Honouring entrepreneurial spirit of women SHG members

For women, confined to home and hearth, managing with meagre resources, it is a rare feat to be financially independent. Running enterprises that would not have been possible but for small loans availed through women SHGs, these gritty female entrepreneurs will be felicitated by the country’s apex industry chamber, Federation of Indian Chambers of Commerce and Industry.

FICCI Ladies Organisation (FLO) will confer the 2014 FLO awards to five women SHG members from Bihar, Maharashtra, Andhra Pradesh and Kerala. Manorama Devi, Anusaya Khopade, Latha Gowri, S. Narayanamma and Bindu Pallichal who started small enterprises with financial and technical support received from their SHGs. Seeing them emerge from the web of poverty motivated other women to develop viable ‘business plans’ and give wings to their dreams.

Anusaya Khopade from Nazare village in Maharashtra played a crucial role in mobilising women from her village to form Jai Bhavani Mahila Bachat Gat SHG. She demonstrated talent for meticulous book-keeping to support her group in economic activities like stitching school uniforms and making agarbattis. The turnover of the group has exceeded Rs12 lakh. Members have taken 13 bank loans to set up businesses that are now flourishing.

S. Narayanamma from Anantapur district of Andhra Pradesh belongs to Rani Mahila Sangham SHG. Her transition from being an abused and abandoned widow forced into bonded labour into a business woman who owns six milch animals and a leather business is one that inspires many. The economic freedom and confidence motivated her to enroll as a Community Resource Person.

Bindu Pallichal of Trivandrum district in Kerala makes a neat income selling ayurveda products in small fairs and has been honoured with Best Entrepreneur Award by Kerala Government. Her literary talents like writing stories in Malayalam and taking tuitions for children are activities she continues alongside.
Loans at 7% interest enthuse women SHGs embarking on entrepreneurship

The entrepreneurial spirit of rural women received a boost with the latest decision announced on behalf of Aajeevika, the NRLM flagship programme of MoRD. By approving interest subvention component on loans sought from banks, members of women SHGs will now access institutional credit at a lower, more affordable cost.

The decision that was taken in May 2012 was made effective 1st April 2013, onwards after planning and preparation activities were carried out. The operational guidelines have been issued by Reserve Bank of India (RBI) and NABARD and the MoRD has coordinated with Ministry of Finance to complete all formalities before issuing instructions to all Public Sector Banks, RRBs and Cooperative banks for implementing the Scheme.

Interest subvention on loans: How does it benefit women?

Category 1 (150 select backward districts, including Maoist affected districts): From Feb 1, 2014, fresh loans upto Rs3 lakh will be charged at 7% only. There will be an additional subvention of 3% on prompt repayment. All outstanding loans from 1st April, 2013 will also get this benefit.

Category 2 (remaining districts): On prompt repayment, interest paid over and above 7% will be credited to the SHG

Supportive banking environment fuels women’s business acumen

NRLM has set itself a target of covering 7 crore rural poor households across 2.5 lakh Gram Panchayats in the country. As many as 60 lakh SHGs and federated institutions of rural poor women will benefit from the scheme over the next decade. NRLM will provide handholding support to help them emerge out of the web of poverty and helplessness.

Comparison of Interest Subvention Scheme for SHGs Category I & II

<table>
<thead>
<tr>
<th>SL</th>
<th>Parameter</th>
<th>IS for Category-I districts</th>
<th>IS for Category-II districts</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Geographic coverage</td>
<td>Limited to selected 150 districts</td>
<td>Applicable for remaining 490 districts</td>
</tr>
<tr>
<td>2</td>
<td>Eligibility for SHGs</td>
<td>All women SHGs are eligible for IS</td>
<td>NRLM compliant women SHGs are eligible for IS</td>
</tr>
<tr>
<td>3</td>
<td>Benefit of the scheme &amp; eligibility Condition</td>
<td>* SHGs will be eligible for loans from banks at upfront 7% per annum; * In case of prompt repayment additional 3% IS. Thus in case of prompt repayment effective interest rate is 4% only</td>
<td>* IS available on prompt repayment only * IS will be equivalent to the difference between lending rate of banks and 7% per annum</td>
</tr>
<tr>
<td>4</td>
<td>Extent of interest subvention</td>
<td>* Banks will be subvented * Difference between lending rate and 7% subjected to a maximum difference of 5.5% + Additional 3% (for eligible SHGs)</td>
<td>* SHGs will be subvented * Difference between the bank’s lending rate and 7% (subjected to a maximum of 5.5%)</td>
</tr>
<tr>
<td>5</td>
<td>Budget Allocation</td>
<td>100% central share</td>
<td>both central &amp; state share</td>
</tr>
<tr>
<td>6</td>
<td>Nodal Agency for implementation</td>
<td>NABARD for RRBs &amp; Cooperative Banks</td>
<td>Respective SRLMs with technical support provided by AP (SERP)</td>
</tr>
</tbody>
</table>
account. All outstanding loans upto Rs 3 lakh from 1st April 2013 will also be eligible for the above benefit.

*Aajeevika*’s objective of organising 7 crore rural poor women into 60 lakh SHGs and linking them to banks by 2018 will get a boost through this interest subvention scheme.

**Encouraging innovative, high impact poverty solutions**

While national poverty alleviation schemes aim to uplift rural poor, having a special programme that encourages innovations is a novel attempt to fight poverty. Maharashtra and Bihar have been marked by poor service delivery, complex political and social conditions, limited inclusion in institutions, poor economic opportunities and development infrastructure. Through the forums, partnerships and alliances have been forged with 180 organisations pan India, in various stages of the project cycle. A robust due diligence process ensured their work was aligned with the scope of rural livelihood projects and partnerships. Applications in both states were invited from public, private and civil society organisations on public sector innovations and social entrepreneurship.

**Maharashtra Rural Livelihoods Innovation Forum:** As many as 350 applications were received and screened, based on pre-determined eligibility criteria. There were dedicated subject expert teams that carried out assessment of financials, impact and innovativeness, following which 38 finalists were selected.

The concept of Innovation Forums attempts to first seek and recognise innovative, high impact poverty solutions and then find ways to popularise and implement them. Using an open, transparent and competitive process, they acknowledge innovation and entrepreneurship as key components for addressing poverty, inclusion and sustainability.

Through the forums, partnerships and alliances have been forged with 180 organisations pan India, in various stages of the project cycle. A robust due diligence process ensured their work was aligned with the scope of rural livelihood projects and partnerships. Applications in both states were invited from public, private and civil society organisations on public sector innovations and social entrepreneurship.

**Maharashtra Rural Livelihoods Innovation Forum:** As many as 350 applications were received and screened, based on pre-determined eligibility criteria. There were dedicated subject expert teams that carried out assessment of financials, impact and innovativeness, following which 38 finalists were selected.

The Innovation Forum culminated in a knowledge event cum awards ceremony where experts were invited to speak and discuss matters related to rural development and scope for innovations. Twelve innovations received cash awards and all 38 finalists got a chance to showcase their innovations at the Knowledge Fair. Maharashtra Rural Livelihoods Innovation Forum (MRLIF).

**Bihar Innovation Forum:** Apart from regular screening, a dedicated website and paperless online application system was developed. A pan-India communication campaign was launched to attract high quality applications, including print, social media and road shows in 11 major cities. Stakeholders included mentoring and incubation agencies, impact investors, donors, foundations and academic institutes. Resultantly, GIZ, Bill & Melinda Gates Foundation, IFC & Dalberg amongst others were invited for stakeholder consultations.

The all-women Mann Deshi Bank wins accolades

A regulated cooperative bank run by and for women was founded in 1997. It was India’s first rural financial institution to receive a cooperative license from RBI and is today the largest microfinance bank in Maharashtra with over 185,000 clients.

The selection process included screening and due diligence of over 550 applications that went through a pre-determined eligibility
Other grassroots innovations

District Innovation Forum is part of Bihar Innovation Forum. It scouted for grassroots innovations and validated them in 38 districts. Jeevika deployed 38 project staff as district nodal officers, receiving 1700 applications in technology, agriculture, traditional and herbal practices. Subject experts scored all innovations and shortlisted 173. These were field validated and after a jury round in Patna, top five were awarded Rs1 lakh each.

Keggfarms, one of the winners is one of the country’s oldest poultry breeding organisations. Using an innovative supply chain, it reaches one million disadvantaged rural households, across 13 states, generating Rs450 million as additional livelihoods.

iVolunteer was introduced as partner for volunteer management in DIF. Almost 200 volunteers were hired from local colleges/universities of Bihar who had a 3-day training with nodal officers on scouting innovations. They were allotted to various nodal officers in groups of 3–5, spending 15 days in each district, visiting villages, scouting innovations/best practices.

Timely review and assessment of implementation status

In an effort to streamline functioning of various bodies under NRLM and to enthuse officers with commitment towards key objectives of Aajeevika, two Performance Review Committee (PRC) meetings were held on 28th January and 30th–31st January, 2014 respectively. The review highlighted gaps and pending tasks that needed action.

Key decisions taken during the two meetings

- All UTs advised to tie up with neighbouring State missions or National Resource Organisations for technical assistance and learn from best practices
- Redesign suitable implementation architecture for UTs and advising them to undertake assessment of rural vulnerable households to identify NRLM target households
- MoRD to consider separate/additional funding window for UTs, similar to NE states
- Take into account rural–urban continuum in UTs and implement rural/urban livelihoods programme through common State Missions
- States to concentrate on recruitment of professionals at State, district and block levels and Kerala SRLM to complete recruitment
- World Bank supported 13 NRLP states to appoint Chief Operating Officer on contract
- All States to hire Financial Management Technical Support Agency (like Bihar Mission)
- States to customise manuals on human resources, financial management and community operations and organise awareness programmes on interest subvention scheme
Joining hands to combat climate variability at national/sub-national levels

Floods in Mumbai and Uttarakhand, disasters in Kosi, cyclones in Philippines and the 2004 tsunami pointed towards urgent need to move from disaster management to mitigation of disaster risks with policy-level attention of concerned governments.

Bringing together more than 15 relevant agencies, think tanks and environmentalists from across the country, TERI organised a conference on “Challenges of Climate Variability, Change and Extremes at the National and Sub-national Levels” on 16th-17th January, 2014 in New Delhi. Experts shared their views on issues related to impact of climate change on natural resources and subsequent initiatives taken to address these for climate adaptation.

Consolidating work of multiple agencies
Participants represented Energy and Resources Institute, Indian Institute of Tropical Metrology, India Metrological Department, NABARD, Central Water Commission, NRLM, Swiss Agency for Development and Cooperation, GIZ India and Department of Land Resources.

Why focus on climate change
- Approximately 10 crore households are vulnerable, of which 7-8 crore pursue agriculture as primary livelihood activity and are vulnerable to climate change
- Unless sustainable practices are followed, vulnerabilities of the poor will increase
- Warming of Indian landmass between 3.5-5 degrees is expected in next 50 years
- Little evidence of integration of scientific knowledge in communities, directly affected by climate change

While some of the agencies provided details on their projects in climate change, others shared findings of studies related to climate change projections at national and regional levels, assessments of impact and vulnerability, role of technology and special challenges of certain geographies.

Management of climate extremes, developments in weather forecasting and warning systems, training and capacity building for managing extremes, climate preparedness of rural communities and livelihoods, role of NRLM, climate change and water resources/watershed management and vulnerability of Indian Himalayan region were the broad themes around which discussions took place.

Mr. T. Vijay Kumar, Joint Secretary, MoRD, in his inaugural address said that the stage was set for discussions on practitioners’ perspective for strategies adopted. Dr. Prodipto Ghosh from Energy and Resources Institute flagged concern towards impending fallout of indiscriminate exploitation of resources. Joint Secretary, MoRD, pressed the need to leverage existing knowledge, practices and strategies adopted by communities towards climate change and to convert scientific knowledge generated at research facilities into user-friendly forms, which could be owned and used by most vulnerable people in remote villages.

Key highlights of discussions
- Different components of nature to fashion the climate of a given geographical area and regional climatic modelling in India to be more relevant
- TERI shared its work in climate assessment for health, livestock and agriculture
- More effective handling of national and sub-national responses and aspects of managing...
extreme weather events and natural disasters needed

- India Metrological Department shared details of systems for monitoring climate, drawing attention to forecasting techniques and collaborations with national/international agencies
- Training/capacity building to mitigate fall-out of disasters with components that address multi-hazards, effect on multiple sectors and protocols for different responses
- NABARD pointed out the importance of assessing projects to address climate change, since these will be affected by geographical, sociological and environmental factors. They were open to supporting sustainable climate change resilient models
- Aajeevika integrated climate change resilience as important components of its overall strategy with collaborations with UNDP and World Bank
- Strengthen management of watersheds and climate change resilience strategies. Creating water harvesting structures (bunds, trenches) will mitigate risks associated with uneven distribution of rainfall

The conference ended with policy makers and institutions agreeing to make it an integral part of their plans of action and working towards overcoming unpredictability associated with climate models using technology and other tools. Establishment and operationalisation of suitable protocols to also support reduction in losses due to poor human response to calamities.

Creating a more equitable environment for rural weavers and artisans

Protecting interests of artisans and weavers is part of many countries’ national manifestos. In India, core livelihood issues of rural weavers and artisans have been under threat. From information asymmetry to competition from mass produced lookalikes, many are forced to lower prices. A fragmented retail system underscores urgency for traders to safeguard their interests.

A stakeholders’ consultation on ‘Developing Strategy for Rural Weavers and Artisans with programmatic design, implementation and monitoring system under NRLPS’ was held on 3rd-4th February, 2014 in New Delhi. Chaired by Mr. T. Vijay Kumar, Joint Secretary, MoRD, it was attended by Mr L.C. Goyal, Secretary, MoRD, representatives from NGOs/NPOs, SRLM, NRLM and sector experts from handloom and handicraft bodies. Participants were briefed on activities of NRLM and MKSP by Mr. Alok De, National Mission Manager, Livelihoods. This was followed by sharing of experiences on successful interventions.

What the workshop aimed to achieve

- Identify gaps/challenges for rural weavers and artisans in handloom/handicraft sector
- Build multi-stakeholder approach through financial institutions, private sector, CSOs, NGOs and government line departments for capacity building, accessing credit, enhancing productivity and market reach
- Design implementation plan and monitoring system for sustainable enhancement
- Identify best practices on livelihoods promotion interventions with rural artisans
- Finalise scaling-up strategy on community-based models for livelihood promotion and strengthening of rural artisans

Building a case for NRLM to launch programme on livelihoods of rural artisans

Empowering women: Handicrafts engage 68.86
lakh adults, of which women constitute 47.4%. Weaving and allied activities engage 38.47 lakh adults, of which 77.90% are women.

More trained workforce needed: According to 12th five year plan, an additional 10% of existing workforce is required per year.

Poverty and lack of job opportunities: Only 69% of total weaving workforce has looms and 61.2% is employed full-time. Rural areas constitute 84% of handloom and handicraft work and 28.8% workforce is illiterate. Person days of work generated by adult handloom workers per household in rural areas is 241 days against 416 person work days in urban areas.

Key Recommendations
The consultation identified the following for developing programme strategy and design:

Non-negotiable outcomes for the programme to be designed by the Ministry
- Proposal submitted on rural artisans to have linkages with other line departments
- PIA to have experience of achieving breakthrough in technology, marketing organisations
- Only proven best practices to be considered for scaling up and all artisans to be brought in SHG fold; formation of producer groups/strong SHGs/federation a must
- Develop pro-poor equitable value chain with breakthrough in technology
- Address supply chain management issues and ensure health, safety and better environment
- Focus on capacity building across value chain and pay attention to traditional crafts
- Include convergence with existing schemes

Embark on community institution building and capacity building strategy
- Include women from artisan families into SHG fold
- Undertake capacity building at hamlet level and on market intelligence, skills training and pricing mechanisms
- Ensure clarity on skill upgradation strategy and flow of knowledge and information
- Develop clear understanding of roles of male/female household members in value chain
- Identify local designers and establish audio-visual extension service delivery mechanism

Develop scaling up strategy for a successful model & strengthen convergence
- Ensure convergence with ongoing line department programmes and ensure projects on rural artisans complement existing efforts
- Make convergence with MSME and Ministry of Textiles mandatory
- Avoid duplication of efforts between MoRD and other ministries
- Establish credit linkage with financial institutions (NABARD, SIDBI)

What next?
Concerted efforts by stakeholders will translate into better lives for artisan/weaver community. Their minimum annual income will go up by 30% and benefit–cost ratio be a minimum 2:1. There would be 100% inclusion of artisans into SHGs and 75% in producer groups. Women entrepreneurs will be encouraged. Regional consultation workshop will help identify existing best practices and sectoral studies will be conducted for better understanding of artisan activities. Guidelines will be developed along with project submission/DPR/appraisal/budget template with sub-component on rural artisans under NRLM. Finally, an advisory committee at NMMU level will also have a resource convergence cell.
One of the mandates of the National Rural Livelihoods Promotion Society (NRLPS) is to partner stakeholders to accelerate pace of programme delivery. The new knowledge is then adapted to reach marginalised communities across rural India. A core strategy of ‘Livelihoods layering’ under NRLM is *Mahila Kisan Sashaktikaran Pariyojana*, that works with small and marginal farmers. It offers a basket of primary sector livelihood opportunities, primarily around sustainable agriculture practices, NTFP and livestock activities. These partnerships empower the poor by strengthening community-to-community learning processes, enhancing potential of women SHGs and building internal capacities of partner organisations.

Currently, 65 projects are being implemented in 14 states on a budget of Rs 797 crore, covering 24.5 lakh *mahila kisans* (female farmers). A recent partnership between Digital Green and NRLPS and State Rural Livelihood Missions facilitates creation of such a knowledge management platform to help NRLPS stimulate widespread adoption of interventions and practices by the community. This will impact farm productivity, reduce cultivation costs, mitigate risks, establish market linkages, strengthen community institutions and enhance financial inclusion and access to entitlements.

**What will the collaboration achieve?**

NRLPS partners will create a cadre of master resource persons to execute and support institutionalisation of Digital Green’s approach with existing rural livelihood development programmes. It will support integration of a knowledge platform with NRLPS and partners for improved organisation and sharing of audio, visual, and written materials. It will facilitate improving effectiveness and efficiency of NRLPS and its partners’ livelihood programmes, helping adoption of best practices through community-based knowledge exchange. Finally, it will strengthen data management, quality assurance and learning systems to leverage community feedback and use of data to inform programmes aligned to community needs.

**Scope of Digital Green’s role as National Support Organisation**

**Knowledge management platform development:** Develop process for identifying locally relevant best practices and technologies; train CRPs and partners to develop locally produced community videos, vetted by specialists; provide platform for mutual learning/exchange of expertise and experience; establish linkages with knowledge and research agencies/individuals.

**Why Digital Green?**

The company works with partners to effectively exchange livelihood practices among rural communities. Using local videos and mediated dissemination. Incubated as a research project in Microsoft Research India’s, Technology for Emerging Markets team in 2006, its innovative ICT based approach focuses on low cost and effective peer-to-peer learning processes.
Training and capacity building support: Create capacities to institutionalise Digital Green’s approach among NRLPS, SRLM/partners/community at state, district, block and village levels; provide recommendations on technical specifications of hardware/software to produce/share videos, capture data and support analysis; help NRLPS, SRLMs and partners to build cadre of master resource persons; develop protocols for assessing impact of programme interventions.

Quality assurance support: Help partners establish systems for effective management and monitoring of the partnership; provide protocols to ensure quality of content and processes that define its approach and create capacities within partners to integrate/ institutionalise the same; leverage expertise of TAC to support partners on knowledge; engage external consultants/researchers to provide support on impact assessments and technology development.

Technology support: Support integration of NRLM’s management information systems and those of its partners and provide complementary support services; leverage Digital Green’s online knowledge management platform; develop e-learning portal to structure videos into online curriculum and provide mechanisms for certification for staff/community intermediaries.

What will be the contours of the partnership?
A Project Steering Committee comprising NRLPS and Digital Green leadership and key stakeholders will provide leadership and management. Strategic guidance will be provided and progress against impact parameters reviewed. Sharing challenges and learning to improve programme effectiveness will be backed by adequate backend support to institutionalise Digital Green’s approach as a cross-cutting platform for NRLM initiatives. It will also facilitate national level coordination of multiple initiatives while identifying opportunities for new interventions, through mechanisms like Production Sharing Contracts.

How will the partnership evolve?
These services will give a thrust to programme roll-out in states where missions have done intensive social mobilisation. Under livelihoods, NRLPS will provide knowledge products, best practices on livelihoods promotion, build capacity of staff for institution building and extend support to thematic areas. All materials will be uploaded on Digital Green’s website as open source with free access, with links for NRLM and partners to embed the same on their website.

Canara Bank deputed Nodal Bank to implement Interest Subvention Scheme
Canara Bank has been identified as Nodal Bank for implementing interest subvention scheme on loans availed by women SHGs. Implemented by MoRD, Government of India in Category I districts1, an MoU was signed between MoRD and Canara Bank and NABARD was assigned as nodal agency for RRBs and cooperative banks on 3rd February, 2014.

Charter of tasks as Nodal Bank
• Collect data of women

1 150 most backward districts, including the Integrated Action Plan (IAP) districts
SHG accounts from all public sector commercial banks

- Create web interface for easy sharing of data on regular basis. Member banks to upload claims under NRLM (for regular claims) and additional 3% (for interest subvention claims), separately

- Based on claims submitted, consolidate claims of member banks for relevant scheme period and submit it to the Ministry

- Based on claim details available in the portal, MoRD to reimburse amount to Canara Bank who will then reimburse it back to respective banks

NRLM and RRBs embark on joint mission to alleviate poverty

A key initiative under NRLM is to implement an interest subvention scheme for women SHGs. Operational guidelines were developed by RBI and NABARD. To discuss modalities related to the scheme, a meeting was chaired by Mr. T Vijay Kumar, Joint Secretary, MoRD and attended by senior officials of leading RRBs in the country and NABARD. On the occasion, a live demonstration of the portal on SHG Bank Linkages was presented and an FAQ booklet ‘Know about Interest Subvention’ released.

The states of Andhra Pradesh, Uttar Pradesh and Bihar have under NRLM, promoted SHGs and through them, built a strong community institutional architecture. Similarly, RRBs must play a more proactive and significant role in enhancing credit linkages, particularly in the northern and eastern states, thereby adhering to RRB’s mandate and improving their bottom line.

Annual Action

Commitments made, support extended

“The government is committed to stepping up credit flow for SHGs. Bankers must have long-term engagement (upto 10 years) in a block, community-based mechanism. By monitoring utilisation and repayment of bank credit and strengthening concept of bank mitras (proposed under NRLM), some of these goals can be achieved.”

T Vijay Kumar, Joint Secretary, MoRD, Govt of India

“RRBs ensure faster percolation of information within their network. Present in remote areas, they have an edge over commercial banks, demonstrating greater potential to shape the SHG movement. Their knowledge and capacity gaps can be managed by having well informed branch managers. Incentive mechanisms will encourage managers to be more proactive.”

P C Choudhari, Chief General Manager—NABARD

“Clients must understand all nuances of the interest subvention scheme and the role banks can play in data sharing and submission of claims.”

Santhi Kumari, Chief Operating Officer—NRLM

“There is greater need to share SHG loan data with NRLM team. This will benefit them with real time analysis of all aspects of SHG credit linkage and monitoring of Non Performing Assets.”

A.K.Singh, General Manager, NABARD
**Plans finalised for FY 2014–15**

Twenty six states and one Union Territory have submitted their Annual Action Plans (AAP) for FY 2014–15 after seeking approval from the Executive Committee of NRLM. The AAP exercise began at the National Annual Writeshop on NRLM at Hyderabad in December 2013. NRLPS provided technical assistance in finalising plans and budgets.

**Progress made**
The EC recommended SRLMs to rationalise State Mission Management Unit (SMMU), District Mission Management Unit (DMMU) and Block Mission Management Unit (BMMU) structures. Thereafter a phasing plan was prepared, covering all districts, blocks and villages by enhancing role of community cadres in rolling out NRLM. It was suggested that states put in place a well structured ‘induction cum immersion training and capacity building architecture’ for staff that was recruited, community-based cadres and community institutions. This was followed by pushing *Panchayati Raj Institutions–Community Based Organisations (PRI–CBO)* convergence at state, district and block levels. Due emphasis was laid on the State-specific scheme of interest subsidy for SHGs and to align it with NRLM’s interest subsidy component.

**Outlining future course of action**
- After receiving approved EC minutes from NRLPS, SMMUs were directed to inform district units of funds available to their respective districts
- SRLMs to develop action plans for each resource, intensive and partnership block
- Plans to emerge from block level and consolidated at district level
- State’s AAPs to be modified to accommodate activities suggested in district plans
- Revised plans to be submitted to MoRD by July 2014 for approval