

September 2017  
Number 1

Accountability Working Paper



## Citizen Oversight and India's Right to Work Program: What Do the Social Auditors Say?

Suchi Pande  
Rakesh R. Dubbudu



**FACTLY**

  
ACCOUNTABILITY RESEARCH CENTER

## About Accountability Research Center (ARC)

The Accountability Research Center (ARC) is an action-research incubator based in the School of International Service at American University.

ARC partners with civil society organizations and policy reformers in the global South to improve research and practice in the field of transparency, participation and accountability.

For more information about ARC, please visit the website:

[www.accountabilityresearch.org](http://www.accountabilityresearch.org).

---

## About ARC Publications

ARC publications serve as a platform for accountability strategists and researchers to share their experiences and insights with diverse readers and potential allies across issue areas and sectors. These publications frame distinctive local and national initiatives in terms that engage with the broader debates in the transparency, participation and accountability (TPA) field. Research publications include brief Accountability Notes, longer Accountability Working Papers and Learning Exchange Reports. ARC publications are open source and licensed under Creative Commons.

---

## Rights and Permissions



The material in this publication is copyrighted under the Creative Commons Attribution 4.0 Unported license (CC BY 4.0) <https://creativecommons.org/licenses/by/4.0/>. Under the Creative Commons Attribution license, you are free to copy, distribute, transmit, and adapt this work, including for commercial purposes, under the following conditions:

**Attribution**—Please cite the work as follows: Pande, Suchi and Rakesh R. Dubbudu. 2017. "Citizen Oversight and India's Right to Work Program: What Do the Social Auditors Say?" Accountability Research Center, *Accountability Working Paper 1*.

**Translation**—If you create a translation of this work, please add the following disclaimer along with the attribution: This translation was not created by The Accountability Research Center (ARC) and should not be considered an official ARC translation. The ARC shall not be liable for any content or error in this translation.

# About the Authors



**Suchi Pande** is a scholar in residence at the Accountability Research Center (ARC), School of International Service, American University. She holds a PhD in Development Studies from the Institute of Development Studies, University of Sussex. Her doctoral research focused on the grassroots struggle for a national Right to Information law in India, and the role of “public audits” in implementing India’s Right to Work law. Before joining ARC, Suchi was associated with India’s National Campaign for People’s Right to Information, and the Rajasthan based Right to Information and Work campaign.



**Rakesh Dubbudu** is the founder of Factly and a campaigner for transparency in governance in India. He has been associated with the Right to Information (RTI) movement in India for more than a decade. He is a guest faculty at various administrative training institutes in Telangana on issues relating to RTI and governance. He brings with him years of experience of dealing with government data and information.

# Notes on Support

Support for ARC comes from the Ford Foundation and the William and Flora Hewlett Foundation.

This research was supported by ARC and co-designed by ARC, Factly, and SSAAT-Telangana. Factly is a for-profit organization that analyzes government data, laws, and processes with the objective of making public data and information more meaningful for citizens and policy makers.

Thanks very much to Sowmya Kidambi, Director, SSAAT- Telangana, for supporting this study, and to the IT and HR staff at SSAAT for helping to coordinate the web survey.



---

## Disclaimer

The findings, interpretations, and conclusions expressed here are those of the author(s) and do not necessarily reflect the views of SSAAT, Factly, or ARC.

---

## Acknowledgements

The authors thank Jonathan Fox, Nikhil Dey, Inayat Sabhiki, Diego Maiorano, Marcos Mendiburu, Arnab Acharya, Angela Bailey, and Brendan Halloran for their detailed comments. Thanks also to Amitabh Mukhopadhyay, Gurjeet Singh, G. Usha Rani, Janani Sridharan, Rakshita Swamy, Nikhil Dey, Pappi Reddy, Sai Chintala, Sashwati Mishra, and Shankar Singh for participating in the field validation workshop (February 2017) and providing valuable feedback. They bear no responsibility for views expressed here by the authors. The authors also thank Ankita Anand and Amit Sharma for generously helping with the Hindi translations of the summary.

*Cover Photo:* Social auditors interacting with wage worker to verify information about her participation in India's National Rural Employment Guarantee Act (NREGA) work in Telangana state. *Credit:* ©Society for Social Audit, Accountability and Transparency (SSAAT).

# Contents

Summary.....	6
Summary in Telugu .....	8
Summary in Hindi .....	11
<b>I. Introduction .....</b>	<b>14</b>
<b>II. SSAAT in Context:</b>	
<b>Embedding Transparency, Participation and Accountability Inside the State .....</b>	<b>15</b>
1. State-run Social Audits .....	15
2. Institutional Innovation .....	16
Box 1. A National Structure for Social Audits: The Role of India's Supreme Audit Institution .....	17
<b>III. Methods .....</b>	<b>18</b>
1. Sample .....	18
2. Demographic Characteristics of Respondents .....	19
3. What Information Was Asked For? .....	20
<b>IV. Detailed Survey Findings.....</b>	<b>21</b>
1. Deterrence Effects of Social Audits .....	21
2. Answerability without Enforcement .....	22
3. Preventing Wage Fraud: Switch from Cash Payments to Bank Accounts .....	23
4. Effects of Social Audits on NREGA Planning .....	25
5. Unexpected Indirect Effects: Political Accountability .....	25
6. Social Audits and Bureaucratic Accountability .....	26
7. Unintended Outcomes of Citizen Oversight .....	26
8. Staff Responses to Obstacles to Social Audit Effectiveness .....	27
9. Suggestions for Improving Social Audit Effectiveness .....	27
<b>V. Authors' Recommendations to SSAAT.....</b>	<b>29</b>
1. Civil Society Engagement in State-run Social Audits .....	29
2. Strategic Proactive Disclosure .....	30
<b>VI. Concluding Reflections.....</b>	<b>31</b>
References .....	32
Endnotes .....	36
Annex 1 – Survey questions .....	40

# Summary

Can citizens' voices improve the performance of large-scale government anti-poverty programs? India's national rural employment guarantee program (NREGA) has provided employment to over 50 million households since its launch in 2005. NREGA also includes a transparency and accountability process—social audits—that enables collective action for public oversight. State governments are responsible for facilitating social audits through local governments, or *panchayats*, to prevent fraud and abuse of NREGA funds.

In practice, however, a majority of local governments either lack capacity or are captured by vested interests. So far, only two state governments have created social audit units with the autonomy needed to prevent capture by vested interests. The states of Andhra Pradesh and Telangana established a neutral body—the Society for Social Audit Accountability and Transparency (SSAAT)—that is independent both of the state government administration and political patronage networks. Over the last decade, SSAAT has organized over 9,125 public hearings across these two states.

## Exploratory Research Strategy

This exploratory study was carried out in partnership with SSAAT-Telangana, and it is the first to examine the performance of the state-run social audits from the perspective of the staff facilitating the audit. This study is based on an anonymized web survey of over three hundred lower mid-level staff involved in facilitating social audits in Telangana (60 percent of SSAAT's full time working staff), as well on ethnographic research and key informant interviews. We ask readers to consider a distinction between the questions that address staff perception of corruption (which can't be verified) and their perception of NREGA processes like demand for work and timely wages (which can be verified with administrative data).

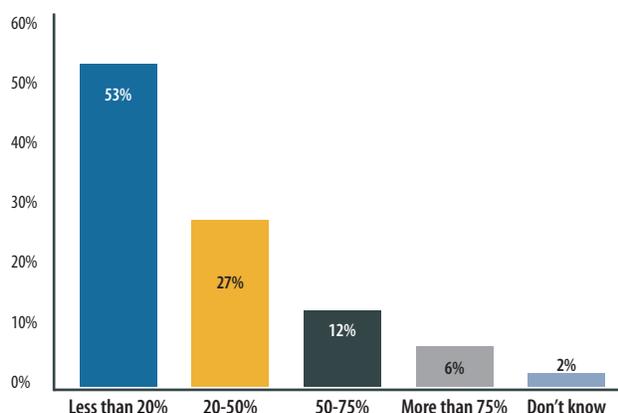
## Deterrence Effect of Social Audits

We find social audits contributed to an overall reduction of the problem of corruption via deterrence. Two thirds of the surveyed staff felt that more than 50 percent of the social audits they facilitated helped in deterring corruption.

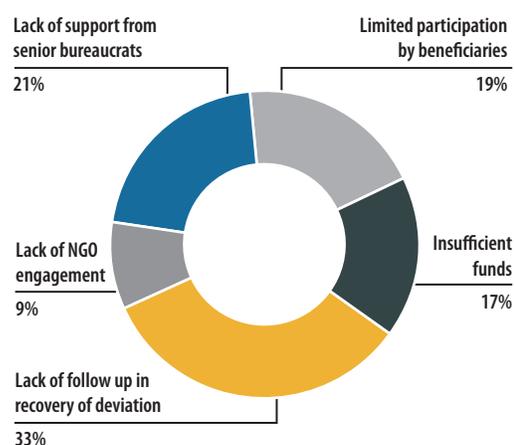
## Social Audits Provide Answerability without Enforcement

More than half of the surveyed staff agree that social audits generate some degree of answerability from social programs to citizens but that formal enforcement is lacking. Social audit findings are discussed in open public hearings, where citizens ask questions and seek clarifications on government actions and decisions. The public hearings are presided over by senior administrators who answer to the public, order inquiries or refer cases to the state government. Follow up to social audit findings of corruption and abuse is limited because the responsibility falls to a different government office that lacks the necessary autonomy and capacity.

**Figure S1. Social Audits that Contributed to a Corrupt Politician Not Being Elected**



**Figure S2. Obstacles in Making Social Audits More Effective**



## Problem Solving Effects: Beyond Detecting Corruption

Though social audits were expected to expose problems rather than to solve them, facilitators report that in practice, they play a significant role in redressing individual citizen grievances. Publicly available administrative data shows the effects of the problem-solving role: of the 45,448 grievances registered with social audit facilitators from December 2015 to November 2016, 32 percent were resolved through the social audit process. Surveyed staff reported that social audits are beginning to address one of the recurring grievances of many NREGA workers: late and incomplete payment of wages.

## Unexpected Indirect Effects: Political Accountability

Despite their lack of enforcement power, the social audits also appear to have indirect accountability effects via local electoral politics. Earlier studies in Andhra Pradesh found collusion between local politicians and program staff to pocket NREGA program funds, but one in five surveyed staff felt that a significant fraction of social audits contributed to a corrupt politician not being re-elected. However, this requires further investigation.

## Implications for Future Applied Research

This exploratory research highlights questions for future research and action to inform strategies for deepening the impact of social audits, including:

1. How do social audits contribute to grievance redress?
2. How can the state government bolster the autonomy and capacity of its enforcement unit to investigate fraud, including a proactive information disclosure strategy?
3. How can SSAAT develop a proactive information disclosure strategy that can enable state government and civil society actors to identify bottlenecks and take action to improve the performance of anti-poverty programs?

# Summary in Telugu

## ఎగ్జిక్యూటివ్ సమ్మరీ

పౌరుల పర్యవేక్షణ వల్ల పెద్ద ఎత్తున జరుగుతున్న ప్రభుత్వ పేదరిక నిర్మూలణ పథకం యొక్క పనితీరు మెరుగు పడుతుందా? భారతదేశ జాతీయ గ్రామీణ ఉపాధి హామీ పథకం (NREGA) మొదలుపెట్టిన (2005) నుంచి 50 మిలియన్ల కంటే ఎక్కువ మందికి ఉపాధి కల్పించింది. పారదర్శకత మరియు జవాబుదారీతనం కోసం ఈ పథకం లో భాగంగా సామజిక తనిఖీ ప్రవేశ పెట్టడం జరిగింది. దీని ద్వారా పౌరులు ఈ పథకం యొక్క పని తీరు ని పర్యవేక్షించొచ్చు. సామజిక తనిఖీ జరిపించే భాద్యత రాష్ట్ర ప్రభుత్వాల మీద ఉంటుంది. రాష్ట్ర ప్రభుత్వాలు స్థానిక ప్రభుత్వాల ద్వారా మరియు గ్రామ పంచాయతీల ద్వారా సామజిక తనిఖీ చేయించి నిధులు దుర్వినియోగం కాకుండా చూడాలి.

కానీ ఆచరణలో మాత్రం మెజారిటీ స్థానిక ప్రభుత్వాలకి సామర్థ్య లోపం వల్ల లేదా సొంత లాభంతో పని తీరు సరిగా లేదు. ఈ రోజు వరకు కేవలం రెండు రాష్ట్రాలు మాత్రమే ఒక స్వతంత్ర సామజిక తనిఖీ సంస్థ ని ఏర్పాటు చేశాయి. ఆంధ్ర ప్రదేశ్ మరియు తెలంగాణ రాష్ట్రాలు 'సొసైటీ ఫర్ సోషల్ ఆడిట్ అకౌంటబిలిటీ అండ్ ట్రాన్స్పారెన్సీ (SSAAT)' అనే ఒక స్వతంత్ర సంస్థని ఏర్పాటు చేశాయి. గత పదేళ్లలో SSAAT సుమారుగా 9,000 లకి పైగా పబ్లిక్ హియరింగ్సు (ప్రజా విచారణ) నిర్వహించింది.

## అధ్యయన ప్రక్రియ

ఈ అధ్యయనం SSAAT- తెలంగాణ భాగస్వామ్యంతో చేయడం జరిగింది. మొట్ట మొదటి సారిగా ఈ అధ్యయనం సామజిక తనిఖీ పనితీరుని వాటిని నడిపే వారి దృక్కోణం నుండి పరిశీలిస్తుంది. ఈ అధ్యయనం కోసం తెలంగాణ లోని సామజిక తనిఖీ విభాగంలో దిగువ మధ్య స్థాయిలో పని చేస్తున్న మూడు వందల మంది సిబ్బంది అభిప్రాయాలు ఒక ఆన్లైన్ సర్వే ద్వారా సేకరించడం జరిగింది. సామజిక తనిఖీ విభాగంలో పని చేస్తున్న ఫుల్ టైం ఉద్యోగుల్లో వీరు దాదాపుగా అరవై శాతం. ఇదే కాకుండా వ్యక్తిగత ఇంటర్వ్యూ ల నుంచి సేకరించిన సమాచారం కూడా ఈ అధ్యయనానికి మూలం. ఈ అధ్యయనం లో రెండు రకాల ప్రశ్నలు సిబ్బందిని అడగడం జరిగింది. ఒకటి ఉపాధి హామీ పనిలోని అవినీతి, దాని మీద సామజిక తనిఖీ ప్రభావం. ఈ ప్రశ్నలకు సిబ్బంది చెప్పిన విషయాలు ద్రువీకరించలేము. రెండవ రకమైన ప్రశ్నలు ఉపాధి హామీ పని లోని వివిధ కార్యక్రమాలు,

ప్రక్రియల పై (పని కోసం డిమాండ్ మరియు సమయానుగుణ వేతనాలు లాంటివి) సిబ్బంది అవగాహన. ఈ విషయాల్ని పరిపాలనా సమాచారాలతో ధృవీకరించవచ్చు. రిపోర్ట్ చదివే పాఠకులు ఈ రెండు రకాల ప్రశ్నలకు మధ్య వ్యత్యాసాన్ని పరిగణలోకి తీసుకోవాలని కోరుతున్నాము.

### సామజిక తనిఖీల ప్రతిబంధక ప్రభావం

మొత్తంగా సామజిక తనిఖీలు అవినీతి కి ప్రతిబంధకంగా మారడం ద్వారా పథకం పనితీరు మెరుగు పడడానికి తోడ్పడ్డాయని ఈ అధ్యయనం ద్వారా తెలుస్తోంది. సమస్యల పరిష్కారం లో అనుకున్నంత పురోగతి లేకపోయినా కూడా సర్వే లో పాల్గొన్న వారిలో మూడింట రెండు వంతుల మంది, వారు నిర్వహించిన సామజిక తనిఖీలలో 50% కంటే ఎక్కువ అవినీతిని నిరోధించడంలో సహాయపడ్డాయని అభిప్రాయపడ్డారు. ఇంకొక 58% మంది వారు నిర్వహించిన సామజిక తనిఖీలలో 50% కంటే ఎక్కువ కూలి చెల్లింపులో అవినీతిని నిరోధించడంలో సహాయపడ్డాయని అభిప్రాయపడ్డారు.

### సామజిక తనిఖీ వల్ల జవాబుదారీతనం పెరిగింది. కానీ తదుపరి చర్యల అమలు లేదు

సర్వే లో పాల్గొన్న వారిలో సగం కంటే ఎక్కువ మంది పథకం అమలులో ఉన్న సమస్యలు గుర్తించడం ద్వారా సామజిక తనిఖీ విభాగం తన పర్యవేక్షణ విధులకు న్యాయం చేస్తుందని అభిప్రాయపడ్డారు. తనిఖీ తర్వాత సరైన దిద్దుబాటు చర్యలు మాత్రం లేవు. సామజిక తనిఖీ లో గుర్తించిన అంశాలు బహిరంగ విచారణల్లో చర్చించబడతాయి. ఈ విచారణలతో ప్రజలు ప్రభుత్వం చర్యలు మరియు నిర్ణయాలు గురించి వివరణలు కోరుతారు, ప్రశ్నలు అడుగుతారు. ప్రభుత్వానికి చెందిన సీనియర్ అధికారులు ఈ విచారణకు అధ్యక్షత వహిస్తారు. వీరు ప్రజల ప్రశ్నలకి సమాధానం చెప్పడం, లేదా విచారణకి ఆదేశించడం లేదా కేసులను రాష్ట్ర ప్రభుత్వానికి రెఫర్ చేస్తారు. సామజిక తనిఖీ తర్వాత తదుపరి చర్యల అమలు అంతంత మాత్రంగానే ఉంది. దీనికి కారణం ఈ చర్యల అమలు భాద్యత వేరే రాష్ట్ర ప్రభుత్వ శాఖది కావడం మరియు వాళ్ళ సామర్థ్యం, స్వతంత్రత కూడా పరిమితం.

### అవినీతి గుర్తించడమే కాదు, సామజిక తనిఖీ వల్ల సమస్యల పరిష్కారం కూడా

సామజిక తనిఖీ ముఖ్య ఉద్దేశం ఉపాధి హామీ పథకం అమలు తీరులో ఉన్న సమస్యలు, అవినీతి ఎత్తి చూపడం అయినా కూడా, అనేక సందర్భాలలో ఉపాధి హామీ కూలీల ఫిర్యాదులు తీర్చడంలో కూడా సామజిక తనిఖీ ముఖ్య పాత్ర పోషిస్తుందని ఈ అధ్యయనం ద్వారా తెలుస్తోంది. డిసెంబర్ 2015 నుండి నవంబర్ 2016 వరకు నమోదైన 45,448 ఫిర్యాదుల్లో 32% సామజిక తనిఖీ ప్రక్రియ ద్వారా పరిష్కరించబడ్డాయని డేటా ద్వారా

తెలుస్తోంది. ఉపాధి హామీ కూలీల ముఖ్యమైన, తరుచుగా ఎదురయ్యే సమస్య ఆలస్యమైన మరియు అసంపూర్ణ చెల్లింపులు. సామజిక తనిఖీ ప్రక్రియ ద్వారా ఈ సమస్యకి కూడా పరిష్కారం దొరకడం మొదలైందని సర్వే లో పాల్గొన్న వారు చెప్పారు.

### ఉపాధి హామీ పరోక్ష ప్రభావాలు: రాజకీయ జవాబుదారీతనం

తనిఖీ తర్వాత తదుపరి చర్యల అమలు అధికారం లేకపోయినా, సామాజిక తనిఖీలు స్థానిక ఎన్నికల రాజకీయాల మీద పరోక్ష ప్రభావాలు చూపుతోందని సర్వే లో పాల్గొన్న వారు అభిప్రాయపడ్డారు. స్థానిక రాజకీయ నాయకులూ మరియు కార్యక్రమ సిబ్బంది కలిసి ఉపాధి హామీ నిధులు దుర్వినియోగం చేసే వారని గతంలో చేసిన అధ్యయనాలలో తేలింది. కానీ ఈ సర్వేలో పాల్గొన్న ప్రతి ఐదుగురిలో ఒకరు సామజిక తనిఖీలు ఒక అవినీతి పరుడైన రాజకీయ నాయకుడు ఎన్నిక కాకపోవడానికి కారణం అయ్యాయని అన్నారు. ఇది నిశ్చయాత్మక ధోరణి కానప్పటికీ, ఇంకా లోతైన అధ్యయనం అవసరం.

### భవిష్యత్ అధ్యయనాలకి దారి

ఈ అధ్యయనం భవిష్యత్ పరిశోధనలకి అనేక ప్రశ్నలు లేవనెత్తుతోంది. సామజిక తనిఖీ ప్రభావాన్ని బలపరచడం, సంస్థాగత మార్పులు తేవడం లాంటి ఎన్నో వాటి పైన భవిష్యత్ పరిశోధనలు చెయ్యొచ్చు. ఇవే కాకుండా

1. ఫిర్యాదుల పరిష్కారానికి సామజిక తనిఖీ ఎలా దోహద పడుతుంది?
2. రాష్ట్ర ప్రభుత్వం తదుపరి చర్యల కోసం పని చేసే సంస్థ యొక్క స్వతంత్రత మరియు సామర్థ్యం ఎలా పెంపొందించొచ్చు? ఇందులో స్వచ్ఛంద సమాచార వెల్లడి సహాయపడుతుందా?
3. ఒక స్వచ్ఛంద సమాచార వెల్లడి వ్యాహాన్ని SSAAT ఎలా అభివృద్ధి చెయ్యవచ్చు? పేదరిక నిర్మూలన పథకాలలో ఉన్న ప్రతిబంధకాలు గుర్తించి వాటి పని తీరు మెరుగు పరచడానికి పౌర సమాజానికి మరియు రాష్ట్ర ప్రభుత్వానికి ఈ వ్యాహం ఎలా ఉపయోగపడుతుంది?

# Summary in Hindi

नागरिक निगरानी और भारत का 'काम का अधिकार' कार्यक्रम: क्या कहते हैं सामाजिक अंकेक्षक?

## सारांश

क्या नागरिकों की आवाज़ सरकार के गरीबी-उन्मूलन के वृहत कार्यक्रमों के प्रदर्शन को बेहतर बना सकती है? भारत के राष्ट्रीय ग्रामीण रोज़गार गारंटी कार्यक्रम (NREGA) ने 2005 में क़ानून के पास होने से लेकर अब तक लगभग 5 करोड़ से भी ज़्यादा परिवारों को रोज़गार दिया है। नरेगा क़ानून में पारदर्शिता और ज़वाबदेही के लिए भी एक प्रक्रिया शामिल है - सोशल ऑडिट या सामाजिक अंकेक्षण - जो जन-निगरानी के लिए सामूहिक कार्यवाही का एक ज़रिया है। राज्य सरकारें पंचायत या स्थानीय शासन के ज़रिए सोशल ऑडिट कर नरेगा के फंड्स का दुरुपयोग और भ्रष्टाचार रोकने के लिए ज़िम्मेदार होती हैं।

पर अधिकतर स्थानीय सरकारें या तो इतनी सक्षम नहीं होतीं या निहित स्वार्थों के नीचे दबी होती हैं। अब तक सिर्फ़ दो राज्य सरकारों ने ही ज़रूरी स्वायत्तता वाली सोशल ऑडिट इकाइयाँ बनायी हैं जो निहित स्वार्थों के क़ब्ज़े से बाहर हैं। आंध्र प्रदेश और तेलंगाना की सरकारों ने एक निष्पक्ष संस्था—Society for Social Audit Accountability and Transparency (SSAAT)/सामाजिक अंकेक्षण ज़वाबदेही व पारदर्शिता संस्था—स्थापित की जो राज्य सरकार के प्रशासन और राजनैतिक सरपरस्ती के जाल से बाहर है। पिछले एक दशक में SSAAT ने 9,000 से भी ज़्यादा जन सुनवाइयाँ इन दो राज्यों में आयोजित की हैं।

## शोध की रणनीति

यह अध्ययन SSAAT तेलंगाना के साथ मिलकर किया गया और यह अपनी तरह का पहला ऐसा अध्ययन है जो सरकार द्वारा संचालित सोशल ऑडिट के प्रदर्शन का मूल्यांकन ऑडिट का समन्वय करने वाले लोगों के दृष्टिकोण से करता है। यह अध्ययन तेलंगाना के तीन सौ से अधिक निम्न मध्य-स्तरीय स्टाफ़ (जो पूर्णकालिक कार्यकारी स्टाफ़ का 60 फ़ीसदी है) के ऐसे वेब सर्वे पर आधारित है जिसमें उनके नाम नहीं लिए गए हैं। साथ ही यह मानवजाति-विज्ञान संबंधी शोध और कुछ मुख्य सूचना-प्रदाताओं के साक्षात्कार पर भी आधारित है। हम पाठकों को उन सवालों के बीच अंतर पर

विचार करने के लिए कहते हैं जो भ्रष्टाचार के कर्मचारियों की धारणा (जो सत्यापित नहीं किया जा सकता है) और नरेगा प्रक्रियाओं की उनकी धारणाओं जैसे काम और समय पर मजदूरी की मांग (जो प्रशासनिक आंकड़ों के साथ सत्यापित किया जा सकता है) के बीच अंतर पर विचार करें।

### सोशल ऑडिट का 'अवरोध' प्रभाव

हमने पाया कि सोशल ऑडिट ने भ्रष्टाचार के लिए अवरोध उत्पन्न कर भ्रष्टाचार की कुल समस्या में कमी लाने में योगदान दिया। सर्वे किए गए स्टाफ़ में से दो-तिहाई का मानना था कि उनके द्वारा किये गए 50 फ़ीसदी से ज़्यादा सोशल ऑडिट ने भ्रष्टाचार रोकने में मदद की। अन्य 58 फ़ीसदी का मानना था कि 50% से ज़्यादा सोशल ऑडिट ने कामगारों के मजदूरी भुगतान में भ्रष्टाचार रोकने में मदद की। हालाँकि पहले से चली आ रही इन समस्याओं को सुलझाने की ओर कुछ खास प्रगति हमें दिखाई नहीं दी।

### सोशल ऑडिट बाध्यकारी शक्ति ना होने के बावजूद जवाबदेही स्थापित करती है

सर्वे किए स्टाफ़ में से आधे से ज़्यादा सहमत हैं कि सोशल ऑडिट एक हद तक सामाजिक कार्यक्रमों की नागरिकों के प्रति जवाबदेही तय करती है। लेकिन जब ग़लतियाँ पकड़ी जाती हैं तो कोई औपचारिक बाध्यकारी कार्यवाही नहीं होती। सोशल ऑडिट के नतीजों पर खुली जन-सुनवाइयों में चर्चा की जाती है जहाँ नागरिक सवाल पूछते हैं और सरकार के कामों और निर्णयों पर सफ़ाई माँगते हैं। इन जन-सुनवाइयों में वरिष्ठ प्रशासक अध्यक्षता करते हैं। वे जनता के सवालों का जवाब देते हैं, जाँच के आदेश देते हैं या मामलों को राज्य सरकार तक भेजते हैं। सोशल ऑडिट से उजागर भ्रष्टाचार और फंड्स के दुरुपयोग के खुलासों पर फ़ॉलो-अप/आगे की कार्यवाही बहुत सीमित है क्योंकि इसकी ज़िम्मेदारी राज्य सरकार के एक अलग दफ़्तर (विभाग) पर होती है जिसके पास आवश्यक स्वतंत्रता और क्षमता नहीं होती।

### समस्याएँ सुलझाने संबंधी प्रभाव: भ्रष्टाचार पकड़ने से परे

सोशल ऑडिट से सिर्फ़ समस्याएँ उजागर करने की ही उम्मीद की जाती है। लेकिन समन्वयक बताते हैं कि ये व्यक्तिगत नागरिक शिकायतों का निबटारा करने में अहम भूमिका अदा करती है। सार्वजनिक रूप से उपलब्ध सरकारी आँकड़े सोशल ऑडिट की समस्याएँ सुलझाने से संबन्धित भूमिका को रेखांकित करते हैं। दिसम्बर 2015 से नवम्बर 2016 के बीच जो 45,448 शिकायतें सोशल ऑडिट समन्वयकों को मिलीं उनमें से 32 फ़ीसदी सोशल ऑडिट की प्रक्रिया से सुलझ गयीं। सर्वे में स्टाफ़ ने बताया कि सोशल ऑडिट की प्रक्रिया नरेगा कामगारों की एक प्रायः

देखी जाने वाली समस्या - मज़दूरी का देरी से और अधूरा भुगतान - को सुलझाने की तरफ़ बढ़ रही है।

### अप्रत्याशित परोक्ष प्रभाव: राजनैतिक जवाबदेही

कोई बाध्यकारी शक्ति नहीं होने के बावजूद सोशल ऑडिट स्थानीय चुनावी राजनीति के ज़रिए अप्रत्यक्ष तौर पर जवाबदेही स्थापित करती प्रतीत होती है। आन्ध्र प्रदेश में पहले किए गए अध्ययनों में स्थानीय राजनेताओं और (नरेगा) कार्यक्रम के कर्मचारियों के बीच नरेगा के फंड्स को हजम करने की साँठ-गाँठ सामने आयी लेकिन सर्वे किए गए स्टाफ़ में से पाँच में से एक का मानना था कि भ्रष्ट राजनेताओं के चुनाव में ना जीतने की ओर सोशल ऑडिट का अहम योगदान रहा। हालांकि यह एक निश्चित प्रवृत्ति नहीं है और आगे की जांच की आवश्यकता है।

### आगे होने वाले प्रायोगिक शोधों के लिए आशय

यह खोजपूर्ण शोध भविष्य में होने वाले शोधों के लिए ऐसे महत्वपूर्ण सवाल खड़े करता है जिससे ऐसे संस्थानिक बदलाव लाए जा सकें जो सोशल ऑडिट के प्रभाव को और गहरा बनाने की तरफ़ बढ़ें:

1. सोशल ऑडिट शिकायत निवारण की ओर किस तरह योगदान देती है?
2. कैसे राज्य सरकार एक सक्रिय सूचना प्रसारण की रणनीति बना सकती है और ग़बन की जाँच करने के लिए अपनी कार्यान्वयन/एन्फ़ॉर्समेंट इकाई की स्वायत्तता और क्षमता में इज़ाफ़ा कर सकती है?
3. SSAAT कैसे एक सक्रिय सूचना साझा करने की रणनीति बना सकता है जिससे राज्य सरकार और सिविल सोसाइटी के लोग आसानी से दिक्कतों को पहचान सकें और लक्षित (targeted) कार्यवाही कर गरीबी-उन्मूलन के कार्यक्रमों के प्रदर्शन को सुधार सकें?



# I. Introduction

India's National Rural Employment Guarantee Act (NREGA, enacted in 2005) is a large scale, demand-based rural employment program. It provides a legal guarantee of 100 days of employment for the unorganized rural workforce. The NREGA also includes a transparency and accountability mechanism—a “social audit”—that provides program participants with a legal right to participate and monitor the implementation of their right to work.

A social audit is a public oversight process through which under-represented categories of citizens scrutinize public sector performance through in-person verification and oral testimonies in collective forums or public hearings. A decade later, we are far from seeing a thorough implementation of NREGA social audits across India; however, there are exceptions, such as the state-convened process in the southern Indian states of Andhra Pradesh and Telangana, facilitated by a parastatal agency—Society for Social Audit Accountability and Transparency (SSAAT). Notably, the organization's material basis is not dependent on the ruling party. The administrative cost of SSAAT is funded through the NREGA state budget. This agency's combination of neutrality and sense of mission allowed it to create an enabling environment for citizen voice and oversight through public hearings, throughout the two states with a total rural population of over fifty-six million. Since their inception in 2006, the state-run social audits for NREGA were organized on a massive scale with repeated public hearings (over 9,125 public hearings), irrespective of changes in state and national governments as well as state bifurcation.<sup>1</sup>

This exploratory research was intended to understand how those responsible for carrying out social audits perceive their strengths and limitations. In August 2016,

the Accountability Research Center at American University and its local partner Factly, in partnership with SSAAT-Telangana, co-designed and administered an anonymized web-survey to assess state-run social audits from the perspective of those facilitating them. This paper adds to earlier studies on social audits in India<sup>2</sup> but had a broader goal—that is, to inform future action-research strategies intended to strengthen the impact of social audits in redressing grievances such as access to work and unpaid wages.

Since 2015, SSAAT-Telangana has recorded and tracked individual workers' grievances related to pending payments, job card application, and opening bank accounts. According to SSAAT, grievance redress is one of the weakest links of NREGA. There is no follow-up on grievances that are usually registered through a phone complaint system. SSAAT's random check of grievances lodged through this complaint system revealed that many complaints were closed without reason or redress. SSAAT's proactive decision to focus on grievance redress was intended to mitigate the harm done to workers through loss of wages, failure to find work, and weak state government responsiveness.<sup>3</sup>

Publicly available administrative data on grievance redress reveals a new problem-solving function of social audits. Of the approximately 45,448 NREGA-related individual grievances received between December 2015 and November 2016, 32 percent were resolved through social audits.<sup>4</sup> SSAAT's efforts at grievance redress complement the interests of 'action-strategists' within India in understanding the effects of social audits on grievance redress. This research suggests that scholars and practitioners should increase their focus on the problem-solving role of social audits, in addition to assessing the deterrence effects of social audits.



## II. SSAAT in Context: Embedding Transparency, Participation and Accountability Inside the State

In the practice-oriented literature, the state (or government bureaucracy) is often portrayed as in need of technical capacity inputs or pursuing transparency and “open government” reforms to improve some aspect of government performance. Since the focal point of open government is making useful government data available to citizens (Halloran 2015) the focus tends to be on “forms” of government transparency—administrative, political, and budget transparency—or on “activities”—decision-making, policy, and policy outcomes transparency (Cucciniello, Porumbescu, and Grimmelikhuijsen 2016). We know relatively little about the enabling factors that permit the creation of new arenas for participation to enable citizen engagement in bolstering state capacity to respond to citizens (Abers and Keck 2009).

This study is a step in the direction of understanding a state-run reform process that permits active engagement of citizens in monitoring the implementation of one of the largest social welfare programs in the world. The social audit process in the southern Indian state of Telangana stands apart because it neither comes from exogenously imposed best practices nor is it primarily driven by civil society. It is an endogenous, state-driven reform that was inspired by civil society activism to make the state more transparent, accountable and responsive to the poor. Social audits are another case where invited spaces can make a difference for enabling citizen voice at scale (Fox 2016) because they are convened by state actors that are not enmeshed in state administrative or partisan politics. It is extremely important for social audits to be convened by neutral parties and to avoid capture by local elites (as happened in another southern state, Karnataka (Rajasekhar, Lakha, and Manujal 2014).

We focus on the efforts of a parastatal agency in charge of facilitating social audits in Telangana, to understand: What is the role of state efforts in transparency, participation, and accountability (TPA) research and practice?

More specifically, what happens to state efforts that create enabling environments for collective action by the most oppressed citizens for public oversight of government programs? What role does public disclosure and answerability play in promoting administrative responsiveness and deterrence of corruption? Our focus is on understanding the relationship between (participatory) state-enabled transparency and accountability, with the aim of contributing to ongoing debates within the TPA field on the connection between transparency, participation and accountability.<sup>5</sup>

### 1. State-run Social Audits

In the years prior to the enactment of NREGA, rural development, poverty alleviation and employment and welfare programs in India were largely viewed as “slush funds” that tended to fall under local political and bureaucratic control rather than focusing on poverty reduction targets. The NREGA, became the first national program that wove transparency, participation and accountability into the mundane fabric of citizen-state interaction at the lowest level of government. Through social audits and other transparency and proactive disclosure measures,<sup>6</sup> state governments are required to facilitate disclosure on program implementation and to help workers to identify and fight pilferage.<sup>7</sup> This research focuses on one state agency’s efforts to empower citizens to change the behavior of other state agencies and make them transparent and accountable in their functioning.

The state-run social audits in Telangana (before it separated from the state of Andhra Pradesh) were directly inspired by the movement-led *jan sunwais*, or public hearings, in the northwestern state of Rajasthan (Pande 2017). Though they differ from *jan sunwais* qualitatively in nature and scope, state-run social audits reflect a breakthrough achieved under unusual circumstances.

The Chief Minister of Andhra Pradesh in 2006, Y.S. Rajasekhara Reddy (YSR), enjoyed strong political capital within his party—the Congress Party—and the electorate. His 2004 election campaign promised to tackle an agrarian crisis in the state by improving the implementation of social welfare programs.<sup>8</sup> YSR appointed pro-poor, reformist civil servants to senior positions in the state department of rural development in charge of implementing the right to work law.<sup>9</sup> For example, one of the architects of the social audit process was his principal advisor. These officials were known for their unabated support for marginalized groups; some of them also came from Dalit or lower caste households. Hence, they enjoyed a unified sense of ideological purpose about the possibility and desirability of using a national legislation like NREGA to promote employment generation for vulnerable populations. These high-level bureaucrats were given a “free hand” in implementing NREGA.<sup>10</sup>

In addition to the political initiative of the state government and the presence of reformist bureaucrats that created the necessary conditions for state-run social audits, these social audits are funded by the state—which means they are neither tied to donor budget cycles or agendas—making them undoubtedly one of the more advanced forms of institutionalized accountability.<sup>11</sup>

## 2. Institutional Innovation

The years 2005 and 2006 can be viewed as a watershed period in Telangana. Drawing on the powers granted to state governments under section 17 of NREGA to provide staff and technical support for social audits, an independent agency was created to coordinate and facilitate social audits: Society for Social Audit Accountability and Transparency (SSAAT).<sup>12</sup> In practice, SSAAT is embedded inside the rural development department but it is not closely tied to political parties or systems of patronage. A former activist from a grassroots campaign—that pioneered *jan sunwais* in Rajasthan, which served as a model for social audits—was invited to join SSAAT, and is the current head of this agency.

Opposition from local party cadres was also contained by a politically powerful chief minister (YSR) who declared the program out of bounds for profiteers within his party.<sup>13</sup> For reformist civil servants, keeping NREGA free of corruption and avoiding the fate of other government social welfare schemes permitted administrators to centralize NREGA implementation and keep it in the hands of the rural development bureaucracy.<sup>14</sup>

State-enabled participatory reform such as the Telangana government's social audits offer a bridge between bureaucratic processes and deliberative forums that allow for debate and meaningful citizen participation.<sup>15</sup> Senior administrators are required to attend social audit public hearings and answer to the public. Social audits are an open forum for women and Dalits, who constitute majority of the NREGA workers and who are often excluded from existing formal participatory spaces. This is important as NREGA Dalit workers can be confronted by District Resource Persons (DRPs), who facilitate social audits and who often belong to the same caste—offsetting the power imbalance that characterizes such interactions (Bremner 1984). However, some research has found mixed results on the effects of social audits on civic engagement (Mehta and Aiyar 2015) and the prevention of fraud (Afridi and Iversen 2014). Social audits can, by unearthing corruption, foster discontent at the grassroots, thus promoting citizens' demands for accountability (Jenkins and Manor 2017). Social audits can also trigger actions by checks and balance institutions, producing horizontal accountability (O'Donnell 1998)<sup>16</sup> (see box 1).

### Box 1. A National Structure for Social Audits: The Role of India's Supreme Audit Institution

The ongoing social audit experiences in India can be classified into three implementation scenarios: the state-run social audits in the southern state of Telangana; the grassroots/movement led process in the north-western state of Rajasthan (Pande 2017); and, the emergent cooperation between civil society and state in the north east and eastern states of Sikkim (Tambe et al 2016), Bihar (Ranjan and Kumar 2010), and the central state of Madhya Pradesh (Halloran 2016). Apart from these implementation scenarios, most state governments are doing little or nothing to organize social audits.

The national audit agency—the Comptroller and Auditor General (CAG)—is trying to change this by facilitating a process to embed lessons from the decade-long experience of movement *jan sunwais* and state-run social audits into a national structure.

In 2011, the CAG in collaboration with civil society drafted national rules on the social audit procedure. Though these were largely ignored by majority of the state governments. This prompted the CAG to carry out a nationwide compliance audit of its Audit of Scheme Rules. It found that social audit units were either non-existent (7 states), existing as cells within the state rural development departments (8 states) or registered as societies or non-government organizations (14 states) (CAG 2016).

With a poor implementation of social audits, and local self-government or *panchayats*—that have control over charge of 50 % NREGA budget—falling outside its jurisdiction, in 2015, state auditor generals received instructions from the CAG to support institutionalization of social audits.

The CAG's interest in social audit pushed the national Ministry of Rural Development to develop standards, a methodology and an action-plan for implementing social audits across India. Since 2016, approximately 3000 social audit staff from 14 states have received social audit training. It is too early to predict what the CAG's complimentary view of social and government audits will yield. But the national interest suggests that as pioneers, Telangana will be watched closely as well as have a space to address their limitations and address sustainability issues.



### III. Methods

This study is based on an anonymized web-survey of three hundred District Resource Persons (DRPs), mid-level staff in charge of facilitating social audits for NREGA in nine districts of Telangana.<sup>17</sup> This approach allows us to draw on the strengths of documenting subjective perceptions of key participant-observers, while getting a large enough sample to allow us to convert qualitative inputs into quantitative data. Our methodological choice was determined by our interest in capturing perceptions or personal opinions of mid-level staffers on the effects of social audits on program performance as well as the obstacles, constraints, and motivations for why they choose to work as local auditors. In-person interviews might have posed obstacles to gathering honest responses. For example, respondents may have felt obligated to provide positive responses or not expressed their opinions freely due to concerns about job security or career advancement. This survey research draws on the authors' previous research and advocacy work on the state-run social audits, which included selecting and training DRPs, analyzing administrative data, conducting ethnographic research and key informant interviews, and reviewing secondary data sources.

#### 1. Sample

A total of about 340 DRPs were working with SSAAT in Telangana at the time of this research, and they were all invited through email to fill out the survey. Of them, 305 responded to the survey, which is about 90 percent. Most (90 percent) of the respondents are male and only 10 percent are female. Often DRPs spend 25 days each month in the field, away from their homes and families, which could be one explanation for the low percentage of female DRPs. In terms of experience, a majority of the respondents (52 percent) had facilitated between 50 and 100 social audits, and 48 percent had facilitated between 20 and 50 social audits in the period covered by this study (FY 2014 to 2015).<sup>18</sup>

Social audits are facilitated by interlocutors who come from the most excluded social groups and are committed to enabling the voices of their counterparts. A majority of the DRPs enter the state-run social audit process as village-level social auditors (VSAs). VSAs work with villagers and workers to record grievances and verify government information on NREGA implementa-

**Table 1. Staff Response Rates to Survey in Districts Across Telangana State**

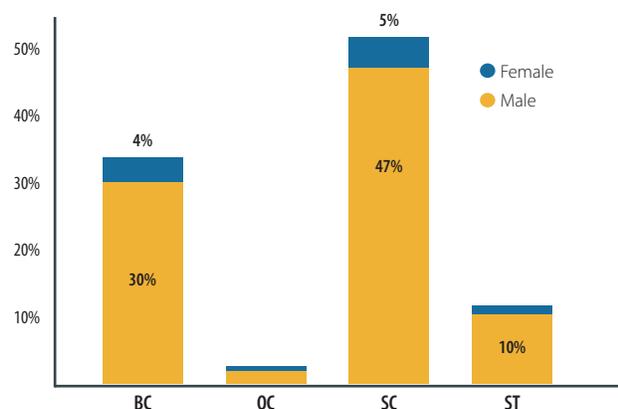
Name of the District	Number of DRPs Invited to Take the Survey	Total Number of DRPs who Responded to the Survey	Response Rate
Adilabad	42	37	88%
Karimnagar	43	38	88%
Khammam	32	29	91%
Mahbubnagar	42	38	90%
Medak	36	32	89%
Nalgonda	45	42	93%
Nizamabad	32	29	91%
Rangareddy	26	23	88%
Warangal	42	37	88%
<b>Total</b>	<b>340</b>	<b>305</b>	<b>90%</b>

tion. DRPs coordinate the VSAs' activities and facilitate the collective fora or public hearings.

Thus, DRP experiences of social audits are shaped by their involvement with the nitty-gritties of the social audit process: obtaining government information, collating the information for verification, conducting in-person verification with workers, visiting worksites to validate official records such as engineers' measurement book entries, bills and invoices for materials used on construction works, and organizing public hearings. DRPs are also the points of contact for program participants, and they record participants' testimonies, share social audit findings with them, and encourage workers to testify at public hearings. A majority of DRPs and VSAs also come from rural households that rely on NREGA for livelihoods. Thus, they are uniquely placed to provide a ground-level view of the state-run social audit process as facilitators of the processes and because of their social ties with program participants.

## 2. Demographic Characteristics of Respondents

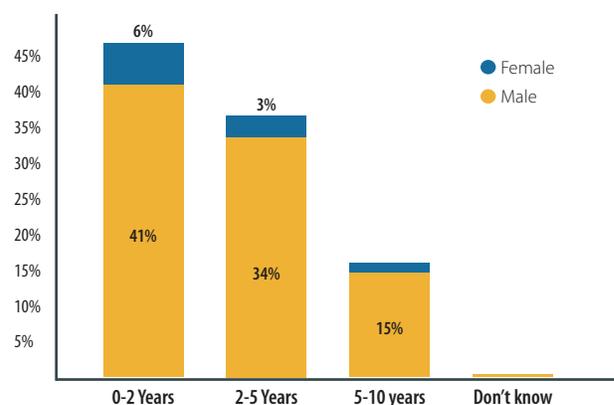
**Figure 1. Total Respondents by Caste**



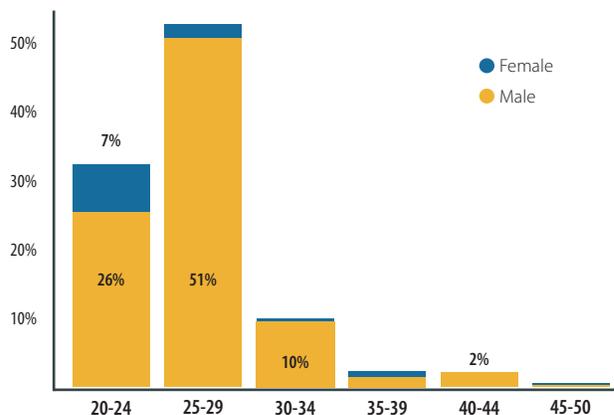
Rural India is characterized by a system of social segregation that separates people into endogamous, hereditary groups: *jatis* or castes. Indians are borne into caste groups of which, historically, the lower caste (Dalit), scheduled castes (SC), as well as the indigenous people or scheduled tribes (ST), have been systematically discriminated against by the dominant castes.

Usually, unequal power relations between state officials and citizens is an obstacle to ensuring state's answerability to citizens (Gupta 2012). We find, in terms of the caste, more than half the DRPs (52%) are SC, 11% are ST, and 34% of our respondents belong to the Backward Castes. Most of the female DRPs are either SC or BC. This is an important feature of the institutional design and roll out of social audits to proactively include unrepresented voices rather than a narrow, technocratic vision.

**Figure 2. Work Experience of DRPs in SSAAT**



**Figure 3. Total Respondents by Age Group**



Many of the surveyed staff are Dalit youth, many of who come from NREGA participant families. Of all the respondents, more than half (53 percent) are in the 25–29 age group, while an additional 33 percent are in the 20–24 age group. In other words, close to 86 percent of the surveyed DRPs are below the age of 29 years. Only 10

percent of the DRPs are between the age of 30–34 while the remaining 4 percent are above the age of 34 years.

In our interaction with senior officials of SSAAT, we learned that attrition of DRPs is a problem and that the retention rate of DRPs in Andhra Pradesh was better than that in Telangana. From our sample, 47 percent of the DRPs have less than 2 years of experience in SSAAT. An additional 37 percent have between 2 and 5 years of experience, while about 16 percent have more than 5 years.

Some village social auditors (VSA) become DRPs because they want to be identified as state functionaries with ID cards, while others consider themselves activists (Veeraraghavan 2015). The job of DRP, however, involves a lot more responsibility than that of a VSA. Some new DRPs leave the job sooner than expected. Sometimes, contracts are not renewed based on performance evaluations or on disciplinary grounds such as absence without taking leave or violation of terms of employment. Attrition has an impact on SSAAT's institutional strength: every two years roughly 40% of the DRPs are new recruits. The turnover of DRPs could also hinder monitoring and reporting of post-audit follow-up. Therefore, SSAAT should assign sufficient resources for continuing professional development of its personnel.

### 3. What Information Was Asked For?

Our main objective was gathering DRPs' perceptions of social audits and aggregating those perceptions by combining numerical and descriptive data. With the aim of collecting DRPs' feedback on what can be done to improve social audit effectiveness, our survey also included one subjective question (see Annex 1 for the original survey questions). To understand the preventative/deterrence effects of social audits on NREGA performance, we asked DRPs twenty-one specific, multiple choice process-oriented questions on the state-run social audits about issues such as the timely availability of work and payment of wages, the inclusion of Dalits, women and other vulnerable groups, the effects of social audits on corruption in payment of wages, re-election of corrupt politicians and suspension of corrupt officials, and the likelihood of threats to local auditors and/or workers. The survey focused on gathering perceptions on three main areas: DRPs' needs/concerns and solution requests; the challenges and limitations to sustaining state-run social audits; and areas of improvement. In the following sections, we discuss the survey findings in some detail.

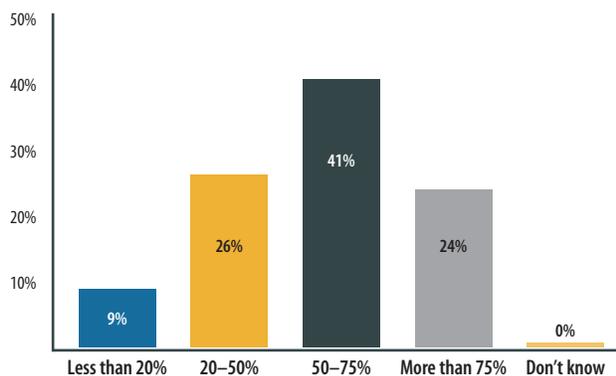


## IV. Detailed Survey Findings

The survey findings discussed below distill the perceptions of mid-level SSAAT staff in Telangana. We ask readers to consider a distinction between the questions that address staff perception of corruption (which cannot be verified by us) and their perception of NREGA processes, such as the demand for work and the timely payment of wages (which can be verified with administrative data). The survey study intended to identify patterns and themes for future research that can inform agency strategies for proactive disclosure and “targeted transparency” (Fung, Graham, and Weil 2007). The findings below should not be viewed as definitive trends of the impact of social audits on NREGA performance in Telangana.

### 1. Deterrence Effects of Social Audits

**Figure 4. Social Audits in the Last Year that Helped in Deterring Corruption**

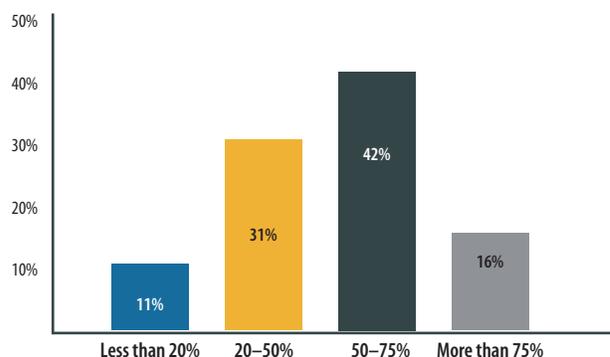


Close to two thirds of the DRPs felt that more than 50 percent of the social audits they were part of in 2014 to 2015 helped deter corruption. This could indicate that there is little corruption (in theory), but follow-up research is required to investigate this perception.<sup>19</sup> Only 9 percent of the DRPs felt that less than 20 percent of the audits they were part of in 2014 to 2015 helped deter corruption. It is equally important to note that nearly a quarter (24 percent) of the DRPs felt that more than 75 percent of the social audits they were part of in 2014 to

2015 helped deter corruption.<sup>20</sup> We recognize that some of the DRP responses reflect a potential bias—that is, respondents tend to overestimate the importance of their job.

Social audits are clearly not a panacea for solving all problems of fraud and corruption in NREGA. Unlike previous studies that, by conflating detection of fraud and follow-up action, claimed that social audits were not successful in halting corruption (Afridi and Iversen 2014), we distinguish between the transparency role of social audits from the follow-up measures needed for full accountability. We also view the investigation of fraud as a different area of oversight than detection. In Indian state governments, the responsibility to detect fraud is separated from the job of investigating those who are exposed, while the function of criminal prosecution falls to yet another agency. The mandate of SSAAT-Telangana is to coordinate and facilitate social audits to publicly identify implementation problems. Follow-up is the responsibility of the Vigilance Office, a separate body which oversees follow-up actions on reported “deviations” (fraud) based on social audits. However, this office lacks adequate independence from the agency it needs to investigate, as well as power and resources to fulfill its mandate; the post of the Chief Vigilance Officer at the state level remained vacant for six months in 2009 to 2010 and then again for a year in 2012 to 2013.<sup>21</sup>

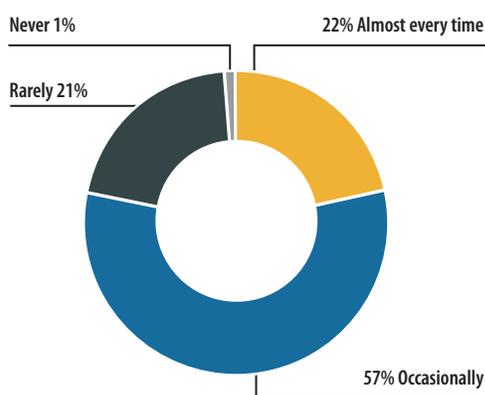
**Figure 5. Social Audits that Helped in Deterring Corruption in Wages Paid**



Corrupt officials or middlemen steal funds by creating fictitious workers or by underpaying workers. About 42 percent of DRPs felt that 50 to 75 percent of the social audits they were part of in 2014 to 2015 helped in deterring “corruption in wages paid”—that is, the money withheld from workers’ wages and pocketed by local officials. Another 16 percent felt that more than 75 percent of the social audits helped in deterring corruption in wages paid. Only 11 percent felt that fewer than 20 percent of the social audits helped in deterring corruption in wages paid.<sup>22</sup> The percentage of the respondents who felt that fewer than 20 percent of the social audits helped in deterring corruption in wages paid was similar across the districts.<sup>23</sup> Despite the perceived reduction in corruption in wages paid, progress in addressing problems that persist is limited because, as noted above, the responsibility for follow-up lies with the Vigilance Office, which lacks autonomy because of its institutional location. It remains to be seen whether the proposal developed by SSAAT and senior NREGA administrators to strengthen the Vigilance Office—currently under consideration by the state government—will be approved.<sup>24</sup>

## 2. Answerability without Enforcement

**Figure 6. Frequency of Applicants Receiving Work within 14 Days of Applying**



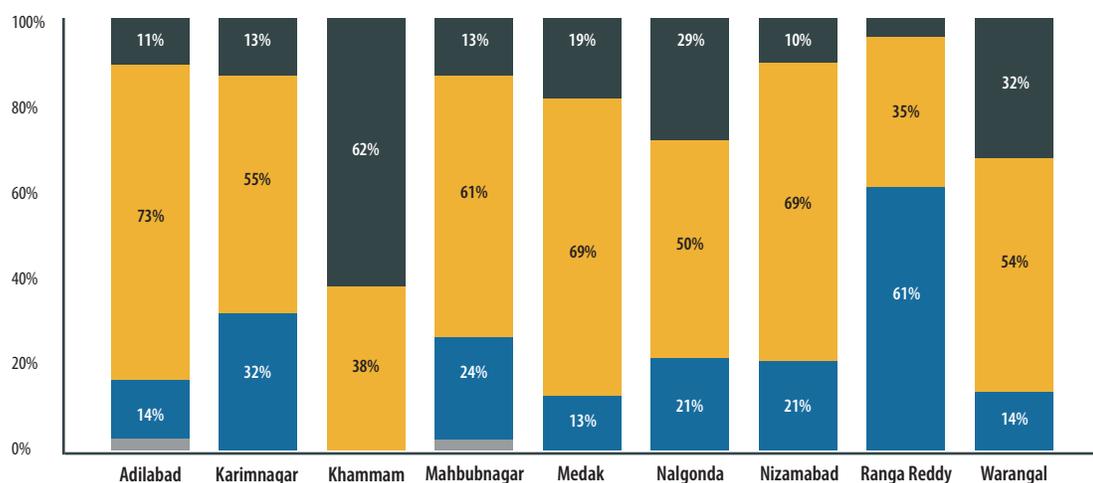
India’s right to work is a demand-based employment generation program. Where state governments fail to provide work, workers are entitled to an “unemployment allowance” from the state budget, not the national

government. So far, unemployment allowance has been paid in some districts across seven states (Madhya Pradesh, Jharkhand, Karnataka, Kerala, Orissa, Tripura and West Bengal) in response to pressure from grassroots groups, NREGA workers’ unions, as well as state governments paying as procedure (Tewari, 2010).

We asked survey respondents if the Telangana government was fulfilling its statutory obligations of providing employment to all workers who apply for work within 14 days. Only 22 percent of the respondents say that applicants receive work within 14 days every time they apply for work under NREGA, 57 percent say that applicants occasionally receive work within 14 days, and 21 percent say that applicants rarely receive work within 14 days. A negligible 1 percent say that applicants never receive work within 14 days of applying, which is encouraging to hear. In practice, this could reflect that Telangana is good at supplying work, but whether all demands for work are registered and acted upon needs further research.

Geographic disaggregation can help SSAAT to identify and learn from high-performing districts as well as to address laggards. For example, the Khammam district does especially well, since 62 percent of the respondents say that applicants get work within 14 days every time, which is three times the state-wide average. This suggests that more in-depth research could identify what scholars call “positive deviance”—in other words, what factors can account for the strong performance. For example, the program’s responsiveness could be due to the strength of citizen’s voices in the district, through social audits or grassroots organizations—the “demand side”—or to the presence of an efficient official overseeing the NREGA implementation—the “supply side.”<sup>25</sup> In contrast, DRPs in Rangareddy district see very poor program responsiveness compared to other districts in the state. Only 4 percent in Rangareddy say that applicants receive work every time within 14 days, and 61 percent felt that applicants rarely get work within 14 days, which is again thrice the state average. This could be because Rangareddy is an urban district. According to the 2011 census, 70 percent of the population in the district is described as urban or living in urban regions, while NREGA is a rural employment program.

**Figure 7. Frequency of Applicants Receiving Work within 14 Days of Applying (by District)**



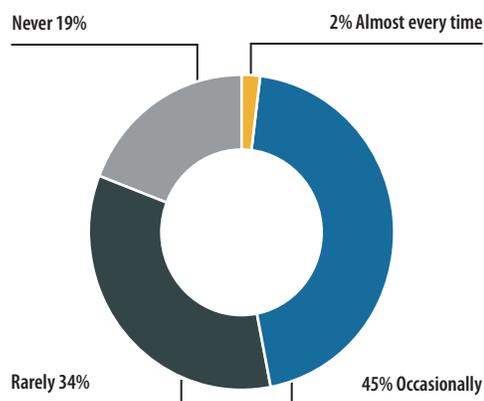
### 3. Preventing Wage Fraud: Switch from Cash Payments to Bank Accounts

Another transparency enhancing measure, which is preferred by government officials, is the switch from cash payments to payment agencies such as banks and post offices to prevent fraud and allegedly give workers better control over their wages. According to the Government of India, the introduction of NREGA wage payments into bank accounts of wage seekers is the “world’s largest ever financial inclusion scheme” (Government of India, cited in Adhikari and Bhatia 2010).<sup>26</sup>

Andhra Pradesh was the first state to pioneer a wage payment system using post offices and later banks, and has since alternated between the two. Over the years, another model of payment was tried: the banking correspondent model, where an authorized representative offers cash payments of wages in the absence of rural bank branches. In practice, the payment system in Telangana is “complicated and opaque, and its implementation on the field has created more structures of delay” (Narayan and Chintala 2015).<sup>27</sup>

State governments are responsible for making timely wage payments—that is, within 15 days after comple-

**Figure 8. Frequency of Workers Getting Paid within 15 Days Of Work Completion**



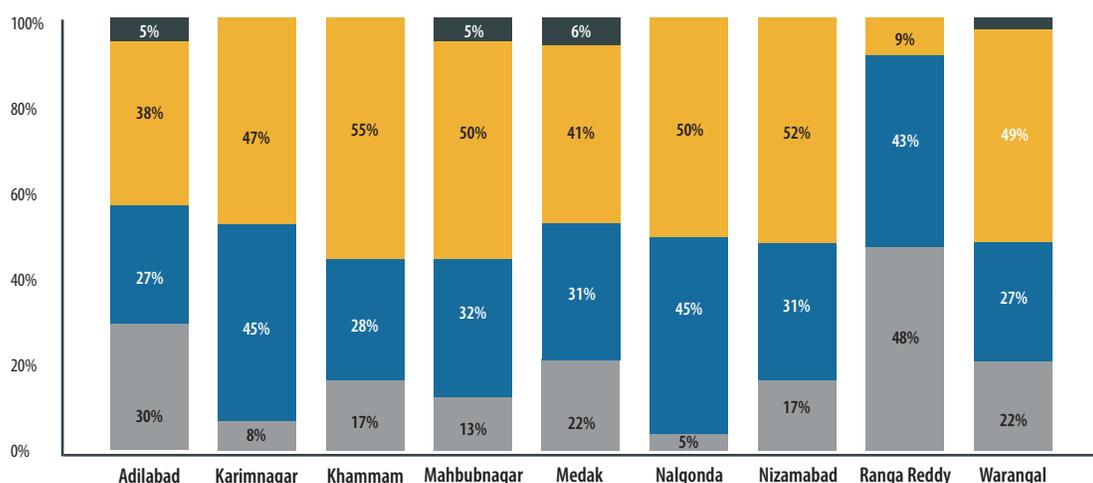
tion of work, as per law. Only 2 percent of the respondents felt that workers get paid within 15 days of the completion of work every time; 45 percent of the respondents say that workers occasionally get paid within 15 days, and 34 percent say workers are rarely paid within 14 days. It is important to note that almost one fifth (19 percent) of respondents say workers never get paid within 15 days of the completion of work. NREGA promises mandatory compensation or an unemployment allowance for delayed wages. Though the intent

is to ensure timely release of wages, despite recurrent delays, compensation for delays is rarely paid.<sup>28</sup> Though payment delays can occur due to a range of factors: national government delays fund release to state governments, faulty handling of labor lists, shortage of staff, shifting methods of payment, and in some states, discretionary actions by mid-level bureaucrats. Future research could include analysis of patterns and causes of delayed payments to determine when is the problem caused by national, state or lower level authorities.

In Telangana, in the last decade, due to political compulsions, personal preference of bureaucrats or efficiency concerns has led to a continuous shift between payment methods—that is, between banks and post office.

As per SSAAT officials, this kind of experimentation with payment systems is driven by bureaucratic concerns to stop graft and prevent fraud; however, wage seekers were rarely consulted with this kind of experimentation. This has caused confusion, and added to delays that occurred due to delayed release of NREGA funds by the central government. According to a national newspaper, in FY2014–15, “72 percent of the total wages disbursed were delayed” (The Hindu 2015). The SSAAT annual report also notes that delay in individual wage payments has gone up from 34% in 2014–15 to 56 % in 2015–16 due to “inordinate delay” in release of funds from the central government (or the Ministry of Rural Development) (SSAAT 2016:9).

**Figure 9. Frequency of Workers Getting Paid within 15 Days of Work Completion (by District)**



A DRP spends 25 days in a month in the field planning and conducting social audits. Many of them come from NREGA participant families. Uninterrupted social audits over the last decade permits villagers to view DRPs as officials who can communicate workers’ grievances to higher levels, or raise them at the social audit public hearings. The nature of their work—collecting and verifying information on NREGA implementation and recording workers’ testimonies—equips DRPs with the knowledge to answer question about whether workers receive work or payment for their work. Late wage

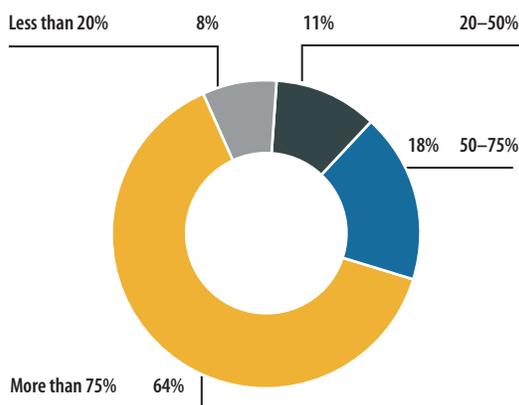
payment is one of the most common grievances across India. Out of the nine districts, none of the respondents from four districts, Karimnagar, Khammam, Nalgonda, Nizamabad & Rangareddy said that workers get paid within 15 days every time.

Only 9 percent of the respondents from Rangareddy say that applicants get paid within 15 days occasionally which is one-fifth of the overall average. It is interesting to note that majority of the respondents in Rangareddy also said that applicants rarely or occasionally get work

within 14 days. In fact, close to half of the respondents in Rangareddy say that workers “never” get paid on time. In Khammam district, more than 55 percent of the respondents felt that the workers receive work every time within 14 days of application. But when it comes to wage payments within 15 days of the completion of work, none of the respondents said that the workers get paid on time almost every time. Overall, the respondents feel that timely wage payment is the most common grievance; they also identified preventing delayed payments as one of the most needed improvements for state-run social audits.

#### 4. Effects of Social Audits on NREGA Planning

**Figure 10.** Social Audits that Checked if the NREGA Work Was Actually Undertaken

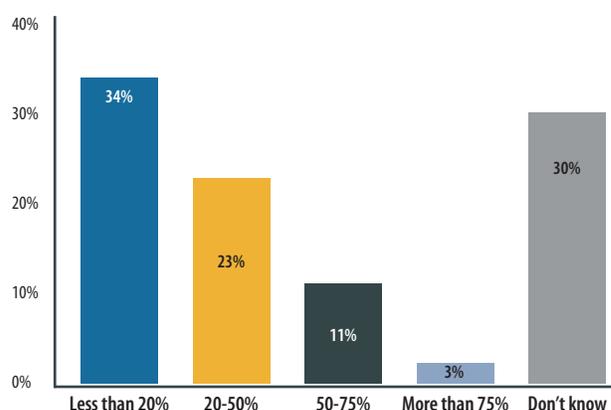


One of the anti-corruption roles of social audits is to check whether the public works were undertaken. Close to two-thirds of respondents felt that more than 75 percent of the audits they were part of checked if the work was undertaken. Only 8 percent felt that less than 20 percent of the social audits they facilitated checked if the work was undertaken. A strong majority (64 percent) of respondents felt that more than 75 percent of the social audits checked if the work was undertaken. Ninety-six percent of respondents working in Rangareddy and 88 percent working in Medak felt that more than 75 percent of the social audits they facilitated checked if the work was undertaken. This is an important achievement that highlights a very important aspect of the so-

cial audits. Though the audits are not usually taken up immediately after the works are completed, it suggests the state-run social audits are fulfilling their oversight function on program implementation and detecting malpractice. These findings in turn could help inform village level meetings for planning future NREGA works.

#### 5. Unexpected Indirect Effects: Political Accountability

**Figure 11.** Social Audits that Contributed to a Corrupt Politician Not Being Elected



Local power holders and authorities have tried to undermine audit activities in numerous ways.<sup>29</sup> A link between election results and localized corruption (like that in NREGA) is difficult to ascertain, and this is reflected in the large number of “don’t know” responses to a question about this topic.

One in five DRPs think that a significant fraction of social audits contributed to a corrupt politician not being elected.<sup>30</sup> Many of our respondents (30 percent) answered that they don’t know. Despite Telangana’s NREGA implementation structure that bypasses local government and politicians and a rather disciplined bureaucracy, local politicians have devised innovative ways to collude with implementers (Mehta and Aiyar 2015). That any sanctions are being imposed is an important finding, especially in so far as these are informal impacts based on civic power, discourse and exposing transgressions.

Having said that, these findings are based on staff perception of corruption which cannot be verified. A de-

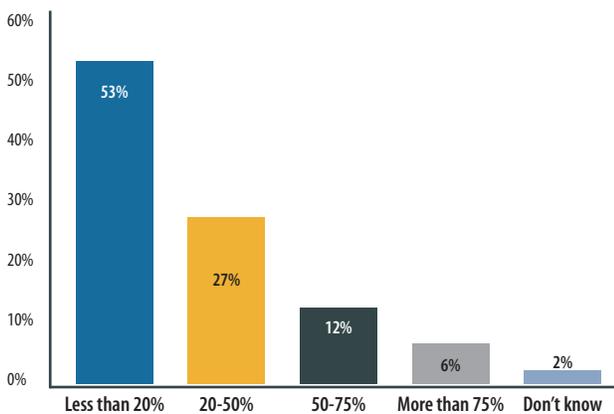
tailed study of the local panchayat elections in each of the districts in Telangana and, more specifically, in areas with large deviations might help us better understand the large variations within districts.

## 6. Social Audits and Bureaucratic Accountability

In contrast to their perceived robust deterrence of corruption, social audits were not widely seen as contributing to the suspension of corrupt officials. One in five DRPs indicated that most of their social audits contributed to the suspension of a corrupt official.

According to SSAAT, less than 5 percent of the officials investigated for fraud were either removed or suspended, because the code of conduct rules that govern SSAAT employees are rarely followed.<sup>31</sup> SSAAT’s annual report calls for placing all the orders and decisions online, and strengthening the independent vigilance agency (SSAAT 2016:23).

**Figure 12. Social Audits that Contributed to Suspension of Corrupt Public Officials**

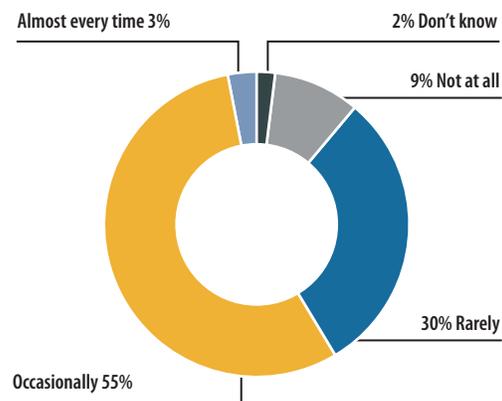


In one district, Warangal, 19 percent of respondents felt that more than 75 percent of the social audits contributed to the suspension of a corrupt official, which is more than 3 times the overall average. The DRP opinion could reflect the presence of a reformist heading the district with a prior commitment to social audits. Overall, explanations for district-level variation are difficult due to lack of disaggregated data on the suspension of officials. If

this data is gathered and made publicly available, we can better understand district-level trends. A rethinking of data gathering practices could help SSAAT determine what kind of data currently collected and not collected would help in putting a strong case to the state government for better post-audit follow-up.

## 7. Unintended Outcomes of Citizen Oversight

**Figure 13. Frequency of Citizens Having Experienced Reprisals for Participating in Social Audits**



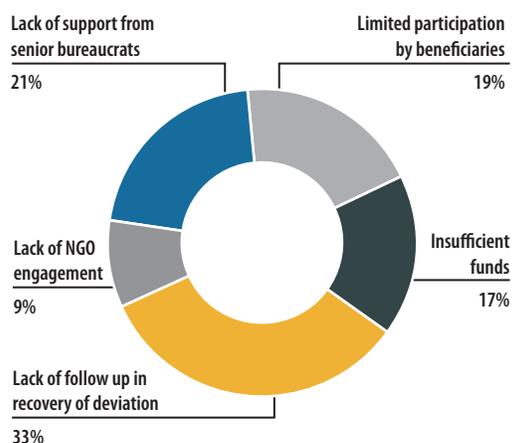
Despite India’s democratic electoral system, citizens who publicly exercise voice to report corruption or abuse still face widespread threats of reprisals. SSAAT’s independence from local elites and party bosses, its staffing by citizens who come from the most excluded social groups, and its commitment to creating a safe space for citizens’ voices gives it a high degree of public credibility. Yet, that turns out not to be enough. Most respondents reported that participants in social audits experienced reprisals either occasionally (55 percent) or almost all the time (3 percent). On the other hand, more than one-third reported reprisals either rarely (30 percent) or not at all (9 percent).<sup>32</sup> Even though reprisals are normal and systemic, people continue to participate.

A detailed analysis of similar reprisals in Telangana is required to understand the reasons for such reprisals as well to contextualize the responses from districts such as Rangareddy and Nizamabad. Almost 18 percent of respondents in Rangareddy district said they “don’t know” about this, almost 9 times the rate in other districts.

This is particularly surprising given the fact that DRPs along with VSAs are often the first point of contact for citizens in the social audit process. Close to 21 percent in Nizamabad said citizens “never” experienced reprisals, the highest for any district. These findings suggest that SSAAT’s capacity for creating a safe space is limited by the persistent impunity of local power-holders and is no substitute for other institutional actions to deter impunity.<sup>33</sup>

## 8. Staff Responses to Obstacles to Social Audit Effectiveness

**Figure 14. Obstacles in Making Social Audits More Effective**



Almost one-third of the respondents ranked “lack of follow up in recovery of deviation” (or fraud) as the main obstacle in making social audits effective. Another 21 percent felt that lack of support from senior bureaucrats was the main obstacle. Together, these two reasons make up 54 percent of the respondents. The DRP responses are consistent with the findings of other studies and reports. Halloran (2016) finds a general lack of participation and coordination by government actors as one of the challenges to social auditing of NREGA. Afridi and Iversen (2014:5) highlight the need for a “time bound process where transgressors are punished and responsibilities for follow up of social audit findings are laid out and credibly enforced.” SSAAT’s annual report (2013-2016) also notes that the only way to control rising “deviation” (increasing 0.5 percent each year for the last three years) is “stringent follow up action.” In addi-

tion to the focus on lack of institutional responsiveness, it is impressive that SSAAT has gotten as far as it has considering that it lacks strong allies within the state committed to acting on its findings. However, 19 percent of respondents also identified limited participation of beneficiaries as an obstacle. This leads to recommendations for SSAAT to build allies, where it currently lacks—in civil society and among organized workers—who can pursue the same goals with pressure from below.

## 9. Suggestions for Improving Social Audit Effectiveness

Our survey included an open-ended question asking DRPs to submit at least three suggestions that, in their view, could improve the effectiveness of the social audits. The respondents identified nine areas for improvement, which we have categorized into three broad areas: post-audit activities; grievance redress; and personnel issues (see Table 2 next page). Post-audit activities include institutional follow-up measures to investigate cases of fraud and abuse, punishing officials found guilty of corruption, and closing “feedback loops” or reporting back to villagers on what remedial action, if any, was taken. Regarding grievances, the suggestion was that delayed wage payments should be addressed. Lastly, personnel-related suggestions involved capacity building, safety, remuneration and job security, and planning and scheduling issues.<sup>34</sup>

**Table 2. DRP Suggestions for Improving Social Audit Effectiveness**

Issue category	Responses Submitted
<b>Post Audit Activities</b>	
<b>Recovery</b>	<ul style="list-style-type: none"> <li>• Recovery in relation to deviations must be fast, and time-bound.</li> </ul>
<b>Follow-up Action</b>	<ul style="list-style-type: none"> <li>• NREGA program officers should act immediately.</li> <li>• Wage seekers should receive immediate payment of delay compensation.</li> <li>• DVOs should take immediate action against officials responsible for delayed payments.</li> <li>• Monitor public hearing decisions.</li> </ul>
<b>Participation</b>	<ul style="list-style-type: none"> <li>• Organize Public hearing after follow up action.</li> <li>• Report back on action taken to wage seekers after public hearing.</li> <li>• Ensure greater participation of wage seekers and non-government organizations in the social audit process.</li> <li>• Improve communication between wage seekers as well as local auditors.</li> </ul>
<b>Grievance Redress</b>	
<b>Delayed Payments</b>	<ul style="list-style-type: none"> <li>• Payments should be made to workers within 15 days of completing work (as mandated by law).</li> </ul>
<b>Personnel Issues</b>	
<b>Capacity Building</b>	<ul style="list-style-type: none"> <li>• Use new technology for training and capacity building.</li> <li>• Organize technical trainings and refresher trainings for local auditors.</li> <li>• Provide trainings on new schemes to be included in the social audit process.</li> </ul>
<b>Fear of Reprisals</b>	<ul style="list-style-type: none"> <li>• Provide security and ensure safety of local auditors.</li> <li>• Need political action against the corrupt.</li> <li>• Provide Insurance policy &amp; health insurance for village social auditors and district resource persons.<sup>35</sup></li> </ul>
<b>Remuneration and Job Security</b>	<ul style="list-style-type: none"> <li>• Make district resource persons' permanent employees, provide job security, and increase honorarium, compensation.</li> <li>• Decrease time-period between audits, and reduce paper work.</li> <li>• Increase rest days between social audits.</li> <li>• SSAAT head office should be sympathetic to the personal issues of district resource persons.</li> </ul>
<b>Social Audit Schedule</b>	<ul style="list-style-type: none"> <li>• Audit should be taken up while the work is going on or within 15 days of the completion of the work.</li> <li>• Randomize social audits at district level and conduct cluster wise social audits.</li> </ul>



## V. Authors' Recommendations to SSAAT

Over the last decade, state-run social audits have unearthed information that has the potential to make the NREGA delivery system more responsive to workers. Although a rather disciplined bureaucracy oversees NREGA implementation, our survey respondents feel that state government follow-up action on social audit findings is weak. Based on suggestions received from survey respondents and our ethnographic research, we recommend that SSAAT focus on two areas—civil society engagement and strategic proactive disclosure—to improve the scope and usefulness of its social audit process.

### 1. Civil Society Engagement in State-run Social Audits

SSAAT's routine social audits and public hearings have permitted workers to voice their grievances. However, surveyed DRPs felt that aggregating workers' voices through social audits is not sufficient in the absence of an institutional response.

- In the introduction to this study, we briefly discussed the role of external allies in instituting state-run social audits. Similarly, to motivate state elites to act on social audit findings, SSAAT needs to, once again, seek out allies in social movements and the media, to identify actionable pathways to challenge decades of institutional impunity.
- We recommend that SSAAT develop a civil society engagement framework. By engaging civil society, we do not mean SSAAT should outsource its auditing functions to civil society. Rather it should determine the terms of engagement while leveraging its strengths—autonomy, and capacity to organize social audits at scale. For example, SSAAT can:
  - ▶ Bring together civil society organizations (CSOs) with shared strategic approaches and long-term interests in public oversight, access to information, budget and legislative transparency,
  - ▶ Share information on planned audits and public hearings as well as social audit reports with CSOs,
  - ▶ Develop a participatory methodology of monitoring and implementation of social audit findings, in cooperation with CSOs.
- For CSOs, the incorporation of social audits into another important national legislative program—the National Food Security Act (NFSA)—as well as the national push for social audits, backed by the Comptroller and Auditor General of India (CAG), is an opportunity to create a national structure for social audits.
- CSOs usually face capacity and resource challenges to carry out monitoring and advocacy. Partnering with multiple actors (in state and society) and working at multiple levels (local, sub-national and national) can help leverage the power of pro-accountability actors (in state and society), to counter anti-accountability actors who, so far, have prevented effective implementation of important social welfare programs.<sup>36</sup> For example, CSOs can:
  - ▶ Report on laggard districts who are impeding the implementation of NREGA,
  - ▶ Use audit findings to support legal action to defend the right to work,
  - ▶ Use any form of media to publicize social audit 'hot spots' and pressure governments to take corrective action,
  - ▶ Build state-wide coalitions to:
    - Blow the whistle on local, mid-level officials unwilling to implement audit reports, court orders or recommendations from the national audit agency,
    - Provide reliable and consistent publicity on audit findings, including personal interest stories and success stories.

## 2. Strategic Proactive Disclosure

- One way in which civil society groups can be encouraged to participate in the social audit process is through publicizing and incorporating social audit findings into their NREGA advocacy campaigns.

*We recommend SSAAT evolve a proactive disclosure strategy to make its social audit data actionable by asking what can be done with its data and how can it become incorporated into everyday citizens' routines.*

- In the last decade, SSAAT has gathered large volumes of data (social audit reports). However, the difficulties in processing this data, making it publicly accessible, and accessing it internally for review, aggregation and analysis means that social audit

findings have been less effectively used to alert other actors to action.

*SSAAT could re-focus its proactive disclosure strategy to identifying social audit "hot spots" that permit other actors who have a stake in a well-functioning NREGA to use the information to mobilize and take action.*

- SSAAT could focus on collecting data that is perceived as usable by program participants, policy makers and civil society. This could help SSAAT convince the state government to conduct better post-audit follow-up.

*Better recovery and corrective action is important from three perspectives: enhancing state capacity to be responsiveness to citizens' demands, boosting staff morale, and facilitating internal access, review, and analysis.*



## VI. Concluding Reflections

As this study illustrates, social audits in Telangana have unearthed information on NREGA implementation, and they have begun to address common and recurring workers' grievances. They have been regularly implemented, irrespective of the political party in power.

A social audit is not a panacea for addressing the social exclusion and institutional impunity that characterizes much of everyday interactions between citizens and state actors in countries like India. As an iterative, ongoing process, however, it permits citizens to collectively interrogate state actions and seek explanations for decisions taken. From this standpoint, it should be associated more with open ended shifts in the balance of power than with the goal of bounded deliverables. This study views SSAAT's decade-long effort as an example of a preventative approach to accountability that goes beyond the moral satisfaction of holding bad guys accountable, to changing actual practices of state agencies. To understand how such forms of state-convened processes might increase state capacity to respond to rights claims from below, researchers and practitioners need to recognize and document change over time that can help strengthen such efforts.

So far, SSAAT has combined people's participation with audit principles, and it has facilitated social audits with relatively little political interference. This is important because SSAAT as an agency has sustained a strong sense of commitment to its mission of working in the public interest, which is rare in the context of large-scale rural development programs. The relative success of state-enabled reforms for TPA, however, does not mean civil society activism is superfluous for achiev-

ing transparency and accountability. Therefore, state-enabled efforts must proactively engage civil society counterparts to leverage their power and broaden the base demanding corrective action. Citizen engagement and the role of non-state actors is important because well-intentioned state reforms are often dependent on the discretion of decision-makers to act on feedback/findings. The respondents for this study identified the lack of institutional follow-up as a major obstacle to social audits. While information access and citizens' voices are not enough to deliver accountability, research and practice can help pro-accountability actors (in state and society) focus on what drives perceived relevance, actionability, and uptake of information (Fung, Graham, and Weil 2007) that can motivate collective action to influence public sector performance.<sup>37</sup>

To sum up, a combination of institutional mechanisms (national legislation) and non-institutional mechanisms (preceding social mobilization for incorporating social audits into NREGA) were necessary for successfully embedding state-run social audits inside Telangana governments: each alone would not have achieved the results that they did. The state government's role in supporting mandatory audits and a sensitive bureaucracy was the third element that permitted SSAAT to organize uninterrupted social audits. In the long run, it remains to be seen what follow-up measures for full accountability will be instituted to strengthen the impact of social audits, and what we can expect to see in terms of a greater role for civil society. These questions need to be explored in further research, but we can conclude for now that the state-run social audits are playing a significant problem-solving role, which needs to be supported and strengthened.

# References

---

- Abers, Rebecca N. and Margaret E. Keck. 2009. "Mobilizing the State: The Erratic Partner in Brazil's Participatory Water Policy." *Politics and Society* 37(2):289-314.
- Adhikari, Anindita, and Bhatia, Kartika. 2010. "Wage Payment: Can We Bank on the Banks?" *Economic and Political Weekly* 45(1):30-37.
- Aggarwal, Ankita. 2017. "Ten Ways MGNREGA Workers Do Not Get Paid." *Economic and Political Weekly* 52(6):2349-8846.
- Aiyar, Yamini, Soumya Kapoor Mehta and Salimah Samji. 2013. "India: Implementing Social Audits." Pp.249-68 in *Public Works as a Safety Net: Design, Evidence and Implementation*, edited by Subarao, Kalanidhi, Carol de Ninno, Colin Andrews, and Claudia Rodriguez-Alas. Washington: The World Bank.
- Aiyar, Yamini and Michael Walton. 2014. "Accountability and Citizenship: Examining India's Emerging Welfare State, Engaging Accountability." *Working Paper Series*. New Delhi: Accountability Initiative, Centre for Policy Research.
- Afridi, Farzana and Vegard Iversen. 2014. "Social Audits and MGNREGA Delivery: Lessons from Andhra Pradesh." *Discussion Paper Series*, IZA DP 8095.
- Ayliffe, Tamsin, Ghazia Aslam, and Robert Schjødt. 2016. "Social Accountability in the Delivery of Social Protection. Literature Review." Unpublished draft (December).
- Breman, Jan. 1985. "I Am the Government Labour Officer...State Protection for Rural Proletariat of South Gujarat." *Economic & Political Weekly* 20(24):1043-1055.
- Brockmeyer, Brandon and Jonathan Fox. 2015. "Assessing the Evidence: The Effectiveness and Impact of Public Governance-Oriented Multi-Stakeholder Initiative." Retrieved 30 September, 2015 (<http://dx.doi.org/10.2139/ssrn.2693608>).
- Chopra, Deepta. 2015. "Political Commitment in India's Social Policy Implementation: Shaping the Performance of MGNREGA." *ESID Working Paper* No. 50. Retrieved June 20, 2017([http://www.effective-states.org/wp-content/uploads/working\\_papers/final-pdfs/esid\\_wp\\_50\\_chopra.pdf](http://www.effective-states.org/wp-content/uploads/working_papers/final-pdfs/esid_wp_50_chopra.pdf)).
- Comptroller and Auditor General of India. 2016. *Report on Mahatma Gandhi National Rural Employment Guarantee Audit of Scheme Rules, 2011 (Social Audit Rules)*. Report No. 8. Retrieved October 30, 2016 ([http://www.cag.gov.in/sites/default/files/audit\\_report\\_files/Union\\_Civil\\_MGNREG\\_SOCIAL\\_Audit\\_Report\\_8\\_2016.pdf](http://www.cag.gov.in/sites/default/files/audit_report_files/Union_Civil_MGNREG_SOCIAL_Audit_Report_8_2016.pdf)).
- Comptroller and Auditor General of India. 2009. *Report of the Task Group on Social Audit*. Retrieved March 9, 2016 (<http://mnregaweb4.nic.in/netnrega/SocialAudit/guidelines/document/Report%20of%20Social%20Audit%20Task%20Group%207%20Dec%202009.docx>).
- Cornejo, Carolina, Aranzazu Guillan, and Renzo Lavin. 2013. "When Supreme Audit Institutions Engage with Civil Society: Exploring Lessons From The Latin American Transparency and Accountability Initiative." *U4 Practice Insight* 5.

- Cucciniello, Maria, Gregory A. Porumbescu, and Stephan Grimmelikhuijsen. 2016. "25 Years of Transparency Research: Evidence and Future Directions." *Public Admin Rev.* 77:32-44.
- Dey, Nikhil. 2013. "India: The Long Road from Transparency to Accountability." *The Brics Post*. Retrieved December 30, 2013 (<http://thebricspost.com/india-the-long-road-from-transparency-to-accountability/#.WRYKmlPytE4>).
- Dubbudu, Rakesh R. 2016. "Delay Compensation of More Than 1250 Crore Pending to NREGA Wage Seekers." Retrieved October 30, 2016 (<https://factly.in/delay-compensation-of-more-than-1250-crore-pending-to-nrega-wage-seekers/>).
- Dutta, Puja, Rinku Murgai, Martin Ravallion, and Dominique Van de Walle. 2012. "Does India's Employment Guarantee Scheme Guarantee Employment?" *Policy Research Working Paper* 6003. Washington: The World Bank.
- Fox, Jonathan. 2016. "Scaling Accountability Through Vertically Integrated Civil Society Policy Monitoring and Advocacy." : IDS Working Paper.
- Fung, Archon, Mary Graham, and David Weil. 2007. *Full Disclosure*. Cambridge University Press.
- Gauri, Varun. 2012. "Redressing Grievances and Complaints Regarding Basic Service Delivery." *World Development* 41:109-119.
- Gopal, K.S. 2014. "Practice and Priorities of the National Rural Employment Guarantee Act in India. An activist's Perspective." Pp. 147-159 in *Socio-Economic Insecurity in Emerging Economies. Building New Spaces*, edited by Fakier, K. and Ehmke, E. London: Routledge.
- Green, Duncan. 2016. *How Change Happens*. Oxford University Press.
- Gupta, Akhil. 2012. *Red Tape: Bureaucracy, Structural Violence, and Poverty in India*. Durham and London: Duke University Press.
- Halloran, Brendan. 2015. "Strengthening Accountability Ecosystems: A Discussion Paper." Retrieved December 10, 2015 (<http://www.transparency-initiative.org/uncategorized/862/strengthening-accountability-ecosystems/>).
- . 2016. "Taking an Ecosystems Approach: Samarthan's Work on Rural Poverty in India." Washington: International Budget Partnership.
- International Budget Partnership. 2016a. "Philippines' Commission on Audit Key to Unearthing "Pork Barrel" Scandal." Washington D.C: International Budget Partnership.
- . 2016b. "Is India's Ministry of Coal Effective in Supporting Coal Production? The Comptroller and Auditor General's Audit of the Coal Industry." Washington D.C: International Budget Partnership.
- . 2016c. "Accountability for Safe Train Service in Argentina." Washington D.C: International Budget Partnership.
- Jenkins, Rob, and James, Manor. 2017. *Politics and The Right to Work: India's National Rural Employment Guarantee Act*. Hurst & Co Publishers Ltd.
- Maiorano, Deigo. 2014. "The Politics of the Mahatma Gandhi National Rural Employment Guarantee Act in Andhra Pradesh." *World Development* 58:95-105.

- McGee, Rosie, and Duncan Edwards. 2016. "Introduction: Opening Governance – Change, Continuity and Conceptual Ambiguity" *IDS Bulletin* 47(1):1-22.
- McGee, Rosie, and John Gaventa. 2011. "Shifting Power? Assessing the Impact of Transparency and Accountability Initiatives." *IDS Working Paper* 383.
- Mehta, Soumya Kapoor, and Yamini, Aiyar. 2015. "Spectators or Participants? Effects of Social Audits in Andhra Pradesh." *Economic and Political Weekly*. 50(7):66-71.
- Muralidharan, Karthik, Paul Niehaus, and Sandip Sukhtankar, 2016. "Building State Capacity: Evidence from Biometric Smartcards in India," *American Economic Review* 106(10):2895-2929.
- Narayanan, Rajendran. and Chintala, Sai C. 2015. "Payment Audit Mechanisms to Capture Gaps in Wage Payments to NREGA Wage Seekers." Unpublished manuscript.
- Narayanan, Rajendran, and Sakina Dhorajiwala. 2017. "A Guarantee, An Illusion." *Indian Express*, 14 February. Retrieved February 14, 2017 (<http://indianexpress.com/article/opinion/columns/mgnrega-provisions-on-right-to-work-and-timely-wages-are-being-violated-4523324/>).
- O'Donnell, Guillermo. 1998. "Horizontal Accountability in New Democracies." *Journal of Democracy*. 9(3):112-126.
- Pande, Suchi. 2015. "Dying for Information: Right to Information and Whistleblower Protection in India." *U4 Brief* 3.
- . 2017. "'The Right to Know, The Right to Live': A Long View of Social Rights Activism in India." Unpublished manuscript.
- Pattenden, Jonathan. 2016. *Labour, State and Society in Rural India: A Class-relational Approach*. Manchester University Press.
- Rajasekhar, D., Salim Lakha, and R. Manujal. 2013. "How Effective are Social Audits under MGNREGS? Lessons from Karnataka." *Working Paper* 294. Bangalore: Institute for Social and Economic Change.
- Ranjan, Ashish, and Purushottam, Kumar. 2010. "A New Twist to Social Audits." *India Together*, 3 January. Retrieved March 10, 2016 (<http://www.indiatogether.org/audit-poverty>).
- Sheahan, Megan Britney, Liu, Yanyan, Barrett, Christopher. B, and Sudha Narayanan. 2016. "Preferential Resource Spending Under an Employment Guarantee: The Political Economy of MGNREGS in Andhra Pradesh." World Bank, Policy Research Working Paper Series 7818.
- Society for Social Audit Accountability and Transparency (SSAAT). 2016. *Annual Report 2013-14, 2014-15 & 2015-16*. Telangana: SSAAT.
- Tambe, Sandeep, Ash Bahadur Subba, Jigme Basi, Sarika Pradhan and B. B. Rai. 2016. "Measuring the Effectiveness of Social Audits: Experiences from Sikkim, India." *Development in Practice* 26:2, 184-192.
- Tewari, Ruhi. 2010. "Unemployment Allowance Under Job Scheme Paid Only in 7 States." *Livemint*, 31 March. Retrieved on March 20, 2017 (<http://www.livemint.com/Politics/x9V7Uzp5yBul570X7qCEnJ/Unemployment-allowance-under-job-scheme-paid-in-only-7-state.html>).

The Hindu. 2015. "Rural Job Scheme Facing Funds Crunch." *The Hindu*. 3 February. Retrieved February 3 (<http://www.thehindu.com/news/national/rural-job-scheme-facing-funds-crunch/article6850028.ece>).

Vanaik, Anish, and Siddhartha. 2008. "Bank Payments: End of Corruption in NREGA?" *Economic and Political Weekly* 43(17):33, 35-39.

Veeraraghavan, Rajesh. 2015. "Open Governance and Surveillance: A Study of the National Rural Employment Guarantee Program in Andhra Pradesh, India." PhD dissertation. University of California: Berkeley.

# Endnotes

---

1. The state of Andhra Pradesh was bifurcated into two separate states in June 2014—Andhra Pradesh and Telangana. This paper focuses on the social audit process in districts that constitute the new state of Telangana.
2. For example, Afridi and Iversen find that audit participation has resulted in an increase in beneficiary learning, and social audits are effective at “detecting” corruption; but, repeated audits did not “deter” corruption, in Andhra Pradesh (2014:9); Mehta and Aiyar show that the corruption market for NREGA in Andhra Pradesh functions like a syndicate which includes local politicians as important players (2015). Political elites in collusion with NREGA staff are involved in corrupt practices through different mechanisms of fraud. See also Veeraraghavan on how local politicians in Andhra Pradesh are subverting formal efforts of control such as the use of information technology from above, and social audits from below, through informal norms (2015).
3. This decision can be understood as what Duncan Green terms a “Theory of Action”—a dynamic, evolving change strategy (2016:235-8).
4. Though Gauri suggests social audits cannot be substitutes for redress procedures, since they focus on “governance processes rather than individual transactions” (2012:110). SSAAT’s grievance redress efforts suggest a high “Fix-Rate” or percentage of identified individual worker grievances that are resolved. (We thank Fredrick Galtung for this point.)
5. For example, according to Fox, the “demand side” approach to accountability assumes that information delivery will, by itself, overcome collective action problems or bolster state capacity to respond to “voice” (or the “supply side”) (2015). These approaches are now understood to be false dichotomies (Halloran 2015). Research also points to the need to work “both sides of the equation” (Gaventa 2002) to bring politics and power back in to redefine accountability, and to clearly articulate “theories of change” that can help develop “relevant, workable, and sustainable” initiatives (McGee and Gaventa 2011). There is also a need to address the issue of “conceptual ambiguity” head on and design transparency and accountability initiatives to “maximize chances of achieving government responsiveness” (McGee and Edwards 2016), to watch for “open washing” as new technologies and concepts such as “open government” and “open data” move center-stage in the field (Brockmeyer and Fox 2015), and to pay attention to an accountability “ecosystem” that includes actors, processes and contextual factors as well as the relationship between these elements (Halloran 2015).
6. Such as worksite boards revealing sanctioned amount for work, wall paintings revealing number of days of employment provided and payments made in the year to every job card holder, and online management information system (MIS) that is intended to make NREGA implementation data accessible to all.
7. Social audits for NREGA were introduced as a distinguishing feature from earlier poverty alleviation and welfare programs that lacked accountability provisions. The audit structure also does not permit India’s national audit agency, the Comptroller and Auditor General of India (CAG), to carry out performance audits of *panchayats*. Over the last decade, local self-governments were increasingly charged with implementing government programs despite the fragile or non-existent accountability mechanisms at the lowest tier of government. Social audits for NREGA were introduced in this context of the evolving design, implementation, and delivery of social welfare programs in India.
8. YSR’s electoral victory in the state coincided with that of his political party, the Congress Party, that was also hoisted to power at the national level. The latter fought the national elections on a platform that included NREGA and a national Right to Information law as its two main promises. See Maiorano (2014) for a discussion of the political commitment of the Congress Chief Minister for NREGA in Andhra Pradesh.

9. See also Aiyar and Walton (2014).

10. “We actively mobilized political support for their efforts both inside the state and in society, and used the media to capitalize on every press conference and public appearance of the Chief Minister to shape public (political) opinion in favor of social audits” (Principal Secretary, Government of Andhra Pradesh, interview with ARC researcher. Hyderabad, May 20, 2010).

11. One percent of the NREGA expenditure for each state, in a financial year, is earmarked for social audits.

12. As per sections 13 and 17 of the NREGA, local government bodies or *panchayats* are the principal authorities for planning and implementation of NREGA, and monitoring the execution of works through regular social audit. In Andhra Pradesh and Telangana, although *gram sabhas* (village councils) are organized to plan NREGA works, its implementation structure bypasses *panchayats*.

13. For example, in 2007, a pilot social audit in one district (Anantpur) involving non-state actors, was opposed by the local political cadres from the chief minister’s political party. During the ARC researcher’s ethnographic field research, in 2010, she was repeatedly told by retired government officials as well as journalists that the erstwhile Chief Minister of Andhra Pradesh, told his party members to keep their “hands off” NREGA. A well implemented NREGA won him titles like “people’s messiah,” while political elites made money elsewhere (through infrastructure contracts).

14. The bureaucratic decision to institute social audits above the *panchayats* also needs to be understood in a unique history of concerted efforts by elites from different political parties, to disempower *panchayats*. For example, in the 1980’s a new regional political party—the *Telugu Desam Party* (TDP)—that displaced the Congress Party, created *mandals* or administrative blocks to limit the influence of *panchayats* that were considered Congress party strongholds. A decade later, the TDP further weakened elected *panchayat* leaders. Receiving structural adjustment loans, the TDP created intermediary institutions like self-help groups, water user associations, and joint forest committees at the local level, that created alternative power structures to elected heads of village *panchayats* (Anant M., independent researcher, interview with ARC researcher. Hyderabad. November 24, 2010). With NREGA the quantum of money transferred to *panchayats* increased significantly, but the Telangana bureaucracy believed *panchayats* were not ready for devolution of administrative and financial powers (Commissioner Rural Development, Government of Andhra Pradesh, interview with ARC researcher. Hyderabad, November 25, 2010).

15. See also, Mehta and Aiyar (2015) on the potential of social audits to enhance civic capacity and improve local political structures.

16. In India, we are seeing incremental progress towards a “momentous shift”—where a legitimate role for social audits is being created in government audits through the national audit agency (former Principal Auditor General, Andhra Pradesh, phone interview, March 9, 2016). According to a retired official from the national audit agency, until recently, the official view was, social audits is something that “society does” (phone interview, March 11, 2016). The national audit agency now recognizes that social audits provide an opportunity to strengthen micro-level scrutiny of program planning and implementation while providing a “multi-perspective and transparent monitoring and appraisal mechanism” (CAG 2009:4). India’s national audit agency’s interest in creating institutional synergy between government audit and social audit is influenced by the domestic civil society and state efforts to organizing public hearing, and later social audits. It also builds on a wide spectrum of collaboration between different pro accountability actors in other countries (see International Budget Partnership 2016a, 2016b, 2016c; Cornejo, Guillan, and Lavin 2013).

17. A few months after we completed the research for this study, the state government of Telangana redrew district boundaries. The ten districts included in our sample—Adilabad, Hyderabad, Karimnagar, Khammam, Mahabubnagar, Medak, Nalgonda, Nizamabad, Rangareddy, and Warangal—were sub-divided into 31.
18. The use of FY 2014-15 in this study refers to the financial year April 1, 2014 to March 31, 2015.
19. We recognize that the experiences of NREGA workers might present a different pattern.
20. Other studies find mixed results in the detection and deterrence effects of social audits. For example, in their study of 100 randomly sampled blocks from eight districts in Andhra Pradesh, Afridi and Iversen find that 87 percent of the amount detected as fraud is not recovered, and social audits were less effective in deterring corruption because of a lack of effective response from the state government (2014); Aiyar and Samji also find mixed results for outcomes of state response to social audits in Andhra Pradesh (2013).
21. Author field notes July 2016, Hyderabad, India.
22. We recognize that this perception needs to be further examined by comparing the opinions of newer staff with older staff who have seen the tangible outcomes (or lack thereof) of social audits.
23. Public hearings are presided over by a bureaucrat in charge of overseeing NREGA (*Mandal* Program Development Officer (MPDO)). Based on oral testimony by workers and findings of the social audit teams, the MPDO questions the implementing staff on allegations of fraud, and has the power to take corrective action. In cases where s/he feels further investigation is required, s/he can refer the case to the rural development department. It is these referred cases that are largely untrackable, in part because of a weak vigilance office that is separate from SSAAT.
24. We do not view institutional channels as the only way to ensure accountability. Civil society could autonomously pick up social audits findings, and mobilize and act on the findings. For example, in other states civil society groups use NREGA implementation data from the national database in advocacy campaigns for effective implementation of NREGA. Some studies (in Andhra Pradesh, Rajasthan and Madhya Pradesh) also find that the unionization of NREGA workers can boost workers' "political capacity" to deal with the implementation bureaucracy and express grievances (Jenkins and Manor 2017; Maiorano 2014), or, more likely, to form a counter-movement against dominant classes (Pattenden 2016).
25. See Chopra (2015) for a discussion on a political perspective of commitment among bureaucrats and politicians, and its role in shaping India's social policy implementation, particularly NREGA.
26. However, some studies show that the switch from cash payments to bank accounts, then to electronic payments systems, and then to biometric or Aadhaar-based payments have their own problems. For example, in Uttar Pradesh workers paid the *panchayat* head or *sarpanch* a share of their total wages (Adhikari and Bhatia 2010). In Orissa, village level officials complained of being overburdened, and the addition of a bank passbook lead to "ad hocism in maintaining job cards and muster rolls" (Vanaik and Siddhartha 2008). In Jharkhand, Aggarwal (2017) shows how biometric or Aadhaar-linked payments were introduced in a rushed manner. Under pressure to meet targets to open new bank account workers with existing bank accounts were compelled to open new accounts as part of the national government's new digital banking scheme. Officials linked Aadhaar numbers to wrong bank accounts. Not finding their wages in the usual account, the worker may assume that his or her wages were not paid and stop applying for NREGA work.
27. Though Muralidharan, Niehaus and Sukhantar found that in Andhra Pradesh biometrically-authenticated payments infrastructure ("smartcards") delivered a faster, more predictable, and less corrupt NREGA payments process

without adversely affecting program implementation (2014). The study does not explain why roll-out of smartcards was blocked in 50 percent of the cases, in spite of state capacity. According to SSAAT officials, payments were often done through a manual override because of a range of issues: non-opening of accounts, non-activation of cards, network congestion, inability to charge payment machines due to loss of power, and a lack of batteries that prevented point of sale machines from working.

28. As of November 2016, across the country, delayed compensation worth 12.5 billion rupees is pending to NREGA workers (Dubbudu 2016). One study shows that the manipulation of the management information system to match the date on which work is demanded with the date of payment, is another reason why legitimate workers' claims for unemployment allowance may be rejected by authorities (Narayanan and Dhorajiwala 2017).

29. See Halloran (2016) and Pande (2017) for local officials' resistance to social audits in Madhya Pradesh and Rajasthan, respectively.

30. While Maiorano (2014) claims that part of the focus of the former Andhra Pradesh Chief Minister was to transform state welfare schemes like NREGA to win re-election, Sheahan et al. (2016) find no major political influence in how NREGA funds are distributed across different districts in Andhra Pradesh, and suggest that "widespread information disclosure and social audits reduce the potential for larger-scale political capture to take hold in AP"

31. The decision-making process for employees under investigation is also arbitrary. For example, if two people commit the same mistake, one might lose the job while the other gets let off the hook (SSAAT 2016:23). There are legal and other institutional constraints that prevent prompt and timely action against erring officials. For example, in the northwestern state of Rajasthan, reformists charged with implementing NREGA discovered they were constrained by the local self-government or *Panchayati Raj*, law which did not permit them to act against elected *panchayat* officials without approval of members of the state legislative assembly, despite evidence implicating local officials for misappropriating NREGA funds (ARC researcher field notes December 2010, Jaipur, India).

32. The survey questions were translated into the local language, Telugu. At the field validation workshop, we learned that the Telugu word for reprisals, *dhadhi*, translates as physical attack. Thus, these findings are limited to perceptions about physical attacks and do apply to threats, intimidation, participants' anxiety or fear of participating and choosing to publicly testify at social audit public hearings.

33. See Pande (2015) on the alarming trend of increasing assaults and murders of right to information (RTI) activists in India. See also Dey (2013) for a discussion of a citizen-centric accountability framework to challenge institutional impunity for caste-based violence as well as the emerging human rights implications of using RTI.

34. See also Dutta, Murgai, and Ravallion (2012) for the need to increase capacity of state functionaries in the context of NREGA.

35. We were informed in the field validation workshop organized on February 10, 2017 that this DRP and Village Social Auditors' demand for insurance was approved by the Telangana state government.

36. Fox (2016) terms this an "integrated approach to civil society monitoring and advocacy."

37. A recent review of the literature on "social accountability in the delivery of social protection" also recognizes the need for multi-layered interfaces or spaces of engagement between citizens and the state; and/or within the state between local service providers and decision makers at sub-national and national levels to further social accountability (Ayliffe, Aslam, and Schjødt 2016). See also Fox (2016) for a discussion on "scaling accountability", an "integrated approach to civil society monitoring and advocacy" that covers all the links in the (governance) chain, revealing more precisely the causes of accountability failure as well as their interconnected nature.

# Annex 1 – Survey questions

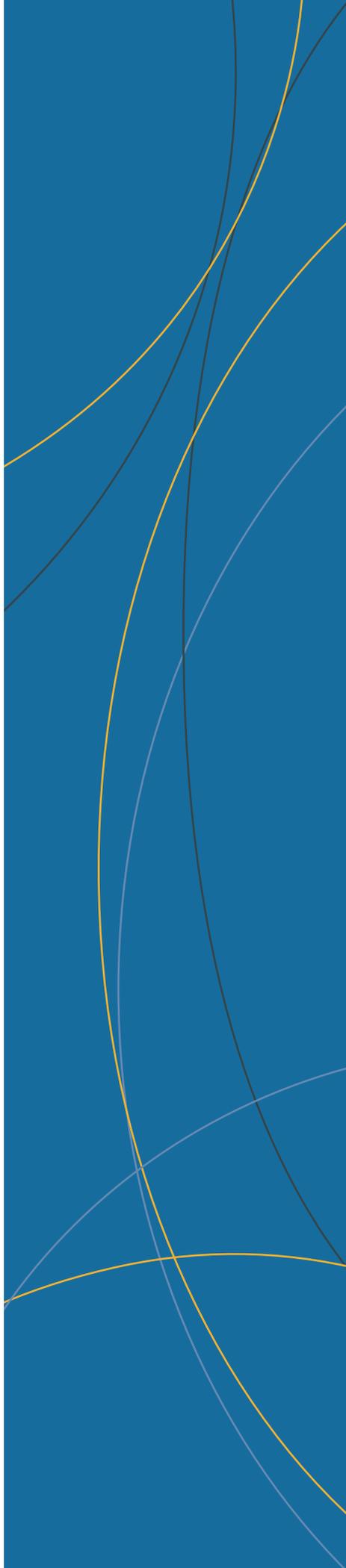
Survey to be completed online by District Resource Persons of the Society for Social Audit Accountability and Transparency, Government of Telangana. The survey will take 20–30 minutes to complete and all responses are anonymized.

<b>1</b>	<b>Please provide us with some personal information</b>
	a. Age
	b. Gender
	1. Female
	2. Male
	c. Caste
	1. SC
	2. ST
	3. BC
	4. OC
	5. Other
	6. Not applicable
	d. Education
	1. Fifth pass
	2. Tenth Pass
	3. High School
	4. Graduate
	5. Post-graduate
	e. Name of your native district
	1. Adilabad
	2. Hyderabad
	3. Karimnagar
	4. Khammam
	5. Mahbubnagar
	6. Medak
	7. Nalgonda
	8. Nizamabad
	9. Rangareddy
	10. Warangal
<b>2</b>	<b>What is your current job title and brief job description?</b>

<b>3</b>	<b>Please provide us with the name of the district where you currently work?</b>
<b>4</b>	<b>Please tell us how many years have you worked at SSAAT?</b>
	<ul style="list-style-type: none"> <li>a. 10 years</li> <li>b. 5–10</li> <li>c. 2–5</li> <li>d. less than 5</li> <li>e. Don't know</li> </ul>
<b>5</b>	<b>Have you worked as a Village Social Auditor?</b>
	<ul style="list-style-type: none"> <li>a. Yes</li> <li>b. No</li> </ul>
<b>6</b>	<b>How many years have you worked as a VSA?</b>
	<ul style="list-style-type: none"> <li>a. More than 7</li> <li>b. 5–7</li> <li>c. 2–5</li> <li>d. less than 5</li> <li>e. Don't know</li> </ul>
<b>7</b>	<b>Please tell us how many years have you worked as a DRP?</b>
	<ul style="list-style-type: none"> <li>a. 10 years</li> <li>b. 5–10</li> <li>c. 2–5</li> <li>d. less than 5</li> <li>e. Don't know</li> </ul>
<b>8</b>	<b>How many social audits have you facilitated?</b>
	<ul style="list-style-type: none"> <li>a. More than 100</li> <li>b. 50–100</li> <li>c. 20–50</li> <li>d. Less than 20</li> <li>e. Don't know</li> </ul>
<b>9</b>	<b>From your experience, do workers who apply for work receive it within 14 days?</b>
	<ul style="list-style-type: none"> <li>a. Almost every time</li> <li>b. Occasionally</li> <li>c. Rarely</li> <li>d. Never</li> <li>e. Don't know</li> </ul>
<b>10</b>	<b>From your experience, are workers paid within 15 days of completing work?</b>
	<ul style="list-style-type: none"> <li>a. Almost every time</li> <li>b. Occasionally</li> <li>c. Rarely</li> <li>d. Never</li> <li>e. Don't know</li> </ul>

<b>11</b>	<b>How many social audits did you facilitate last year (2014-15)?</b>
	<ul style="list-style-type: none"> <li>a. More than 50</li> <li>b. 20–50</li> <li>c. Less than 20</li> <li>d. Did not organize any social audit last year</li> <li>e. Don't know</li> </ul>
<b>12</b>	<b>Of the social audits you have facilitated in the last year, how many do you think have been effective in deterring corruption?</b>
	<ul style="list-style-type: none"> <li>a. More than 75 %</li> <li>b. 50–75%</li> <li>c. 20–50%</li> <li>d. less than 20%</li> <li>e. Don't know</li> </ul>
<b>13</b>	<b>Of the social audits you have facilitated, how many do you think prevent corruption in wages paid</b>
	<ul style="list-style-type: none"> <li>a. More than 75 %</li> <li>b. 50–75%</li> <li>c. 20–50%</li> <li>d. less than 20%</li> <li>e. Don't know</li> </ul>
<b>14</b>	<b>Of the social audits you have facilitated, how many do you think checked to make sure the work was actually undertaken</b>
	<ul style="list-style-type: none"> <li>a. More than 75 %</li> <li>b. 50–75%</li> <li>c. 20–50%</li> <li>d. less than 20%</li> <li>e. Don't know</li> </ul>
<b>15</b>	<b>Of the social audits you have facilitated, how many do you think contribute to a corrupt politician NOT being elected</b>
	<ul style="list-style-type: none"> <li>a. More than 75 %</li> <li>b. 50–75%</li> <li>c. 20–50%</li> <li>d. less than 20%</li> <li>e. Don't know</li> </ul>
<b>16</b>	<b>Of the social audits you have facilitated, how many do you think led to the suspension of corrupt public officials</b>
	<ul style="list-style-type: none"> <li>a. More than 75 %</li> <li>b. 50–75%</li> <li>c. 20–50%</li> <li>d. less than 20%</li> <li>e. Don't know</li> </ul>

17	<b>How likely is it for everyone who applies for work under NREGS, to get work?</b>
	<ul style="list-style-type: none"> <li>a. Extremely likely</li> <li>b. Likely</li> <li>c. Rarely</li> <li>d. Unlikely</li> <li>e. Extremely unlikely</li> <li>f. Don't know</li> </ul>
18	<b>From your experience, in which of these works is social audit most effective? (you can select more than one)</b>
	<ul style="list-style-type: none"> <li>a. Plantation &amp; Afforestation</li> <li>b. Bush Clearance</li> <li>c. Laying of CC Roads</li> <li>d. Desilting Works</li> <li>e. Digging Related Works</li> <li>f. Land Development Works</li> <li>g. Construction of Check Dams &amp; Feeder Channels</li> <li>h. Boulder Removal &amp; other such works</li> <li>i. Vermi Compost related works</li> </ul>
19	<b>What are the biggest obstacles to making social audits (more) effective in all aspects (you can select more than one)?</b>
	<ul style="list-style-type: none"> <li>a. Insufficient funds</li> <li>b. Political pressure</li> <li>c. Lack of support from senior bureaucrats</li> <li>d. Lack of follow up in recovery of deviation</li> <li>e. Lack of NGO engagement</li> <li>f. Limited participation by beneficiaries</li> <li>g. Don't know</li> </ul>
20	<b>From social audits you have facilitated, do you know cases where citizens have experienced reprisals as result of participating in social audits?</b>
	<ul style="list-style-type: none"> <li>a. Almost every time</li> <li>b. Occasionally</li> <li>c. Rarely</li> <li>d. Never</li> <li>e. Don't know</li> </ul>
21	<b>What in your view would most increase the effectiveness of social audit? [Please list at least three suggestions]</b>



American University  
School of International Service  
4400 Massachusetts Ave NW  
Washington, DC 20016  
[www.accountabilityresearch.org](http://www.accountabilityresearch.org)