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Report No: PAD4916

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT

PROJECT APPRAISAL DOCUMENT

ON A

PROPOSED LOAN

IN THE AMOUNT OF

US\$162 MILLION

TO

INDIA

FOR A

RIGHTS: INCLUSION, ACCESSIBILITY AND OPPORTUNITIES FOR PERSONS WITH  
DISABILITIES IN TAMIL NADU PROJECT

May 21, 2022

Social Protection & Jobs Global Practice  
South Asia Region

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## CURRENCY EQUIVALENTS

(Exchange Rate Effective May 18, 2022)

Currency Unit = Indian Rupee (INR)

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INR 76.46 = US\$ 1

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US\$ 0.01 = INR 1

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## FISCAL YEAR

April 1 – March 31

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## ABBREVIATIONS AND ACRONYMS

CAAA	Controller of Aid, Accounts and Audit	OMIP	Operations Manual and Implementation Plan
CAG	Comptroller and Auditor General of India	OSC	One Stop Social Care Center
CPF	Country Partnership Framework	PDO	Project Development Objective
CRW	Community Rehabilitation Worker	PHC	Primary Health Center
CSP	Community Service Provider	PIC	Project Implementation Committee
CSR	Corporate Social Responsibility	PIU	Project Implementation Unit
DDAWO	District Differently Abled Welfare Office	PPSD	Project Procurement Strategy for Development
DfWDAP	Department for the Welfare of Differently Abled Persons	PSC	Project Steering Committee
DPIU	District Project Implementation Unit	RAP	Resettlement Action Plan
DWDAP	Directorate for the Welfare of Differently Abled Persons	RAS	Reimbursable Advisory Services
EIC	Early Intervention Center	RCP	Representative Concentration Pathway
EHS	Environmental Health and Safety	RPF	Resettlement Policy Framework
ESA	Environment and Social Assessment	RPWD	Rights of Persons with Disabilities
ESCP	Environmental and Social Commitment Plan	SC	Scheduled Caste
ESF	Environmental and Social Framework	SEA-SH	Sexual Exploitation and Abuse – Sexual Harassment
ESHS	Environment Social Health and Safety	SEP	Stakeholder Engagement Plan
ESMP	Environmental and Social Management Plan	SFDB	State Family Database
ESMF	Environmental and Social Management Framework	SP	Social Protection
ESS	Environment and Social Standards	SPIU	State Project Implementation Unit
FM	Financial Management	ST	Scheduled Tribe
GDP	Gross Domestic Product	STEP	Systematic Tracking of Exchanges in Procurement
GoI	Government of India		
GoTN	Government of Tamil Nadu	TNeGA	Tamil Nadu e-Governance Agency
GRM	Grievance Redress Mechanism		
GRS	Grievance Redress Service	UDID	Unique Disabilities ID
GST	Goods and Services Tax	WB	World Bank
IBRD	International Bank for Reconstruction and Development		
IFHRMS	Integrated Financial and Human Resource Management System		
IFR	Interim Financial Report		
IPPF	Indigenous Peoples Policy Framework		
ISP	Implementation Support Plan		
LMP	Labor Management Procedure		
MIS	Management Information System		
NEET	Not in Education, Employment, or Training		
NGO	Non-Government Organization		
NSO	National Statistical Office		
OBC	Other Backward Caste		

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## DATASHEET

### BASIC INFORMATION

Country(ies)	Project Name	
India	RIGHTS: Inclusion, Accessibility and Opportunities for Persons with Disabilities in Tamil Nadu	
Project ID	Financing Instrument	Environmental and Social Risk Classification
P176404	Investment Project Financing	Moderate

### Financing & Implementation Modalities

<input type="checkbox"/> Multiphase Programmatic Approach (MPA)	<input checked="" type="checkbox"/> Contingent Emergency Response Component (CERC)
<input type="checkbox"/> Series of Projects (SOP)	<input type="checkbox"/> Fragile State(s)
<input type="checkbox"/> Performance-Based Conditions (PBCs)	<input type="checkbox"/> Small State(s)
<input type="checkbox"/> Financial Intermediaries (FI)	<input type="checkbox"/> Fragile within a non-fragile Country
<input type="checkbox"/> Project-Based Guarantee	<input type="checkbox"/> Conflict
<input type="checkbox"/> Deferred Drawdown	<input type="checkbox"/> Responding to Natural or Man-made Disaster
<input type="checkbox"/> Alternate Procurement Arrangements (APA)	<input type="checkbox"/> Hands-on Enhanced Implementation Support (HEIS)

Expected Approval Date	Expected Closing Date
14-Jun-2022	30-Jun-2028

Bank/IFC Collaboration

No

### Proposed Development Objective(s)

To strengthen the social protection systems and capability of the State of Tamil Nadu to promote inclusion, accessibility and opportunities for persons with disabilities.

**Components**

Component Name	Cost (US\$, millions)
Strengthen state capability and establish an integrated social protection system	42.86
Strengthen last mile delivery of social care services and benefits	174.85
Pilots to enhance resilience and productivity of persons with disabilities	14.29
Contingent emergency response component (CERC)	0.00

**Organizations**

Borrower:	India
Implementing Agency:	Department for the Welfare of Differently Abled Persons (DfWDAP)

**PROJECT FINANCING DATA (US\$, Millions)****SUMMARY**

Total Project Cost	232.00
Total Financing	232.00
of which IBRD/IDA	162.00
Financing Gap	0.00

**DETAILS****World Bank Group Financing**

International Bank for Reconstruction and Development (IBRD)	162.00
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**Non-World Bank Group Financing**

Counterpart Funding	70.00
Borrower/Recipient	70.00

**Expected Disbursements (in US\$, Millions)**

WB Fiscal Year	2022	2023	2024	2025	2026	2027	2028	2029
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Annual	0.00	4.00	8.00	23.00	45.00	45.00	32.00	5.00
Cumulative	0.00	4.00	12.00	35.00	80.00	125.00	157.00	162.00

**INSTITUTIONAL DATA****Practice Area (Lead)**

Social Protection &amp; Jobs

**Contributing Practice Areas**

Education, Health, Nutrition &amp; Population

**Climate Change and Disaster Screening**

This operation has been screened for short and long-term climate change and disaster risks

**SYSTEMATIC OPERATIONS RISK-RATING TOOL (SORT)**

Risk Category	Rating
1. Political and Governance	● Moderate
2. Macroeconomic	● Moderate
3. Sector Strategies and Policies	● Low
4. Technical Design of Project or Program	● Moderate
5. Institutional Capacity for Implementation and Sustainability	● Substantial
6. Fiduciary	● Substantial
7. Environment and Social	● Moderate
8. Stakeholders	● Moderate
9. Other	
10. Overall	● Moderate

**COMPLIANCE****Policy**

Does the project depart from the CPF in content or in other significant respects?

☐ Yes   ☒ No



Does the project require any waivers of Bank policies?

[ ] Yes [✓] No

### Environmental and Social Standards Relevance Given its Context at the Time of Appraisal

E & S Standards	Relevance
Assessment and Management of Environmental and Social Risks and Impacts	Relevant
Stakeholder Engagement and Information Disclosure	Relevant
Labor and Working Conditions	Relevant
Resource Efficiency and Pollution Prevention and Management	Relevant
Community Health and Safety	Relevant
Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Relevant
Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Currently Relevant
Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Relevant
Cultural Heritage	Relevant
Financial Intermediaries	Not Currently Relevant

**NOTE:** For further information regarding the World Bank's due diligence assessment of the Project's potential environmental and social risks and impacts, please refer to the Project's Appraisal Environmental and Social Review Summary (ESRS).

### Legal Covenants

#### Sections and Description

Section I.A.1 of the Schedule to the Project Agreement: The Project Implementing Entity shall vest the overall responsibility for the management and implementation of the Project in the Department for the Welfare of Differently Abled Persons (DfWDAP), which shall implement the Project through its Directorate for the Welfare of Differently Abled Persons (DWDAP), and with the assistance of the Tamil Nadu e-Governance Agency (TNeGA).

#### Sections and Description

Section I.A.2 of the Schedule to the Project Agreement: The Project Implementing Entity shall establish, within three (3) months of the Effective Date, and thereafter maintain throughout the period of Project implementation, a





Project Steering Committee.

**Sections and Description**

Section I.A.3 of the Schedule to the Project Agreement: The Project Implementing Entity shall establish, within three (3) months of the Effective Date, and thereafter maintain throughout the period of Project implementation, a Project Implementation Committee, established as per provisions of the Operations Manual and Implementation Plan (OMIP).

**Sections and Description**

Section I.A.4 of the Schedule to the Project Agreement: The Project Implementing Entity shall maintain throughout the period of Project implementation, the State Project Implementation Unit (SPIU) under the DWDAP, comprising of experienced and qualified staff and consultants, in sufficient numbers and under terms of reference acceptable to the Bank.

**Sections and Description**

Section I.A.5 of the Schedule to the Project Agreement: The Project Implementing Entity shall establish in accordance with the roll-out plan in the OMIP, and thereafter maintain throughout the period of Project implementation, District Project Implementation Units (DPIU) at the district level, comprising of experienced and qualified staff and consultants, in sufficient numbers and under terms of reference acceptable to the Bank.

**Sections and Description**

Section I.B.1 of the Schedule to the Project Agreement: The Project Implementing Entity shall prepare and approve an OMIP in a manner and substance satisfactory to the Bank, and thereafter carry out the Project in accordance with the provisions of the OMIP.

**Sections and Description**

Section III.1(a) of the Schedule to the Project Agreement: The Project Implementing Entity shall ensure that the Project's activities involving collection, storage, usage, and/or processing of Personal Data are carried out with due regard to the Borrower's existing legal framework and appropriate international data protection and privacy standards and practices.

**Sections and Description**

Section III.1(b) of the Schedule to the Project Agreement: In the event that, during the implementation of the Project, the approval of any new legislation regarding Personal Data protection may have an impact on the activities financed by the Project, ensure that a technical analysis of said impact is conducted, and that the necessary recommendations and adjustments, are implemented, as appropriate.

**Sections and Description**

Section III.1(c) of the Schedule to the Project Agreement: Except as may otherwise be explicitly required or permitted under this Agreement and/or the Loan Agreement, or as may be explicitly requested by the Bank, in sharing any information, report or document related to the activities described in Schedule 1 to the Loan Agreement, ensure that such information, report or document does not include Personal Data.



Conditions		
Type Effectiveness	Financing source IBRD/IDA	Description Section 4.01(a) of the Loan Agreement: The Project Implementing Entity has prepared and approved the OMIP.
Type Effectiveness	Financing source IBRD/IDA	Description Section 4.01(b) of the Loan Agreement: The Project Implementing Entity has prepared the Multisectoral Disability Framework for Action.
Type Disbursement	Financing source IBRD/IDA	Description No withdrawal shall be made for payments made prior to the Signature Date, except that withdrawals up to an aggregate amount not to exceed US\$ 5,000,000 may be made for payments made prior to this date but on or after December 1, 2021 for Eligible Expenditures under Category (1).
Type Disbursement	Financing source IBRD/IDA	Description No withdrawal shall be made for Emergency Expenditures under Category (4), unless and until all of the following conditions have been met in respect of said expenditures: (a) the Borrower has determined that an Eligible Crisis or Emergency has occurred, and has furnished to the Bank a request to withdraw loan amounts under category (4); (b) the Bank has agreed with such determination and accepted said request; and (c) the Borrower has adopted the CER Manual and Emergency Action Plan in form and substance acceptable to the Bank.



## I. STRATEGIC CONTEXT

### A. Country Context

1. **Growth rebound in FY22 has been quick, pulled up by investment, recovering consumer demand and a low base.** Real Gross Domestic Product (GDP) growth moderated from an average of 7.4 percent during FY14/15-FY18/19 to an estimated 3.7 percent in FY19/20, mostly due to (i) shocks to the financial sector, and (ii) decline in private consumption growth.<sup>1</sup> Against this backdrop, the outbreak of Coronavirus Disease (COVID-19) had a significant impact, with real GDP contracting by 6.6 percent in FY20/21.<sup>2</sup> On the fiscal side, the general government deficit widened significantly in FY20/21, owing to higher spending and lower revenues.<sup>3</sup> However, with the easing of COVID-19 restrictions, Goods and Services Tax (GST) collections have crossed the INR 1.1 trillion mark every month since July 2021 reaching as high as INR 1.67 trillion mark as of April 2022. The robust GST revenues are expected to continue as the economic recovery gathers momentum. The real GDP growth for FY21/22, per World Bank forecast, is likely to be 8.3 percent, on the back of increased capital expenditure by the government and recovering consumer demand.<sup>4</sup> The real GDP in FY21/22 is expected to reach the FY19/20 level. Given the global concerns on significant uncertainty around the pandemic, elevated inflation, geo-political tensions and extended supply disruptions, growth in FY22/23 is expected to be 8 percent.<sup>5</sup> Nonetheless, the projected recovery will put India among the world's fastest-growing economies over the next two years.

2. **Although India has made remarkable progress in reducing absolute poverty in recent years, the COVID-19 outbreak has delayed the course of poverty reduction.**<sup>6</sup> Between 2011-12 and 2020-21, India's poverty rate has declined from 22.5 percent to between 9 to 12.3 percent.<sup>7</sup> However, projections of GDP per capita growth suggest that this estimated decline also includes a reversal of poverty reduction due to the pandemic.<sup>8</sup> Labor market indicators from high frequency surveys - including from the Centre for Monitoring Indian Economy (CMIE) - suggest that vulnerability has increased after the pandemic, particularly for urban households, with a moderate recovery in 2021. Overall, the pandemic and its economic impacts are estimated to have raised urban poverty, creating a set of "new poor" that are relatively more likely to be engaged in the non-farm sector and to have received at least secondary education. In order to respond to the pandemic, the Government of India (GoI) deployed significant resources as part of the Pradhan Mantri Garib Kalyan Yojana (PMGKY) scheme, launched in 2016, for social assistance, including to urban poor households and migrants.

3. **Building the capability of State-level social protection (SP) systems will be critical to ensure India can deliver adequate support to its citizens.** Given the diverse risk and poverty profile of India, adaptation of State – level SP delivery systems, policies and programs will be key to ensure that risk-mitigation and prevention measures are best tailored to respond to the local context. As highlighted in the India Country Partnership Framework (CPF) FY18-22 discussed at the World Bank Group's Board of Executive Directors on September 20, 2018 (Report No. 126667-IN), investing in the

<sup>1</sup> National Accounts Data, National Statistical Office (NSO), Ministry of Statistics and Program Implementation (MOSPI), GOI.

<sup>2</sup> Ibid

<sup>3</sup> Union budget 2021, 2022, Ministry of Finance, GOI.

<sup>4</sup> World Bank estimate of 8.3 percent compared to the GoI's second advance estimate of 8.9 percent.

<sup>5</sup> World Bank real GDP forecasts for FY22/23 published in April 2022

<sup>6</sup> World Bank projections. GoI has deployed significant resources for social assistance, including towards urban poor households and migrants

<sup>7</sup> Consumption Expenditure Survey 2011-12, National Sample Survey Office (NSSO), GOI compared with the World Bank estimates. Macro Poverty Outlook, October 2021

<sup>8</sup> World Bank estimates, Macro Poverty Outlook, 2020.



capabilities of State governments in India is essential to India's development trajectory as States play a leading role in designing policies and implementation frameworks for service delivery. India's future shared prosperity will depend on how its SP system evolves and catches up with the diversity and demography of its States. Therefore, reforming SP systems at the State level will be essential to enabling India to achieve future resilience, growth, and prosperity. In view of this, the World Bank (WB) has in recent years supported measures for building India's State capabilities and SP systems both at the national and State levels through a series of lending operations and analytical work. The proposed project is one of the uniquely placed State operations that is forwarding the agenda of SP delivery systems in India, especially in the context of one of the most vulnerable populations, i.e., persons with disabilities. Furthermore, successful implementation and lessons learned from the ecosystem approach proposed by the RIGHTS: Inclusion, Accessibility, and Opportunities for Persons with Disabilities in Tamil Nadu project (RIGHTS) will serve as a lighthouse not only for other Indian States but for other countries as well.

4. **Tamil Nadu is the sixth most populous State in India with a population of 72 million.**<sup>9</sup> With 48 percent of its population residing in urban areas, it is one of the most urbanized states in India. Demographically, the State's population is older compared to the national average, and a larger share of the population is of working age. The State's dependency ratio is 43 percent compared to the national average of 57 percent. Between 2000 and 2010, the population grew by 15.6 percent, but the total fertility rate declined from 2.2 percent in 1998 – 99 to 1.6 percent in 2015–16. According to the Census 2011, Scheduled Castes (SCs) represent 20 percent of Tamil Nadu's population, Scheduled Tribes (STs) comprise 1.1 percent, Other Backward Caste (OBCs) form 68 percent, and other castes constitute 10.5 percent.

## B. Sectoral and Institutional Context

5. **According to the 2011 Census, more than 26.8 million people in India and 1.18 million in Tamil Nadu live with some form of disability. However, recent studies in Tamil Nadu estimate those may significantly underestimate the number of people with disabilities and the actual number may be around 3.2 million.**<sup>10</sup> According to the Census 2011, the proportion of persons with disabilities was about 1.63 percent in Tamil Nadu compared to the national average of 2.21 percent. A higher percentage of men live with some form of disability compared to women, both in India and Tamil Nadu and most cases relate to multiple or locomotor disabilities (Graph 1). Estimates of prevalence of disability remains a key challenge in India due to the paucity of prevalence data. Data on prevalence of disability remains largely dependent on the Census 2011 which estimated 1,635 persons with disabilities amongst every 100,000 people in Tamil Nadu. A 2012-13 study using pooled data from the District Level Household Survey-4 and the 2<sup>nd</sup> Annual Health Survey update (2012-13) reveals that there are 4,550 persons with disabilities among every 100,000 population in Tamil Nadu.<sup>11</sup> Therefore, if one goes by the estimates of this study, there would be about 3.2 million people in Tamil Nadu living with some form of disability. Moreover, even these estimates appear on the lower side as the number of specified disabilities has increased since the promulgation of the Rights of Persons with Disabilities (RPWD) Act 2016. The RPWD Act 2016 and the Tamil Nadu RPWD Rules 2018 define a "person with disability" as a person with long term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders his/her full and effective participation in society equally with others. The proposed project follows this definition.

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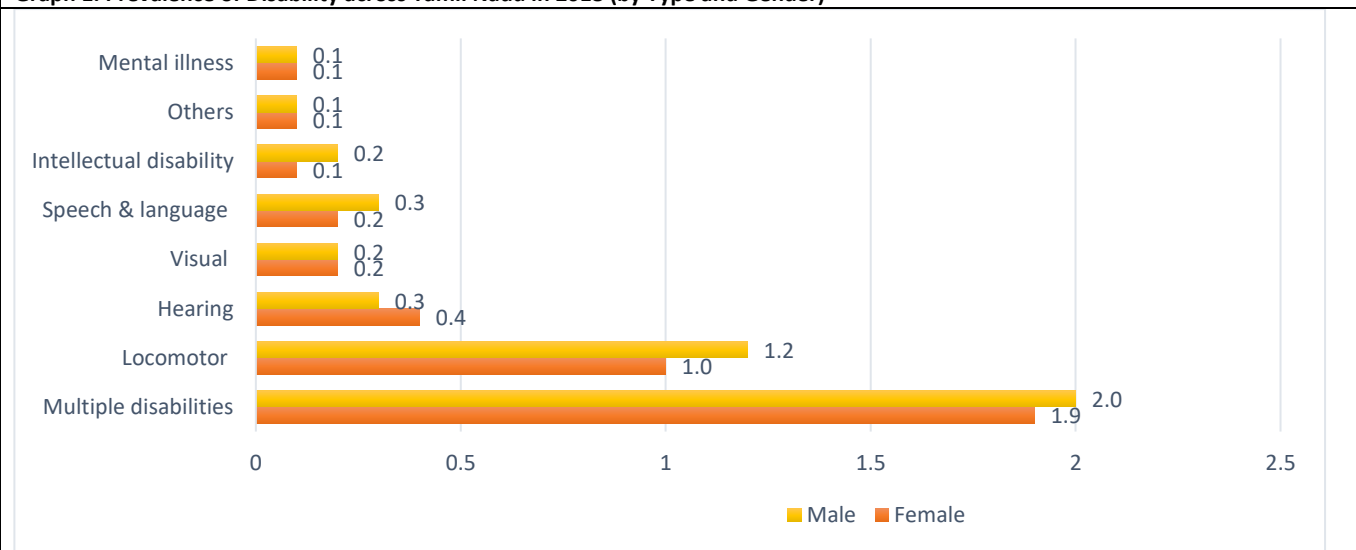
<sup>9</sup> Census 2011

<sup>10</sup> Dandona, Rakhi, Anamika Pandey, Sibin George, G. Anil Kumar, and Lalit Dandona. 2019. *India's Disability Estimates: Limitations and Way Forward*.

<sup>11</sup> Ibid



Graph 1. Prevalence of Disability across Tamil Nadu in 2018 (by Type and Gender)



Source: NSS Report No. 583(76/26/1), 76<sup>th</sup> Round, July – December 2018, Persons with Disabilities in India, NSO, MOSPI

6. **Persons with disabilities and their families are more likely to experience economic and social disadvantage than those without disability, which in turn affects economic development and social inclusion.** Persons with disabilities have poor health outcomes, lower educational achievements, lower economic engagement, higher rates of poverty and vulnerabilities, and are often isolated from mainstream social, cultural, and political opportunities. They experience exclusion and barriers in accessing health services, education, employment, transportation, information as well as care and support services. Children with disabilities are less likely to attend school, thus experiencing limited opportunities for human capital formation and face reduced employment opportunities and decreased productivity in adulthood. Persons with disabilities are more likely to be excluded from participating in the labor force, or unemployed, and generally earn less even when employed.<sup>12</sup> According to the Census 2011, among the total persons with disabilities, 45 percent are illiterate and only about 26.5 percent have completed secondary education and above. Youth with disabilities are among the poorest and experience more adverse socioeconomic outcomes than those without disabilities. Although there are no data on youth with disabilities “not in education, employment, or training (NEET),” global evidence suggests that they are twice as likely to be NEET compared to youth without disabilities.<sup>13</sup>

7. **Climate change has a disproportionate effect on individuals with disabilities, both directly and indirectly.** Tamil Nadu is highly vulnerable to climate change and increase in the frequency and intensity of some extreme events, such as extreme heat events, flooding (related to heavy rains, hurricanes, and coastal storms), droughts, and wildfires is projected. Natural disasters and extreme climatic emergencies exacerbate the existing vulnerabilities of persons with disabilities as many of them are dependent on aids and caregivers for evacuation and access to basic amenities. Hence, persons with disabilities are often among those most adversely affected in a climate-induced event, sustaining

<sup>12</sup> The World Health Organization and The World Bank. 2011. World Report on Disability 2011.

<sup>13</sup> Singh, S., and D. S. Raja. 2021. *Digital Jobs for Youth with Disabilities*. Thematic Note Issue 2, Solutions for Youth Employment and World Bank.



disproportionately higher rates of morbidity and mortality.<sup>14</sup> People with disabilities often face barriers in accessing healthcare services and in receiving timely public health or emergency information in an accessible format. As such, the project will include climate considerations in the formulation of policies, standards, and provision of enhanced service delivery.

8. **Government programs for persons with disabilities are anchored in the legal provisions and commitments made under several policies, legislations, and regulations enacted by national and State governments.** Some of the major national legal instruments for persons with disabilities include the: (a) National Policy for Persons with Disabilities 2006; (b) RPWD Act 2016; (c) National Trust for Welfare of Persons with Autism, Cerebral Palsy, Mental Retardation, and Multiple Disability Act 1999; (d) Mental Health Act 2017; and (e) Rehabilitation Council of India Act 1992. At the State level, the Government of Tamil Nadu (GoTN) has enacted the: (a) Tamil Nadu RPWD Rules 2018 and (Amendment) Rules 2019; (b) National Trust Rules and Regulations 2001; (c) National Award for the Persons with Disabilities Rules 2013; (d) Tamil Nadu Urban Local Bodies (Provision of Special Facilities for the Differently Abled Persons in the Multi-Storied and Public Buildings) Rules 2013; and (e) Tamil Nadu Combined Development and Building Rules 2019, including barrier-free built environment for persons with disabilities and elder persons, among others. The assessment and determination of disabilities is undertaken according to the 'Guidelines for the purpose of assessing the extent of specified disability in a person included under RPWD Act 2016.'

9. **Compared to other States, Tamil Nadu has taken a range of initiatives for persons with disabilities, yet challenges remain in terms of institutional capabilities and systems, last mile delivery, and resilience and productivity.** With a budget allocation of about US\$150 million per annum, the GoTN is funding a range of programs and is far ahead of other State governments in terms of making enabling provisions for persons with disabilities. However, much like many other Indian States, the current social protection system in Tamil Nadu remains fragmented and inadequate. At present, there are about 74 small schemes for persons with disabilities, with each implemented by multiple departments in silos lacking coordination and convergence. In the absence of data and systems, the process of identification, targeting, and selection is largely supply driven. The current programs are mostly dependent on nongovernmental organizations (NGOs) for service delivery. At present, most of the expenditure of the Department for the Welfare of Differently Abled Persons (DfWDAP) is on social security cash transfers and grants to NGOs, with family and community-based care and rehabilitation services being deficient.

10. **Inadequate mechanisms for outreach together with lack of quality human resources, data, and systems adversely affect the last-mile delivery of benefits and services for persons with disabilities.** Strengthening last-mile delivery of SP services in Tamil Nadu requires adequate infrastructure facilities, strong institutional arrangements, appropriate mechanisms for citizen interface, qualified human resources, particularly at the community levels, as well as a well-functioning grievance management system. The current mechanisms for last mile delivery of services in the State is faced with challenges pertaining to lack of institutional mechanisms or human resources beyond district levels, low coverage of social care services, lack of citizen's involvement, lack of support to families and caregivers, bottlenecks in accessing State health insurance schemes for care and rehabilitation needs, among others.

11. **The current mechanism for cash transfer to beneficiaries follows a manual process for identification and selection of beneficiaries.** Currently, the Directorate for the Welfare of Differently Abled Persons (DWDAP) implements

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<sup>14</sup> Gutnik, A., & Roth, M. (2018). Disability and Climate Change: How climate-related hazards increase vulnerabilities among the most at risk populations and the necessary convergence of inclusive disaster risk reduction and climate change adaptation. Humanity & Inclusion. Lyon: Humanity and Inclusion.



several cash transfer schemes in the form of scholarships, stipends, maintenance allowances, and unemployment benefits, among others. These benefits are disbursed directly into the bank accounts of beneficiaries by district offices using the GoTN's treasury system - Integrated Financial and Human Resource Management System (IFHRMS) portal. However, the identification and selection process for these schemes are largely manual as detailed records of beneficiaries are maintained by the District Differently Abled Welfare Office (DDAWO) in manual registers and EXCEL spreadsheets.

**12. Persons with disabilities face reduced employment opportunities and often face barriers to enter the labor force.** Both employment and income outcomes worsen with the severity of disability. In addition to facing similar obstacles that young people face in entering labor markets, people with disabilities face additional infrastructural, institutional, and attitudinal barriers. They are often at a disadvantage and enter the labor market with a skills deficit and a lack of previous work experience. In instances where they are employed, they are more likely to be in low-paid jobs with poor career prospects and working conditions.<sup>15</sup>

**13. Women with disabilities experience the combined disadvantages associated with gender and disability.** They face significantly more difficulties, in both public and private spheres, in attaining access to adequate housing, health, education, vocational training, and employment opportunities, among others.<sup>16</sup> A World Bank (WB) Rapid Assessment of persons with disabilities conducted across three districts in Tamil Nadu (Chennai, Dindigul and Kanyakumari) found that women with disabilities were less likely to be employed. Only 30 percent female respondents reported being employed in past or currently employed, compared to 47 percent male respondents.<sup>17</sup>

**14. The cross-sectoral nature of disability inclusive policy and programing is a challenge for State governments toward ensuring the rights and entitlements of persons with disabilities.** Disability is a cross-sectoral issue and therefore its management requires a multisectoral statewide approach together with investing in building institutional capacities of respective departments. There are several departments within the GoTN with sectoral roles and responsibilities mandated by the national- and State-level legislative frameworks toward ensuring rights of the persons with disabilities. Apart from the DfWDAP, some of the major departments are Health, Education, Revenue, Labor, Skills, Housing, Transport, Urban Development, Rural Development, Social Welfare, and Women and Child Development. Most of these departments have benefits/services for persons with disabilities under their respective core schemes/programs. However, often due to the vastness of the core sectoral interventions and lack of systems and capacities, the disability inclusion components in their programs remain at the fringe or do not get implemented. Recognizing this challenge, the GoTN has taken an initiative to develop a Multisectoral Disability Framework for Action that intends to identify key activities and outcomes for each of the departments. It also proposes to identify disability focal points from the respective line departments and invest in building their capabilities and skills for efficient delivery of SP benefits and services for persons with disabilities.

**15. The current institutional capacity of the DfWDAP is not commensurate to its mandate toward rights of person with disabilities and the need for extensive service delivery at all levels.** At the State level, the DWDAP under the DfWDAP is the main implementing body for disability policies and programs. The DWDAP plays the dual role of both statutory (Commissionerate) and implementation functions (Directorate) with a small team of technical and administrative personnel. The district level unit of the DWDAP is called DDAWO and is responsible for administrative,

<sup>15</sup> Singh S, Raja D.S 2021, Thematic Note Issue 2, Digital Jobs for Youth with Disabilities, Solutions for Youth Employment & World Bank

<sup>16</sup> Women and adequate housing, Study by the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, Miloon Kothari, E/CN.4/2005/43, para. 64.

<sup>17</sup> World Bank, Gender, Social Inclusion and State Capacity Assessment Study undertake for the preparation of the Tamil Nadu RIGHTS Project between December 2021 and February 2022.





statutory, and service delivery functions. Originally, the DDAWOs were set up as district level rehabilitation centers with technical staff but over the years they have largely moved to administrative and statutory functions. This is due to the fact that: (a) the DfWDAP needed a district level implementation and supervision team for its programs; and (b) the beneficiaries faced challenges in accessing these service centers as they were mostly located at the district headquarters. This resulted in most of the technical staff (such as speech therapists) performing administrative functions, while for the delivery of care and rehabilitation services the State largely depends on NGOs through several grant-in-aid schemes. Additionally, DfWDAP, being the nodal Department for Disability in the State of Tamil Nadu, lacks adequate institutional capacity and systems for coordination and monitoring of the State disability program.

**16. The World Bank's assistance is being sought to support the State of Tamil Nadu in addressing some of the binding constraints to inclusion, accessibility, and opportunities for persons with disabilities, and to strengthen the State's capabilities and SP delivery systems.** Overall, Tamil Nadu faces three major constraints: (a) institutional and human resource capabilities of the State departments; (b) efficient and timely delivery of last mile services and benefits; and (c) the barriers faced by persons with disabilities, particularly females, in entering the labor market. The project proposes to address these constraints by investing in strengthening the capabilities of the State through adequate institutional and governance structures, putting in place SP delivery systems, implementation of a Multisectoral Disability Framework for Action, and putting in place skilled human resource at all levels. The project will also finance strengthening outreach and coverage of SP programs/services to support last mile delivery, imparting life skills to persons with disabilities, and supporting design, implementation, and evaluation of models for economic empowerment for better labor market outcomes.

**17. The project will seek areas of collaboration with other WB-financed projects in Tamil Nadu to ensure better coordination and convergence for inclusion, accessibility, and opportunities for persons with disabilities.** Specifically, the project will seek potential areas of collaboration with the Tamil Nadu Health System Reform Program (P166373) for co-locating block level social care facility with existing primary health centers (PHCs) and ensuring access of choice-based service provision funded through the health insurance scheme for persons with disabilities. The project will collaborate with the Tamil Nadu Rural Transformation Project (P157702) to use its grassroots organizations and community level presence together with learning from prior experience of implementing a disability component. Finally, the project will explore possibilities of working closely with the Chennai City Partnership Project (P175221) on piloting initiatives relating to SP systems and urban model of family and community-based rehabilitation services for persons with disabilities.

### **C. Relevance to Higher Level Objectives**

**18. The project is consistent with the FY18-22 World Bank Group CPF.** The CPF has three focus areas: (a) promoting resource-efficient growth; (b) enhancing competitiveness and enabling job creation; and (c) investing in human capital. The proposed project is fully aligned with the focus area on enabling job creation by increasing access to market relevant skills development for persons with disabilities. It also contributes significantly to the CPF focus area of investing in human capital by improving the coverage and coordination of SP programs and delivery of last mile social care services.

**19. In addition, the CPF focuses on four catalytic approaches of engagement to serve as impact multipliers.** The operation contributes to the first approach of leveraging the private sector by ensuring strong public – private partnerships for the last mile delivery of social care services and tapping into innovative financing through corporate social responsibility funds. It is also well aligned to the third approach of strengthening public sector institutions by developing the capability of the GoTN for efficient SP service delivery for persons with disabilities. Lastly, the operation contributes to the fourth approach of supporting a Lighthouse India by facilitating the design and implementation of





innovative interventions. In addition, the proposed operation supports two of the three cross-cutting themes of the CPF on reducing gender-based inclusion gaps through socioeconomic empowerment of women with disabilities and harnessing high impact technologies for development enabled through SP service delivery systems.

## **II. PROJECT DESCRIPTION**

### **A. Project Development Objective**

#### **PDO Statement**

To strengthen the social protection systems and capability of the State of Tamil Nadu to promote inclusion, accessibility and opportunities for persons with disabilities.

#### **PDO Level Indicators**

- (i) Beneficiaries selected using the social protection delivery system (Percent)
- (ii) Persons with disabilities receiving enhanced social care services and benefits (Number)
  - a) Women with disabilities receiving enhanced social care services and benefits (Number)
  - b) Persons with disabilities from vulnerable groups (SC, ST) receiving enhanced social care services and benefits (Number)
- (iii) Models for wage and self-employment evaluated (Text)

### **B. Project Components**

20. **The proposed project uses a systems-based approach towards building the state capabilities and strengthening last-mile delivery.** Project interventions are designed to address the binding constraints in the current disability program and support the State government's vision of moving from a fragmented scheme-based approach to an integrated SP delivery system approach, together with strengthening outreach and coverage of SP benefits and services to persons with disabilities. The SP delivery system seeks to serve as a tool for the State government in efficient inclusion, delivery, monitoring and supervision of benefits and services to the persons with disabilities. The implementation of a Multisectoral Disability Framework for Action will facilitate coordinated interventions to ensure access to health, education, skills developments and employment opportunities for youth, accessible transport, housing, and infrastructure, among others. The SP delivery system for the State will help ensure multiple forms of assistance in an efficient and timely manner by reducing delivery costs, ensuring readiness for future program planning, and promoting fiscal consolidation. Further, such a delivery systems approach will result in long term cost savings and enable quick responses to disasters, contributing to reduced losses and increased cost efficiencies.

#### **COMPONENT 1: Strengthen State Capability and Establish an Integrated Social Protection System (US\$42.86 million)**

21. This component will focus on building and strengthening the State's capabilities towards streamlining mechanisms for better delivery of benefits and services, as well as inclusion of persons with disabilities, following a life cycle approach. In addition, it will support putting in place building blocks of a comprehensive statewide SP delivery program for disability inclusion by enabling a policy environment, standards, investments in capacities, and communication. The SP delivery



system being proposed under the RIGHTS project will comprise of a Registry of Persons with Disabilities in Tamil Nadu and an integrated Management Information System (MIS). Specifically, the component will focus on the following interventions:

- a) Enabling environment for persons with disabilities through adequate policy and standards, mobilization and behavior change communication.** The project will support: (i) an assessment of the existing policy framework for persons with disabilities in the GoTN and its implementation status to inform key sectoral and gender gaps and potential areas for further strengthening; (ii) the development and implementation of disability inclusive policies and standards of the GoTN cutting across key sectors and departments; (iii) the identification of gender gaps in the implementation of the policy framework and development of an action plan to improve human resource capacities for reaching women with disabilities; (iv) a communication needs assessment for the development of community mobilization, outreach and communication strategy to address the stigma and discrimination faced by persons with disabilities, particularly women with disabilities; and (v) the formulation of strategies and plans for engaging organizations working for persons with disabilities.
- b) Strengthening systems for disability assessment and determination.** Disability assessment and eligibility determination is one of the main challenges often faced by governments in implementing disability inclusive programs. To strengthen this process, the project will support the DWDAP in: (i) identifying the socio-economic status of households with persons with disabilities; (ii) strengthening of procedures for the assessment and determination, as well as issuance, of disability certificates, in collaboration with the health department; and (iii) strengthening of the process for determination of eligibility for benefits and services available for persons with disabilities. In addition, the project will support the development of a Registry of Persons with Disabilities, which will work as a single window for persons with disabilities to apply for and to be determined eligible for select programs. This registry will be part of the SP delivery platform developed under the project to be enabled by a Unique Disability ID (UDID) and other ID systems.<sup>18</sup>
- c) Rationalization of existing schemes and putting in place Integrated State Disability Program(s).** To address constraints pertaining to fragmentation and overlapping between existing schemes, as well as to ensure improved inclusion, access, and opportunities for persons with disabilities, the project will support rationalization of the existing schemes of the DfWDAP and putting in place an integrated State scheme for persons with disabilities. This will be done by supporting: (i) an assessment of the existing schemes of the DfWDAP for persons with disabilities; (ii) public consultations and workshops to understand constraints and challenges in accessing schemes; (iii) the development of integrated State scheme(s) for persons with disabilities; and (iv) the dissemination of information on application, eligibility, benefits, service delivery locations, service providers, citizen engagement procedure, and other provisions under the integrated State Disability Scheme(s).
- d) Development and deployment of a robust social protection delivery system for equitable, efficient, and transparent service delivery for persons with disabilities, including women with disabilities.** The project will support the development of the SP Delivery System that will combine the registry of persons with disabilities and an integrated MIS system with forward and backward linkages to the State Family Database (SFDB).<sup>19</sup> In view of

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<sup>18</sup> The UDID initiated by GoI aims at building a holistic end-to-end integrated system for Issuance of Universal ID and Disability Certificates for persons with disabilities with their identification and disability details. UDID system plans to set up a National Database for Persons with Disabilities to encourage transparency, efficiency, uniformity and ease of delivering the government benefits.

<sup>19</sup> The Tamil Nadu eGovernance Agency (TNeGA) is developing SFDB, which is a data-driven decision support infrastructure for improving governance by enabling data harmonization and synchronization among various departments to ensure transparent and seamless service delivery to citizens.



the long-term sustainability and ensuring support to statewide systems approach, the project proposes to link up its SP delivery platform with the SFDB by using “Makkal Number” to allow interoperability between the two systems.<sup>20</sup> Specifically, the project will finance: (i) the development and operationalization of an SP delivery system, including registry of persons with disabilities and an integrated MIS; (ii) the strengthening of the interoperability and integration between relevant government databases and information systems; (iii) the development and implementation of appropriate data protection and sharing protocols; (iv) the development of a partnership management system for improved planning and management of partnerships with private sector/civil society/organizations of persons with disabilities, among others; and (v) carrying out of analytical and reporting activities and strengthening Grievance Redress Mechanism (GRM) to better understand and redress grievances. The project proposes that the SP delivery system be developed in a modular fashion, with DWDAP being the first user of the platform which would then be expanded into a state – wide system in the future.

**e) Inter-departmental convergent action and Implementation Support.** Recognizing the multisectoral nature of disability and related interventions, the project will work towards strengthening the capacity of other Departments to be disability inclusive. Use of performance indicators for each department and regular reporting will be an integral part of the Multisectoral Disability Framework for Action. Referrals could be broadened to ensure provision of benefits from other sectoral programs. This will be done by supporting the: (i) development of a Multisectoral Disability Framework for Action for identification of key actions, outcomes and performance indicators of relevant line departments in the State government towards fulfilment of the rights of persons with disabilities; (ii) development of mechanisms for periodic monitoring of the implementation of the Multisectoral Disability Framework for Action; (iii) orientation and capacity building of the DfWDAP and other relevant departments to enhance disability inclusion into their planning, implementation and monitoring processes; (iv) provision of incentives for the district and local level functionaries of different line departments for promoting disability inclusion and convergence; and (v) preparation and dissemination of an annual State disability report.

**f) Project implementation support to the DfWDAP and the Tamil Nadu eGovernance Agency (TNeGA).** The project will provide day-to-day implementation and operational support to the DfWDAP and TNeGA to efficiently deliver the project at all levels. The project will finance costs pertaining to: (i) day-to-day operations and management support; (ii) development of manuals and guidelines for project implementation, partnerships, and human resource management; (iii) development of a capacity-building strategy and training of service providers and stakeholders; and (iv) monitoring and evaluation activities including baseline, mid-term and end-term surveys, among others.

## **COMPONENT 2: Strengthen Last Mile Delivery of Social Care Services and Benefits (US\$174.85 million)**

22. Under this component, the focus will be on improving access and quality of care and rehabilitation services for persons with disabilities by setting up a comprehensive ecosystem for social care services. This will be done by supporting three major strategic priorities: (a) adopting a case management approach for persons with disabilities for individual centric needs assessment and care plan; (b) making a shift in the social care service delivery through family and community-based care and rehabilitation services led by a cadre of trained frontline workers (community rehabilitation workers [CRWs] and community facilitators) and by training homecare providers; and (c) strengthening the supply side through low-cost social care services through a public–private partnership approach together with identification and use of a strong referral network. Specifically, the component will focus on the following interventions:

<sup>20</sup> Makkal Number/ID is a unique eight-digit varchar introduced by TNeGA, which will be used as a unique identifier for the records without an Aadhaar number and would be seeded in a participating program database for the SFDB.



- a) Family and community-based care and rehabilitation services.** The proposed family and community-based rehabilitation models for the RIGHTS project will focus on: (i) the design, evaluation, and upscale of comprehensive family and community-based care and rehabilitation; (ii) carrying out training of parents and caregivers in care and management of persons with disabilities within the home environment; (iii) establishment of specialized neighborhood services operated by trained frontline workers having provisions for basic therapy services, guidance; (iv) provision of life skills education on selfcare, daily living skills, counselling, self-image and aspirations of youth with disabilities at the neighborhood service community centers; (v) engagement of Community Service Providers (CSPs) through performance-based contracts for the implementation of the community based care and rehabilitation services including engagement of community level frontline workers; and (vi) provision of performance-based incentives to community level service providers/frontline workers to support efficient and timely delivery of social care services and benefits.
- b) Integrated one – stop social care and rehabilitation services.** The project will support the: (i) setting up one-stop social care service centers (OSCs), at the district, sub-division and block/PHC levels; (ii) establishment and upgrade of the Early Intervention Center (EICs), as needed; (iii) provision of mobility support for improving access to OSCs and EICs; and (iv) provision of mobile outreach and therapy services. The project will support the establishment and operations of 97 sub – division level OSCs either through the construction of new buildings or renovation of existing buildings made available by the GoTN to the DWDAP or a public–private partnership mode through outsourced performance-based contracts. In addition, the project will also support renovation and upgrade of block/PHC level EICs. A district level assessment of infrastructure requirements for setting up these centers will be undertaken and a plan for construction/renovation/operationalization of these OSCs will be developed on the basis of the assessment findings. The project will be implemented in a phased manner so the construction/renovation related activities will only begin during the third year of project implementation. The project will leverage OSCs to develop aid packages in case of climate shocks. The detailed operational procedures and guidelines for setting up these OSCs will be developed and disseminated by the State Project Implementation Unit (SPIU) to all field level implementation entities and personnel.
- c) Facilitating utilization of health insurance schemes for choice-based access of public or private sector services.** Considering the specialized health, care and rehabilitation needs of persons with disabilities and addressing barriers in accessing professional public – private facilities, the project will collaborate with the Department of Health for inclusion of a specialized disability component under the existing State Health Insurance Scheme. Involvement of private sector insurance companies and specialized health, care and rehabilitation service providers will be explored to facilitate improved choices for persons with disabilities. The aim is to create choices for need-based care and rehabilitation services for persons with disabilities, including for widows/single women with disabilities, by ensuring accessibility to suitable insurance instruments and supply side interventions.
- d) Improving access to public infrastructure, housing, and mobility for persons with disabilities.** The project will play a facilitator's role in improving access to public infrastructure, housing, and mobility for persons with disabilities, especially women and girls. This will be done by the: (i) development and sharing of knowledge about inclusive mobility and accessible housing with all stakeholders; (ii) carrying out of “accessibility audits” of public facilities (infrastructure, housing, and mobility) and suggest measures for making these facilities accessible to persons with disabilities; and (iii) collaboration with relevant departments and agencies to facilitate development of innovative and accessible models for disability inclusion.



### COMPONENT 3: Pilots to Enhance Resilience and Productivity of Persons with Disabilities (US\$14.29 million)

23. Under this component, the project will largely focus on piloting models for enhancing resilience and productive inclusion of persons with disabilities, especially youth with disabilities in Tamil Nadu. Special attention will be paid to young women with disabilities. The focus will also be on inclusion of persons with disabilities who are in households headed by single women. The following activities will be supported under this component:

- a) Conduct market assessments and jobs diagnostics for understanding the demand and supply sides.** The project will support a labor market assessment across all districts of Tamil Nadu to identify high-potential wage and self-employment opportunities and skills requirements for the persons with disabilities in Tamil Nadu. Persons with disabilities face specific and unique challenges in entering the labor market. The market assessment will diagnose the specific constraints that persons with disabilities face in accessing productive work and will identify new demand-driven entry points into the labor market. The market assessment will also help identify non-traditional higher-productivity and higher-wage employment opportunities that persons with disabilities can pursue.
- b) Design and deployment of select pilots to evaluate models for economic empowerment of persons with disabilities.** The focus will be on testing models for preparing youth with disabilities, focusing on young women, for equitable access to skills training and employment opportunities. Based on the actual needs identified through the market assessment and job diagnostics, the innovative models may consider inclusion of elements pertaining to: (i) setting up of a need-based institutional mechanism; (ii) developing of specialized curriculum and pedagogy designed for disability sensitive skills training courses (both vocation and self-employment) in collaboration with key stakeholders such as State Skills Development Mission, Sector Skills Council, National Skills Development Corporation, and so on; (iii) forging private sector partnerships, regulation, and incentives to encourage disability inclusive and safe work environment free from sexual harassment and discrimination, particularly for women with disabilities; (iv) providing cash transfers to promote enrollment and retention of youth with disabilities in skills training programs, post placement, and transition support; (v) providing grants (credit linkages) and business development support for youth with disabilities receiving training under the project, self-help groups for persons with disabilities, community-based organizations, associations/organization of persons with disabilities for business development and/or livelihood generation; and (vi) facilitating specialized apprenticeship and internship support in collaboration with the private sector.
- c) Design and deployment of select pilots to evaluate models for completion of secondary education for persons with disabilities.** To facilitate the design and development of innovative models for supporting completion of secondary or higher education for youth with disabilities, the project will support a needs assessment and sectoral review to understand the demand and supply side issues. Based on the findings of the needs assessment, the project may support the: (i) design, implementation and evaluation of appropriate pilot interventions; and (ii) design and development of a customized curriculum for bridge education of young children/youth with disabilities.

### COMPONENT – 4: Contingent Emergency Response Component (CERC) (US\$0.00 million)

24. This component will support an immediate response to an eligible crisis or emergency, as needed.

25. **Project cost and financing.** The WB financing will reimburse the GoTN up to US\$162 million of defined eligible expenditures and incentives under the total project cost. The GoTN will contribute 30 percent counterpart share, an estimated US\$70 million, as counterpart financing:



<b>Table 1. Project Costs (US\$, millions)</b>			
<b>Project Components</b>	<b>Project Cost</b>	<b>IBRD Financing– 70 percent</b>	<b>State Government Counterpart Financing– 30 percent</b>
<b>Component 1:</b> Strengthen State Capability and Establish an Integrated Social Protection System	42.86	30.00	12.86
<b>Component 2:</b> Strengthen Last Mile Delivery of Social Care Services and Benefits	174.85	121.59	52.85
<b>Component 3:</b> Pilots to Enhance Resilience and Productivity of Persons with Disabilities	14.29	10.00	4.29
<b>Component 4:</b> Contingent Emergency Response (CERC)	0.00	0.00	0.00
Front-end fee		0.41	
<b>Total</b>	<b>232.00</b>	<b>162.00</b>	<b>70.00</b>

### C. Project Beneficiaries

26. **The primary project beneficiaries are persons with disabilities from the State of Tamil Nadu.** As previously stated, according to official estimates, there are about 1.2 million persons with disabilities in TN, albeit other studies point to about three times as many persons with disabilities. Of the officially estimated population, 21 percent are from vulnerable groups including persons from SCs and STs. The project expects to benefit about 800,000 persons with disabilities across the State through its range of social care services. At least 44 percent of these beneficiaries are expected to be women with disabilities, while at least 21 percent will be persons belonging to vulnerable groups (SC and ST). The project will impart life skills education to at least 400,000 beneficiaries (persons with disabilities, parents, teachers), while 400,000 beneficiaries are expected to avail the services of OSCs. In addition, the project will also impart training to about 300,000 parents and primary caregivers in home-based care services. Through pilot models for wage and self-employment, the project is expected to train about 5,000 beneficiaries. Considering the vulnerabilities of women with disabilities, special focus on women and young girls with disabilities will be given. In addition, the project has also committed to engage at least 40 percent of women as frontline workers (CRWs/community facilitators) from amongst the total number of workers proposed to be engaged through CSPs using performance based outsourced contracts. Overall, the project will indirectly benefit all persons with disabilities across Tamil Nadu, as well as their families who remain primary care givers.





## D. Results Chain

CHALLENGES		ACTIVITIES	OUTPUTS	OUTCOMES
State Capabilities & Systems	<ul style="list-style-type: none"> <li>Lack of policy &amp; standards for ensuring convergent service delivery by different line departments</li> <li>Fragmentation due to multiple schemes &amp; lack of systems</li> <li>Supply driven identification &amp; targeting</li> <li>Current mechanism for cash transfer to beneficiaries follows a manual process for identification and selection</li> <li>Weak institutional capacity &amp; monitoring systems</li> </ul>	<ul style="list-style-type: none"> <li>Strengthening state disability policy &amp; standards</li> <li>Rationalization of Schemes &amp; development of an integrated state program</li> <li>Development of Social Protection Platform &amp; Integrated systems – a) Social Registry linked with ID system (Aadhaar, UDID); b) Integrated MIS; c) DBT platform</li> <li>Build capacity for improved service delivery at State, District &amp; local levels</li> </ul>	<ul style="list-style-type: none"> <li>Multisectoral Framework and State Policy developed</li> <li>Integrated scheme for persons with disabilities formulated</li> <li>Disability certification system linked with UDID in place</li> <li>Registry of Persons with Disabilities developed and deployed</li> <li>Integrated MIS developed &amp; deployed</li> <li>Cash allowance beneficiaries receiving direct benefit transfers</li> <li>Institutional &amp; human resource structures at State, District &amp; local levels set up</li> <li>M&amp;E &amp; grievances redress system established</li> </ul>	<ul style="list-style-type: none"> <li>State of Tamil Nadu moves from a currently multiple fragmented “schemes” to a comprehensive “SP system” approach for persons with disabilities</li> <li>Registry of Persons with disabilities facilitates identification of all potentially eligible beneficiaries for the relevant SP services / programs</li> <li>Effective management and tracking of all current and eligible beneficiaries through SP delivery system</li> </ul>
	<ul style="list-style-type: none"> <li>Inadequate coverage &amp; outreach</li> <li>Limited coverage of social care services</li> <li>Lack of involvement &amp; support to families and caregivers</li> <li>Deficient last mile delivery of benefits &amp; services</li> <li>Bottlenecks in accessing state health insurance scheme for care &amp; rehabilitation needs</li> </ul>	<ul style="list-style-type: none"> <li>Family and Community-based early intervention for care and rehabilitation services children / persons with disabilities.</li> <li>Centre based integrated social care and rehabilitation services for persons with disabilities with extended outreach facility through mobile outreach services</li> <li>Development of life skills curriculum &amp; impart training to beneficiaries</li> <li>Specialized component for persons with disabilities under the existing Health Insurance Scheme</li> </ul>	<ul style="list-style-type: none"> <li>Family &amp; Community based care &amp; rehabilitation implemented</li> <li>Urban &amp; rural areas covered by community-based rehabilitation service</li> <li>Neighborhood Centres (one-stop shops) operated by Trained frontline workers</li> <li>Caregivers trained – a) family members / parents, and b) professionals for homebased care &amp; handholding support</li> <li>97 sub – divisional level OSCs operational</li> <li>Life skills curriculum &amp; training plan developed</li> <li>Specialized Insurance Scheme designed.</li> </ul>	<ul style="list-style-type: none"> <li>Persons with disabilities receiving enhanced social care services and benefit (Gender / SC, ST)</li> <li>Increased access of social care services for persons with disabilities</li> <li>Improved homebased care and daily living standards for persons with disabilities</li> <li>State health insurance scheme more responsive to the specialized needs of persons with disabilities</li> </ul>
	<ul style="list-style-type: none"> <li>Persons with disabilities face reduced employment opportunities and decreased productivity.</li> <li>Both employment and income outcomes worsen with the severity of the disability.</li> <li>Majority of Persons with Disabilities either do not go to school or drop out of education at elementary levels.</li> </ul>	<ul style="list-style-type: none"> <li>Market assessment / job diagnostics for understanding the demand and supply</li> <li>Design, implement &amp; evaluate models for economic empowerment</li> <li>Design, implement &amp; evaluate models for the completion of secondary education (formal / non – formal)</li> </ul>	<ul style="list-style-type: none"> <li>Market assessment / job diagnostics undertaken</li> <li>Pilot models for economic empowerment implemented &amp; evaluated</li> <li>Pilot models for the completion of secondary education implemented &amp; evaluated</li> </ul>	<ul style="list-style-type: none"> <li>Models for wage &amp; self-employment evaluated</li> <li>Persons with disabilities receiving skills training (wage &amp; self-employment) through the project (Gender / SC, ST)</li> </ul>

## E. Rationale for Bank Involvement and Role of Partners

27. The value added of the WB derives from its expertise and experience in social care services and SP systems in India and beyond. The WB team has considerable experience, both at the national and international levels, in developing effective SP systems, and partnering with civil society organizations and private sector institutions for service delivery. The WB team also includes specialists with experience for designing and implementing non-formal education, economic empowerment programs, and delivery of last mile services. The team also has adept knowledge of national laws, policies, and schemes related to persons with disabilities. Finally, the team has included disability experts with considerable



knowledge and experience in designing and implementing disability inclusion projects to provide technical advice and share best practices from around the world.

## **F. Lessons Learned and Reflected in the Project Design**

28. **Project design has benefited from lessons drawn from the WB's experience in financing similar lending operations and technical assistance in strengthening State capabilities and SP system as well as expanding outreach and coverage of social care services for vulnerable groups both at the national and States levels in India.** Additionally, project design is also informed by the relevant international best practices supported by multilateral and international agencies.

- a) Investment in State capability and SP systems builds on a series of operations and analytical work undertaken by the WB in India together with State-specific lending support such as Bihar, Chhattisgarh, Odisha, and West Bengal. Lessons from these operations highlight that investment in building the institutional capacities of implementing departments through social registry and integrated information systems goes a long way in improving the targeting, implementation, last mile delivery of benefits, fiscal efficiency, and citizen access, among others.
- b) For the OSCs for persons with disabilities, the project draws lessons from the two innovative projects successfully implemented by the Social Protection and Jobs team in South Asia Region, including: (i) India: Bihar Integrated Social Protection Strengthening Project (P118826); and (ii) Bangladesh Disability and Children-at-Risk Project (P106332). The lessons learned from these operations include: (i) case management is a critical tool in individual care planning and delivery of social care services to elderly and persons with disabilities; (ii) quality care, therapy and rehabilitation services can help improve the quality of life of persons with disabilities; and (iii) linkage with family and community-based rehabilitation services is an essential component of a larger social care service delivery ecosystem.
- c) For home and community care services, the project builds on global experiences and lessons. For example, the Singapore Program for Integrated Care for the Elderly (SPICE) centers operate integrated services and provide need-based care services in home settings. Thailand piloted service models that integrate health and social care (known as the Bangkok 7 Model) for older persons through collaboration among local authorities, volunteers, and older people. In India, a homecare pilot project implemented by HelpAge India in three locations of the country (Shimla, Leh and Cuddalore) had encouraging results and found transformational changes in the lives of elderly beneficiaries and their families.<sup>21</sup> The major lesson emanating from these models is that provision of care and rehabilitation services within the home and community settings is a cost-effective model and enables coverage of a larger population. Building the capacities of homecare providers not only improves the quality of care but also helps family members in reducing caregiving burden, stress and frees up time for other productive engagements.

## **III. IMPLEMENTATION ARRANGEMENTS**

### **A. Institutional and Implementation Arrangements**

29. **The DWDAP under the DfWDAP will be responsible for project implementation.** The institutional structures and services from State to subdivisional levels will be directly operated by the DWDAP, while block and community level

<sup>21</sup> HelpAge India, Home Care for the Elderly in India—A Call to Action





service delivery will be operated through performance-based service contracts with the private sector/civil society organizations community-based organizations/organization of persons with disabilities.

30. **At the State level, a State-level PIU (SPIU) set up under the DWDAP will be responsible for the day-to-day project implementation. At the district level, a District Project Implementation Unit (DPIU) will be set up for supporting day-to-day implementation and supervision of the project.** The SPIU and DPIU will include a combination of administrative, program personnel and specialists comprising of procurement, Financial Management (FM), social and environmental specialists, as well as technical experts. An Operations Manual and Implementation Plan (OMIP) will be developed by the SPIU to provide clear definitions of rules and guidelines on program implementation, monitoring and supervision as well as the roles and responsibilities of institutions/personnel at all levels of implementation.

31. **Project implementation oversight will be led by a Project Steering Committee (PSC).** Headed by the Chief Secretary of the State, the PSC will comprise the Principal Secretary/Secretary of relevant departments and representatives of other relevant agencies; the Principal Secretary/Secretary, DfWDAP will act as the Member Secretary, while the Project Director will be the convener. Detailed procedures, powers, roles and responsibilities and logistics relating to PSC will be detailed in the OMIP.

32. **At an operational level, a Project Implementation Committee (PIC), headed by the Principal Secretary/Secretary of DfWDAP will be constituted at the State level.** This committee will comprise members/representatives from the relevant departments and agencies, while the Project Director for the proposed project will act as the Member Secretary. Detailed procedures, powers, roles and responsibilities and logistics relating to PIC will also be detailed in the OMIP.

33. **To facilitate the development and deployment of the SP delivery system in a timely manner, TNeGA will be a sub-implementing agency of the project.** A sub-Project Implementation Unit (PIU) will be set up at TNeGA for facilitating day-to-day implementation of activities. The DWDAP with the assistance of TNeGA will undertake the development and deployment of the SP delivery system including a Registry of Persons with Disabilities, and development and/or customization of the existing program management information system (MIS) linked with the Registry and DBT platforms. All technical documents pertaining to system design, architecture, and process will be reviewed and vetted by a Technical Committee headed by the project Director. Detailed procedures pertaining to the Technical Committee will be elaborated in the OMIP.

34. **Project implementation will adopt an incremental approach.** In the first two years of its implementation, key models/interventions will be designed, implemented, and evaluated for upscale and saturation in all 38 districts by the end of the fourth year. This will be achieved by targeting: (a) five districts in the first year of the Project; (b) 10 districts in the second year; (c) 15 districts in the third year; and (d) remaining eight districts in the fourth year of the project implementation. The number districts taken up in a particular year may vary depending on the field requirements and the rollout plan will be reflected appropriately in the Project's OMIP.

## **B. Results Monitoring and Evaluation Arrangements**

35. **The DWDAP will lead the monitoring and evaluation arrangements of the project with support from the SPIU.** The SPIU will develop a robust mechanism (linked with the SP delivery system and the MIS developed through component 1) for monitoring and supervision at all levels of project implementation and ensure overall monitoring, reporting, benchmarking and evaluation of the targeted SP services, beneficiary groups and communities supported by the project.



Routine data on the relevant indicators will be collected through the administrative records and integrated MIS for all the targeted service provisions according to the Results Framework.

36. **Options for impact evaluation design that takes advantage of the phase-wise rollout of the project in different districts and communities will be considered.** The RIGHTS project is one of the first-generation disability inclusion projects supported by the WB and therefore includes a lot of “firsts/innovations.” Therefore, a “learning while doing” approach will be followed, particularly on models for family and community-based rehabilitation, life-skills education, and economic empowerment of persons with disabilities, among others. Based on the available information, baseline data will be captured for the PDO and key performance indicators, and mid-term and end-term evaluations of the project will also be undertaken. Key performance indicators and related targets will be evaluated at the project mid-term consistent with project design and calibrated as needed. In addition to the impact evaluation of key project interventions, the project will consider rapid, low-cost impact evaluations of micro-interventions or ‘tweaks’ that might optimize program effectiveness. These could include, for example, modified messages or incentives to implementing staff or partners intended to improve implementation quality, adjustments to intervention design, or intensity to compare effects. Beyond the impact evaluation, the project will establish a third-party arrangement by which regular and systematic information from the field can inform performance management and midcourse corrections, especially through an ongoing process evaluation of key aspects of project implementation and community and beneficiary feedback.

### C. Sustainability

37. **There is a high level of political commitment and ownership from the GoTN for building the state capabilities, setting up social protection systems, and improving last – mile delivery of benefits and services for persons with disabilities.** The State recognizes that poor human development outcomes among persons with disabilities is a serious concern and that a strong multisectoral framework for convergence is required to address them. The GoTN has undertaken several measures toward strengthening the disability inclusion agenda across the State. The Tamil Nadu RIGHTS project has been announced on the floor of the State Assembly and has been included in the State budget for FY 22/23. DWDAP will develop a Multisectoral Disability Framework for Action that will commit key activities, milestones, and timelines from various government departments. This Framework will be reviewed, approved, and monitored by the PSC on a periodic basis. In addition, the project will support GoTN to put in place statewide integrated program(s) for persons with disabilities with a built-in provision to sustain project components after its closure.

## IV. PROJECT APPRAISAL SUMMARY

### A. Technical, Economic and Financial Analysis

38. **By improving the coverage, delivery, and quality of multisectoral services for persons with disabilities, the Project will contribute to human capital development and income generation for direct beneficiaries and reduced expenditures for their households.** The value added of the WB engagement will ensure availability of resources, sharing of global knowledge, and galvanizing commitments for systemic reforms for improved efficiency and service delivery. Indirect benefits will also flow to jobseekers who gain employment through the expansion of care and rehabilitation services financed under this project. Currently, the DfWDAP has an annual expenditure of about US\$100 million per year for disability, apart from another US\$70 million towards disability pensions. Most of the budget allocation goes toward



social security programs, followed by special education, assistive devices. The share of expenditures on prevention and early interventions is less than 2 percent. The proposed WB financing for this project will be US\$162 million for six years. The investment in SP delivery systems and innovations in last mile service delivery will enable the GoTN to reach out to a much larger population in an efficient and timely manner.

39. **Around the world, care and rehabilitation services for persons with disabilities is commonly financed by the public sector, particularly for individuals from households classified as poor.** The gap between the cost of these services and the ability of households to pay is often filled through public financing. This cost is usually justified by the benefit to society of having persons with disabilities participate equally in society and the economy. Governments are well positioned to directly provide the public goods of screening, identification, and referral to services. The actual provision of care and rehabilitation services, special education, and job training activities could be and are provided by the private sector in some contexts. In Tamil Nadu, the bulk of the capacity for delivering these services lies in the NGO sector. NGOs have the community presence and experience with delivery of services for persons with disabilities. The proposed project will continue to build on the existing relationships between the DWDAP and local organizations and invest in improved systems for oversight, monitoring, and streamlining of business processes to improve efficiency. In some cases, such as with job training and placement services, the project will seek to build partnerships with the private sector for provisioning of services.

40. **Persons with disabilities have traditionally been excluded from the mainstream and there is limited secondary information on the monetization of benefits that may be gained.** However, while a formal economic analysis for the project has not yet been undertaken, high economic and social benefits, as well as improvements in utilization of services, are expected. Direct economic benefits would include increased earnings by beneficiaries, reduced expenditures by households, and any cost savings through improved efficiency, early identification, and interventions. Indirect benefits will include time savings by family members on caring for persons with disabilities (and increased labor availability due to the time saved) as well as job creation in care and rehabilitation services. Moreover, the social benefits and returns of the project are expected to be high, considering that the direct project beneficiaries are one of the most vulnerable population groups in the society. As more data becomes available, an assessment of the economic and social benefits resulting from the interventions during the initial phase of the project implementation will be undertaken.

## B. Fiduciary

### (i) Financial Management (FM)

41. **The FM assessment was carried out in accordance with Bank Policy and Directive on Investment Project Financing.** The FM risk is assessed as 'Substantial' The FM activities of the project will be carried out by the SPIUs and DPIUs. In addition, TNeGA under the Information Technology Department of GoTN will be a sub-implementing agency and will provide assistance to the DWDAP in the development and deployment of the SP delivery systems. A construction agency will also be engaged by DWDAP for construction and upgradation of OSCs and EICs.<sup>22</sup> SPIU will have overall responsibility to ensure that implementing agencies maintain adequate FM systems agreed in the project's Loan Agreement. These include (a) adequate budget provision and effective utilization; (b) sufficient and timely flow of funds to implementing agencies; (c) maintenance of adequate and competent FM staff; (d) timely payment and accounting of

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<sup>22</sup> A construction agency of the GoTN such as Tamil Nadu Public Works Department will be selected based on the findings of the infrastructural needs assessment (construction / renovation) and GoTN's decision to collaborate with other Government Departments / agencies / private sector.



project expenses; (e) oversight on project funds spent by implementing agencies; (f) control over assets; (g) submission of Interim Financial Reports (IFR) and obtaining disbursements from the WB; and (h) timely submission of audit reports to the WB and audit compliances. The SPIU will periodically review FM arrangements, and any changes required for smooth functioning of the project will be made in consultation with the WB and with approval of PIC.

42. **Budget and Fund Flow.** DWDAP has opened a separate budget line to finance project expenses. The GoTN will provide funding (IBRD and State share) under this budget line at the beginning of each financial year based on budget estimates approved by PIC. The project may require putting in place arrangements for decentralized expenditures at the subdivision levels (e.g., operating cost including salary at OSCs, civil work payments to construction agency); due procedures for the same will be described in the OMIP.

## (ii) Procurement

43. **Procurement will be carried out in accordance with the World Bank Procurement Regulations for IPF Borrowers for Goods, Works, Non-Consulting and Consulting Services Fourth Edition November 2020** hereinafter referred to as 'Regulations.' The project will be subject to the WB's Anticorruption Guidelines, dated October 15, 2006, and revised in January 2011 and as of July 1, 2016. All procurement will also be in accordance with the provisions stipulated in the Loan Agreement. The project's OMIP will detail the procurement procedures along with procurement thresholds, record keeping, disclosure of procurement information, high risk and high value procurements (if any) and other relevant details.

44. **The project will be implemented, monitored, and coordinated by the DWDAP under the DfWDAP,** GoTN, which has not implemented any WB aided project. In addition, TNeGA will be one of the sub-implementing agency of the project. The Procurement Plan for the first 18 months of project implementation has been finalized by the project and agreed by the WB.

45. **As per the requirement of the Procurement Regulations, a Project Procurement Strategy for Development (PPSD) has been developed,** based on which the Procurement Plan has been prepared and sets out the selection methods and selection arrangements to be followed by the borrower during project implementation in the procurement of goods, works, and non-consulting and consulting services financed by the WB. The Procurement Plan will be updated annually for larger procurements like or as required to reflect the actual project implementation needs and improvements in institutional capacity. The project will use the Systematic Tracking of Exchanges in Procurement (STEP) system for all procurement activities under the project.

## C. Legal Operational Policies

	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Areas OP 7.60	No

## D. Environmental and Social

46. **Environmental risks/impacts.** Most activities proposed under the project are likely to be environmentally neutral or may have negligible adverse environmental impacts. However, civil works associated with construction/ upgrade of OSCs, establishment/construction of EICs in underserved areas, and launching of mobile outreach facilities in each district (component 2b), if not appropriately managed, have the potential to create an unwarranted moderate level of



environmental impacts in the local context. The proposed 'accessibility audit' of public infrastructure and facilities (component 2d), however, provides an opportunity to strengthen policies/codes and introduce measures to promote universal access, thereby positively affecting the quality of physical/built environment.

47. Based on the environment assessment carried out as part of Environment and Social Assessment (ESA), the potential Environmental Health and Safety (EHS) risks could stem from: (a) deficiencies in planning/design of facilities/infrastructure, including those pertaining to 'universal access' on account of limited skills/experience/enforcement of codes/guidelines; (b) improper construction management/ monitoring and; (c) poor operation and maintenance procedures covering both buildings/infrastructure and equipment. The anticipated impacts on account of project interventions include: (a) potential issues related to construction and renovation works such as dust, noise and those pertaining to on-site storage of construction materials; (b) occupational health and safety risks to workers; (c) inappropriate storage and/or disposal of debris/construction wastes (including potentially hazardous materials); (d) health and safety risks to near-by communities during execution of civil works, including from movement of vehicles; (e) life and fire safety risks due to inadequacies in design and maintenance of facilities/equipment; (f) inadequate attention to emergency preparedness and response arrangements; (g) water contamination during construction and operation of buildings; (h) water stress (the urban areas in the State face high to extremely high water shortages, particularly in summers) and; (i) limited impact on trees/vegetation in and around the construction sites.

48. **Social risks/impacts.** The likely social risks and impacts from project activities will be related to (a) selection and distribution of benefits/services to persons with disabilities including outreach (component 1); (b) physical investments such as setting up of OSCs at the subdivisional level/PHCs, establishment and upgrade of EIC, particularly in underserved or remote areas (component 2); and (c) creating opportunities (disabled-friendly workplaces, vocational trainings, community engagement, and so on) for equitable access to educational and employment opportunities to persons with disabilities (component 3). It is critical, thus, to ensure that the benefits/ services reach all categories of persons with disabilities, most notably women, STs/SCs and OBCs, below poverty line, sexual minorities, and persons with cognitive or emotional disabilities who are at higher risk of exclusion from project benefits.

49. Based on the social assessment, the following social risks and impacts have been identified under the project: (a) limited accessibility and exclusion of persons with disabilities falling under vulnerable sub-groups such as women, the elderly, SCs/STs/OBCs, and sexual minorities, from targeting mechanisms (disability assessment and eligibility determination) for services such as social care services, health insurance program, education and skills training and market linked employment opportunities; (b) temporary or permanent loss of land and assets leading to loss of livelihood, in case land upto 25 acres is required for any physical investments such as development of OSCs; (c) construction induced impacts such as workers and communities' health and safety, including impacts of project-induced labor influx during construction of OSCs, establishment and upgrade of EIC; (d) risks of Sexual Exploitation and Abuse–Sexual Harassment (SEA-SH) at the workplace, schools, health centers and other establishments covered under the project including construction sites where women and children with disabilities are likely to be more vulnerable; (e) limited active participation of all sub-groups within persons with disabilities including organization of persons with disabilities in design, preparation and implementation of the project; (f) lack of inclusive and accessible GRM for project workers and project beneficiaries, particularly for persons with disabilities; and, (g) inadequate monitoring, implementation and inter-departmental coordination on social management for efficient service delivery.

50. **Environmental and social management approach and instruments.** Environment and Social Standards (ESS) 1, ESS 2, ESS 3, ESS 4, ESS 5, ESS 7, ESS 8 and ESS 10 are relevant to the project. To mitigate the identified environment and social risks, the DWDAP has prepared an Environmental and Social Management Framework (ESMF) that will guide the project to address the adverse risks and impacts. The ESMF provides guidelines for screening of sub-Project sites for



environment and social risks and based on the screening results, further site specific Environmental and Social Management Plan (ESMPs) will be prepared, during the implementation of the project. The ESMF provides for use of green building concepts (for both new and existing buildings), provision of renewable energy sources (reducing greenhouse gas emission over life of the asset), climate adaptive solutions (with focus on water management), and training on universal access and other EHS aspects, to be integrated into sub-project/activity design for improved environment, health and safety management. In addition, a Resettlement Policy Framework (RPF) and an Indigenous Peoples Policy Framework (IPPF) have been prepared. These documents will guide the preparation of site-specific Resettlement Action Plan (RAP)/abbreviated RAPs and Indigenous Peoples Development Plans, where necessary.

51. According to the requirements of ESS 10, a Stakeholder Engagement Plan (SEP) has been developed during preparation to ensure inclusive stakeholder engagement and participation during all phases of the project. The stakeholders ranging from relevant government departments, all categories of persons with disabilities including their parents/caregivers, NGOs/organization of persons with disabilities and various service providers have been mapped as part of the development of the SEP. Concerns and requirements of beneficiaries particularly those belonging to vulnerable and disadvantaged sub-groups, were sought through consultations with NGOs/organization of persons with disabilities working with them. Further, appropriate mechanisms to incorporate the concerns and needs of persons with disabilities in a continued manner and ways to engage them during project implementation are detailed in SEP. Further, the existing GRM of the DWDAP were assessed during preparation and it was found that there is a need to strengthen the system. A deep-dive analysis of the existing systems will be carried out to ensure a single data point through the centralized MIS is established, to track the registration, resolution of project-related concerns and grievances, and satisfactory closure of the grievance within a given timeframe, in a manner consistent with the SEP within year one of project implementation.

52. **Labor Management Procedures (LMP)** have been developed to enable different project-related parties, including the PIUs, design and supervision consultant, contractors, sub-contractors, and workers of the project to have a clear understanding of the National/State laws and ESS2 requirements. In addition, an Environmental and Social Commitment Plan (ESCP) has been prepared, which includes preparation of any follow-on mitigation plans agreed with the DWDAP. The ESCP, along with the ESMF, RPF, IPPF, SEP and LMP have been disclosed on the DWDAP website on April 8, 2022.<sup>23</sup> An executive summary of these documents in Tamil Nadu was also disclosed by the DWDAP on their website on April 8, 2022.<sup>24</sup> Subsequently, these documents were disclosed on the WB's external website on April 22, 2022.<sup>25</sup> The ESMF, RPF, IPPF, SEP and ESCP may be updated as required during implementation of the project. Further details on the Environment and Social Framework (ESF) are in Annex 1.

53. **Citizen engagement.** The project supports a partnership management system for improved planning and management of partnerships with private sector/civil society/organizations for persons with disabilities (components 2 and 3). A communication needs assessment will also be carried out and will form the basis for community mobilization and development of a communication strategy for the project. In addition, the citizen engagement approach of the project includes capacity building of community-based organizations, organization of persons with disabilities, families/caregivers of persons with disabilities, and community frontline workers to plan and manage community-based care and rehabilitation services. More specifically, citizen engagement will be carried out to: (a) address stigma and discrimination faced by persons with disabilities; (b) increase outreach and coverage of programs and service provisions that supports persons with disabilities; (c) address any knowledge gap of communities, line departments and other key

<sup>23</sup> [https://www.scd.tn.gov.in/whats\\_new.php](https://www.scd.tn.gov.in/whats_new.php)

<sup>24</sup> [https://scd.tn.gov.in/static\\_site\\_tamil/whats\\_new.php](https://scd.tn.gov.in/static_site_tamil/whats_new.php)

<sup>25</sup> <https://projects.worldbank.org/en/projects-operations/document-detail/P176404>





stakeholders on project components and activities; and (d) enhance disability inclusion in the project planning, implementation, and monitoring processes. These activities are detailed in the SEP and progress on these activities will be monitored through beneficiaries' satisfaction surveys of the performance of service centers combined with a social audit tool to evaluate public satisfaction of services.

54. **Gender.** A WB Rapid Assessment indicates that nearly 70 percent of female respondents have never been engaged in paid work (compared to 33 percent of men).<sup>26</sup> While 21 percent of the respondents had undergone some form of skilling or vocational/life skills education programs, 36 percent had not received any training but were interested. Further, about half of the respondents, the majority being women with disabilities, had less than an eighth-grade education. The assessment further notes that women with disabilities face significantly more barriers in social care/protection services and lack sufficient access to female healthcare professionals in their areas. Further, women have limited knowledge of the existing schemes and programs run by GoTN compared to men.

55. The project will enable access to education and employment opportunities with a focus on women, youth, and adolescent girls. The project will focus on raising awareness among all educational stakeholders and training teachers to meet the specific needs of girls with disabilities. Specific modules on prevention against child sexual abuse and harassment, and gender integration will be developed, which can be incorporated in the State's teacher training curriculum. Further, the labor market assessment carried out under the project will help identify high-potential wage and self-employment opportunities and skills requirements for women and youth with disabilities, which will be implemented under the project. For better identification and targeting of women with disabilities for needs based social care services, the project will also support creation of a cadre of frontline workers known as CRWs/Community Facilitators, of which 40 percent will be women.

56. **Based on the SEA-SH risk assessment tool for civil works and social protection, the risk rating remains low.** However, studies have indicated that women and children with disabilities are often susceptible to higher risks of gender-based violence, sexual abuse, and exploitation. Therefore, to address risks of SEA-SH during the construction/upgrade of OSCs, EICs (component 2), and project activities related to access to educational and employment opportunities to persons with disabilities (component 3), an SEA-SH prevention and response plan has been prepared as a part of the ESMF. The DWDAP will also adopt and implement an SEA-SH prevention and response plan as part of the site-specific ESMP, to assess and manage the risks of SEA-SH at the sub-project level.

57. **Climate co-benefits.** Given the high vulnerability of Tamil Nadu to extreme climatic events, such as cyclones, floods, extreme heat, severe water scarcity/droughts, and storm surges apart from lightning, earthquakes, tsunami, coastal erosion, and landslides, it is imperative to include climate and disaster concerns in disability policy, planning, and implementation. With the warming conditions likely to exacerbate, Tamil Nadu forecasts the average annual temperature to rise by 3.1°C by 2100 from 1970-2000 levels. Projections of north-east rainfall over south peninsular India indicate an increase in the near future (2020-2049) by 5 percent under Representative Concentration Pathway (RCP) 4.5 and 11 percent (under RCP 8.5).<sup>27</sup> The rainfall intensity is expected to be higher in coastal areas such as Chennai as coastal regions

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<sup>26</sup> World Bank, Gender, Social Inclusion and State Capacity Assessment Study undertake for the preparation of the Tamil Nadu RIGHTS Project between December 2021 and February 2022.

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[https://www.researchgate.net/publication/342692255\\_Future\\_changes\\_in\\_precipitation\\_extremes\\_during\\_northeast\\_monsoon\\_over\\_south\\_peninsular\\_India](https://www.researchgate.net/publication/342692255_Future_changes_in_precipitation_extremes_during_northeast_monsoon_over_south_peninsular_India)



absorb moisture directly from the sea. Sea level rise for Chennai is expected to be around 7.37 cm by 2025 (under RCP 4.5).<sup>28</sup>

58. The project aims to build State capacity and improve service delivery for persons with disabilities, which will help develop their adaptive capacity to climate-related shocks. Through component 1, the project will include climate considerations in disability policy, standards, and behavior communication. The project will also facilitate the development of a Multisectoral Disability Framework for Action that will contribute to the preparation of a disability inclusive Disaster Mitigation Plan of Action by the Department of Disaster Management. It will support the development of institutional capacities to plan and coordinate specialized programs for persons with disabilities to adapt to climate stressors. Through component 2, the project will leverage the family and community-based care and rehabilitation services and frontline workers to disseminated information, impart homebased training and life skills education, and act as first responders in times of disasters/emergencies. Besides, OSCs will aid the development of a basic package of care services including cash transfer for climate related shocks and building the capacities of frontline workers. Through component 3, the project will embed a climate module in training and skills development to empower the resilience and productivity of persons with disabilities. The project will address the existing and projected climate/disaster risks by introducing climate-proof designs and building multi-hazard resilience during the rehabilitation of existing infrastructure and construction of new facilities. Climate adaptive solutions, including a vulnerability assessment before selection of sites, use of green building concepts, provision of renewable energy sources (reducing greenhouse gas emission over the life of the asset), roll out of emergency/evacuation systems, and training, will be integrated into the project design to reduce risks from natural and climate-induced hazards.

## V. GRIEVANCE REDRESS SERVICES

59. Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## VI. KEY RISKS

60. **The overall risk to achieving the PDO is moderate.** This reflects Substantial risks for institutional capacity for implementation and sustainability and fiduciary risks after accounting for mitigating measures.

61. **The Institutional capacity for implementation and sustainability risk is Substantial:** The GoTN has a strong commitment to the overall design of the project and its development objective. They have also been proactive in

<sup>28</sup> [https://www.researchgate.net/publication/318745802\\_Projection\\_of\\_climate\\_change-induced\\_sea-level\\_rise\\_for\\_the\\_coasts\\_of\\_Tamil\\_Nadu\\_and\\_Puducherry\\_India\\_using\\_SimCLIM\\_a\\_first\\_step\\_towards\\_planning\\_adaptation\\_policies](https://www.researchgate.net/publication/318745802_Projection_of_climate_change-induced_sea-level_rise_for_the_coasts_of_Tamil_Nadu_and_Puducherry_India_using_SimCLIM_a_first_step_towards_planning_adaptation_policies)





engaging stakeholders at different levels to provide informed inputs to the design. At the same time, the DfWDAP is relatively new and the proposed project interventions will extensively expand the scope of its roles and responsibilities. The GoTN understands the challenges it faces and the need to invest in the capacity of the DfWDAP and has already initiated a detailed assessment, followed by an institutional development exercise, to strengthen the capacity of the department. The institutional capacity risk will be mitigated by investing in building institutional capacity at State, district, and sub-division levels to cope with the additional responsibilities while enhancing coordination efforts, and by setting up the SPIU and DPIU comprising of experienced technical specialists to carry out day-to-day project activities.

62. **The Fiduciary risk is Substantial:** The proposed implementing agencies (DWDAP and TNeGA) do not have any prior experience of working on projects financed by multilateral agencies. Moreover, the DWDAP has limited exposure to procurement, contract management, and financial management of consultancy services and civil works. Also, the FM functions will be done at multiple offices i.e., SPIUs and DPIUs of the DWDAP, State sub-PIU at TNeGA, and therefore delays are expected at the outset in getting timely and reliable utilization certificates/expenditure statements which in turn may result in delays in the preparation and submission of consolidated financial reports (IFRs) to the WB for disbursement, and preparation of annual financial statements and timely audits. These risks will be mitigated by hiring experienced FM, procurement and contract management specialists and ensuring that they are provided continuous training and capacity building and hiring of audit firms and conducting periodic audits. The project will also engage necessary technical assistance, including individuals, firms, and organization of persons of disabilities/NGOs to support the various activities.

## VII. RESULTS FRAMEWORK AND MONITORING

### Results Framework

COUNTRY: India

RIGHTS: Inclusion, Accessibility and Opportunities for Persons with Disabilities in Tamil Nadu

#### Project Development Objectives(s)

To strengthen the social protection systems and capability of the State of Tamil Nadu to promote inclusion, accessibility and opportunities for persons with disabilities.

#### Project Development Objective Indicators

Indicator Name	PBC	Baseline	End Target
<b>Project Development Objective Indicators</b>			
Beneficiaries selected using the social protection delivery system (Percentage)		0.00	80.00
Persons with disabilities receiving enhanced social care services and benefits (Number)		0.00	800,000.00
Women with disabilities receiving enhanced social care services and benefits (Number)		0.00	352,000.00
Persons with disabilities from vulnerable groups (SC, ST) receiving enhanced social care services and benefits (Number)		0.00	168,000.00
Models for wage and self-employment evaluated (Text)		No model exists	Models for wage/self-employment designed, piloted and evaluated.

### Intermediate Results Indicators by Components

Indicator Name	PBC	Baseline	Intermediate Targets	End Target
			1	
Strengthen state capability and establish an integrated social protection system				
Multisectoral Disability Framework for Action operational (Text)		No Multisectoral Disability Framework for Action in place		Multisectoral Disability Framework for Action adopted and State Disability Report published.
Registry of Persons with Disabilities operational (Text)		No registry in place	Design/data protection and sharing protocols established	Registry of Persons with Disabilities deployed
Integrated management information system operationalized (Text)		No MIS in place	Design/data protection and sharing protocols established	MIS deployed
State program for persons with disabilities developed by rationalization of existing multiple schemes (Yes/No)		No		Yes
Strengthen last mile delivery of social care services and benefits				
Frontline workers engaged (Number)		0.00		6,000.00
Women among frontline workers engaged (Number)		0.00		2,400.00
Homebased caregivers trained (Number)		0.00		300,000.00
One stop social care service centers (OSC) operational following green building standards (Number)		0.00		97.00
Mobile outreach and therapy service operational (Number)		0.00		97.00
Cash allowance beneficiaries receiving direct benefit transfers (Percentage)		0.00		100.00
Persons with disabilities receiving life skills education (Number)		0.00		400,000.00
Women with disabilities receiving life skills education (Number)		0.00		176,000.00

Indicator Name	PBC	Baseline	Intermediate Targets	End Target
			1	
Persons with disabilities from vulnerable groups (SC, ST) receiving life skills education (Number)		0.00		84,000.00
Beneficiaries satisfied with service/benefit delivery modality (Percentage)		0.00		80.00
Women with disabilities satisfied with service/benefit delivery modality (Percentage)		0.00		80.00
Grievances redressed (Percentage)		0.00		90.00
<b>Pilots to enhance resilience and productivity of persons with disabilities</b>				
Persons with disabilities receiving market-linked vocational training (Number)		0.00		5,000.00
Women with disabilities receiving market-linked vocational training (Number)		0.00		2,000.00
Persons with disabilities from vulnerable groups (SC, ST) receiving market-linked vocational training (Number)		0.00		1,050.00

Monitoring & Evaluation Plan: PDO Indicators					
Indicator Name	Definition/Description	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
Beneficiaries selected using the social protection delivery system	Share of beneficiaries of disability programs selected using the social protection delivery system (registry of persons with disabilities and	Annual	Administrative reports; MIS.	Documentation review; database query.	DWDAP

	integrated MIS) that facilitates beneficiary selection by sharing / receiving securely transmitted data. The existing beneficiary data of current programs will be counted as share of beneficiaries upon successful transfer/integration with the social protection service delivery system. This indicates the aggregate outcomes of Component 1 interventions.				
Persons with disabilities receiving enhanced social care services and benefits	Cumulative number of persons with disabilities whose needs are identified using case assessment tool, receive need based social care services either through frontline workers, home-based caregivers, OSCs, and mobile outreach and therapy units, as well as those who receive benefits via the DBT. Elders accessing social care services will also be considered beneficiaries. This indicates the aggregate outcomes of Component 2	Semi-Annual	Administrative reports; MIS.	Documentation review; database query.	DWDAP

	interventions.				
Women with disabilities receiving enhanced social care services and benefits	Cumulative number of women with disabilities (including girls) whose needs are identified using case assessment tool, receive need based social care services either through frontline workers, home-based caregivers, OSCs, and mobile outreach and therapy units, as well as those who receive benefits via the DBT. Share of women with disabilities has been taken as 44 percent in proportion to the population of women in the State, in absence of absolute data. The cumulative number of women would also include elderly women accessing social care services. This indicates the aggregate outcomes of Component 2 interventions.	Semi-Annual	Administrative reports; MIS.	Documentation review; database query.	DWDAP
Persons with disabilities from vulnerable groups (SC, ST) receiving enhanced social care services and benefits	Cumulative number of persons with disabilities from vulnerable groups (SC, ST) whose needs are	Semi-Annual	Administrative reports; MIS.	Documentation review; database query.	DWDAP

	identified using case assessment tool, receive need based social care services either through frontline workers, home-based caregivers, OSCs, and mobile outreach and therapy units, as well as those who receive benefits via the DBT. Indicator target is proportionate to the cumulative population share of SC, ST in Tamil Nadu, which is 21 percent. This indicates the aggregate outcomes of Component 2 interventions.				
Models for wage and self-employment evaluated	Models for wage and self-employment designed, piloted and evaluated in select geographical locations to inform potential for scalability.	Once	Evaluation Report (survey based)	Documentation Review	DWDAP

#### Monitoring & Evaluation Plan: Intermediate Results Indicators

Indicator Name	Definition/Description	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
Multisectoral Disability Framework for Action operational	The Multisectoral Disability Framework for Action would need to be adopted by the	Annual	Policy documents; administrativ	Documentation review.	DWDAP

	Project Steering Committee (PSC), and annual monitoring status report published in accordance with its provisions, to be considered to be “operationalized”.		e reports.		
Registry of Persons with Disabilities operational	The IT application for the registry would need to be developed, tested, and transmitting data securely, to be considered to be “operationalized”.	Annual	Administrative reports; social registry.	Documentation review; database query.	DWDAP
Integrated management information system operationalized	The IT application for integrated MIS of DWDAP would need to be developed, tested, populated with uniquely identifiable program beneficiary data, and integrated with the registry for persons with disabilities, to be considered to be “operationalized”.	Annual	Administrative reports; MIS.	Documentation review; database query.	DWDAP
State program for persons with disabilities developed by rationalization of existing multiple schemes	Existing multiple schemes of DfWDAP rationalized to reduce fragmentation.	Once	Rationalization / scheme document	Document review	DWDAP
Frontline workers engaged	Cumulative number of persons (CRWs/Community Facilitators) who have been engaged to serve as	Semi-Annual	Administrative reports; MIS.	Documentation review; database query; site visits.	DWDAP



	frontline workers located at the community levels.				
Women among frontline workers engaged	Cumulative number of women (CRWs/Community Facilitators) who have been engaged to serve as frontline workers. 40 percent of total number of frontline workers.				
Homebased caregivers trained	Cumulative number of persons (care givers) who have completed a training in home based care.	Semi-Annual	Administrative reports; MIS.	Documentation review; database query; site visits.	DWDAP
One stop social care service centers (OSC) operational following green building standards	Cumulative number of OSCs which have been made operational either through construction of new buildings or renovation of existing buildings made available by Government of Tamil Nadu to the DfWDAP or in public-private partnership mode through outsourced performance-based contracts, following the green building standards.	Semi-Annual	Administrative reports.	Documentation review; site visits.	DWDAP
Mobile outreach and therapy service operational	Cumulative number of mobile outreach and therapy vans which have started providing services.	Semi-Annual	Administrative reports.	Documentation review; site visits.	DWDAP

Cash allowance beneficiaries receiving direct benefit transfers	Cumulative share of persons (benefit recipients) whose identification and other who have received their allowances into their bank accounts directly from government treasury.				
Persons with disabilities receiving life skills education	Number of persons with disabilities who attend at least 80 percent of sessions in the project's life skills education.	Semi-Annual	Administrative reports; MIS.	Documentation review; database query; site visits.	DWDAP
Women with disabilities receiving life skills education	Number of women with disabilities (including girls) who attend at least 80 percent of sessions in the project's life skills education.	Semi-Annual	Administrative reports; MIS.	Documentation review; database query; site visits.	DWDAP
Persons with disabilities from vulnerable groups (SC, ST) receiving life skills education	Number of persons with disabilities from vulnerable groups (SC, ST) who attend at least 80 percent of sessions in the project's life skills education from vulnerable groups (SC, ST).	Semi-Annual	Administrative reports; MIS.	Documentation review; database query; site visits.	DWDAP
Beneficiaries satisfied with service/benefit delivery modality	Share of beneficiaries (persons with disabilities) satisfied with service delivery, out of a sample of beneficiaries (not cumulative). Responses to a satisfaction survey	Annual	Evaluation report (survey-based).	Documentation review.	DWDAP

	indicating an overall positive experience will be considered to be “satisfied”.				
Women with disabilities satisfied with service/benefit delivery modality	Share of women with disabilities (project beneficiaries) satisfied with service delivery, out of a sample of women beneficiaries (not cumulative). Responses to a satisfaction survey indicating an overall positive experience will be considered to be “satisfied”. Women with disabilities includes girls.	Annual	Evaluation report (survey-based).	Documentation review.	DWDAP
Grievances redressed	Share of grievances registered and redressed, through accessible and responsive GRM system, within stipulated timeframe in line with the GRM protocols developed and adopted by the Project.	Semi-Annual	Administrative reports; MIS, GRM portal.	Documentation review; database query.	DWDAP
Persons with disabilities receiving market-linked vocational training	Cumulative number of persons with disabilities who have completed the skills training program (Wage/Self Employment) they are enrolled in.	Semi-Annual	Administrative reports.	Documentation review, site visits.	DWDAP
Women with disabilities receiving market-linked vocational training	Cumulative number of women with disabilities	Semi-Annual	Administrative reports;	Documentation review, site visits.	DWDAP

	(including girls) who have completed the respective training program they are enrolled in.		MIS		
Persons with disabilities from vulnerable groups (SC, ST) receiving market-linked vocational training	Cumulative number of persons with disabilities from the vulnerable groups (SC, ST) who have completed the respective skills training program they are enrolled in. Indicator target is proportionate to the cumulative population share of SC, ST in Tamil Nadu, which is 21 percent.	Semi-Annual	Administrative reports.	Documentation review, site visits.	DWDAP

## ANNEX 1: Implementation Arrangements and Support Plan

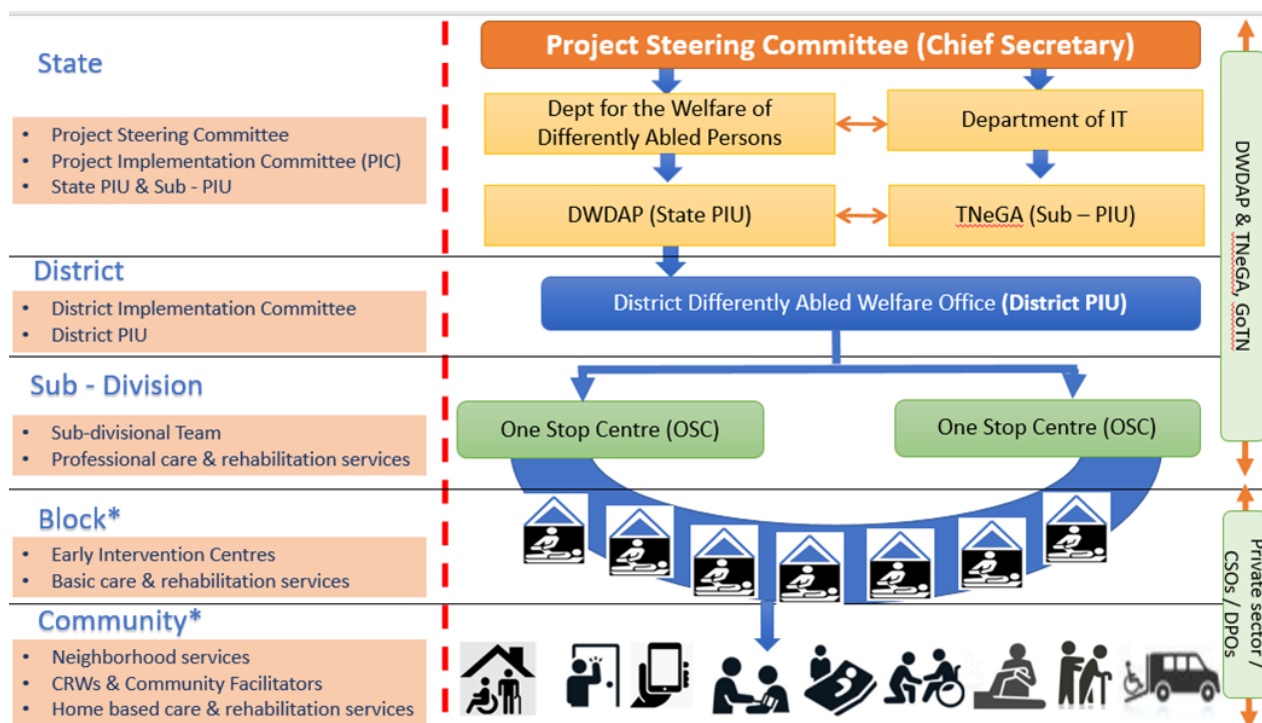
COUNTRY: India

RIGHTS: Inclusion, Accessibility and Opportunities for Persons with Disabilities in Tamil Nadu

### Project Implementation Arrangements

1. The project will be implemented by the DfWDAP and the TNeGA, the Information Technology (IT) Department of the GoTN. While the DfWDAP is the main implementation Department for the RIGHTS project, the TNeGA, as sub-implementing agency of the project, will assist the DWDAP in the implementation of the activities pertaining to development and deployment of the SP Delivery System including registry of persons with disabilities and integrated MIS system.

**Figure 1. Implementation Modalities**



*Note.\* Implemented through NGOs/CSPs/private sector/organizations of persons with disabilities/other civil society organizations, among others. Involvement of panchayati raj institutions and local bodies in community based planning, implementation and supervision.*

2. Project implementation and oversight at the State level will be led by a PSC and a PIC. The constitution, roles and responsibilities, and other logistical information on functioning of these will be further detailed in the OMIP.

3. An SPIU will be set up in the DWDAP for the day-to-day implementation of the project (Figure 1). The SPIU will be headed by a Project Director (Commissioner/Director level officer) and will include a combination of administrative and program personnel. A dedicated team of staff and consultants will be included in the SPIU and will be responsible for: (a)

preparing annual work plans and budgets and ensuring all project activities are planned, financed and implemented accordingly; (b) ensuring project implementation is in accordance with the project's OMIP; (c) ensuring that procurement and financial management activities are carried out on time in accordance with the OMIP; (d) ensuring compliance with the ESCP; (e) monitoring project activities; and (f) preparing project progress reports and ensuring their timely submission to the WB. Particularly for environment and social safeguard compliance, the overall responsibility for day-to-day monitoring and supervision will be with the Joint Director - DWDAP/Deputy Project Director. The SPIU will develop the project's OMIP that will provide guidelines and procedures for the establishment of the SPIU for implementation of the project.

4. At the district level, an existing Inter-departmental District Coordination Committee headed by the District Collector will supervise the implementation of the project. This committee will comprise officials from various departments including the DWDAP, Education, Labor, Health, Skills Development, among others.

5. The day-to-day implementation and supervision of the project at the district and local levels will be led by the respective DDAWO. A district level PIU (DPIU) will be set up within the DDAWO. The DPIU will be headed by the respective District Differently Abled Welfare Officer and will include a combination of administrative and program personnel. A dedicated team of staff and consultants will be included in the DPIU and will be responsible for procurement and financial management, social and environmental management, as well as technical areas. Particularly for environment and social safeguard compliance, the overall responsibility for day-to-day monitoring and supervision will be with the DPIU. The OMIP will provide guidelines and procedures for the establishment of the DPIU for implementation of the project. The subdivisional OSCs will function under the direct supervision and control of the DPIU. Each of these OSCs will have a combination of administrative and technical human resources that will be determined on the basis of needs identified during the project preparation.

6. At the block levels, the implementation and supervision of the project will be led by a Block Coordinator in each block together with a two-to-three-member technical team. The technical team at the block level will be hired through an outsourced contract for CSPs under the project who will be responsible for the implementation of family and community-based care and rehabilitation service interventions in the respective geographical locations. The project OMIP will provide guidelines and procedures for the establishment of Block level team through outsourced contract for implementation and supervision of the project.

7. At the community levels, PRIs/local bodies/organizations of persons with disabilities will be involved in community-based planning, implementation, and supervision. For facilitating project implementation at the community levels, CSPs will be engaged by the project. In addition, the project will support the creation of a cadre of frontline workers known as CRWs and Community Facilitators. These frontline workers will be identified and engaged by the respective CSPs and will be responsible for operating the family and community-based rehabilitation services, including: (a) homebased assessment, early intervention, care and rehabilitation services using technology; (b) training of parents and caregivers; (c) specialized neighborhood services having provision for basic therapy services, guidance, facilitate access to citizen services etc.; and (d) life skills education on selfcare, daily living skills, counselling, self-image and aspirations of youth with disabilities at the neighborhood service centers located in community. The project OMIP will provide guidelines and procedures for the implementation and supervision of community level services of the project, particularly engagement of CSPs, frontline workers, and establishment of neighborhood services.

## Financial Management and Disbursement Arrangements

8. The FM arrangements for the project which are predicated on the State's existing systems are adequate to account for and report the sources and uses of project funds and meet the Bank's fiduciary requirements. These arrangements are summarized as follows:

- (a) The Budget Manual, Treasury code, Account code, and Financial code of GoTN provides the overarching framework that govern the FM systems of the project, and IFHRMS portal (Treasury system) of GoTN will be used for budget execution and payment.
- (b) The budget for the project (100 percent funding including both IBRD and State share) will be provided by the GoTN under a separate budget line (16 digit code: 2235-02-101-PA-309-03) of externally aided project.
- (c) The budget will be distributed by the DWDAP to Drawing and Disbursing Officer of State and DPIUs through the IFHRMS portal of GoTN.
- (d) The TNeGA will open a separate bank account for the project and funds will be transferred by the DWDAP into this bank account.
- (e) For activities related to small grants and cash transfers under component 3, the SPIU will identify eligible candidates and payments will be disbursed directly into the beneficiary's bank accounts using IFHRMS portal.
- (f) The SPIUs and DPIUs and the TNeGA will maintain project books of accounts at the respective offices for subsequent audit and verification by project auditors.
- (g) The DWDAP has engaged FM staff at the SPIU and is in the process of engaging accountants at the DPIUs. For TNeGA, the existing staff will perform accounting functions.
- (h) DPIU's and the TNeGA will periodically submit expenditure statements to the SPIU on funds spent under the project. The DWDAP will submit IFR to Controller of Aid, Accounts and Audit (CAAA) and the WB within 45 days from the end of each calendar quarter.
- (i) The internal audit of the project will be conducted by a firm of Chartered Accountants engaged by the DWDAP in the first year of project implementation as per terms of reference approved by the Bank.
- (j) The SPIU will prepare consolidated financial statements of the project and submit to the '*The Office of Accountant General, Tamil Nadu*' within four months from end of each FY for conducting financial audit. The audit report will be submitted to WB within nine months of the end of each FY.

9. The finance section at the DWDAP is headed by an accounts officer from the Treasuries and Accounts Department and supported by staff with experience in handling government accounting matters. Project accounts at the SPIU and DPIUs will be maintained as per procedures prescribed by GoTN in Treasury, Financial and Accounts rules. TNeGA will open a separate ledger account in the existing accounting system to account for expenses incurred under the project. Detailed arrangement pertaining to the accounting procedures to be followed by all project entities, including construction agency to be engaged by the project, will be described in the OMIP.

10. Under component 3, the project proposes to finance design, implementation, and evaluation of need-based pilot interventions for the economic empowerment of persons with disabilities. Provision of (i) small grants (within an overall funding limit of US\$2 million) as credit support for business development/livelihood generation activities for persons

with disabilities, self-help groups, community-based organizations and associations of persons, and (ii) cash transfers (about 5,000 beneficiaries, within an overall funding limit of US\$2 million) for ensuring enrollment and retention of persons with disabilities in skills training programs are expected to be part of the design element of these pilot interventions.

11. The disbursement method will be 'reimbursement.' The SPIU will submit IFRs to the WB through the CAAA, Loan Funds will be disbursed by the WB to the GoI into a Special Account for IBRD Loan maintained by CAAA in the Reserve Bank of India (RBI). The amount will be released by CAAA to the GoTN as per financing norms agreed between GoI and GoTN. The format of the IFR agreed with the SPIU is attached to the Disbursement and Financial Information Letter.

12. Project expenditures made by the SPIU before the signing date but on or after December 1, 2021, on contracts awarded following WB procurement guidelines will be eligible for retroactive financing up to a maximum of US\$5 million.

13. The SPIU will engage a private audit firm to conduct semi-annual Internal Audit as per terms of reference agreed with WB during first year of project implementation. The Comptroller and Auditor General of India (CAG) will be the project external auditor. The audit will be conducted by 'The Office of the Accountant General, Tamil Nadu'. The SPIU will be responsible to submit project financial statements to the Accountant General within 4 months from the close of each Financial Year (April to March). The audit report will be monitored in the WB FM system.

Audit Reports to be submitted			
Responsible Agency	Audit Report	Auditor	Due Date
DWDAP, GoTN	Audit report and project financial statements for the funds spent under the project by all agencies	CAG of India (Office of the Accountant General, Tamil Nadu)	December 31

14. The annual audit report issued by 'The Office of the Accountant General, Tamil Nadu' along with project financial statements will be disclosed by the SPIU, DWDAP on the project website. These audit reports will also be disclosed by the WBG.

#### Procurement Arrangement

15. Procurement for the project will be carried out in accordance with the World Bank Procurement Regulations for IPF Borrowers for Goods, Works, Non-Consulting and Consulting Services Fourth Edition November 2020. The project will be subject to the WB's Anti-Corruption Guidelines, dated October 15, 2006, and revised in January 2011 and as of July 1, 2016. The WB's standard procurement documents will be used as agreed with the WB. All procurement will also be in accordance with the provisions stipulated in the Loan Agreement.

16. As per the requirement of the Procurement Regulations, a PPSD has been developed, based on which the procurement plan has been prepared and sets out the selection methods and selection arrangements to be followed by the Borrower during project implementation in the procurement of goods, works, non-consulting and consulting services financed by the Bank. The Procurement Plan will be updated annually for larger procurements like Open National (NCB) or as required to reflect the actual project implementation needs and improvements in institutional capacity. The project will use the STEP system for all procurement activities under the project. DWDAP adopts and follows the Tamil Nadu Transparency in Tenders Act, 1998, and Tamil Nadu Transparency in Tenders Rules, 2000 as amended from time to time. The e-Procurement Portal ([www.tntenders.gov.in](http://www.tntenders.gov.in)) of the GoTN will be used. The State, and District level authorities are responsible for implementing procurement activities and Decision making as per the powers delegated to them. The



PPSD should assess and address any GBV, forced labor, gender issues upfront. The project Procurement Risk rating is “Substantial” according to the PSD and the Procurement Risk Assessment and Management System assessment.

17. The procurement capacity of the DWDAP needs to be strengthened as it does not have prior experience of implementing multilateral funded projects and has limited exposure to e-procurement, procurement of Consultancy Services and Civil Works. Technical support will be required, especially in the initial phase of project implementation given the likely complexities in procurement of consultancy services, civil works, compliance with environment social health and safety (ESHS) requirements, inappropriate market readiness and logistical issues. Engagement of experienced procurement, contract management and ESHS Specialists, construction supervision/management agencies, procurement trainings and other capacity building programs, developing SOPs to streamline procurement processes, and developing and using procurement manuals and so on will help building the capacity.

18. For each contract to be financed by the loan, the different selection methods/arrangements and market approach options to be used, estimated costs, prior review requirements, and time frames will be reflected in the Procurement Plan to be agreed between the Borrower and the WB team. The Procurement Plan for the first 18 months of project implementation has been finalized and agreed by the WB. The Procurement Plan, as agreed, will be uploaded in STEP.

19. The risk ratings have been decided based on both the probability of occurrence of various events and their likely impact. Based on the risk factors and mitigation measures, the overall procurement risk rating for the project is determined as “Substantial.” The rating on procurement will be reviewed and updated periodically by the WB. The PSD gives the details of the Assessed Procurement Risks and Mitigation Measures.

20. The Procurement Plan will list review requirements for each of the packages. Prior review and procurement method thresholds agreed with the WB for the project based on the risk assessed. These thresholds shall be reviewed and revised, if necessary, during the life of the proposed project so that these are consistent with the risk assessments made periodically. Any amendments to post-review contracts and raising the contract value to prior review threshold, will also be subject to prior review by the WB.

21. In the case of contracts subject to prior review, the implementing agency shall seek the WB’s ‘no objection’ before granting/agreeing to (a) an extension of the stipulated time for performance of a contract that either increases the contract price or has an impact on the planned completion of the project; (b) any substantial modification of the scope of works, goods, non-consulting services or consulting services, and other significant changes to the terms and conditions of the contract; (c) any variation order or amendment (except in cases of extreme urgency) which singly or combined with all variation orders or amendments previously issued, increase the original contract amount by more than 15 percent; (d) the proposed termination of the contract.

22. The WB’s online STEP tool shall be used to update the Procurement Plan and for tracking all procurement activities of the project.

23. The National Procurement Procedures conditions for India for the procurement of goods, works and non-consulting services according to the established thresholds will be conducted in accordance with paragraphs 5.3 – 5.5 of Section V of the World Bank Procurement Regulations for IPF Borrowers for Goods, Works, Non-Consulting and Consulting Services Fourth Edition November 2020. Detailed procurement procedures and provisions for National Procurement Procedures will be laid down in project’s OMIP and procurement plan.

24. The provisions of domestic preference will be applied in the evaluation of bids in accordance with Annex VI of the Procurement Regulations.

#### Implementation Support Plan (ISP)

25. The ISP has been developed based on the nature of the project and its risk profile. It lays out the support required for implementation of the mitigation measures of the risks and provide support to the DWDAP and TNeGA in effective implementation of the project, particularly in the following areas: (a) technical design; (b) institutional capacity for implementation and sustainability; (c) fiduciary; and (d) environment and social management. The ISP aims to make implementation support to the project counterparts flexible and efficient. The design of the project contains safeguards against each of the risks and the ISP is designed to review and ensure that those safeguards are effective and to reinforce them where necessary.

26. The supervision strategy consists of mechanisms that will enhance support to the implementation agencies and ensure timely and effective monitoring. The supervision thus comprises (a) real-time online/offline support for FM and procurement; (b) joint implementation support missions; (c) regular technical meetings and phone check-ins with the DWDAP and SPIU between formal implementation support missions; (d) annual reporting based on the internal monitoring system; (e) independent third-party evaluation, where relevant; and (f) internal and external audit and FM reporting.

27. The WB team, together with the PSC, will formally review project progress semiannually. Implementation Support Missions will be carried out at least twice per year in person or virtually, if physical travel is not feasible. The scope of implementation support missions will also include monitoring compliance with stipulated FM, procurement, environment, and social management guidelines. At the conclusion of each implementation support mission, the WB team will update the government and WB management on the status of the project.

28. In addition to the review missions, ongoing real-time support will be provided to help accelerate implementation. The WB team will also participate in consultations with project stakeholders where possible. To ensure high-quality supervision, the WB team will comprise not only SP specialists but also specialists in IT, implementation, FM, procurement, and environment and social management. The team composition for each mission will be determined by supervision requirements at that time and be communicated ahead of time with counterparts.