

Statement showing shortage of toilets/bathrooms in hostels

Sl. No.	Name of the hostel	Student sanctioned strength	Number of toilets and bathrooms to be provided as per norms	Number of toilets provided	Number of bathrooms provided
1.	School Boys Hostel, Uthamapalyam	200	25	20	10*
2.	School Boys Hostel, Kadamalaikundu	65	8	8	2
3.	School Boys Hostel, Cumbum	50	6	6	4
4.	School Girls Hostel, Melagudalur	70	12	16	19
5.	School Boys Hostel, Vathalagundu, Dindigul	130	16	4	4
6.	School Boys Hostel, Vellamalaipatti	50	6	3	2
7.	School Boys Hostel, Vickkiramangalam	60	8	6*	4
8.	School Boys Hostel, Vagurani	50	6	3	3
9.	School Boys Hostel, Thummakundu	112	14	4	3
10.	School Girls Hostel, Thirumangalam, Madurai	131	22	10	10

* Under repairs and unusable.

Appendix 3.10

(Reference: Paragraph 3.2.6.2; Page 52)

Shortage of manpower in the test-checked Hostels

Post		2014-15	2015-16	2016-17
Warden/Matron	Sanctioned	16	16	16
	Actual	13	15	14
	Vacant	3	1	2
	<i>Vacancy percentage</i>	<i>18.75</i>	<i>6.25</i>	<i>12.5</i>
Cook/Assistant Cook	Sanctioned	31	31	31
	Actual	21	23	21
	Vacant	10	8	10
	<i>Vacancy percentage</i>	<i>32.26</i>	<i>25.81</i>	<i>32.26</i>
Sanitary workers	Sanctioned	16	16	16
	Actual	10	8	8
	Vacant	6	8	8
	<i>Vacancy percentage</i>	<i>37.5</i>	<i>50</i>	<i>50</i>
Watchman	Sanctioned	38	40	40
	Actual	33	31	35
	Vacant	5	9	5
	<i>Vacancy percentage</i>	<i>13.5</i>	<i>22.5</i>	<i>12.5</i>

(Source: Information furnished by the department)

Appendix 3.11

(Reference: Paragraph 3.3.1; Page 55)

Pension schemes, funding pattern, scheme benefits and eligibility criteria

Sl. No.	Scheme Name	Funding pattern	Amount of pension payable (in ₹)	Eligibility Criteria
1.	Indira Gandhi National Old Age Pension Scheme (IGNOAPS)	Partially funded by GoI	1,000	60 years and above; Destitute and belonging to Below Poverty Line (BPL) family (The pension of ₹ 200 is reimbursed by GoI to the GoTN for the beneficiaries between the age group of 60-79 years and ₹ 500 is reimbursed for the beneficiaries beyond 80 years).
2.	Indira Gandhi National Widow Pension Scheme (IGNWPS)	Partially funded by GoI	1,000	Should be a widow; 40 years and above; Destitute and belonging to Below Poverty Line (BPL) family. (The pension of ₹ 300 is reimbursed by GoI to the GoTN for the beneficiaries between the age group of 40-79 and ₹ 500 is reimbursed for the beneficiaries beyond 80 years).
3.	Indira Gandhi National Disability Pension Scheme (IGNDPS)	Partially funded by GoI	1,000	18 years and above; Disability level 80 <i>per cent</i> and above, belonging to Below Poverty Line (BPL) family (The pension of ₹ 300 is reimbursed by GoI to the GoTN for the beneficiaries between the age group of 18-79 years and ₹ 500 is reimbursed for the beneficiaries beyond 80 years).
4.	Destitute Widow Pension Scheme (DWPS)	GoTN	1,000	Destitute; 18 years and above and should be a widow.
5.	Differently Abled Pension Scheme (DAPS)	GoTN	1,000	18 years and above; Disability level 40 <i>per cent</i> and above.
6.	Destitute/Deserted Wives Pension Scheme (DDWPS)	GoTN	1,000	Destitute; 30 years and above; Must be legally divorced or deserted for not less than five years (or) obtained legal separation certificate from a competent Court of Law.
7.	Unmarried, Poor, Incapacitated Women Pension Scheme (UWPS)	GoTN	1,000	Destitute; should have completed 50 years; should be an unmarried woman.
8.	Chief Minister's Uzhavar Pathukappu Thittam (CMUPT)	GoTN	1,000	Destitute; 60 years and above; Landless agricultural labourer.

Appendix 3.12

(Reference: Paragraph 3.3.1; Page 56)

List of sampled districts, taluks and villages

District Name	Taluk Name	Sl. No.	Village Name
Vellore	Natrampalli	1.	Puthagaram
		2.	Vilakkalnatham
		3.	Paniyandapalli
	Tirupathur	4.	Tirupathur Town
		5.	Madapalli
		6.	Bommikuppam
	Katpadi	7.	Dharapadavedu
		8.	Kalinjur
		9.	Katpadi
Tiruvannamalai	Kalasapakkam	10.	Ketavarampalayam
		11.	Adamangalam
		12.	Siruvaloor
	Polur	13.	Polur
		14.	Aliyapet
		15.	Padavedu
	Arni	16.	Arni East
		17.	Arni West
		18.	Kannamangalam
Theni	Theni	19.	Allinagaram
		20.	Veerapandi
		21.	Koduvilarpatti
	Bodinayakanur	22.	Melachockanathapuram
		23.	Bodi (Town)
		24.	Rasingapuram
	Andipatti	25.	Myladumparai
		26.	Kadamalaiyandu
		27.	Megamalai

Appendix 3.13

(Reference: Paragraph 3.3.2.1; Page 56)

Scheme-wise and year-wise number of beneficiaries and expenditure

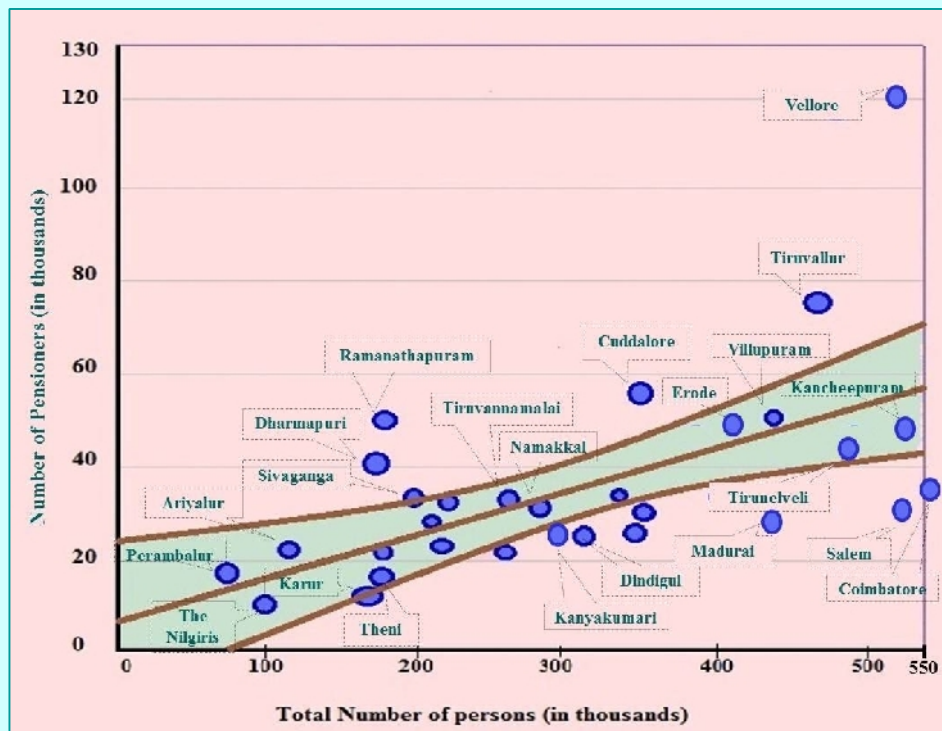
Scheme	Number of Beneficiaries			Expenditure (₹ in crore)		
	2014-15	2015-16	2016-17	2014-15	2015-16	2016-17
IGNOAPS	13,63,625	13,59,010	13,04,357	1,859.91	1,667.11	1,638.71
IGNWPS	5,84,413	5,58,073	5,28,794	787.26	698.55	667.57
IGNDPS	62,337	58,355	56,217	83.74	74.45	70.02
DWPS	4,24,012	4,25,335	4,17,564	568.41	515.61	519.40
DAPS	2,00,600	2,07,422	2,18,572	260.75	252.09	258.29
DDWPS	1,19,759	1,18,909	1,14,248	156.78	147.14	142.90
UWPS	21,016	21,165	21,141	27.99	25.91	26.34
CMUPT	3,35,251	3,21,493	3,10,514	673.85	603.09	590.42
Total	31,11,013	30,69,762	29,71,407	4,418.69	3,983.95	3,913.65

Appendix 3.14

(Reference: Paragraph 3.3.2.2; Pages 57 and 58)

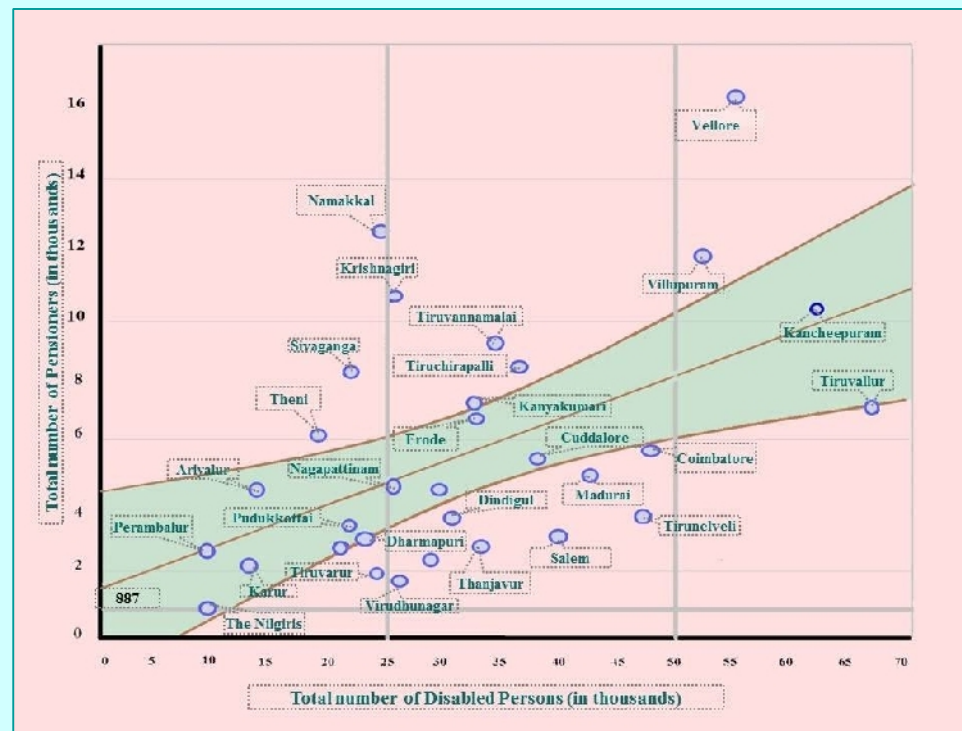
Scheme-wise number of beneficiaries versus target population

IGNOAPS



District-wise comparison of target population with total IGNOAP pensioners

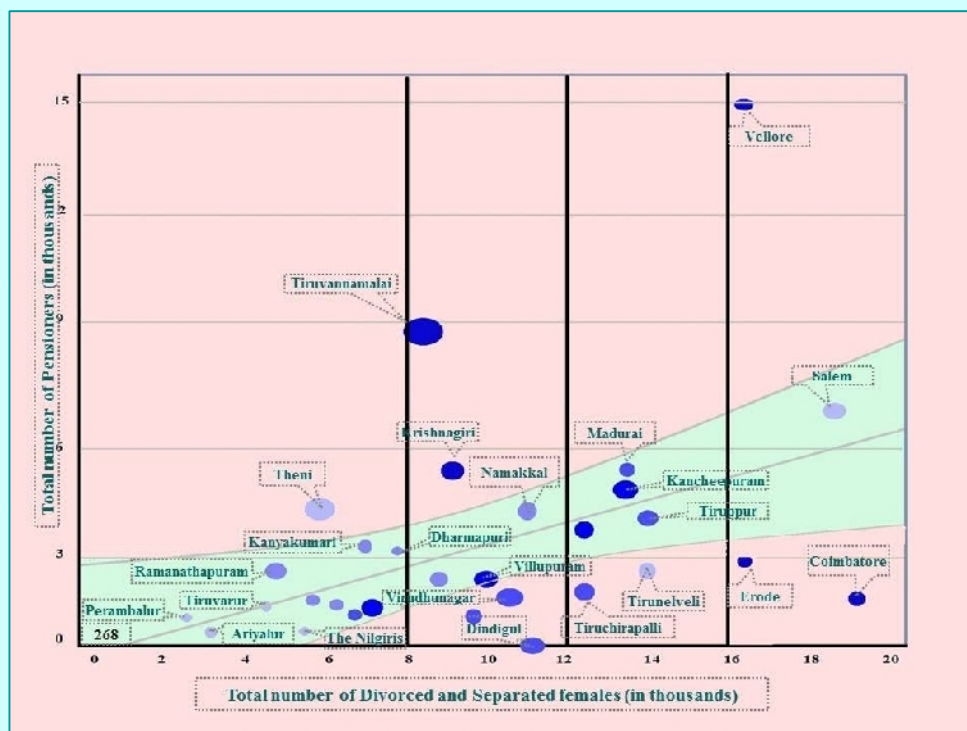
DAPS



District-wise comparison of disabled persons with total DAPS pensioners

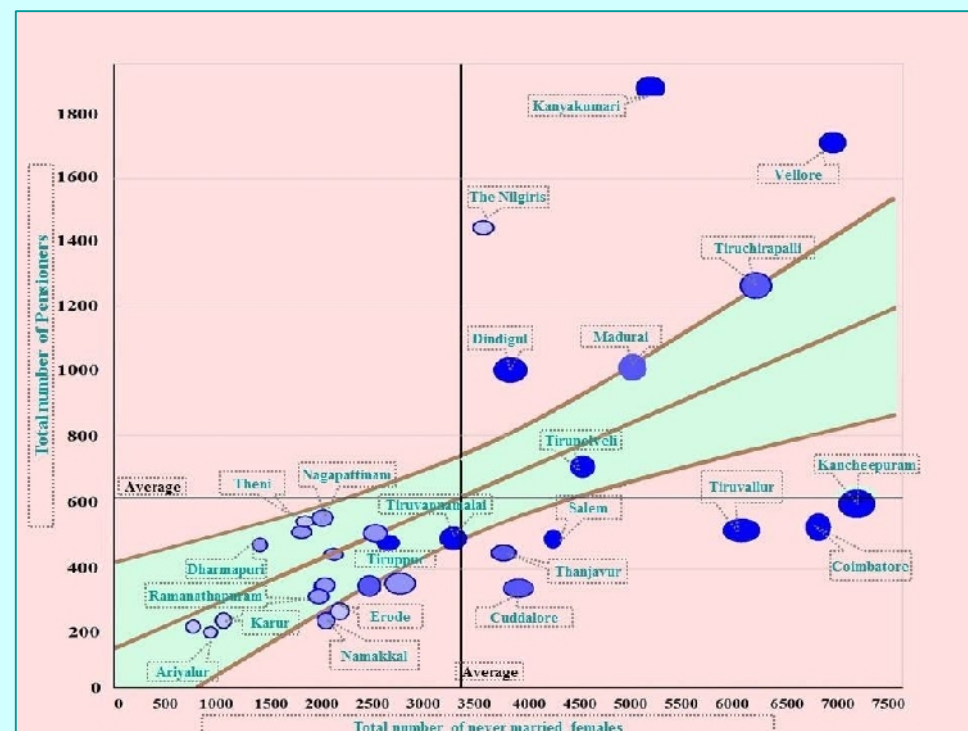
Appendix 3.14 (Contd.)
 (Reference: Paragraph 3.3.2.2; Pages 57 and 58)

DDWPS



District-wise comparison of Divorced and separated females above 30 years with total DDWP pensioners

UWPS

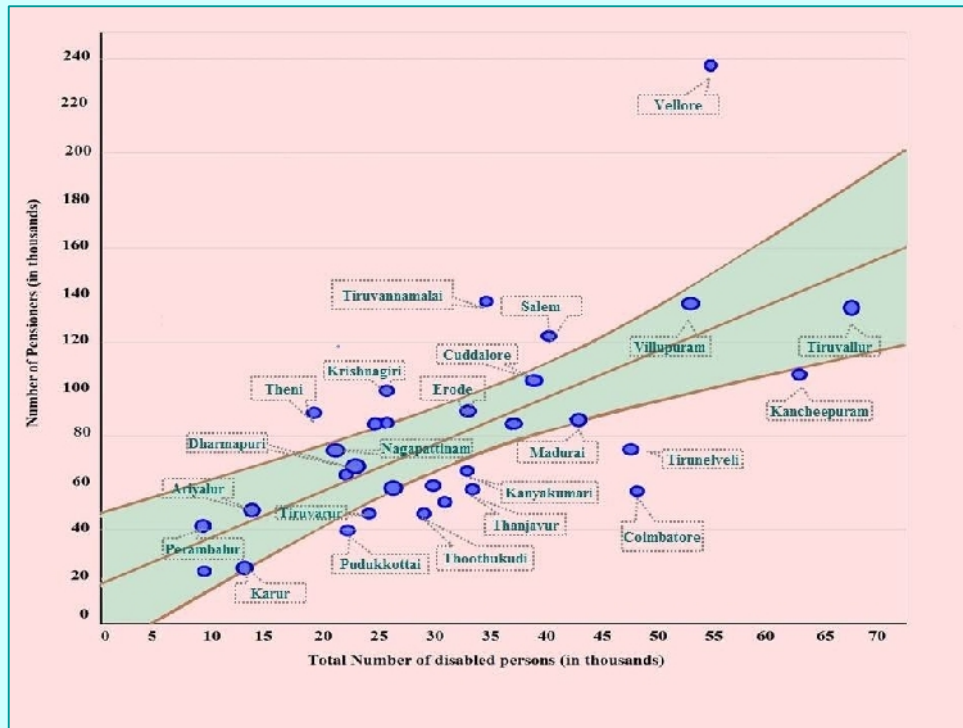


District-wise comparison of Unmarried females with total UWPS pensioners

Appendix 3.14 (Contd.)

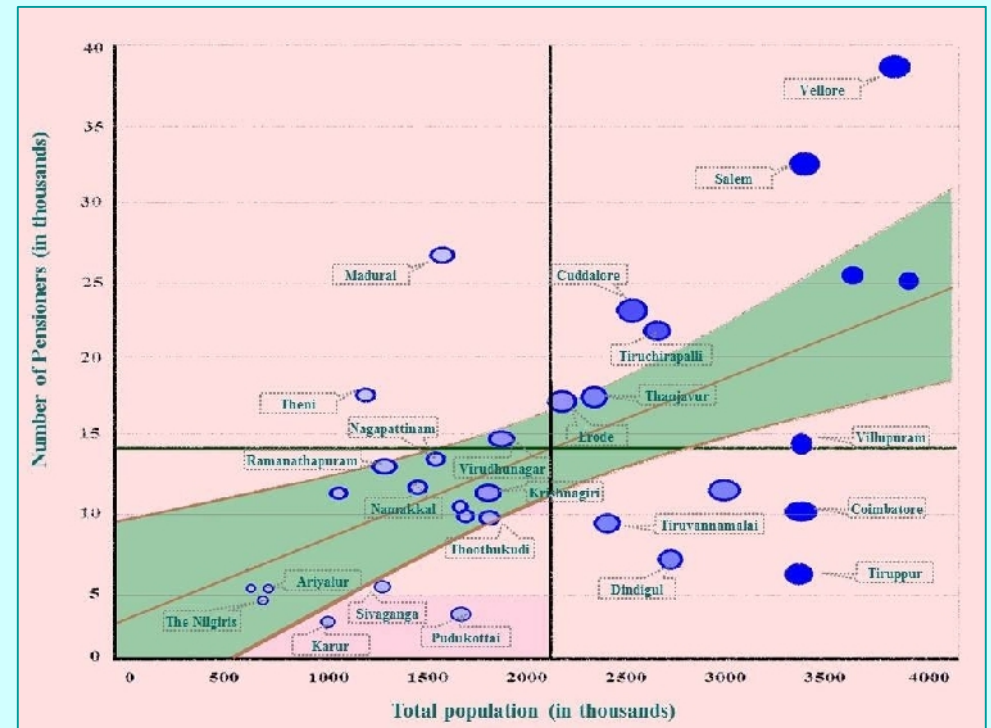
(Reference: Paragraph 3.3.2.2; Pages 57 and 58)

IGNDPS



District-wise comparison of total number of disabled persons with disabled pensioners

IGNWPS

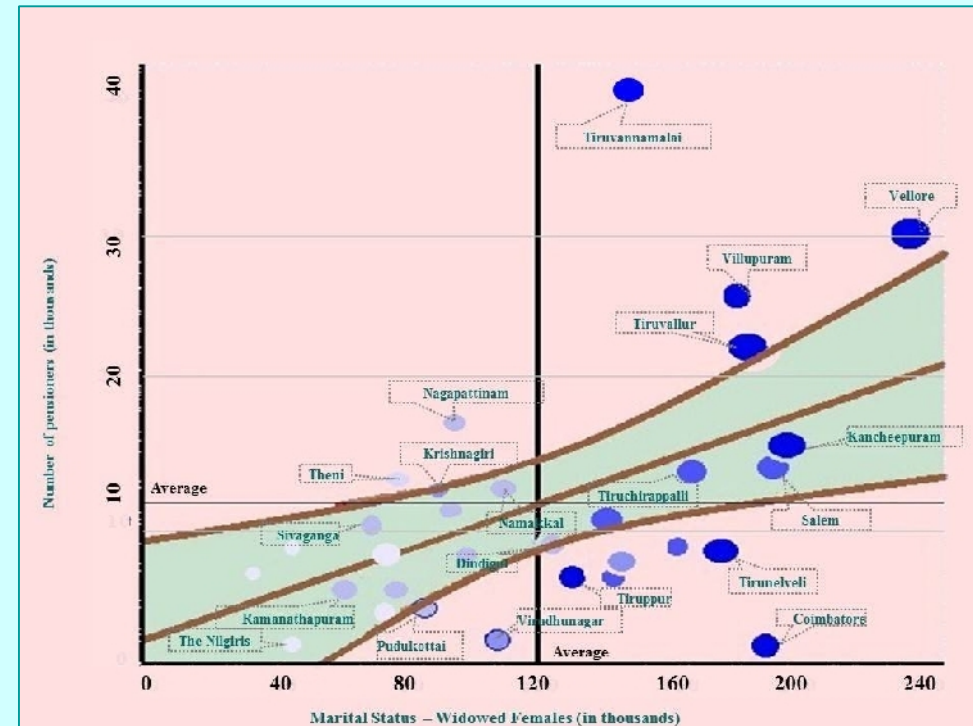
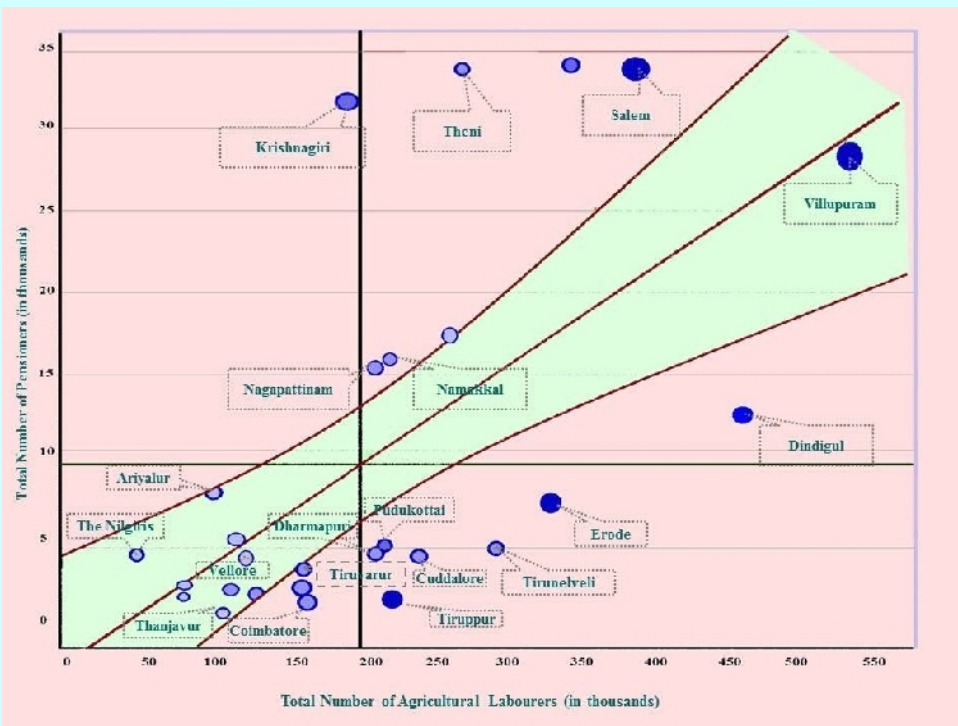


District-wise comparison of total population with total widow pensioners

Appendix 3.14 (Concl.)
 (Reference: Paragraph 3.3.2.2; Pages 57 and 58)

CMUPT

DWPS



District-wise comparison of total agricultural labourers with total CMUPT pensioners

District-wise comparison of total widow females with total widow pensioners

Appendix 3.15

(Reference: Paragraph 3.3.2.2; Page 58)

Disparity between districts in number of beneficiaries as a proportion to the target population

Name of the scheme	Top outliers - Districts			Bottom outliers - Districts			Data used
Chief Minister's Uzhavar Padhukappu Thittam (CMUPT)	Thiruvannamalai	Salem	Theni	Tiruvallur	Tiruppur	Karur	Pensioners vs. Total agricultural labourers (total agricultural labourers; total illiterates; total population).
Differently Abled Pension Scheme (DAPS)	Vellore	Villupuram	Thiruvannamalai	Salem	Thanjavur	Virudunagar	Pensioners vs. Total disabled persons.
Destitute/Deserted Wives Pension Scheme (DDWPS)	Vellore	Thiruvannamalai	Madurai	Dindigul	Coimbatore	Thanjavur	Pensioners vs. Total female population (female workers; female illiterates; female population).
Destitute Widows Pension Scheme (DWPS)	Vellore	Thiruvannamalai	Villupuram	Virudunagar	Tiruppur	Coimbatore	Pensioners vs. Marital status widowed females (total population; total illiterates; total non-workers).
Unmarried, Poor, Incapacitated Women Pension Scheme (UWPS)	The Nilgiris	Vellore	Kanyakumari	Cuddalore	Erode	Villupuram	Pensioners vs. Total female population.
Indira Gandhi National Disability Pension Scheme (IGNDPS)	Vellore	Villupuram	Cuddalore	Dindigul	Thiruvannamalai	Namakkal	Pensioners vs. Total number of disabled persons.
Indira Gandhi National Old Age Pension Scheme (IGNOAPS)	Vellore	Cuddalore	Ramand	Dindigul	Thanjavur	Tiruppur	Pensioners vs. Total illiterates and non-workers.
Indira Gandhi National Widow Pension Scheme (IGNWPS)	Vellore	Salem	Madurai	Pudukottai	Dindigul	Tiruppur	Pensioners vs. Total illiterates and non-workers.

* Seems to be no overall pattern between agricultural labours and pensioners in CMUPT. Higher illiteracy could be the factor affecting the higher enrolment in the district but Tiruppur can be considered as an outlier in this case. Agricultural labourers are higher in Dindigul as compared to Salem and Thiruvannamalai but enrolment is less.

** Thiruvannamalai has the higher ratio of enrolment despite being less population of widows, less female illiteracy and less female non-workers as compared to Vellore. Coimbatore has lower enrolment but population of widows is higher than Thiruvannamalai, despite the factors illiteracy and non-workers are similar. Cuddalore and Thiruvannamalai are almost comparable in every aspect as above but enrolment is higher in Thiruvannamalai.

*** Vellore has the higher ratio of enrolment compared to all the other districts. Coimbatore has the lower enrolment as compared to Vellore but never Married (Un- married) females are almost comparable, illiteracy might be the factor as Vellore has the higher illiteracy compared to Coimbatore. The Nilgiris has less enrolment as compared to Perambalur in factors like illiteracy and non-workers despite being less population of Un-married females.

Tiruppur can be roughly compared to Cuddalore in terms of population of widowed females but has the lower enrolment. It can be inferred that district having higher illiteracy has higher enrolment but Tiruppur and Madurai seems to be significant outliers. Tiruppur has higher illiteracy and higher non-workers but less enrolment as compared to Madurai.

Appendix 3.16
(Reference: Paragraph 3.4.1; Page 67)
Expiry of medicines

(Value in ₹)

Sl. No.	Drug code	Drug Name*	Procurement		Actual consumption (2014-16)		Percentage of consumption to procurement	Drugs expired	
			Quantity	Value	Quantity	Value		Quantity	Value
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1.	771	Amoxicillin and Pottassium Clavulanate Tab IP	30,74,500	51,99,594.40	16,66,000	28,17,762.88	54	14,08,500	23,81,831.52
2.	774	Carboplatin Inj IP 10 mg/ml	16,590	2,40,93,558.36	12,862	1,84,57,300.84	77	3,728	56,36,257.52
3.	783	Doxorubicin Inj IP 2 mg/ml	41,800	55,63,998.00	12,406	16,37,310.06	30	29,394	39,26,687.94
4.	793	Methyl Prednisolone Tab IP 8 mg	14,50,000	39,91,995.00	2,84,400	7,83,095	18	11,65,600	32,08,900.00
5.	797	Paclitaxel Inj Ip 100 mg	28,900	90,46,113.20	15,977	49,52,226.20	69	12,923	40,93,887.00
		Total							1,92,47,563.98

* Only those drugs where the value of expired quantity was more than ₹ 10 lakh

Appendix 3.17

(Reference: Paragraph 3.5.1; Page 71)

Particulars of delays that arose in settling the contractor's bills

Sl. No.	Name of the work	Agreement Value (₹ in crore)	Value of work done (₹ in crore)	Value of bills paid (₹ in crore)	Bill Submitted by the contractor on	Bill passed by Building section on	Approved by Building Committee on	Approved by Syndicate on	Payment made to contractor on	Delay in paying the bills* col. 6 (-) col 10
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
1.	Civil Works	24.20								
	I and part bill		5.14	5.14	03/01/13	31/01/13	12/02/13	18/02/13	13/03/13	49 days
	II and part bill		2.90	2.90	11/03/13	20/03/13	22/04/13	26/04/13	29/05/13	59 days
	III and part bill		0.99	0.99	07/07/13	19/07/13	07/08/13	27/08/13	27/09/13	62 days
	IV and part bill		4.23	4.23	10/09/13	26/09/13	03/10/13	11/10/13	19/11/13	50 days
	V and part bill**		2.47	2.47	07/11/13	02/12/13 05/12/13	02/12/13 23/12/13	09/12/13 26/12/13	12/12/13 06/03/14	15 days 99 days
	VI and part bill**		2.35	2.35	10/02/14	24/02/14 09/04/14	03/10/13 12/05/14	11/10/13 19/05/14	28/03/14 04/07/14	26 days 124 days
	VII and part bill		1.82	1.82	16/07/14	17/11/14	17/12/14	22/12/14	01/12/16	849 days
	VIII and part bill		1.12
2.	Sanitation and Water Supply	4.96	2.71	2.65	11/08/14	25/08/14	17/12/14	22/12/14	23/02/17	907 days
3.	Electrical	5.74	0.28
4.	Elevation	1.00	0.51	0.24	17/07/14	28/07/14	17/12/14	22/12/14	28/10/16	814 days
Total		35.90	24.52	22.79						

* Adjusted for the time allowed for processing, approval and payment i.e.20 days.

** Paid in two parts @ 70 per cent and 30 per cent respectively.

Appendix 3.18

(Reference: Paragraph 3.5.2; Page 75)

Avoidable expenditure on purchase of furniture for colleges

Sl. No.	Description of items	Quantity supplied by TANSI (in numbers)	Rate at which purchase was made from TANSI (₹)	Discount* offered by TANSI (₹)	Rate of purchase from TANSI after discount col. 4 (-) col. 5 (₹)	Corresponding rate of TNKVIB (₹)	Rate of TANSI in excess over TNKVIB rate col. 6 (-) col. 7 (₹)	Total avoidable excess expenditure col. 3 (x) col. 8 (₹)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1.	Teacher's Table for class room	2,648	2,344	234	2,110	1,500	610	16,15,280
2.	Teacher's Table for staff room	2,959	10,513	1,051	9,462	6,750	2,712	80,24,808
3.	Teacher's Chair for classroom	2,693	3,897	390	3,507	2,000	1,507	40,58,351
4.	Teacher's Chair for staff room	3,662	3,897	390	3,507	2,000	1,507	55,18,634
5.	Desk and Bench for students	13,922	10,493	1,049	9,444	5,400	4,044	5,63,00,568
6.	Library Table	2,224	13,145	1,315	11,830	6,500	5,330	1,18,53,920
7.	Library Chair	9,049	3,897	390	3,507	2,000	1,507	1,36,36,843
8.	Computer Table	5,874	9,585	959	8,626	3,000	5,626	3,30,47,124
9.	Notice Board (Glass framed)	1,085	6,430	643	5,787	3,900	1,887	20,47,395
10.	Notice Board (Wire framed)	920	6,810	681	6,129	4,250	1,879	17,28,680
11.	Library Cupboard (Glass)	3,719	11,065	1,107	9,958	9,600	358	13,31,402
Total								13,91,63,005 i.e. ₹ 13.92 crore

* TANSI as a sales promotion measure and gesture of goodwill provided (April 2014) bulk discount of 10 per cent on the total sales bill paid by eligible Government Departments in 2013-14.

Appendix 3.19

(Reference: Paragraph 3.6.1; Page 77)

Standardised guard/escort/bandobust charges fixed in August 2008

Standard Cost for Guard Duty				
Rank of the Police Personnel		Charges per month per each personnel		
Grade I/Grade II Police Constable		₹ 15,000		
Head Constable		₹ 18,100		
Sub Inspector of Police		₹ 24,000		
Inspector of Police		₹ 30,000		
Standard Cost for Escort Duty				
Rank	Below 12 Hrs (₹)	Above 12 Hrs (₹)	One day (₹)	One day and Less than 12 Hrs (₹)
Inspector of Police	700	1,000	1,400	2,100
Sub Inspector of Police	500	700	900	1,400
Head Constable	350	500	700	1,050
Police Constable	300	450	600	900
Standard Cost for Bandobust to Private Mega Events				
Rank	Below 12 Hrs (₹)	Above 12 Hrs (₹)	One day (₹)	One day and Less than 12 Hrs (₹)
Inspector	1,200	1,800	2,400	3,600
Sub Inspector of Police	700	1,100	1,400	2,100
Head Constable	600	900	1,200	1,800
Police Constable	500	700	1,000	1,500

Appendix 3.20

(Reference: Paragraph 3.6.1; Page 78)

Details of short-collection of revenue due to non-revision of charges in time

Sl. No.	Name of the Office, District	To be collected* (in ₹)		Actually collected (in ₹)		Short collection (in ₹)		
		Charges	Supervision and Amenities fund	Charges	Supervision and Amenities fund	Charges	Supervision and Amenities fund	Total
(a) Guard Charges								
1.	Commissioner of Police, Chennai	65,79,35,853	13,15,87,173	24,63,73,889	0	41,15,61,964	13,15,87,173	54,31,49,137
2.	Superintendent of Police, Thoothukudi	5,34,10,562	1,06,82,111	1,97,15,278	39,43,055	3,36,95,284	67,39,056	4,04,34,340
3.	Commandant TSP X Battalion Ulundurpet, Villupuram	12,58,21,537	2,51,64,302	4,37,27,180	0	8,20,94,357	2,51,64,302	10,72,58,659
4.	Superintendent of Police, Dindigul	4,43,79,884	88,75,976	1,65,04,127	0	2,78,75,757	88,75,976	3,67,51,733
5.	Superintendent of Police, Krishnagiri	5,17,46,826	1,03,49,364	1,26,75,921	0	3,90,70,905	1,03,49,364	4,94,20,269
6.	Commandant, TSP II Avadi, Tiruvallur	95,12,499	19,02,500	31,39,224	4,39,232	63,73,275	14,63,268	78,36,543
7.	Commandant, TSP XIII Poonamallee, Tiruvallur	14,36,17,245	2,87,23,453	4,04,93,481	0	10,31,23,764	2,87,23,453	13,18,47,217
Total		1,08,64,24,406	21,72,84,879	38,26,29,100	43,82,287	70,37,95,306	21,29,02,592	91,66,97,898
(b) Escort Charges								
1.	Commissioner of Police, Tiruppur	6,07,029	1,21,407	2,20,346	44,350	3,86,683	77,057	4,63,740
2.	Superintendent of Police, The Nilgiris	11,36,464	2,27,299	4,00,365	56,810	7,36,099	1,70,489	9,06,588
3.	Superintendent of Police, Tiruvarur	52,51,274	10,50,249	17,89,580	3,200	34,61,694	10,47,049	45,08,743
4.	Superintendent of Police, Thoothukudi	2,10,24,394	42,04,878	50,28,200	5,250	1,59,96,194	41,99,628	2,01,95,822
5.	Superintendent of Police, Jeyamkondan, Ariyalur	3,85,691	77,138	91,018	3,184	2,94,673	73,954	3,68,627
Total		2,84,04,852	56,80,971	75,29,509	1,12,794	2,08,75,343	55,68,177	2,64,43,520
(c) Bandobust Charges								
1.	Commissioner of Police, Chennai	4,59,46,320	91,89,264	1,93,45,200	0	2,66,01,120	91,89,264	3,57,90,384
2.	Commissioner of Police, Tiruppur	3,77,482	4,548	1,10,600	22,120	2,66,882	-17,572	2,49,310
Total		4,63,23,802	91,93,812	1,94,55,800	22,120	2,68,68,002	91,71,692	3,60,39,694
Grand Total (a) + (b) + (c)						75,15,38,651	22,76,42,461	97,91,81,112 or ₹ 97.92 crore

* Calculated based on the revised charges worked out in Audit and data on manpower and duration for which deployed as furnished by the Department.

Appendix 3.21
(Reference: Paragraph 3.6.2; Page 81)
Details of possible additional burden

(₹ in crore)

Year	Drugs and consumables	Institutional development	Total
January 2015-January 2016	3.35	1.48	4.83
January 2016-January 2017	3.07	1.31	4.38
January 2017-July 2017	1.13	0.48	1.61
Total	7.55	3.27	10.82

Glossary of abbreviations

Abbreviations	Full Form
ADGP-TC	Additional Director General of Police, Technical Cell
APCMS	Agricultural Producers Cooperative Marketing Societies
BDO	Block Development Officer
BEL	Bharat Electronics Limited
CAG	Comptroller and Auditor General of India
CLA	Commissioner of Land Administration
CM Insurance Scheme	Chief Minister's Comprehensive Health Insurance Scheme
CMUPT	Chief Minister's Uzhavar Padhukappu Thittam
CRA	Commissioner of Revenue Administration
CSE	Coimbatore Stock Exchange
DAPS	Differently Abled Pension Scheme
DCE	Director of Collegiate Education
DDWPS	Destitute/Deserted Wives Pension Scheme
DGP	Director General of Police
DME	Director of Medical Education
DPC	Duties, Powers and Conditions of Services
DWPS	Destitute Widows Pension Scheme
ECIL	Electronics Corporation of India Limited
EDL	Essential Drug List
EE	Executive Engineer
GCC	Greater Chennai Corporation
GLR	Government Land Registry
GoI	Government of India
GoTN	Government of Tamil Nadu
Ha	hectare
HLC	High Level Committee
Hospital	Government Stanley Medical College Hospital
HSSs	Higher Secondary Schools
ICMR	Indian Council of Medical Research
IDE	Institute of Distance Education
IGNDPS	Indira Gandhi National Disability Pension Scheme
IGNOAPS	Indira Gandhi National Old Age Pension Scheme

Glossary of abbreviations (Contd.)

Abbreviations	Full Form
IGNWPS	Indira Gandhi National Widow Pension Scheme
IGP	Inspector General of Prisons
IRs	Inspection Reports
JD, KR	Joint Director of Kallar Reclamation
KR Schools	Kallar Reclamation Schools
LKG	lower kindergarten
MBC&DNC Welfare	Most Backward Classes & De-notified Communities Welfare
MSO	Medical Stores Officer
NABARD	National Bank for Agriculture and Rural Development
NCDC	National Cooperative Development Corporation
NOC	No Objection Certificate
OAH	Old Age Homes
OSR	Open Space Reservation
PAC	Public Accounts Committee
PACCS	Primary Agricultural Cooperative Credit Societies
PET	Physical Education Teacher
PGT	Post Graduate Teacher
PK	Piramalai Kallar
POB	Prohibitive Order Book
PPL	Produce Pledge Loan
PWD	Public Works Department
RCS	Registrar of Cooperative Societies
RDO	Revenue Divisional Officer
RGGGH	Rajiv Gandhi Government General Hospital
RSO	Revenue Standing Order
SDL	Speciality Drug List
SGT	Secondary Grade Teachers
TANSI	Tamil Nadu Small Industries Corporation Limited
TCMC	Tiruchirappalli City Municipal Corporation
TNHB	Tamil Nadu Housing Board

Glossary of abbreviations (Concl.)

Abbreviations	Full Form
TNHSS	Tamil Nadu Health System Society
TNKVIB	Tamil Nadu Khadi and Village Industries Board
TNLE	TN Land Encroachment
TNMSC	Tamil Nadu Medical Services Corporation Limited
TNPTEE	Tamil Nadu Protection of Tanks and Eviction of Encroachment
TRB	Teachers Recruitment Board
UIIC	United India Insurance Company
UWPS	Unmarried Poor Incapacitated Women Pension Scheme
VAO	Village Administrative Officer
VC	Vice-Chancellor
WDRA	Warehousing Development and Regulatory Authority
WRD	Water Resources Department

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