Instituting a state-level school regulator

Ideas for sound agency design

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Executive Summary

The Draft National Education Policy (NEP) 2019 proposes that "the three distinct roles of governance and regulation, namely, the provision/operation of education, the regulation of the education system, and policymaking, will be conducted by separate independent bodies, in order to avoid conflicts of interest and concentrations of power, and to ensure due and quality focus on each role". The Policy proposes that state governments separate their service delivery functions from their regulatory responsibilities by dispersing their powers into separate agencies. It proposes that each state set up a State School Regulatory Authority to regulate all schools, public and private, on the same set of minimum standards towards the goal of quality education for all.

In this note we discuss the five design considerations that should go into the setting up of the State School Regulatory Authority:

1. Defining clear and narrow agency objectives;
2. Preparing a legislative framework delegating authority to the regulator, and ensuring regulatory coherence;
3. Structures that ensure independence in functioning via board selection and composition, board functioning and internal reporting lines, management processes and term limits;
4. Measures for accountability for actions and performance via internal separation of functions and information disclosures on processes; and
5. Checks on executive discretion and against abuse of power.

Introduction: Separating regulatory functions from the running of government schools

The Draft National Education Policy (NEP) 2019 document rightly identifies a central problem in the current education governance structure: "At the current time, all three main functions of governance and regulation of the school education system - namely, the provision of public education, the regulation of educational institutions, and policymaking - are handled by a single body, i.e., the Department of School Education (DSE) or its arms... This leads to harmful conflicts of interest and excessive centralised concentrations of power; it also leads to ineffective management of the school system, as efforts toward educational provision are often diluted by the focus on the other roles, particularly regulation that the DSE must perform."

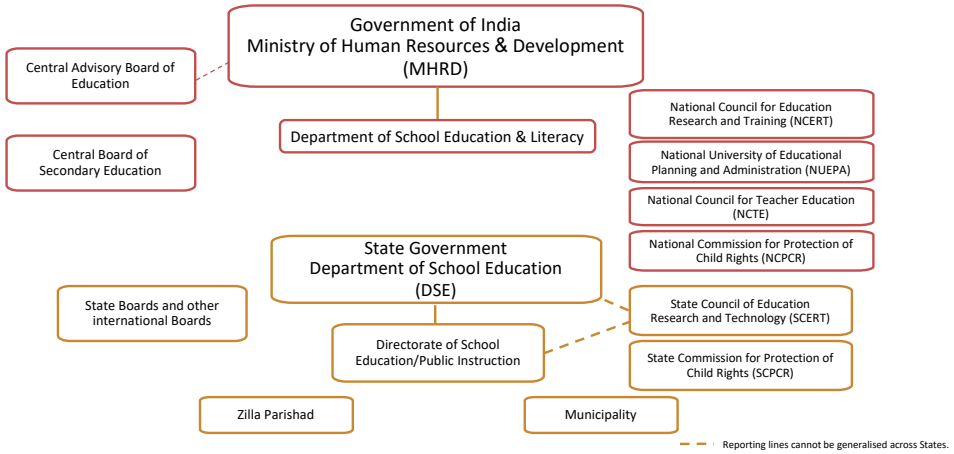

Figure 1: Governance and regulatory architecture of School Education as it stands today.

Policy proposes an independent school regulator at the state level

Draft NEP 2019 proposes that state governments separate their service delivery functions from their regulatory responsibilities by dispersing their powers into separate agencies. Such a process of creating separate agencies for a narrow set of functions is called *uncoupling*, and is adopted in several countries including India to improve the governance quality across a variety of sectors. In India uncoupling has been successfully carried out in telecom, aviation, and financial markets.

The revised state education administration structure envisaged under Draft NEP 2019 is:

the existing Directorate of School Education (DSE) to oversee the operations and management of government schools;

a newly formed State School Regulatory Authority (SSRA) to have exclusive responsibilities over making rules for all schools, public and private, and ensuring their compliance;

The Department of School Education to be the primary institution for overall monitoring and policymaking (minus any involvement with the provision and operation of schools or with regulation of the system).

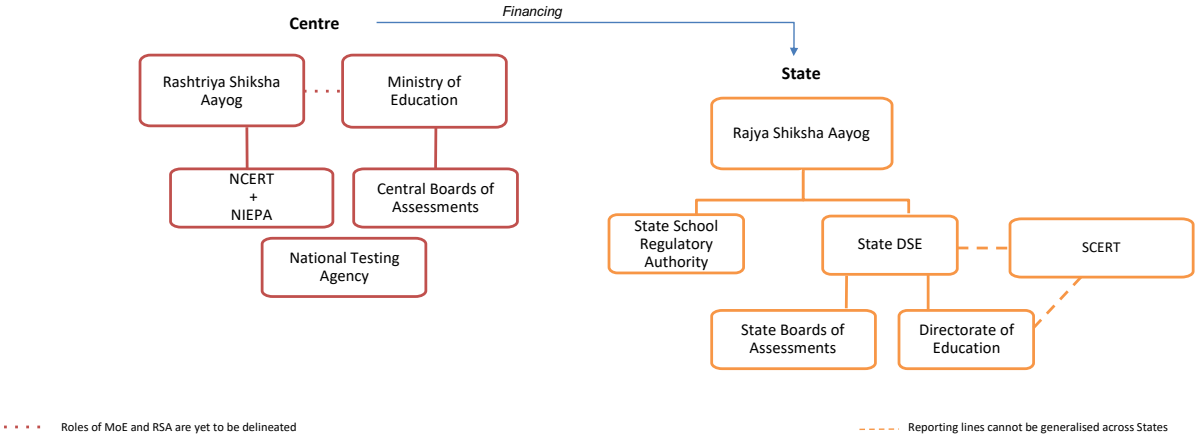

Figure 2: Governance and regulatory architecture of School Education post NEP 2019

Promise and perils of a State School Regulatory Authority (SSRA)

The separation of regulation and service delivery functions performed by state school education departments/directorates with the creation of state-level independent regulators for all schools is the most significant reform proposal in the Policy on school education.

Independent regulation will likely bring competitive neutrality, focus and efficiency

A dedicated regulator for a marketplace of a variety of suppliers, public and private, is an approach increasingly followed in India and several other countries. An independent regulator can deliver three significant benefits over the current system:

Unlike the current system where a market-player is also the market-regulator, SSRA will only regulate. The conflicts of interest that currently exist between a government service-provider regulating itself and other service providers will be contained. This will encourage a level playing field for both government and non-government service-providers, i.e schools.

SSRA, as a regulator, will function separately from any government department. As a result, the role played by discretion and *quid pro quos* in licensing, school recognition, inspections and fee regulation can be minimised.

SSRA will be mandated to draft specialised rules only for the K-12 sector. This can encourage a symbiotic relationship where the regulator receives feedback on the efficacy of the rules from the regulatees and consumers alike. Such a consultative and responsive framework can help the sector adapt to changing times.

Per the recommendation we will need to create 28 different SSRAs across India

The Draft NEP's proposal to create SSRAs can take different forms. Since education is a concurrent subject, there are three options to consider:

1. Each state government constitute SSRA: following a law demanding such action by the legislative assembly. Eg, in 2009 Government of India drafted a central policy recommending that states set up a legal framework to protect and regulate street vending. However, very few states implemented this proposal. Similar to this case, in the case of SSRA we run the risk of a good idea with no takers.
2. Central regulator combined with state regulators: Eg. the Air/Water Pollution Acts where the Central Pollution Control Board is set up as a national pollution regulator, and State Pollution Control Boards are set up as state regulators.
3. Central law mandating states create school regulators: Eg. The Real Estate (Regulation and Development) Act, 2016 passed by the Parliament of India establishes Real Estate Regulatory Authority (RERA) in each state for regulation of the real estate sector.

Whichever proposal is implemented, central and state governments need to think through the question of regulatory coherence. Since states have multiple laws governing private schools, we need a careful examination of the legislative rationalisation required.

Regulators violate the doctrine of separation of powers and require checks and balances

An independent regulator makes rules, conducts investigations into compliance, and enforces the rules. This fusing of powers vests extensive authority in unelected officials. This fusing needs to be countered by assigning the regulator a limited and well-defined mandate and developing an agency design to be accountable to Parliament/Legislature, regulatees, and parents and children whose interests they are to protect. Absent thoughtful agency design, such a newly created regulatory agency may not meet its objectives and may spur off unintended consequences.

Elements of sound agency design for an SSRA

In this note we discuss the design considerations that should go into the setting up of the State School Regulatory Authority (SSRA). These design considerations are common across all high performing regulators, irrespective of sector or geography.

Objectives that are specific, general, and difficult to hack

In the current structure, state level Education Departments are tasked with the conflicting objectives of market regulation, and running government schools, i.e a special market player is also the market

referee. Therefore, there is a need for a market referee, an SSRA, neutral but demanding towards all schools irrespective of ownership.

The SSRA will then write rules and enforce them towards an end goal/objective. Assessment of the SSRA's performance, metrics to hold it accountable, governance structure, and management processes, all hinge on a clearly articulated objective.

1. **An SSRA must be set up with limited clear objectives that can be measured.** One way to write the objectives is to focus on the quality of all schools, as defined by outcomes not inputs. All the rules written by a regulator will then be focussed towards compelling schools to deliver on outcomes. Another way is to use the lens of consumer protection, where the objective of SSRA is to bridge the information asymmetry facing parents, and prevent fraud and unfair practices in the sector. Parents can then exercise their voice, choice and exit options to hold schools accountable. The objectives must preclude powers to allocate public funds, land, or infrastructure, and limit the ways the agency can pursue the objectives.

2. **The objectives must subscribe to the critical principle of competitive neutrality.** The rules that emerge from the objectives be the same for all schools irrespective of the incorporation structure (whether owned by an individual, government, trust, society, corporation, etc). The writing of the objective needs to embed this principle since many conflicts have arisen previously in its absence as noted in the Draft NEP. For example, currently a recognition certificate is required for private schools to operate legally, while no such requirement exists for government-owned schools.

3. **Objectives should discourage agency management from taking shortcuts.** For example, if the objective is *to achieve greater learning quality across the system*, the regulator could forcing poorly performing schools to close as a potential solution. To prevent such a shortcut, the regulator's mandate should include an opposing goal, say *maximise competition amongst schools, increase choice of schools for students/parents, and high value for public spending.*

Deriving authority from legislation

In a democratic set-up, the authority to frame rules that constrain actions of private individuals rests solely with the legislature of elected representatives. Therefore, the legislature must pass an Act to delegate this power to unelected members of the SSRA. SSRA being a state-level agency, the Act enabling its creation and functioning has to be passed by the Legislative Assembly of the state.

The Act is a contract of the Assembly with the SSRA

The Act that creates the SSRA is the contract that defines the relationship between the government department (representing the Legislative Assembly) and SSRA. It should govern the SSRA's actions by clearly outlining the regulator's objective, placing constraints on its actions against private persons, instilling accountability through the composition of its board, and creating incentive structures for performance. The Legislative Assembly is required to constantly examine whether the SSRA is executing its objective. It must regularly review the Act to push the SSRA towards higher levels of performance.

Even with this separation, challenges remain around who will draft the Act constituting SSRA, how will future amendments of the Act balance SSRA intervention and department intervention, and how to prevent the department from interfering in 'individual transactions of licensing, inspections, investigation or punishment orders' (Roy et al. 2018).

Regulatory coherence derived through reconfiguration of rule-sets

The powers, procedures and punishments as related to school education are currently scattered across numerous Union and state Acts, and enforced by several different officers and agencies. These need to be mapped and moved under the SSRA's jurisdiction.

In the state of Maharashtra, 8 Acts govern different facets of K-12 education, the School Code of Delhi and West Bengal amount to 2500 pages each. The officers in-charge of the responsibilities, the administrative procedures laid out to execute these responsibilities, timelines for inspection, investigation, prosecution etc vary significantly with the Acts. Therefore, when the SSRA is formed, regulatory powers, including rule-making, enforcement and judicial powers vested with state Education Department officers under other existing Acts will need to be reconfigured and largely transferred to the SSRA.

This will require legislative rewrite. Failure to do so will only lead to more regulatory cholesterol without solving the problem that was originally intended. For example, when the Right to Education (RTE)Act 2009 was passed, it mandated that private schools obtain a recognition certificate from the state government. The Delhi School Education Act and Rules (DSEAR) 1973 however did not mandate school recognition. Given that DSEAR was not revised to align with RTE, new schools opening in Delhi are required to comply with regulations of the RTE and the DSEAR, and fulfil norms outlined under both the Acts. This requires producing multiple copies of the same documents under two Acts.

Such a rationalisation exercise is not new in India. When the Indian Financial Code was drafted, it proposed to replace 61 distinct laws of the financial sector with a single-law of 140 internally consistent sections in a 211-page document. Powers of different regulators were reconfigured to eliminate conflicting interests, internal inconsistencies, and multiple power-centres. A similar exercise is required while forming the SSRA. In addition to rationalising state-level legislation and delegated legislation, the reconfiguration exercise also requires coordination with the centre to review conflicts with RTE 2009.

Independent governance to perform effectively

A regulator requires independence to carry out its mandate effectively. Independence of a regulator can be best understood through its opposite: non-independence—a state where regulatory actions are influenced by external pressures from political actors, special interest groups (teachers, group of institutions etc.), and incentives/interests of the SSRA's own staff.

Independence insulates the SSRA from regulatory capture while allowing room for guided discretion. Such independence when balanced with measures to ensure accountability will allow the regulator to build expertise in specialised rule-making required for the sector, and build capacity for impartial and effective enforcement.

Independence of a SSRA as a regulator implies:

1. Fidelity only to SSRA's objectives as laid out by law;
2. Freedom to write and enforce rules without fear or favour; and
3. Absence of cover from poor decisions.

Independence of the standalone regulator stems from an independent but accountable Governing Board. Literature and experience from designing other regulators suggest five steps to secure independence of the Board:

Transparent process-driven appointments of best-in-class Board members

While the appointment of a Chairperson and members of the Board is always the prerogative of the government, their selection must be insulated from political influence. One way of ensuring such political insulation is by constituting a neutral Search cum Selection Committee (ScSC) with a member each from the ruling-party, the opposition-party, and the highest Court of the State. A neutral third number helps break the potential vote-tie. This ScSC should lay out the qualifying criteria for candidates, publish an open invitation for application and nominate candidates qualified for the job from the pool of applicants. The government should be restricted to this list to appoint the Chairperson and other members.

Another method of insulating from politics is by choosing a few Board members through a random-draw from the list of eligible candidates who showed interest in the job. History and literature shows that random selection of a few members in government positions benefits the governing body's performance. It is likely that these randomly selected members, who do not owe anything to anyone for their position, would be loyal only to their conscience and not to political interests (Pluchino et al. 2011). This practice, *sortition*, was first used in ancient Greece to select a certain share of legislators in their city democracy.[1]

Independence in internal management by lean and balanced Board composition

The Kasturirangan Committee on NEP proposed that SSRA be governed by an independent Board consisting of 10-15 members with expertise in education and other relevant areas. The Committee report, however, did not provide justification for its proposal on board-strength nor specify the type of members. We recommend the following parameters for Board composition:

1. **Board should be as lean as possible.** The members on the board (including the Chairman) must be an odd number for voting clarity and to prevent abeyance of decisions. Per our calculations, the Board will consist of at least 9 members: Three members—the Chairman and two top-functionaries—will form the core management team; One nominee-member from the parent department is required to represent its interests on the board; and At least five independent members to balance the composition, bringing the total count to nine.
2. **Board must always be dominated by independent members.** These independent members should not be ex-officio members from other government departments. If representation from other departments is required on the Board, it will inevitably increase the strength of ex-officio members. This must be balanced by adding more independent members to ensure that they always dominate the Board. Ex-officio members can potentially abuse their power on the Board and it is the responsibility of the independent members to prevent such abuse. Finally, representatives from the Education Department allocate resources to and operate government schools, and also hold have some allocative powers vis-a-vis private schools (such as grants to aided schools, and reimbursements under RTE Section 12(1)(c)). This makes them special market players. Therefore, the strength of the independent members should be sufficient to block the tendency of ex-officio members to exercise their effective *veto* power.

Board working processes that incentivise performance

Drafting internal working procedures for the Board appropriately is one way to force the regulator to follow its objectives, write rules without fear or favour, and bear the consequences of its decisions. Requirements such as disclosures of regulatory decisions, publication of meeting minutes and voting decisions, and public demands should be drafted in the law:

1. Many other cities such as Bologna, Parma, Vicenza, San Marino, Barcelona and some parts of Switzerland used random draws as some kind of rule. It was also used in Florence in the 13th and 14th century and in Venice from 1268 until the fall of the Venetian Republic in 1797.

1. All regulations passed should be published within 24 hours on SSRA's website;
2. Detailed transcripts and minutes of the meeting should be published after every board meeting within a specified time. Only sensitive information as strictly predefined in the law should be exempt from publication.[2]
3. Voting process should be transparent, and the votes of individual members should be made public within a specified duration.

Term limits and other restrictions to minimise conflicts of interest

The Chairperson and members of the Board should be insulated from external special interests, and prevented from forming a rent-seeking culture. Three principles can be followed to ensure this.

1. **Explicit caps on the number of years served in a position on the Board:** The Kasturirangan committee report proposed to cap the term of each Board member of SSRA, including the Chairperson, at two consecutive terms of 3 years each. The use of the word 'consecutive' implies the cap can take effect only if two three-year terms are served consecutively, but not if the two terms are spaced apart by any duration of time. One way to avoid this loophole is by capping the total duration of service on the board, i.e six years. We acknowledge the difficulties of imposing uniform term limits for government department representatives on the Board.
2. **Mandating a cooling off period before the next assignment:** Absence of this restriction can lead to a *revolving-door* problem where the members can use their influence on the board (or relationships with other board-members) for a *quid pro quo* of favourable appointments immediately after their term ends. In cases where the official wishes to return to the SSRA after the first term and cooling off period, all reappointments should follow the ScSC application/nomination procedure.
3. **Proactive disclosure of conflicts of interests:** The Chairman and members of the Board should be periodically required to provide an undertaking of every potential conflict of interest. This will include disclosing the ownership (or a family member being an owner) of an institution/business that may be affected by the SSRA's rules, and presence of other family members on the Board of the SSRA.

Accountability for actions and performance

Reporting structure that is transparent yet insulated from interference

In a democracy, the power to make laws is granted only to a legislative body of elected representatives accountable to voters. But when this power is devolved to unelected individuals, they must be held accountable to legislature.

The Kasturirangan Committee Report 2019 proposed that the SSRA report to the Rajya Shiksha Aayog, and in its absence, to the Chief Minister, both executive offices. This will likely open up the regulator to political and executive interference. Instead, the law constituting the SSRA should require the agency to prepare an annual report and submit to the state Legislative Assembly. We also recommend that mandatory disclosure norms be put in place that open all actions of SSRA to public and legislative scrutiny.

Two measures will make the need for a reporting line to the Rajya Shiksha Aayog unnecessary: the state Legislative Assembly and the parent department will hold the powers to amend the Act constituting the SSRA, and the department will have representation on the governing Board.

2. Examples of sensitive information can include trade secrets that are proprietary; personal information of individuals that can be misused etc.

Mandatory input, process, output and outcome disclosures

The SSRA should be forced to perform high-frequency disclosures. As sunlight is the best disinfectant, the concerned stakeholders and the Parliament/parent-department can raise questions on the data disclosed by the SSRA and hold it accountable to its performance. The management of SSRA should be asked to explain the absolute values and the time-series variation in these measures.

Some metrics for forced voluntary disclosures can be:

1. Licensing/approval processes and real-time status of applications: Steps are required for approvals, administrative data from single-window clearance systems, time taken to grant recent licences/approvals, numbers of applications received, data on current queue, number and names of officials in the process etc.

2. Compliance/enforcement documentation: Processes followed for inspection, documentation on each inspection including proforma filled and observations/violations recorded, processes followed for each enforcement action, administrative data on notices served, documentation of notices served, etc.

3. Internal efficiency metrics: Number of investigations begun and concluded, man-days spent, per investigation, time taken from the start of an investigation to file closing etc.

4. Internal effectiveness metrics: Proportion of investigations resulting in prosecution, proportion of prosecutions resulting in orders/punishments, proportion of orders appealed, SSRA's win rate at appeal etc.

In addition to these disclosures, we recommend that SSRAs be required to publish the three most frequent queries requested under the Right to Information Act every quarter on their website. This is the idea of Section 4 of the Right to Information Act 2009, also called Duty to Publish, where the government agency proactively discloses information demanded frequently by the public.

Checks and Balances to prevent abuse of power

A regulator performs three distinct functions: writes rules governing the actions of private parties, checks compliance, and enforces rules (through investigation of complaints/lapses, prosecution, and awarding punishments).

Internal separation of powers

Since SSRA will be formed through the fusing of quasi-legislative, executive and quasi-judicial powers, fail-safes against abuse of power must be instituted.

To ensure this, three key elements must be coded into the law that forms the SSRA:

1. Only the Board of the SSRA must hold rule-making powers. Besides the Board, no other staff members must have the power to write any rules. A rule approved by the Board meeting should not be modified outside Board processes. A similar practice is followed in the legislature, where a law passed by the Parliament/Legislative Assembly cannot be modified outside it.

2. An internal adjudication body, and an external Education Appellate Tribunal are required. Draft NEP 2019 requires the SSRA to have an adjudication body within it, but an external Education Appellate Tribunal is rendered optional. In fact, both the bodies are essential.

(a) The internal adjudication body, also called the *Administrative Law Vertical*, is required to keep the powers of *investigation team* in check. This ensures that players accused of lapses in compliance and the prosecution team are given a fair hearing, and judgments/orders passed are insulated from the biases of the prosecution and investigation teams. In the case of SSRA, the *Administrative Law Vertical* should be a separate department headed by a Board member to check potential abuse of power by lower-level officers to meet performance targets.

(b) An external and independent Education Tribunal is essential to place a check on the orders of the SSRA. Its formation must not be contingent on the *Administrative Law Vertical*. Lessons from India have shown that such independent tribunals are indispensable for the effective performance of regulators.

3. The law or the rules governing the SSRA must lay out procedural and substantive guidance on applying quasi-legislative, executive and quasi-judicial actions.

Checks on Executive Discretion

Principles for Rule-making: Quasi-legislative process

Board members in-charge of making rules are non-elected individuals and they do not face any negative consequences produced from the bad rules they write. The system will neither punish sloppiness nor award thoroughness.

At the very least, Board members must be compelled to be thoughtful while passing rules. Below are some principles for a rule-making process that help achieve this:

1. Only the Board of the SSRA should have the power to make rules.
2. Before any regulation is passed, SSRA must prepare draft-regulations and place it for public comments for a minimum period of 30 days.
3. A set of documents outlining the rationale of the regulations should accompany the draft regulations. It should answer the following questions:
   (a) What is the problem to be solved?
   (b) What is the proposed regulatory intervention? How will the specific rule solve the identified problem?
   (c) What are the costs and benefits of the intervention?
   (d) Are there alternative interventions that can reduce the cost to the taxpayer/society?
4. After the 30-day comment window but before passing the final regulations, the regulator should release all comments received and a public response.
5. All regulations framed by the Board must be placed before the Legislative Assembly when it is in session. The set of documents with the rationale and analysis, public comments and the responses to those comments should also accompany the text of the regulation. The Assembly must scrutinize the regulations and modify them through a resolution, if necessary.

Principles for Regulating Activity: Executive process Actions of a regulator such as licensing, inspections and investigations cause private individuals to bear significant costs. When a licence is denied, several voluntary transactions that could increase social welfare do not happen; when an inspection is conducted, activities of an institution are halted leading to a loss of time, money and effort; when an investigation is ongoing, significant resources are diverted towards cooperating with the officers.

The regulator should be forced towards efficiency and prevented from imposing unjustified costs on regulatees. Below are a few processes that would help achieve these goals:

Licences

1. Criteria for granting any licence should be prospective, general and made available publicly.
2. SSRA must respond to applications for licences within a duration clearly specified in advance, and indicate whether the licence is *granted*.
3. Where approvals are not granted, the applicant must be allowed to make their case before the *Administrative Law Vertical* and any subsequent rejection should be accompanied with a statement of reasons.
4. Decisions following the hearing should be accompanied by a reasoned order (containing all the information relied upon to make the decision, including proceedings of the preceding hearing). All orders should open for appeal before the Education Tribunal.
5. If the application does not receive an initial response or a final decision within the timeline, the licence should be deemed granted/approved.

Inspections Inspections typically are of two types: ex-ante inspection to check compliance with rules, and ex-post inspection to ensure a specific order is enforced.

1. Criteria of evaluation and processes to be followed in inspections should be published. Inspections conducted should be based only on these criteria and processes. The institutions being inspected must have access to these process manuals.
2. Findings of inspections should be documented and a copy must be made available to the school/institution that was inspected and in the public domain.
3. All inspection proforma and reports must be tabled during any judicial scrutiny.

Investigation

1. Investigations should only be conducted by the *investigation team*.
2. Before the investigation team disrupts the functioning of any school/institution, it should demonstrate reasonable grounds for doing so before the *Administrative Law Vertical*.
3. If the *Administrative Law Vertical* is satisfied, it must grant permission for further investigation, and should stipulate time for the investigation to be complete.

Principles for Awarding Punishments: Quasi-judicial process In addition to framing rules and executing them, regulators are also given the power to award punishments to those who violate these rules. But according to the doctrine of separation of powers, the power to award punishments should rest with an independent judiciary.

In the case of a regulator that fuses all three powers into one agency, a combination of internal firewalls, external accountability, and strict procedures for passing orders are mandated. A few principles can be embedded in the SSRA's working to produce the effect of a neutral judiciary:

1. The *investigation* and *prosecution teams* must be distinct from each other.
2. If the *investigation team* is able to make a strong case to take action, it must convince the *prosecution team* through an internal discussion.
3. If the *prosecution team* is convinced that the case is worthy of being acted upon, it must notify the accused school/institution of the allegations along with facts from the investigation.

4. The school/institute should have a fair hearing and be allowed to defend itself before the *Administrative Law Vertical*.
5. Action should be taken only based on a written order from the *Administrative Law Vertical*. The order must be reasoned, and must reference the specific violation, facts uncovered during investigation, and rationale for the punishment awarded. Every such order must be placed in the public domain.
6. Every order issued by the SSRA should be open to challenge in the Education Tribunal.

Conclusions

Learning outcomes in India's schools are not only abysmal but stagnant or declining. Over the years, several reforms in increased funding, scalable interventions, rejigging of bureaucracies have been attempted. But none of them have led to any significant improvements on the metric.

The proposal of the draft NEP 2019 to establish an independent SSRA for K-12 is a promising reform because it precisely tackles the key impediments to improvement—conflicts of interest between service-delivery and regulation, absence of accountability, violation of natural justice, and unchecked discretionary power of officers.

Several regulators similar to the SSRA have been established in other sectors of India, and all have varying capacity to govern effectively (Burman and Zaveri 2016). This paper borrows from the lessons of all these domestic regulators, including best practices from other agencies worldwide, and tailors them for an SSRA of a typical state in India. Embedding these design elements in the SSRA may not guarantee a world-class regulator, but their absence will certainly guarantee a regulator that is ineffective and will compound the problems in the sector.

Bibliography

Burman, Anirudh, and Bhargavi Zaveri. 2016. "Regulatory responsiveness in India: A normative and empirical framework for assessment." *IGDIR.* http://www.igidr.ac.in/pdf/publication/WP-2016-025.pdf.

Pluchino, Alessandro, Cesare Garofalo, Andrea Rapisarda, Salvatore Spagano, and Maurizio Caserta. 2011. "Accidental politicians: How randomly selected legislators can improve parliament efficiency." *Physica A: Statistical Mechanics and Its Applications* 390 (21-22): 3944–3954.

Roy, Shubho, Ajay Shah, BN Srikrishna, Somasekhar Sundaresan, et al. 2018. "Building State capacity for regulation in India." *National Institute of Public Finance and Policy.* https://macrofinance.%20nipfp.%20org.%20in/PDF/RSSS%5C_%20building-state-capacity.pdf.