

## **The Bihar Rural Livelihoods Promotion Society (Terms of Reference for Internal Audit of DPCUs)**

### **1. Background**

BRLPS is an independent and autonomous institution registered under the Society Registration Act 1860. BRLPS has been set up by the Government of Bihar as part of its strategy to address rural poverty through enhancing the livelihoods of the poor. Bihar Rural Livelihoods Promotion Society (BRLPS) is implementing multiple projects funded by the World Bank, Government of Bihar, Govt. of India through Community Based Organizations (CBOs) and nurturing institution of the poor by supporting formation, strengthening and empowering self-managed community organizations and adopting demand responsive and participatory processes. BRLPS will also facilitate participation of poor through forming producer groups and companies for key commodities – farm, off farm and non-farm products and services.

### **2. Objectives of the Society**

The objectives of Society inter alia include:

- To contribute to the lives of rural poor across the state of Bihar through empowering and fostering strong self managed grassroots institutions and support investments by groups of poor.
- To promote microfinance institutions in order to deal with development of rural poor by way of providing financial assistance and obtaining commercial funding or by way of refinancing under the guidance of state level society with overall objective of developing microfinance sector in Bihar.
- To support village governance in becoming more responsive and effective in delivery of services and assisting rural poor especially the women.

### **3. Project/Schemes and its Components**

At present, the BRLPS is implementing central schemes namely NRLM, NRETP and its verticals funded by MoRD, state scheme namely BTDP(Bihar Transformative Development Project) supported by world bank and Satat Jeevikoparjan Yojana (SJY), covering more than 1.25 crores households through around 10,25,000 Self Help Groups (SHGs).

Besides the above, there are other schemes under Lohiya Swachch Bihar Abhiyan (LSBA) for which BRLPS has been designated as nodal agency since 2016. This project is implemented in all the 38-Districts of Bihar under active participation of DRDAs and District Project Co-ordination units of Jeevika (DPCUs). The main schemes under LSBA are –

- a) SBM-G - (Swachch Bharat Mission- Grameen),
- b) SBM-G-EBR - (Swachch Bharat Mission- Grameen-Extra Budgetary Resource)
- c) SBM-G-PIG-NARSS (Swachch Bharat Mission- Grameen-Performance based incentive grant-National Annual Rural Sanitation Survey)
- d) NNP / LIS – (Neer Nirmal Pariyojana),
- e) LSY – (Lohiya Swachta Yojana),

- f) GAP – (Ganga Action Plan),

#### **4. Implementation Arrangement**

The Bihar Rural Livelihoods Promotion Society under the administrative Control of Rural Development Department, Govt. of Bihar is led by its General Body, from which a more functional Executive Committee has been formed for taking all policy level decisions and advising the functionaries over the management of Bihar Rural Livelihoods Promotion Society. Representatives from the Government of Bihar, civil society, banks, and developmental institutions form the executive committee of the Society.

**State Level:** At the state level, the **State Project Management Unit (SPMU)** has been formed and staffed with a team of dedicated development professionals. The society is headed by **Chief Executive Officer**.

**District level:** The District Project Manager heads the DPCU with primary responsibility of Coordinating with their Blocks for effective implementation and convergence with ongoing Government Programme in the district.

**Block Level:** The Block Project Manager heads the BPIU and is responsible for implementing the projects / Schemes in concerned BPIU. BPIU will work very closely with the Community based organizations (CBOs).

At the community level the project will be implemented through the following community-based institutions:

- a) Self Help Groups
- b) Village Organizations (federation of a group of SHGs)
- c) Cluster Level Federation (federation of Village Organizations).
- d) Producers Groups / Producers' companies.

#### **5. Objectives of the Audit:**

The objectives of the internal audit are to enable the auditor to express a professional opinion on the effectiveness of the overall set in financial management and procurement arrangements. It has to be ensured that the overall financial management and arrangements including the system of internal controls as documented in the Project Financial Management Manual (FMM), Community Operations Manual (COM), Procurement Manual and the Project Implementation Plan (PIP) are in practice, effective and adequate. It is expected that the process of audit shall be in position to provide a report to the management on financial management aspects of the projects / schemes. It includes internal controls system, statutory compliances applicable to the society and compliance of financing agreements with World Bank.

In addition, it is expected that internal audit should play a role in assisting management to prevent misutilization of funds including the prevention, detection and investigation of fraud as part of "bringing a

systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.

## **6. Coverage and Standards for the Audit:**

The audit would cover all projects/program/activities implemented by the BRLPS in allotted units (DPCUs). All the DPCU auditors has to follow a uniform approach to the audit and reporting.

The auditor is also required to verify the IUFR / Project Financial Statements.

The internal audit should be carried out in accordance with the Auditing & Assurance Standards prescribed by the Institute of Chartered Accountants of India and will include such tests and controls, as the auditor considers necessary under the circumstances.

## **7. Scope**

It is expected from the auditor that hundred percent payment/adjustment vouchers must be verified and authenticated by the auditor. Specific areas of coverage of the audit will include the following:

### **A. DPCU Level:**

In conducting the audit, special attention should be given to assess whether adequate controls have been established and complied with, to ensure that:

- (a) All funds have been used in accordance with the conditions of relevant MoU/agreement with funding agencies, approved guidelines and only for the purposes for which the financing was provided;
- (b) All necessary supporting documents, records, and accounts have been kept in respect of all transactions including expenditures reported via Interim Unaudited Financial Reports (IUFRs) to ascertain that IUFR are as per books of records and submitted in prescribed format to SPMU by DPCU;
- (c) Assets are adequately safeguarded and used solely for their intended purposes;
- (d) Risk assessment report is to be prepared by the auditor in the quarterly report:
  - (i) Identifying what are the risks in the project.
  - (ii) Assessment of risk (High, Medium, Low).
  - (iii) Ensure that appropriate response / measures have been taken to all risks.
  - (iv) Informing the authority about the risks which are outside acceptable limits, usually those which are not to be tolerated or taken as potential risks.
- (f) An assessment of the adequacy of the project financial management systems, including internal controls. This would include aspects such as adequacy and effectiveness of accounting, financial and operational controls and is there any need for revision in established policies, plan and procedures, reliability of accounting systems, data and financial reports, methods of remedying weak controls or creating controls in areas where they are lacking including verification of assets and liabilities.
- (g) Efficiency and timeliness of the funds flow mechanism at the DPCUs and BPIUs and to the Community Institutions;
- (h) Whether the funds / tranche released to the Community Institutions are properly recommended by the BPIU and approved by the DPCU having the necessary authority and the conditions /

triggers for tranche release have been complied with and are in line with the related guidelines / office order.

- (i) Whether the DPCU is accounting for the fund release properly in the subsidiary records and monitoring the receipt of periodic reports and utilization certificates from the CBOs & systems to follow up on overdue reports are adequate. Quantify (number and amount) of the funds transferred to the Community Institutions for which the reports and/or UCs are overdue.
- (j) Whether the accounts of the project are compiled in a timely manner and the expenditures consolidated on periodical basis at the DPCU level and submitted to SPMU.
- (k) Goods, works and services have been procured in accordance with the World Bank / NRLM / Bihar Govt. procurement guidelines as specified in financial & procurement manual of the Society;
- (l) All necessary supporting documents, records, accounts of all the activities have been kept in respect of all projects and that clear synchronizations exists between accounting records, accounts books and the periodic financial reports (internal and external i.e. Interim Financial Reports)
- (m) Adequate records are maintained regarding the assets created and assets acquired by the unit, including details of cost, identification and location of assets and physical verification of assets acquired by the project and comment on its uses;
- (n) The auditor is expected to obtain sufficient documentary audit evidence to support their audit observation/ conclusions.
- (o) Inter project fund transfer is not desirable at DPCU level. However, in specific case approval from the competent authority must be obtained;
- (p) Bank reconciliations have been carried out on a monthly basis.
- (q) Internal auditors to summarize key issues and risks from a review of a sample of village audit reports and comment on actions taken by DPCU/BPIU.
- (r) Certify the Project financial statements on half yearly and annual basis for the unit audited. (Auditor will prepare financial statement on half yearly and annual basis.)
- (s) The auditor or his representative shall be required to certify the audited documents with date on all manual records and books of accounts. Any record not found to have the stamp shall be considered as not verified and shall be treated as deficiency in audit on the part of auditor.
- (t) District auditor will verify the documents / physical verification of fixed assets / stock at DPCUs /BPIUs level on quarterly basis and submit verification report forming part of audit report.
- (u) Auditor will verify the no. of CBOs to whom fund was transferred during the quarter with available records at DPCUs.
- (v) Auditor will certify IUFR on quarterly basis with signature on IUFR after verification of Tally data.
- (w) Auditor will verify CIF disbursement with entries in Tally/other accounting software if any.
- (x) Auditor will certify that no duplicate payment has been made in same CBOs for the same tranche.
- (y) Auditor will verify and certify the payments made to the beneficiaries / service providers / suppliers under LSBA with relevant documents available at DPCU/BPIU and also check the MIS entry for the same.
- (z) All advances needs to be settled as per their specified credit period in office order. Auditor should submit the breakup of advances on periodic basis i.e. on quarterly, half yearly and annually.
- (aa) Advances given to BPIU on imprest basis must be reconciled on quarterly basis with DPCU/BPIU books by the internal auditor. DPCU should collect all bills and vouchers from BPIU on fortnightly basis and settled the same as per approved guidelines.

- (bb) Auditor should also identify and report those advance and liabilities (if any) for which no proper supporting documents are available at DPCUs.
- (cc) Any other observations/issues relevant to the reporting unit should also be reported by auditor.

**B. BPIU Level :**

- a. The DPCU's Internal Auditors will provide a BPIU-wise brief summary, along with their (Internal Auditors') opinion/recommendations, over the observations / recommendations given by the VO – Auditors;
- b. Whether the manual books of accounts and other registers have been maintained on daily basis of all the project and the bill / voucher related to all expenditures have been submitted to DPCUs on fortnightly basis as per District Accounting Center guidelines;
- c. Goods, works and services have been procured in accordance with the World Bank / NRLM / Bihar Govt. procurement guidelines as specified in financial & procurement manual of the Society;
- d. All necessary supporting documents, records, accounts of all the activities have been kept in respect of all projects and that clear synchronizations exists between accounting records, accounts books;
- e. Adequate records are maintained regarding the assets created and assets acquired by the unit, including details of cost, identification and location of assets and physical verification of assets acquired by the project and comment on its uses; Auditor must also physically verify all fixed assets mentioned in fixed assets register and verify the stock from stock register.
- f. The auditor is expected to obtain sufficient documentary audit evidence to support their audit observation/ conclusions.
- g. Bank reconciliations have been carried out on a monthly basis.
- h. Advances received by BPIU on imprest basis must be reconciled on quarterly basis with DPCU/BPIU records by the internal auditor. BPIU should submit all bills and vouchers to DPCU on fortnightly basis and settled the same as per approved guidelines.
- i. Auditor should also identify and report those advance and liabilities (if any) for which no proper supporting documents are available at BPIUs.
- j. Any other observations/issues relevant to the reporting unit should also be reported by auditor.

**C Producer Company (PC) level**

The DPCU's Internal Auditors will perform Internal Audits, on Quarterly Basis to the Producer Companies (PCs) funded by BRLPS, if any, functioning in their allotted DPCU/s. The Internal Audit of PCs is to be done in accordance with the concerned provisions under The Companies Act – 2013 and the agreement/s/ Terms of grants with BRLPS whereby the funds from BRLPS were provided to the PC/s concerned. The Quarterly Internal Audit Reports has to be submitted separately to the Producer Company, DPCU/s concerned and SPMU – BRLPS. Main area of the audit includes the following-

- a. Verification of all statutory payments/returns made by the company and report any deviation from applicable act/laws
- b. Verification of books of account maintained in tally/manual with bills/vouchers and applicable act/laws of the company.
- c. Auditor should verify the compliances of secretarial practices e.g. notice of the meeting, agenda, quorum, proxy resolution, minutes, appointment/renewal/resignation/termination of statutory auditors and filing the required returns/report to MCA sites.

- d. Auditor should analyze the idle fund, advances, liabilities, physical progress of the company from the related guidelines and report the deviation, if any.
- e. Auditor should verify the all the procurements made by the company from their procurement guidelines/guideline issued by the funding agencies.
- f. Assets/stocks verification from fixed assets/stock register.
- g. Any other issues should also be verified and reported by auditor.
- h. The internal auditor should provide necessary support, suggestions for the compliance of above mentioned topics and ensure the implementation of the same

## **8. Data, services and facilities to be provided by the BRLPS**

- a. All the project documents, copies of agreement and relevant papers needed for audit will be provided by the BRLPS. The auditor would be given access to all documents, correspondence and any other information relating to the Projects which is deemed necessary by the auditor for carrying out the audit.
- b. The auditor will be provided copies of the Project Implementation Plan, Community Operations Manual, Financial Management Manuals, Procurement Manual, guidelines, policies, office order etc. issued by Society.
- c. One day's workshop will be organized by the BRLPS for giving details of projects and it should be attended by all the members of audit team.
- d. BRLPS will extend active support of officials at SPMU/DPCU/BPIU levels.

## **9. Period, Timing and coverage of Internal Audit**

The Internal Audit of DPCU will be for the period from 1<sup>st</sup> April 2022 to March 31, 2023 and will be carried out on a quarterly basis. The contract may be renewed after assessing the project's needs and performance of the auditors for further year/s on same terms & conditions.

The auditor should become familiar with the Project and with the relevant policies and guidelines of the World Bank and other funding agencies (including those relating to disbursements, procurement and financial management and reporting).

## **10. Reporting**

**10.1 Quarterly Reporting & Annual Reporting:** The Auditors will provide a quarterly report for the units audited (a summary of the key findings, implications and recommendations of each Block must be prepared and to be shared with the District Project Manager so as to enable the Project Management to take timely action). The report should be discussed with the auditee units and should be structured in a manner giving the observations, the implications of the observations and suggest recommendations to the management for necessary action. The audit observations should be supported by instances and quantified as far as practicable. Besides quarterly audit report, annual report will also be submitted by the auditor. Discussion notes duly signed by the both parties will be part of audit Report.

The audit reports (in hard and soft copy) should be submitted within stipulated time as mentioned in general clause of TOR. A penalty of 0.5 % per week or part thereof shall be deducted from the bill of

audit fee. Any delay beyond 5 weeks for any quarterly report / annual report shall be treated as unsatisfactory performance by the auditor and may attract the termination of the contract without any financial liability of the Society. The reports will be submitted as under –

- Executive Summary to the Chief Executive Officer.
- The individual project wise audit reports to each of the auditee units along with a copy of the same to SPMU and SPMU internal Auditor.

The internal auditor should highlight the critical issues in executive summary which requires the attention of CEO, BRLPS and status of action on previous recommendation.

**The** BRLPS has implemented e-audit modules to review the audit observations and status of the compliances made by the units. The internal auditors will upload the soft copy of internal audit reports duly signed by the auditors in PDF format and also report their major audit observations as specified in e-audit module. Concerned unit will upload their reply in e-module which will be duly checked by concerned SFM and forwarded the same to the auditor.

Based on satisfactory compliance, Auditor will drop the audit para and in case of unsatisfactory compliance the same may be forwarded to CFO. The time line for above compliances are as below

Sl.No.	Particulars	Time line
1	Uploading the audit report/observations by the auditor	On or before due date for submission of audit report
2	Audit compliances by the district unit	Within 10 working days from the date of submission of audit report
3	Checking of compliance by SFM	Within 5 working days from the date of submission of audit compliance by the district.
4	Acceptance/rejection of audit compliance by the auditor	Within 6 working days from the date of forwarding the audit compliance by the SFM to the auditor

For this purpose, login ID/password will be provided to the auditor by the BRLPS. Auditor should change their password after first login. Date of submission of audit report will be uploading the audit report/Submission of major audit observations in e-audit module or submission of hard copy of report which-ever is latter.

10.2 Format of the Audit Report: The Audit Report will, inter alia, have the following sections -

- Executive Summary;
- Serious observation;
- The status of implementation of the schemes / project;
- The status of compliance of the previous audit reports;
- Any other issues/recommendations/suggestions for improvements.

10.3 **Procedure of conducting audit at DPCU**

1. The auditor should provide detailed work plan for conducting audit to DPCU, Contract Manager and CFO before one week from commencement of audit.
2. The audit questionnaire and audit work sheet shall be signed by the audit team member and officials of DPCU.
3. The auditor shall interact with the DPCU/BPIU team on the audit observations and the same will be signed by the both party. This discussion note will be part of the audit report.
4. After completion of DPCU audit, the auditor will submit the report to SPMU auditor for consolidation of serious observation made therein.
5. The detail approach and methodology should be provided by the auditor themselves in the RFP.

#### 11. Composition of review committee and review procedure to monitor internal audit work

The proposed assignment will be reviewed and monitored by a review committee constituted by BRLPS. This committee will be constituted to interact with the Auditor, review and monitor the progress of the assignment on a quarterly basis and take further remedial measures on the discrepancies pointed out in internal audit.

#### 12. KEY PERSONNEL

The list of key personnel, whose CVs and experiences would be evaluated, is as follows:

Sl. No.	Key Professionals	Expertise of the consultant and Description of Services to be provided	Experience	No. of persons
1	Partner/Audit Team Leader	Overall coordination, & planning, team leadership, reporting, liaison with client .Responsibility to lead the audit teams in the field, planning and execution of the audits, discussion with heads of offices.	Qualified Chartered Accountants with at least 5 years experience as audit team leader in internal / concurrent audit of Govt. Organization/PSUs/externally aided project with ability to lead the team and interact with senior level govt. officials	2
2	Team member	Vouching verification of books of records, statutory compliances as per guidelines/office order and applicable statutory provisions to the society.	CA (Inter) with 2 yrs.experience in internal audit in similar type organization and well versed with vouching, verification, statutory compliances, physical verification of	8



			inventory/assets, skill of report writing etc.	
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Two internal audit teams will be formed for the audit of the DPCU/BPIU. One Internal Audit team consisting one team leader and four team member will be deputed for the audit in each DPCU. The minimum man days of the team leader in each DPCU unit will be at least 5 man days and for team member will be at least 8 man days for each DPCU in each quarter.

Above minimum man days are for DPCU audit only. Besides this, one team member-day per quarter for each BPIU is required. The auditor will have to ensure minimum man days for audit of DPCUs including BPIUs. Auditor will submit the CV of team leader and Team member with one coloured photo, educational qualification and experience certificate along with RFP.

### 13. General

1. Time lines of the conducting of the audit will be as follows:

Quarter	Period of Audit	Time line for District Auditors
1 <sup>st</sup>	1 <sup>st</sup> April 2022 to 30 <sup>th</sup> June 2022	15 <sup>th</sup> July 2022
2 <sup>nd</sup>	1 <sup>st</sup> July 2022 to 30 <sup>th</sup> Sep 2022	15 <sup>th</sup> October 2022
3 <sup>rd</sup>	1 <sup>st</sup> Oct 2022 to 31 <sup>st</sup> Dec 2022	15 <sup>th</sup> January 2023
4 <sup>th</sup> and Annual Report	1 <sup>st</sup> Jan 2023 to 31 <sup>st</sup> Mar 2023	30 <sup>th</sup> April 2023

- 1 Final report of the audit will be submitted as per the timelines indicated above.

2. Before start of the audit, the internal auditor will issue Identity Card to every member of the Audit team who have been proposed by the Auditors in the RFP. Any change in audit team due to unavoidable circumstances can only be done by the internal auditor after seeking prior 'no objection from the BRLPS'. The replaced member should be of similar or higher qualification and experience. Any change in team without no objection from BRLPS will not be eligible for the audit.
3. Audit report format will be provided by SPMU auditor to DPCU auditor for proper consolidation and compilation of audit at SPMU level.

## **Format of Audit Report**

### **Part A: Executive Summary including Suggestions/Recommendations**

Provide an Executive Summary of the observations in Part A along with suggestions/recommendations. Only those observations that are very serious in nature and require immediate attention of the management should be reported in this section. Auditor should provide specific recommendations on referred issues.

### **Part B: Observations related to procedural lapses and weaknesses**

In this part, give details of audit observations such as ineligible expenses, major lapses in internal controls, systemic weaknesses, procurement procedures etc.

1. Auditor should point out the issues that are not serious in nature, but nonetheless require the attention of the management should be detailed in this part.
2. Persisting Irregularities: Under this Para, Auditor should report the persisting irregularities which have been raised earlier but not complied.
3. Books of Account: Under this, Auditor should verify all the books of account maintained by the unit, identify the discrepancies in the books of accounts and also suggest their improvement.
4. Internal Control System: Under this Para, auditor should report on discrepancies of current internal control system and suggest remedial measures.
5. Compliance with FM Manual / devolution of power
6. Procurement Procedures: Under this paragraph auditor should report on procurement process which deviates from applicable procurement guidelines. Besides above, auditor will physically verify the fixed assets on quarterly basis and submit the verification report in separate annexure.
7. CIF Disbursement–recommendation from LCM, verification of CIF disbursement, Utilization certificate received or not. , CIF guidelines and triggers for release of CIF followed or not, MIS entries of CBOs profile, observation of CBOs auditor,
8. Computerized financial Management system (Tally)
  - a) Data entries in tally/accounting software are up to date or not

- b) Payroll accounting in tally or not
  - c) Verification of group, sub – group, head, sub head and ledger in tally and make suggestions on proper classification of accounts, if any.
  - d) Maintenance of Cost Centre in Tally
  - e) Chart of accounts and upload of approved quarterly budget in tally
  - f) Verify the computerized balance with Manual Books of accounts (cash Books, Cheque register etc)
9. Advance to staff and others and its periodicity
  10. Discrepancies in statutory deduction/ payments/return like TDS, GST, EPF , Professional Tax etc.
  11. Employee benefit in the light of HR manual and relevant office order.
  12. Verify and certify the IUFRR from available books of records
    13. Auditor should verify the payments to the beneficiaries under LSBA through DBT ( Direct Benefit Transfer) from the available records at DPCU/BPIU
  14. Auditor should check the procedure of procurement of goods / services as laid down under LSBA.
    15. Any other matter which auditor deemed fit for notice to the management.
  16. Suggestion with specific case for improvement

**SUGGESTIVE QUESTIONNAIRE FOR DPCU (GIVE SHORT DETAILS OF DIVERGENCE):**

1. Whether Office has maintained proper records showing full particulars including quantitative details and status of Fixed Assets?
2. Whether all assets including current assets like inventories has been physically verified during the quarter?
3. Whether the loans and advances are being repaid / adjusted in a timely manner?
4. Whether loan and advance register updated or not?
5. Whether the manual cash book is properly maintained and whether it conforms to computerized system of accounting?
6. Whether Physical cash balance is as per cash book balance as on the date of audit or not?
7. Whether expenditure has been made as per the devolution of power or not? Details of any divergence should be mentioned.
8. Whether monthly bank reconciliation statement have been prepared or not?
9. Whether Limits register for zero balance child account have been maintained or not and the same will be reconciled with limit available in Zero balance child account at bank level
11. Whether the advance given by DPCU has been reconciled with the books of BPIUs or not?
12. Whether the office is depositing TDS – GST/IT, Professional Tax and EPF regularly and within time or not?
13. Whether log book of Generator hiring and Vehicle hiring has been properly maintained or not?

14. Whether stock register is maintained and up to date?
15. Whether all vouchers have been verified and duly stamp by the auditor or not? Provide total number of vouchers, and aggregate amount involved during reporting period,
16. Whether payments to beneficiaries is made after fulfilling the requisite guidelines of LSBA or not? If not please give the details of such cases.
17. Whether any case is reported for double payment for the same tranche to the beneficiary or not? If yes, the same has been recovered or not?

**List of District Units**

<u>Sl. No.</u>	<u>Names of DPCU</u>	<u>No. of Blocks</u>
Assignment-1	Motihari & Shivhar	32
Assignment-2	Gaya & Arwal	29
Assignment-3	Patna & Sheikhpura	29
Assignment-4	Madhubani & Saharsa	31
Assignment-5	Nalanda & Munger	29
Assignment-6	Samastipur & Jamui	30
Assignment-7	Saran & Jahanabad	27
Assignment-8	Rohtas & Aurangabad	30
Assignment-9	Darbhanga & Madhepura	31
Assignment-10	Siwan & Lakhisarai	26
Assignment-11	Bettiah & Gopalganj	32
Assignment-12	Begusarai & Khagaria	25
Assignment-13	Sitamarhi & Kishanganj	24
Assignment-14	Muzaffarpur & Buxar	27
Assignment-15	Bhagalpur & Banka	27
Assignment-16	Katihar & Araria	25
Assignment-17	Vaishali & Bhojpur	30
Assignment-18	Purnea & Supaul	25
Assignment-19	Nawada & Kaimur	25
Assignment-20	SPMU	-