Chapter-IV

Infrastructure, organisation and management of Direct Benefit Transfer

Chapter-IV

Infrastructure, organisation and management of Direct Benefit Transfer

4.1 State Direct Benefit Transfer Cell

Paragraph 2.1 of Protocol Document on Direct Benefit Transfer (DBT) in States (June 2017) prescribes for constitution of DBT Cell at State level to enable adoption and understanding of the DBT framework. Further, Guidelines for State DBT Cell issued by DBT Mission, GoI provide that DBT Cell in the States is expected to be the one-stop point for coordinating all efforts for bringing and implementing schemes on to DBT. The DBT Cell has been divided into three components namely - (i) Advisory Board; (ii) State DBT Co-ordinator; and (iii) Implementation Support Layer.

The GoP, in order to coordinate the activities of DBT Cell, nominated (July 2017) the Secretary to Government of Punjab, Department of Finance, Directorate of Institutional Finance and Banking as State Nodal Officer of State DBT Cell (State DBT Co-ordinator), the charge of which was transferred (June 2020) to the Additional Secretary-cum-Director, Department of Governance Reforms and Public Grievances (DGRPG), GoP. The activities of State DBT Cell, noticed during the course of audit, are discussed in the succeeding paragraphs.

4.1.1 Constitution of State Advisory Board

In accordance with the Guidelines for State DBT Cell, the Government of Punjab, Department of Finance constituted (November 2017) State Advisory Board (SAB) to DBT Cell having 20 members from various departments/organisations under the chairmanship of Chief Secretary to Government of Punjab. As per Guidelines for State DBT Cell, the chief role of SAB was to provide the Cell's executive body, a holistic and well-rounded advisory and consulting inputs. Since this unit witnesses the representation from all stakeholders, its advisory shall ensure that the Cell's operations are not exclusionary and are in sync with the interests of DBT's various enablers. The guidelines further provide that SAB may meet once in a quarter or in any other regular interval, as deemed fit. However, no meeting of SAB was held during 2017-2021 (up to July 2020).

During exit conference, the Director, DGRPG, while apprising about holding of first meeting of SAB in March 2021, stated (July 2021) that meeting would now be held after every six months.

4.1.2 Implementation Support Layer

(i) The Implementation Support Layer consisting of three coordinators of the rank of Director or Officer on Special Duty (OSD), responsible for technical, non-technical, and finance and administration support to the Cell's operations for eliciting cooperation and participation from the grass-root levels required to be constituted, as per Guidelines for State DBT Cell, had not been constituted (December 2020).

During exit conference, the Director, DGRPG stated (July 2021) that Associate Principal Consultant (UID-PMU) had been deputed (June 2020) as Project Manager for end-to-end operations of the State DBT Cell Project which included technical as well as administrative support and Head of the Finance Branch of the Department i.e. Assistant Controller, Finance and Accounts (ACFA) could be assumed as Financial Support for the State DBT Cell as no separate notification was issued in this regard. It was added that file for constitution of Implementation Support Layer in line with the DBT mission framework would be sent to the Chief Secretary, Government of Punjab for consideration.

(ii) Guidelines for State DBT Cell issued by DBT Mission, GoI provide that as a part of implementation support, the State DBT Cell shall provide training and support in capacity building of State officials on DBT. The guidelines further provide for organising exposure visits for the State/district officials in DBT progressive States for familiarising them with model practices, besides, conducting bench-marking studies on Best Practices, running innovations in the State through pilots/experiments and developing roadmap to incorporate those practices in State operations.

Audit observed that during the period from 2017-18 to 2020-21 (up to July 2020):

• Neither any training calendar was prepared nor was any training on DBT provided to State officials by the State DBT Cell.

• No exposure visits for State/district officials in DBT progressive States[1] were arranged by the State DBT Cell for familiarising the officials with model practices being adopted by those states.

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[1] Haryana, Uttar Pradesh, Tripura, etc.

- Neither any benchmark studies were conducted on Best Practices for developing roadmap to incorporate those practices in State operations nor was any innovation in the State through pilots/experiments carried out by the State DBT Cell.

The DSSWCD admitted (October 2020) the above audit observations. During exit conference, the Director, DGRPG stated (July 2021) that no record on training, exposure visits and benchmark studies arranged before May 2020 was found. However, since reconstitution (July 2020) of State DBT Cell, regular review meetings were being held with the stakeholder departments for monitoring and compliance purposes. It was added that shortage of manpower and non-provision of separate budget for State DBT cell were major bottlenecks in constitution of Implementation Support Layer in the State DBT cell as per DBT framework.

4.1.3 *Robust governance framework*

Paragraph 2.4 of the Protocol Document on DBT in States (June 2017) provides for a robust governance framework at the State level to continuously monitor the readiness of schemes and programmes. The Governance framework would operate under State DBT Cell and shall be responsible for (i) DBT applicability assessment of schemes and programmes; (ii) consultations with stakeholders on DBT; (iii) beneficiary digitisation analysis and recommendations; (iv) DBT on-boarding of schemes and programmes; (v) monitoring scheme on-boarding progress; and (vi) providing programme management support.

Audit, however, observed that robust governance framework was lacking at State level to continuously monitor the readiness of schemes and programmes. No workshop, seminar, etc. to operationalise DBT was conducted either by the State DBT Cell or DSSWCD during the period of audit (up to June 2020), in contravention of the provisions *ibid*.

It was further noticed that all 127 schemes (cash transfer: 94; and in-kind transfer/others: 33) across 17 departments/entities were brought on the DBT platform as of July 2020. However, Information Communication Technology (ICT) applications in respect of 42 schemes (cash transfer: 33 including 08 in DSSWCD; and in-kind transfer: 09) had only been developed, leaving behind 85 schemes (cash transfer: 61; and in-kind transfer/others: 24) of twelve departments [2], for which no timeline had been fixed by the

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[2]   (i) Department of Social Justice, Empowerment and Minorities (37); (ii) Department of Animal Husbandry (05); (iii) Department of Defence Services Welfare (10); (iv) Department of Horticulture (01); (v) Punjab Municipal Infrastructure Development Company (01); (vi) Department of Technical Education and Industrial Training (02); (vii) Department of Forests and Wildlife Preservation (01); (viii) Department of Social Security and Women and Child Development (15); (ix) Department of School Education (02); (x) Department of Health and Family Welfare (05); (xi) Department of Agriculture and Farmers' Welfare (04); and (xii) Punjab Skill Development Mission (02).

Department (October 2020), as envisaged in the Guidelines for State DBT Cell issued by DBT Mission (GoI).

During exit conference, the Director, DGRPG stated (July 2021) that the SAB in its first meeting (March 2021) had given in-principle approval for building of an integrated DBT solution for the State within a period of 7-9 months. It was added that non-provision of separate budget for the State DBT cell was a major bottleneck to continuously monitor the readiness of schemes and programmes. Further, testing of DBT schemes in National Informatics Centre (NIC) portal had also been taken-up to bring the schemes on NIC platform.

4.1.4 *Non-constitution of departmental DBT Cell/Committee*

Paragraph 2.1 of Protocol Document on DBT in States provides that apart from State DBT Cell, individual departments shall also constitute a DBT Cell/Committee within each department, so as to ensure that DBT framework is adopted in implementation of schemes.

The State DBT portal displayed information with regard to 127 schemes (cash transfer: 94; and in-kind transfer/others: 33) across 17 departments/entities under DBT. However, it was observed that no internal DBT Cell/Committee had been constituted in DSSWCD. It was further noticed that the State DBT Cell under DGRPG, also did not have any information regarding constitution of DBT Cell/Committee by the individual departments, which is expected to be the one-stop point for coordinating all efforts for bringing and implementing schemes on to DBT.

During exit conference, the Director, DGRPG stated (July 2021) that internal DBT Cell/Committee had been constituted in 08[3] out of 17 Departments/ entities and confirmation in this regard from remaining nine Departments/ entities had been sought. The Director, DSSWCD assured to take necessary action in this regard. This showed lack of coordination between DGRPG and the implementing departments, as in spite of monthly review meetings being conducted with the implementing departments by DGRPG from July 2020 onwards, the DGRPG was unaware of the establishment of internal DBT Cells/Committees by the respective departments.

4.2 Hosting of State Direct Benefit Transfer Portal

(i) The DGRPG, being the administrative department for State DBT Cell, is hosting the Punjab's DBT Portal *(http://dbt.punjab.gov.in)*, which

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[3] (i) School Education; (ii) Health and Family Welfare; (iii) Defence Services Welfare; (iv) Agriculture and Farmers' Welfare; (v) Technical Education and Industrial Training; (vi) Punjab Municipal Infrastructure Development Company; (vii) Food, Civil Supplies and Consumer Affairs; and (viii) Fisheries.

became operational from August 2017. The Government of India (GoI) issued (January 2009 and February 2019) Guidelines for Indian Government Websites (GIGW). The guidelines recommend policies and guidelines for Indian Government Websites and Portals, at any organisational level and belonging to both Central Government as well as State/UT Governments for making Government websites citizen centric and visitor friendly.

Audit noticed that State DBT Portal was integrated with the DBT Bharat Portal *(https://dbtbharat.gov.in)*, which is an aggregator portal for all DBT related schemes. The State DBT Portal displayed information with regard to 127 schemes across 17 departments in the State. However, the following shortcomings were observed in State DBT Portal being maintained by DGRPG:

➢ Website Quality Certification was not obtained from Standardisation Testing Quality Certification (STQC) - an organisation of Ministry of Electronics and Information Technology (MeitY), GoI, as required under Paragraph 1.4 of GIGW guidelines. During the exit conference, the Director, DGRPG stated that an agency would be engaged to obtain the requisite certification.

➢ The Web Information Manager and Technical Manager were not appointed to ensure proper flow and quality of content to the site, as per paragraphs 10.1.1 and 10.1.2 of GIGW guidelines. During exit conference, the Director, DGRPG stated (July 2021) that Associate Principal Consultant (UID PMU) had been deputed (June 2020) to look after end-to-end operations of the State DBT Cell which included the responsibility of Web Information Manager and Technical Manager for State DBT Portal, however, separate orders had not been issued in this regard. The reply of the Department was not in line with the guidelines *ibid*.

➢ No Content Contribution, Moderation and Approval Policy to ensure authenticity of data and responsibility, authorisation and workflow details with regard to content publishing on State DBT Portal was framed, as required under paragraph 5.2 of GIGW guidelines. During the exit conference, the Director, DGRPG assured to notify the policy at the earliest.

➢ No Website Monitoring Policy was formulated to address and fix the quality and compatibility issues, as per paragraph 10.3 of GIGW guidelines. During the exit conference, the Director, DGRPG stated that Website Monitoring Policy had been formulated in January 2021. Audit, however, observed that no periodicity for monitoring and plan to address and fix the quality and compatibility issues were incorporated in the said policy. The policy formulated by the Department was merely reiteration of the provisions of the guidelines *ibid.*

> ➤ No provision for regional language content on State DBT Portal was made, as required under paragraph 5.7 of GIGW guidelines. During the exit conference, the Director, DGRPG assured compliance at the earliest.

(ii) Paragraph 2.2(4) of Protocol Document on DBT in States provides that the State DBT Portal would require to be conceptualised and implemented to aggregate State level information on benefit transfers. Portal also has anonymous access for public to know about DBT and its progress in the State and it should have functionalities for public *viz.* Home Page, About Us, Scheme, Multimedia, DBT Cell, Documents, Success Story, Contact Us, RTI, FAQ, Feedback and Download.

Examination of State DBT Portal revealed that various information, as detailed in **Table 4.1**, were not made available to public on the Portal.

Table 4.1: Information not available to public on State DBT Portal

Name of the functionality	Information not available to public on Portal
About Us	Provision of guidelines to departments on DBT Standard Operating Procedure (SOP).
Scheme	A list of DBT schemes to be on-boarded.
Multimedia	Images, videos and press articles related to DBT in State.
Documents	Though functionality has been provided but no documents such as circulars, reports, event documents, etc. have been uploaded.
Success Story	State initiatives on DBT success related to control leakages, savings and removal of duplication story in a department or across departments in State.
Download	Section where department can refer for location master which is LGD (Local Government Directory) and State DBT MIS integration approach document as developer toolkit having web service signature or predefined file format for data exchange with State DBT Portal.

Source: Website of State DBT Portal (http://dbt.punjab.gov.in)

During exit conference, the Director, DGRPG stated (July 2021) that these sections were kept blank as there was no content available. The reply of the Department was not convincing as despite making 127 schemes across 17 departments/entities functional under DBT, the requisite information was not made available on the State DBT Portal for general public, as per guidelines *ibid*.

4.3   Non-provision of real time capturing of beneficiary data

The Standard Operating Procedure (SOP) for DBT Bharat Portal (States/UTs) and SOP Modules for Direct Benefit Transfer issued by GoI provides for creation and maintenance of real time MIS Portal.

Audit noticed that no mechanism existed for real time capturing of beneficiaries' data on State DBT Portal. During exit conference, the Director,

DGRPG stated (July 2021) that the data on State DBT Portal was being depicted as per the monthly progress input by the respective departments. It was added that the current State DBT Portal, based on the standard DBT Portal framework provided by the DBT Mission did not have any provision for real time capturing of data. The reply of the Department was not in line with the SOP *ibid*. In the absence of real time capturing of data, current position of DBT schemes, beneficiaries covered, financial assistance disbursed, etc. would not be available on DBT Portal, which may hamper prompt and efficient decision making and monitoring.

4.4 Mismatch of data in Social Security Schemes

Paragraph 1.2 of SOP on DBT Bharat Portal for States/UTs issued by DBT Mission, GoI provides that since the data provided on DBT Portal is available in public domain, State DBT Cell Coordinators are to validate and confirm before entering any details on the Portal. It further provides that the ownership of all State specific information will lie with the States. Further, GoI reiterated (May 2017) that State DBT Nodal Officer would nominate Departmental/Section level officers who would be responsible for the entry of the monthly data of each Centrally Sponsored Scheme and would direct them to register themselves in the DBT MIS Portal. However, responsibility of correctness of data would be with the State DBT Nodal Officer only.

Audit observed that there was a variation ranging between ₹ 34.00 crore and ₹ 4,555.58 crore in respect of the amount of cash transferred to the beneficiaries in three selected scheme *viz.* OAP, FAWDW and FADC under DBT during the period 2017-2021 (up to July 2020), uploaded on the DBT Portal and that supplied by DSSWCD, as detailed in **Table 4.2**.

Table 4.2: **Variation in amount of cash transferred to the beneficiaries in three selected schemes during the period 2017-2021 (up to July 2020)**

(₹in crore)

Name of the Scheme	Year	Cash transferred as per DBT Portal	Cash transferred as per DSSWCD	Variation in figures
Old Age Pension (OAP)	2017-18	5,242.92	687.34	4,555.58
	2018-19	262.06	1,179.04	916.98
	2019-20	246.30	1,399.26	1,152.96
	2020-21 (up to 07/2020)	822.22	629.93	192.29
Financial Assistance to Widows and Destitute Women (FAWDW)	2017-18	399.88	197.95	201.93
	2018-19	24.97	336.02	311.05
	2019-20	102.02	388.58	286.56
	2020-21 (up to 07/2020)	241.74	172.65	69.09

Name of the Scheme	Year	Cash transferred as per DBT Portal	Cash transferred as per DSSWCD	Variation in figures
Financial Assistance to Dependent Children (FADC)	2017-18	206.81	68.66	138.15
	2018-19	8.58	114.51	105.93
	2019-20	23.05	132.13	109.08
	2020-21 (up to 07/2020)	92.07	58.07	34.00

Source: Departmental information

During exit conference, the Director, DSSWCD stated (July 2021) that reconciliation with the DSSOs at district level would be done to sort out the variation in figures and correct figures would be depicted on the State DBT Portal. Whereas, the Director (DGRPG) stated that there was no possibility to check the correctness of the data at the level of State DBT Cell, as the data pertaining to the implementation of the schemes was submitted by the departments concerned after due diligence. It was added that the departments had been directed to upload correct data on the web portal.

The facts remained that due to lack of monitoring at DGRPG level and coordination between State DBT Cell and DSSWCD, the data in respect of amount of cash transferred to the beneficiaries under the selected social security schemes uploaded on the public domain could not be considered as authentic, thereby not adhering to the provisions *ibid*.

4.5 Disaster Recovery and Business Continuity Plan

Paragraph 8.3.4 of GIGW guidelines provides that there could be circumstances wherein due to some natural calamity, the entire data centre where the website is being hosted gets destroyed or ceases to exist. A well planned contingency mechanism has to be in place for such eventualities wherein it should be ensured that the Hosting Service Provider has a 'Disaster Recovery Centre' (DRC) set up at a geographically remote location and the website is switched over to the DRC with minimum delay and restored on the Web.

Audit observed that though PBMS had been hosted on Bharat Sanchar Nigam Limited (BSNL) cloud hired by the DSSWCD, the DGRPG did not have any Disaster Recovery and Business Continuity Plan (DRBCP) for State DBT Portal. This was being maintained locally at State Data Centre (SDC) in Directorate office of DGRPG.

During exit conference, the Director, DGRPG stated (July 2021) that negotiations with firms were being made to set up Disaster Recovery Centre as per the GIGW guidelines.

4.6   Password Policy

The purpose of a password policy is to establish a standard for creation of strong passwords, the protection of those passwords, and the frequency of change of the passwords.   All user-level passwords should be changed periodically. Password should be enforced to be of a certain minimum length and comprising of mix of alphabets, numbers and special characters.

Audit observed that no password policy defining the structure and length of password, periodicity for changing passwords, etc. had been framed.   In the absence of this, it was not mandatory for DSSOs/users of the application to have a password with a combination of upper/lower case-numeric-special characters. The password was also not being changed by the DSSOs of the selected districts and the users of the application on regular basis resulting in inadequate access controls.

During exit conference, the Director, DGRPG stated (July 2021) that currently there was no formal password policy with respect to Social Security Pension Beneficiary Management System, but password related rules such as length (06-12 characters), combination of numerals and alphabets, restriction on use of last 3 passwords while changing password and mandatory password change for every new user on its first login had been implemented. It was admitted that no password expiry rules had been framed so far.   It was added that formal password policy would be prepared and circulated to the concerned departments. The Director, DSSWCD stated that the efforts would be made to implement the password policy. It was further intimated (February 2022) that a Cyber Security Consultant had been appointed in June 2021.

4.7   Conclusions

There was scope of improvement in infrastructure, organisation and management of DBT as could be seen from the following inconsistencies noticed during the performance audit:

➢ The State Advisory Board (SAB) had been constituted (November 2017) in the State of Punjab.   However, no meeting of SAB to provide the Cell's executive body, a holistic and well-rounded advisory and consulting inputs, was held during the audit period.

➢ Implementation Support Layer consisting of three coordinators of the rank of Director or Officer on Special Duty (OSD), responsible for technical, non-technical, and finance and administration support to Cell's operations for eliciting cooperation and participation from the grass-root levels had not been constituted in line with the Guidelines for State DBT Cell. Neither any training calendar was prepared nor was any training on DBT

provided to State officials by the State DBT Cell. No exposure visits for State/district officials in DBT progressive States were arranged by the State DBT Cell for familiarising the officials with model practices being adopted by those States. Neither any benchmark studies were conducted on Best Practices for developing roadmap to incorporate those practices in State operations nor was any innovation in the State through pilots/experiments carried out by the State DBT Cell.

➢ Robust governance framework was lacking at State level to continuously monitor the readiness of schemes and programmes. No workshop, seminar, etc. to operationalise DBT was conducted either by the State DBT Cell or DSSWCD. Besides, the departmental DBT Cell/Committee to ensure adoption of DBT framework in implementation of schemes, as per Protocol Document on DBT in States, was not constituted in DSSWCD.

➢ The State DBT Portal was integrated with DBT Bharat Portal *(https://dbtbharat.gov.in)* and information related to all 127 identified schemes across 17 departments in the State was displayed on the Portal. However, Website Quality Certification was not obtained from Standardisation Testing Quality Certification; Web Information Manager and Technical Manager were not appointed in line with the GIGW guidelines to ensure proper flow and quality of content to the site; Content Contribution, Moderation and Approval Policy to ensure authenticity of data and responsibility, authorisation and workflow details with regard to content publishing on State DBT Portal was not framed; provision for regional language content on State DBT Portal was not made; and various important information with regard to Portal functionalities *viz.* About Us, Scheme, Multimedia, Documents, Success Story, Download, etc. were not made available on State DBT Portal. There was a mismatch in the amount of cash transferred to the beneficiaries in three selected schemes under DBT during the period 2017-2021 (up to July 2020), uploaded on the DBT Portal and that supplied by DSSWCD.

➢ The DSSWCD did not have any Disaster Recovery and Business Continuity Plan for State DBT Portal and Password Policy both for State DBT Portal and PBMS application.

4.8   Recommendations

In the light of the audit findings, the State Government may consider:

(i)   conducting periodical meetings of SAB for providing DBT Cell, a holistic and well-rounded advisory and consulting inputs;

(ii)   *strengthening governance framework including constitution of internal DBT Cell/Committee in each department, in line with the Guidelines for State DBT Cell to ensure adoption of DBT framework in implementation of schemes;*

(iii)   *hosting of State DBT Portal in accordance with the Guidelines for Indian Government Websites and Standard Operating Procedure and User Manual on State DBT Portal, besides, depicting authentic data on State DBT Portal with regard to benefits transferred to the beneficiaries in respective schemes under DBT; and*

(iv)   *putting in place Disaster Recovery and Business Continuity Plan and Password Policy to ensure safety and smooth functioning of State DBT Portal and PBMS application.*

Chandigarh   **(PUNAM PANDEY)**
The 18 April 2022   **Principal Accountant General (Audit), Punjab**

Countersigned

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The 26 April 2022   **Comptroller and Auditor General of India**