

Chapter-IV
Issue of Disability
Certificates and
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Shortfall in the issue of Disability Certificates was more than 50 per cent in Sawaimadhopur and Udaipur districts. Significant number of applications for Disability Certificates were pending at various levels of Medical and Health department.

Rajasthan was ranked second lowest (34th rank out of 35) in SAP literacy rate (40.16 per cent). Children with Special Needs who enrolled for school education decreased from 1.07 lakh in 2016-17 to 0.75 lakh in 2020-21, a reduction of 30 per cent. There was shortage of essential human resources as posts of teachers in Government Special Schools (38.10 per cent) and 357 Resource Persons (56.22 per cent) at Resource Centres were vacant.

Non-engagement of Speech Therapist/Audiologist/Physiotherapist for SAPs was noticed in NGO run Residential/Non-Residential schools. There were inordinate delays in registration/renewal of certificates of NGOs working for the welfare of SAPs by the Directorate SAP.

Section 2 (s) of RPwD Act, 2016 provides that person with disability means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others. Further, Section 2 (r) of RPwD Act, 2016 provides that person with benchmark disability means a person with not less than forty per cent of a specified disability.

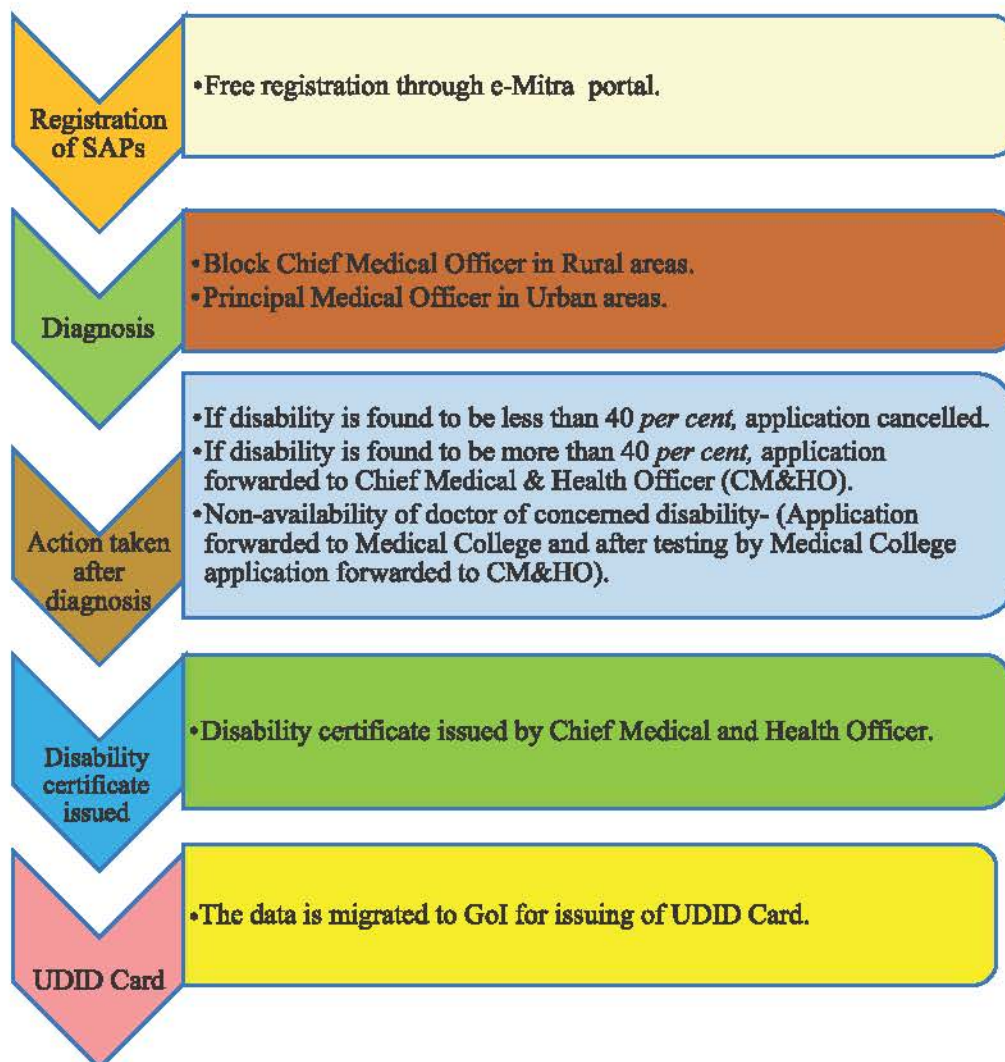
The RPwD Act, 2016 makes provisions for education of children with disabilities and provides for measures that the Government and local authorities must take for maintaining a system of inclusive education. The Act mandates that every child with disability must be admitted to these schools without any discrimination.

4.1 Identification of SAPs and issue of disability certificates

All the rights and entitlements of PwDs and benefits of the schemes being implemented by GoI/GoR are available to the persons with benchmark disability for which a disability certificate issued by certifying authority is required. The process of issue of disability certificate and Unique Disability Identification (UDID)⁴⁷ Card, which is valid throughout the country, has the steps as depicted in Chart 2.

⁴⁷ The Department of Empowerment of Persons with Disabilities, GoI implemented the UDID Project with a view to create a national database for PwDs and also to issue unique ID cards to each SAP.

Chart 2: Process of issue of disability certificate and Unique Disability Identification Card



- (i) Audit scrutiny (July-August 2021) revealed that in Rajasthan, 15.64 lakh SAPs were identified in Census 2011 against which 11.17 lakh (71.42 per cent) had been registered as of March 2021. The position in the eight test checked districts in this regard is shown in the Table 1 below:

Table 1

Test Checked District	Number of SAPs as per Census 2011	Number of registrations in the District	Shortfall (Per cent)
Barmer	56,183	32,617	23,566 (41.94)
Bikaner	37,898	32,421	5,477 (14.45)
Dungarpur	33,774	18,847	14,927 (44.19)
Jodhpur	91,730	57,286	34,444 (37.55)
Kota	44,859	33,939	10,920 (24.34)
Sawaimadhopur	32,563	15,345	17,218 (52.87)
Tonk	40,510	23,745	16,765 (41.38)
Udaipur	82,270	25,296	56,974 (69.25)

Source: Information provided by the Medical and Health Department and Directorate SAP.

It can be seen that there was shortfall of more than 50 per cent in Sawaimadhopur and Udaipur districts. While the seriousness of the issue was acknowledged by the State Government as evident from the instructions of the Chief Secretary, GoR (November 2017) for special focus in districts with less than 50 per cent registrations, little was done by the Department in this regard as no special campaign was organised in the State after the campaign of *Pandit Deen Dayal Upadhyay Specially Abled Persons Camps* held in 2017-18.

- (ii) Further, examination of records and analysis of information provided by the Department revealed significant pendency in the processing of applications registered with the Department. The details of applications registered for issue of disability certificate, disability certificates issued, rejected applications and pending applications during 2017-21 are given in **Table 2** below:

Table 2

Year	Applications registered	Disability certificates issued	Applications rejected	Pending with BCMOs/ PMOs/ Medical colleges/ CMHOs for diagnosis
2017-18 ⁴⁸	9,54,850	2,42,489	Information not available	5,46,041
2018-19	10,12,969	3,17,606	1,11,846	4,46,566
2019-20	10,64,540	3,58,943	1,23,435	4,10,362
2020-21	11,17,160	3,94,496	1,32,054	3,05,557

Source: Information provided by the Medical and Health Department and Directorate SAP. Figures in the table are progressive figures.

Information pertaining to 2016-17 was not provided by the Department (July 2021-January 2022).

It can be seen from the table that out of the 11,17,160 applications registered for issue of disability certificates, 1,32,054 applications were rejected as of March 2021. Of the remaining 9,85,106 applications, only 3,94,496 disability certificates (40.05 per cent) were issued to SAPs in the State. More importantly, 3,05,557 applications (31.01 per cent) were pending with the BCMOs (1,72,710), PMOs (36,351), Medical Colleges (94,232) and CM&HOs (2,264) for diagnosis due to which they could not be processed for issue of disability certificates. While the pendency of applications came down during the period 2017-21, the rate of processing of applications was not adequate as reflected in the significant pendency as of March 2021. Detail of applications on which objections had been raised were not furnished by the department.

GoR accepted the facts and stated (November 2022) that concerned applicants were informed through message on mobile, but they did not take interest and these applications were kept on hold.

48 Position as on 21 March 2018.

In the absence of timely processing of applications, a significant number of SAPs could not be issued disability certificates and thus were deprived of various benefits for long periods of time.

Recommendation 7: The State Government may undertake special campaigns to enhance the coverage of SAPs for issue of disability certificates and prescribe norms regarding time limits for various stages of processing of applications.

4.2 Education

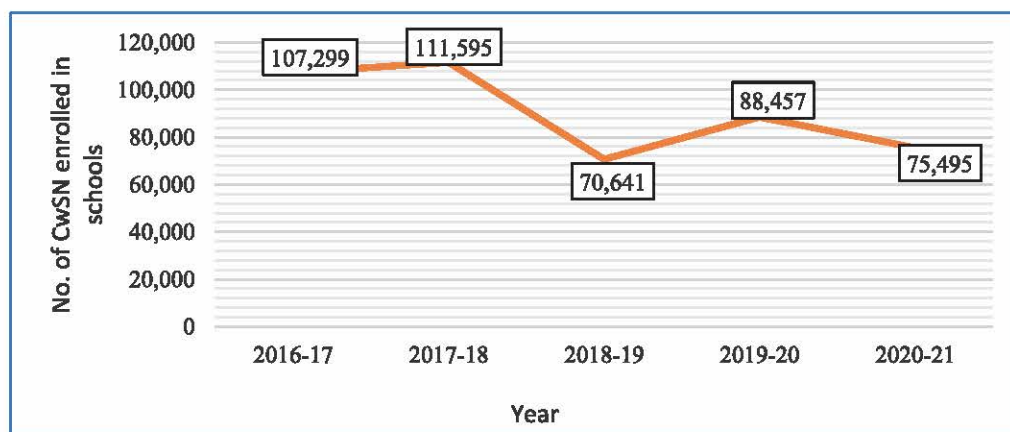
Disability may act as a major hindrance in formal education. Educational attainment of SAPs is important in improving their living condition and enhancing their participation in the public life with dignity.

(i) Enrolment of SAP children in educational institutions

Section 16 of RPwD Act, 2016 provided that the State Government should endeavour that all educational institutions funded or recognised by them provide inclusive education to the children with disabilities. Section 31 of RPwD Act, 2016 mandated that every child with benchmark disability between the age of six to eighteen years should have the right to free education in a neighbourhood school, or in a special school of her/his choice.

Audit scrutiny (July-August 2021) revealed significant deficiency in the educational attainment of Children with Special Needs (CwSN) in the State. As per Census 2011, there were 3,06,750 disabled children in the age group of 5-19 years in Rajasthan. Rajasthan Council of School Education (RCSE) informed (August 2021) the State Commissioner, SAP that only 75,495 Children with Special Needs (CwSN) were enrolled in schools (Private, Government and Government aided) during the session 2020-21. This shows that a significant number of CwSN have not been enrolled in educational institutions in the State. In fact, the enrolment of CwSN has been declining during the period 2016-21 as depicted in Chart 3:

Chart 3: Number of CwSN students enrolled in the school during session 2016-21

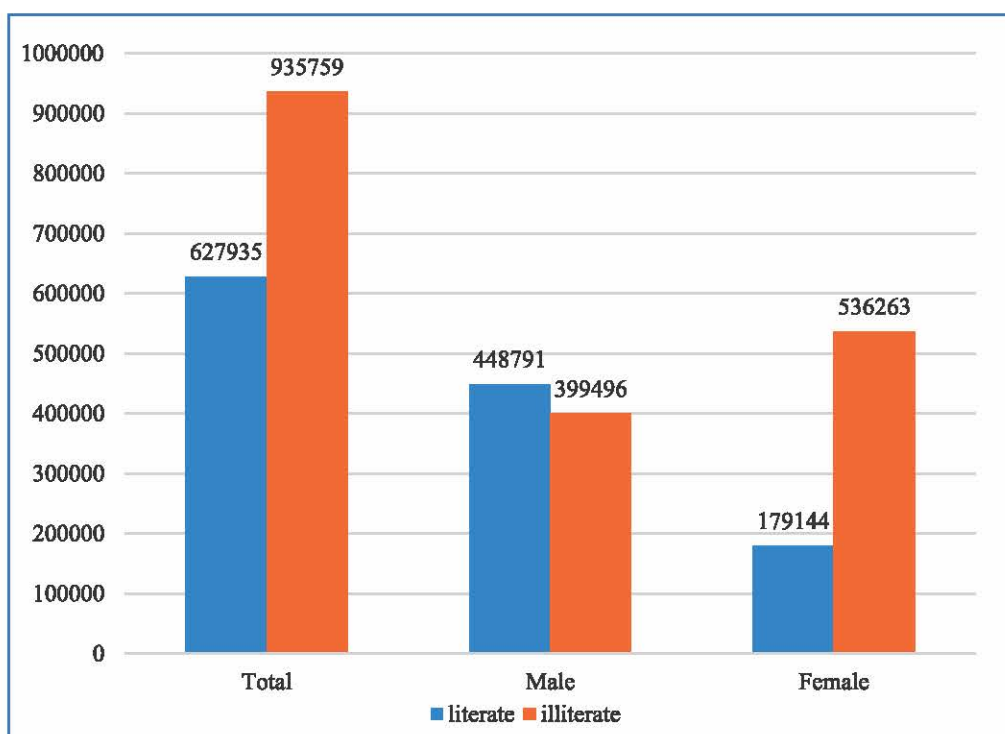


Source: Information provided by Rajasthan Council of School Education, Jaipur.

The chart depicts that enrolment of CwSN students decreased from 1,07,299 in 2016-17 to 75,495 in 2020-21, a reduction of 30 *per cent*.

Deficient enrolment of CwSN in schools has resulted in poor literacy status among SAPs in the State. According to the report Persons with Disabilities (*Divyangjan*) in India- A Statistical Profile: 2021 published by GoI, Rajasthan was ranked second lowest (34th rank out of 35) in literacy rate of SAPs (40.16 *per cent*) in the country. Literacy among SAPs in Rajasthan is given in **Chart 4**:

Chart 4: Literacy status of SAPs by gender in Rajasthan as per Census 2011



Source: Persons with Disabilities (*Divyangjan*) in India- A Statistical Profile: 2021 published by Ministry of Statistics and Programme Implementation, GoI.

The chart depicts that in Rajasthan, 59.84 *per cent* SAPs were not literate. Further, among the female SAPs, 74.96 *per cent* (5,36,263) were not literate as compared to 47.09 *per cent* (3,99,496) male SAPs who were illiterate.

GoR stated (November 2022) that action is being taken for compliance of this section through Inclusive Education Campaign. Further, SAPs could avail free education under Right to Education Act and 110 special schools were running in the State through NGOs for providing free education to SAPs.

Recommendation 8: The State Government may make all efforts to enhance the enrolment and retention of Children with Special Needs in the educational institutions in the State.

(ii) Availability of teachers and Resource Persons

Section 17 of RPwD Act provided that State Government should take measures to promote and facilitate Inclusive Education like conducting survey of school going children, establishing adequate number of resource centres and teacher training institutions, train and employ teachers, etc.

It was observed that the State Government was operating seven Government Special Schools⁴⁹ having special teachers⁵⁰ in six districts to promote education of CwSN. In addition, Resource Centres have also been developed in the State with suitably trained Resource Persons to provide necessary educational and therapeutic support to the special needs boys and girls of the State to develop their inherent abilities.

Audit examination (August 2021-January 2022) revealed that these Special Schools and Resource Centres were not suitably staffed to cater to the needs of CwSN. It was observed that:

- a. Only 65 teachers (61.90 *per cent*) were working against sanctioned 105 posts of teachers in the seven Government Special Schools with 1,131 students in 2020-21 session.
- b. Against 635 posts⁵¹ of Resource Persons, 357 posts (56.22 *per cent*) were vacant in the State as of March 2021. In the eight test checked districts, against the sanctioned 234 Resource Persons, 149 posts (63.67 *per cent*) were vacant as of March 2021 with vacancies ranging from 22.22 *per cent* in Tonk to 92.16 *per cent* in Udaipur.

In the absence of adequate number of Special Teachers and Resource Persons, the requisite educational and therapeutic support to CwSN could not be provided.

4.3 Functioning of Residential/Non-Residential Schools for SAPs

In Rajasthan, 101 Special Schools (Residential/Non-Residential schools) were established in 31 districts as of March 2021. The remuneration is provided by GoR to the NGOs for sanctioned/actual staff⁵² (whichever is less) in these Residential/Non-Residential schools. Similarly, Mess allowance is provided by the GoR to NGOs on the basis of inmates residing in the Residential schools.

49 Deaf and Dumb schools: 03 and Blind Schools: 04.

50 A special teacher is a teacher who works with children of all ages who have cognitive, emotional or physical special needs.

51 District level: 33 and Block level: 602.

52 Norms for deployment of staff by NGOs are prescribed by the Directorate SAP. If NGO deploys less than the norms, the Directorate SAP release the grant according to staff deployed by the NGOs.

4.3.1 Providing quality education to Children with Special Needs

As per condition of grants released to the Special Schools run by NGOs by the DSAP, Special Educators should be qualified according to norms of Rehabilitation Council of India (RCI) and in case of Special Educators not being properly qualified, the payment made to these Special Educators was recoverable from the institution. Further, the teacher student ratio prescribed by the department (in 2006) was 1:15 for Special Schools with visual impairment and hearing impairment students and 1:8 in Special Schools for the Mentally Retarded.

Audit scrutiny (August 2021-January 2022) of records of 11 NGOs run Special Schools in the eight test checked districts revealed that:

- (i) Special Educators registered with RCI were not deployed in two Special Schools run by two NGOs⁵³. However, these NGOs were receiving grants from DSAP. On being pointed out, both the NGOs accepted the facts. Out of these, one NGO⁵⁴, stated (September 2021) that it did not deploy RCI registered teachers as qualified teacher demanded high salary which could not be borne by the NGO.

Lack of proper qualification of Educators may have an adverse impact on the quality of education being provided to the Children with Special Needs in Special Schools.

- (ii) Speech Therapist/Audiologist/Physiotherapist⁵⁵ were not engaged by six NGOs⁵⁶ during 2016-21. GoR stated (November 2022) that medical specialist were not deployed due to non-availability in the district and due to less honorarium (Bikaner and Dungarpur).

These instances reflect lack of effective monitoring by the Department to ensure proper utilization of grants released to NGOs for the education and well-being of the Children with Special Needs.

4.4 Registration of institutions

Section 49 of RPwD Act provided that the State Government should appoint an authority to be a competent authority for the purposes of registration of institutions for PwD and giving grants to such institutions. As per Rule 7 of RRPwD Rules, 2018, the Director, DSAP should be the competent authority for the registration of institution. Accordingly, GoR appointed (June 2018)

53 *Sucheta Kriplani Shiksha Niketan Manklav*, Jodhpur and *Viklang Kalyan Samiti*, Udaipur.

54 *Viklang Kalyan Samiti*, Udaipur.

55 Commissioner cum Secretary, SJED issued orders (April 2011) for engagement of services of one Speech Therapist/Audiologist/Physiotherapist/Braille Teacher/Yoga Teacher/Psychologist having specialization in the subject in the Special School according to the category of school.

56 (i) *Viklang Kalyan Samiti*, Udaipur (ii) Welfare India Society, Kota (iii) *Tapas Shekshik Punervash evam Anusandhan Sansthan*, Dungarpur (iv) Society to Uplift Rural Economy (SURE), Barmer (v) *Saur Chetna evam Urja Vigyan Shodh Sansthan*, Bikaner (vi) *Yogesh Shekshik Punervash evam Shodh Sansthan*, Niwai, Tonk.

Director DSAP as the competent authority. District Collector was authorized for issuing certificate of registration/renewal to NGOs upto May 2018.

Audit scrutiny (July-August 2021) of records of DSAP revealed that 184 NGOs were registered for five years by the DSAP during the period July 2018 to March 2021.

- (i) **Granting of new registration** - Section 51 (2) of RPwD Act, 2016 provided that on receipt of an application from the NGO, the competent authority should grant a certificate of registration to the applicant within a period of ninety days of receipt of application. Audit scrutiny of 23 applications received for new registration of NGOs during September 2019 to March 2021 by DSAP revealed that 109 days to 526 days were taken in granting of 22 registration certificates from the submission date /date of sending by District Officer (*Details in Appendix-IV*).
- (ii) **Granting of renewal of registration** - Director, DSAP issued (July 2018) orders that on receipt of an application from the NGO for the renewal of certificate of registration, the competent authority should grant renewal certificate to the applicant within a period of sixty days of receipt of application. Audit scrutiny of 23 cases of renewal of registration of NGOs revealed that in 17 cases, DSAP took 78 days to 529 days for renewal of registration certificates from the date of receipt of the application during 2018-21 (*Details in Appendix-V*).

GoR stated (November 2022) that registration certificates are issued after the required documents are provided and timely issuance of registration certificates may be hindered by the lack of required documents. The reply also stated that making the process online is under consideration.

Recommendation 9: *The State Government may make all efforts to facilitate NGOs through timely grant of registrations and their renewal and prepare proper database for effective monitoring of NGOs.*