

Annexure-7.62

Minutes of the Sub-Committee of SLBC, Kerala on Education Loan Issues held on 10.04.2012 at Canara Bank, Circle Office, Trivandrum

The meeting commenced at 3 p.m with Sri. G. J. Raju, Deputy General Manager, RBI, Sri. C. G. Nair, Deputy General Manager, Canara Bank (for Convenor, SLBC Kerala), Executives/Officials from RBI, Major Banks and LDMs in place. List of participants is annexed. The Sub-committee examined the agenda items provided to SLBC in seriatim.

I. Issues suggested by Planning & Economic Affairs Department, Government of Kerala

1. Nursing students are denied loans stating that they may not have adequate repaying capacity.

The meeting observed that there was no issue with regard to admissions sought under IBA model scheme. However, the quantum of loan sanctioned for B.Sc. (Nursing) under Management Quota was not uniform. It varied from bank to bank. SLBC in its 105th meeting had drawn out a broad guideline to have uniformity of loans sanctioned under Management Quota in the State of Kerala. The Sub-Committee observed that the salary structure of nurses in the State was not sufficient to service the loans availed. It hence recommended fixing a maximum cap of Rs.2.50 lakhs for B.Sc. (Nursing) under Management Quota.

2. Students qualified in humanities groups securing admission for General Nursing are denied educational loans, though G.O.(Rt) No.384/10/H&FWD dated 24/06.10 states that those qualified in humanities are also eligible to get admission to General Nursing.

SLBC has already clarified the matter in its meeting that for GNM courses the eligibility is plus two without insisting on science subject. (Please see Page No: 59 of Agenda & background notes for 106th SLBC)

3. Banks prescribe their own qualifying marks for each course though Indian Banks Association guidelines do not stipulate any mark restriction.

IBA had not stipulated any minimum marks for admissions under its model scheme and the only condition stipulated was that admissions should be through merit cum selection process. However, it had indicated that admissions under Management Quota are outside the purview of IBA Model Scheme and banks were free to stipulate the minimum marks. However, SLBC in its earlier meeting had stipulated minimum of 50% marks for Education loans under Management Quota subject to approval of their respective boards. The Sub-committee observed that the said recommendation of the SLBC is yet to be approved by many of the bank Boards. Hence, requested all member banks to ensure that the uniform guidelines for Management Quota recommended by SLBC be got approved at the earliest.

4. Full amount of loan is not sanctioned.

It is observed that some of the private colleges are projecting highly inflated fee structure which is having wide variation in comparison with the fee structure of most colleges for the same course. IBA had already clarified that a practical approach in such cases would be to consider approved fee structure for merit quota seats in all colleges/institutions provided banks are satisfied about repayment prospects on employment.

Hence banks would be considering Government/ regulatory body approved fee structure for merit seats for granting Education loans for all type of loans.

5. Subsequent installments of education loans are not sanctioned stating that the interest for the first installment has not been repaid.

At present for the loans disbursed after 01.04.2009 Government of India is extending interest subsidy and hence this question does not arise at all. Even otherwise the IBA guideline on servicing of interest reads as follows:

“Servicing of interest during study period and the moratorium period till commencement of repayment is optional for students. Accrued interest will be added to the principal amount borrowed for fixing EMI for repayment”. Repayment of interest being an option given to the students, banks shall not demand interest during the moratorium period.

All banks are sensitized on the matter & the same was reiterated in the Agenda & background notes of 106th meeting (Page No:60)

6. Undue delay in sanctioning education loan.

As per IBA guidelines sanction/rejection shall be communicated within 15 days of receipt of duly completed application with supporting documents and rejection shall be done only with the concurrence of Controlling Offices of banks. Controlling Offices of banks are requested to reiterate the time norms stipulated by RBI/IBA on the matter for information of their branches.

7. Different banks charge different rates of interest ranging from 11% to 17%.

RBI had already deregulated interest rates and each bank is permitted to fix rate of interest according to the structure of their assets and liabilities. Hence this falls outside the purview of SLBC. However if the State Government desires so, the matter shall be taken up directly with central Government requesting to implement uniform rate of interest for education loans.

8. Though surety and security are exempted for loans up to Rs. 4 lakhs, many banks demand surety and property deeds for granting educational loans.

As per IBA guidelines no security should be insisted for loans up to Rs. 4 lakhs and banks in the state are following the same in letter and spirit. It was requested that instead of generalised comments, specific cases if any may be brought to SLBC. However, the above stipulation applies only to merit admissions as per IBA scheme. For management quota admissions the same is not applicable and banks are free to stipulate their own board approved conditions/ collateral security.

9. As Service area has been fixed, loan has to be availed only from a particular bank. Therefore, people do not have the option to choose a bank that charges less interest.

The fixation of service area for granting Education loans had helped in bringing down the complaints under the scheme drastically. This ensured equitable participation of banks in lending process thereby helping to avoid bunching of loan applications in certain bank branches. This helped in speedy disposal of loan applications.

Now every bank/customer is clear on the service area concept and to whom they shall approach for education loan. Hence, the existing arrangement shall continue.

10. Introduction of compulsory insurance scheme covering all loanees.

The Sub-committee welcomed the proposal and suggested that if the Government could bear the premia it would benefit the student community. The committee recommended that government of Kerala may make a proposal to GoI / IBA.

11. Proper Orientation to the parents and as the students to get information about the prospect of the courses as well as the liabilities if once loan has been availed.

The Sub-committee observed that SLBC had already prepared a poster on Education Loan scheme explaining the salient features and the same is displayed in all the bank branches in the state. Further, for this year also it is planned to prepare similar brochures highlighting salient features of the scheme for creating awareness among the public. It was also pointed out that dissemination of course prospects and other details does not come within the purview of the banking sector.

SLBC may propose to hold a joint publicity with Government of Kerala on the salient features of the scheme through Public Relations Department in all the leading dailies to create awareness among the public.

II. Educational loan under ‘Management Quota’ - Agenda by LDM, Kasaragod

The 105th meeting after thorough deliberations evolved a scheme for granting Educational loans under Management Quota in the State. The said Meeting adopted a scheme for uniform implementation by the banks in the State.

We understand that the branches of Canara Bank have now received guidelines from their Head Office that bank should restrict loans under Management Quota to 10% of the total Educational Loan sanctioned, which does not appear in the SLBC approved guidelines circulated to all the banks by SLBC, Trivandrum.

It may kindly be noted that in the wake of the ‘Service Area’ norms being implemented in the District for Educational Loans, this stipulation will give rise of many complaints from applicants who are otherwise eligible for loans as per the SLBC approved guidelines on Educational Loans under Management Quota.

It was informed in the meeting that the above matter had been referred to the Head Office of Canara Bank for suitable action.

III. Agenda suggested by LDM, Ernakulam

1. Inordinate delay on the part of banks in sanction of loans.
 - a. ICICI Bank : Kothamangalam, Thrippunithura branches (Aswini Vijayan B. Sc Nursing, applied in Agust 2011, Jithin Sreeram, Govt. Engineering Collge, Thrikkakara – 3 months, Suresh, PG IN fashion Technology, NIT, Mumbai applied on 05.11.2011)
 - b. Dhanlaxmi Bank : Thrikkariyoor, Kuzhuppilly, Cheranallur
 - (i) After 6-8 months also loans are not sanctioned
 - (ii) Sanctioned amount far below than required

As per IBA guidelines sanction/rejection shall be communicated within 15 days of receipt of duly completed application with supporting documents and rejection shall be done only with the concurrence of Controlling Offices of banks. Controlling Offices of banks are requested to reiterate the time norms stipulated by RBI/IBA on the matter for information of their branches.

Regarding individual banks issues, the matter has to be sorted out by LDM, Ernakulam with the respective banks in the district level redressal committee.

2. Even loan under merit quota are denied by banks stating the admission is not under merit
 - a. Sheeja, M.Sc. Micro Biology, St. Xavier's College , Aluva – South Indian Bank, Kalamassery
 - b. Sesil Mariya Varghese, M.B.B.S, Amala Medical College, Trichur - Federal Bank, Kalady
 - c. Suraj Kumar, B.Tech, MES College, Kunnukara by HDFC Bank, Palluruthy
 - d. Muhammed Al Mansoor, B.Sc Interior Design Course, Christ College, Irinjalakuda – Punjab National Bank, Aluva

Regarding individual banks issues, the matter has to be sorted out by LDM, Ernakulam with the respective banks in the district level redressal committee.

It was informed by SLBC Cell that though HDFC bank was invited for the meeting there was no representation from that bank.

3. Upper cap fixed by certain banks on loan amount
 - a. SBT has fixed upper cap of Rs.2.50 lakh for nursing

The issue may be resolved as per the decision mentioned in item (I) 1.

4. Security/ guarantee demanded for all loans under non-merit eg:- Syndicate Bank

SLBC has recommended a uniform model scheme for Education loans under Management Quota wherein this issue has been addressed. Banks to adopt the model scheme proposed.

5. Minimum mark stipulation in certain banks

Eg:- Canara Bank require 60% marks under non-merit/management quota.

It was informed in the meeting that the above matter had been taken up with the Head Office of Canara Bank for suitable action.

6. Some banks are sanctioning education loans for off-campus / distant education. Banks which are sticking on the instructions of SLBC are blamed for non-sanction in such cases.

The Sub-committee opined that such courses are not eligible as per the IBI guidelines. Banks to abide by the IBA guidelines.

7. Loan to persons who do not have own residence
 - a. Banks are reluctant to sanction education loan.
 - i. CSB, Thrippunithura
 - b. Documents submitted to comply KYC norms, not appears to be genuine.
 - c. One person has filed a case against Federal Bank, Varapuzha

The Sub-committee clarified that banks may adopt the place of present domicile as a criteria to decide on the loans to be availed by persons do not have own residence. Individual cases are to be taken up with the Controlling Office of respective banks.

8. The number of representations seeking waiver / relief on interest etc are increasing day by day. Some organizations are propagating messages dissuading repayment.

The matter has already been brought to the notice of the Government of Kerala by SLBC.

IV. Agenda suggested by Canara Bank

1. There is no specific guideline differentiating Merit admissions and Management admissions. Is the mode of admission to be decided based on the fee structure being charged by the college. There are many instances where the student secures admission directly to the college based on the screening/ assessment test conducted by the college independently. How are these loans to be classified?

The Sub-committee suggested implementing the provisions in the model management quota scheme proposal of SLBC, adopted in its 105th meeting for common implementation by all banks. The scheme clearly specifies on how to differentiate between merit and management quota.

2. List of courses eligible for EL may be circulated by SLBC to have uniformity.

Indicative list would be circulated by SLBC.

3. No eligible fee structure has been circulated by SLBC for admissions to various courses under MERIT / MANAGEMENT quota in Kerala and other states as a result of which the amount being financed by banks differ.

SLBC Cell would collect the fee structure and circulate the same after consolidation.

4. Uniform interest rate may be fixed for EL.

The Sub-committee had already indicated that adoption of a uniform rate of interest was not possible in view of the deregulation of interest rates by RBI.

5. As per the latest circular, no subsidy is eligible for admissions secured under management quota. The guideline is not clear about the sanctions/ disbursements made during the previous years 2009-10, 10-11 and 11-12 if those disbursements are eligible for EL subsidy. Branches have already claimed subsidy for EL-Management quota for the years 2009-10 and 2010-11. Subsidy for 2011-12 is pending to be claimed.

The Sub-committee suggested referring the matter to IBA for clarification.

6. In most of the cases loans are restricted to Rs 4 lacs to avoid providing security. There are instances where the total course fee is Rs 10 lacs, however the loan amount applied for is only Rs 4 lacs leaving the margin as Rs 6 lacs. There is no verifiable source of income for the parent to meet the margin requirement annually. In such cases, the proposals are unviable.

The Sub-committee felt that the subject instance is a credit decision to be undertaken by the respective banks.

7. It is seen that in the admission letters issued by colleges, they specify that they will not undertake any responsibility in recovery / tracking the students. Colleges should provide an undertaking to furnish the placement / employment details and also make a provision for noting the loan details in the degree certificate issued by them.

The Sub-committee noted that the suggestion is not implementable.

8. Undue influence by outside agencies and even threats of assault are being faced by the branch managers in many of the sensitive districts like Palakkad and Wyanad. This matter is to be taken up for discussion by SLBC in the forum where Govt officials participate. The working of branches should not be disrupted by such undue threats / agitations.

The matter had already been brought to the notice of Hon'ble Chief Minister of Kerala during the special meeting of SLBC, Kerala to discuss on farmers issues in Wayanad District held on 23.11.2011 at Trivandrum.

V. Agenda suggested by Federal Bank

1. In a recent judgement of the Hon'ble High Court of Kerala in Vasanthakumari vs. SBT (2012 KLT (i) 755) in WP (C) No. 270/2012, while considering a question raised as to whether loan should have been granted by the bank without surety ship of parent in terms of Model Educational Loan Scheme approved by RBI, the High Court has held that as per the Model Educational Loan Scheme approved by RBI, surety cannot be insisted for loan up to Rs.4 lakhs. According to the Court order, parent should not have been asked to sign any loan agreement and that the loan agreement obtained from the parent is illegal. As per the IBA Model Educational Loan Scheme, for loan up to Rs.4 lakhs, parents are to be joint borrowers for the loan and no other security is to be insisted. Hence it is to be clarified whether we can insist that the loan documents be executed by both the student and the parent /guardian as joint borrower as per IBA Scheme in the light of the High Court order.

The Bank may clarify the matter properly according to the provisions of the IBA Model Education Loan Scheme.

2. In the new Management Quota Scheme proposed by SLBC, Kerala, security norms stipulated are as follows:-
 - (i) For Loans up to Rs.2.50 lakhs – No security
 - (ii) For Loans between Rs.2.5 lakhs to Rs.4 lakhs – Third party guarantee having net worth to cover the loan amount.
 - (iii) For Loans above Rs.4 lakhs – EM of landed property with suitable Value

Uniform guidelines for selecting Third party guarantors & security margin norms to be decided by SLBC so as to reduce customer complaints on account of each Bank stipulating various security margin norms and eligibility criteria for guarantors.

The Sub-committee suggested that SLBC proposals are only recommendatory in nature and the same are to be approved by the respective Boards of banks. Hence to have uniformity amongst banks for implementation of Education loans for Management Quota the above proposal was placed.

3. Clarification from SLBC, Kerala that “admission to ‘Nursing courses’ have to be considered as meritorious subject to the condition that the fee considered for assessment of loan was the fee stipulated by the regulatory authority concerned for merit seats in the respective colleges/institutions” needs to be discussed –

Such an elucidation was issued by SLBC quoting a clarification given by IBA to State Bank of Mysore- “Management quota is kept outside the purview of IBA Model Scheme except for nursing courses where the fees are restrictive (as decided by respective State Governments/regulatory authority).”

In our opinion, such a special treatment to ‘nursing students obtaining admission under Management Quota’ will raise complaints from students pursuing various other professional courses such as Engineering, Medicine etc especially from those who have got higher percentage of marks in the qualifying examination than the nursing students.

This point is already clarified under IBA Model Education Loan Scheme guidelines.

4. Please inform us whether we have to adopt service area norms while sanctioning loans under the new management Quota Scheme as the same is not coming under IBA Scheme.

In the State of Kerala as per SLBC decision, Education loans should be considered as per service area norms.

5. Institutions which do not have AICTE approval/ other regulatory body approval for the current academic year – We are receiving lot of requests from students who got admission to Institutions which do not have AICTE approval/ other regulatory Body approval for the academic year in which they have been selected.

We would like to know the stand to be taken in such cases. This is to be viewed especially in the background of AICTE/other regulatory bodies not renewing approval of many of the colleges stating poor infrastructure, facilities etc.

This matter is clarified in FAQs of IBA.

VI. Agenda suggested by Catholic Syrian Bank

1. Maximum amount of tuition fee that can be considered for sanction under management quota for various courses to be given. Various colleges are quoting different amount as tuition fee. Whether we are bound to sanction the full amount quoted by the concerned colleges?

The Sub-committee suggested that Government approved fee may be taken for all courses.

2. Students securing less than 50% marks in the qualifying examination and for qualifying subjects- How to treat them?

The Sub-committee suggested that individual banks may take a view in this regard.

3. Political interference for deviation from IBA/SLBC model scheme

The Sub-committee suggested that the matter may be dealt with appropriately as it is a credit decision.

4. Applicants residing outside the service area of a bank

The Sub-committee suggested that individual banks may take appropriate decision in this regard. However, SLBC had suggested following service area norms for sanctioning Education loans.

VII. Agenda suggested by LDM, Thrissur

1. The Educational Loan scheme has become a sensitive segment of Lending as far as Kerala is concerned due to various reasons. One of the main reasons is lack of information to the Students/Parents/Educational Institutions and Public Leaders. This obviously led the concerned to disbelieve genuine terms and stipulations of the Bank as 'Superfluous and Manager made'. Unless this aspect is addressed, whatever sincerity the Bankers give to the scheme may result futile and the situation continue with undue expectations and pressure on the Branches.

The subcommittee hence may think of a Joint Publicity by Bankers and the State Government in Print Media as well as the Website of the SLBC and the Government. Besides, detailed Brochures on the scheme covering the repayment expectation for an illustrative lending situation may be prepared in Malayalam for counter service at the Branches for the intending Public. It is our opinion that it may go a long way in properly understanding the scheme by the public themselves and thus they will not be carried away by anybody else including the 'Brokers' in the field. A page on checklist of papers required for processing Educational Loan, in such Brochures will take care of the SLBC suggestion on this.

The Sub-committee suggested that the matter be brought to notice of Government of Kerala. However, it was proposed that a joint publicity on cost sharing basis by State Government & SLBC on the salient features of the scheme be given in the leading dailies through Public Relations Department to create awareness among the public regarding the norms of Education loans.

The Sub-committee suggested that Brochures on Education Loan Scheme have to be displayed at the premises of Panchayat/Village offices also.

2. In certain medical and para medical courses, the students are required to execute "bonds" on service conditions. Obviously the remuneration during the bond service as we know will be definitely not to the extent of repayment commitment on the Loan. This lean period has to be obviously excluded from the repayment period, treating this service period also as moratorium. The subcommittee may please deliberate upon this point.

The Sub-committee rejected the suggestion.

3. There are extant instructions on time norms and its strict adherence by Branches/sanctioning authorities. Some Banks have the remote sanctioning Authorities located outside the District/State. Obviously the decision making is at stake taking shelter that the grass root level branches are not the authorities and even such branches do not even care at times to assess the fate of the proposal from the authorities concerned. This leaves the anxiety driven parent/student to drag the issue to the notice of People's Representatives. There exists good number of Complaints on long silence by the Branches as well as the sanctioning Authority and the controlling office.

The subcommittee may discuss as to how best the compliance of time norms can be ensured and the aforesaid problems solved.

The Sub-committee suggested that the concerned banks have to adhere to the time norms for sanctioning Education Loans. LDM may monitor this aspect.

4. By virtue of limiting the tuition Fees to that of government approved ones, the IBA has stated that nursing courses can be taken in its scheme. Besides the 105th SLBC has clarified that admission to Nursing courses can be treated as under “merit”. Branches may be suitably instructed by their controlling Offices based on the guidelines to avoid stipulation of terms and conditions applicable for loans under management Quota.

The Sub-committee suggested that clarification in this regard is already in force and that banks have to circulate the same and confirm to SLBC.

5. By and large the Bankers do not come out with problems in recovery of Educational Loans except in forums like SLBC/DLBC and certain in house review meets. With good number of clean NPAs under EL segment only the Revenue Recovery process can bring in not only recovery but attitudinal change in other similar borrowers. But for resultant reluctance on sanctioning ELs, the problems are not brought to the notice of the government. Cases of long pending RR with a stake of over Rs 5 Lakhs should be brought for discussion in the Dist Level RR meetings by the Lead Bank and the concerned Bank.

The subcommittee may discuss the ways and means on this strategy of improving Recovery with the involvement of the government. Similarly the subcommittee may review the overdue/NPA position and apprise the government on the situation periodically.

The Sub-committee suggested that Recovery on Education Loans shall be taken as one of the agenda items in DLRC meetings of the respective districts. LDMs may collect the data – Demand, Collection and Overdues, NPA under Education Loans and place it in the DLRC meetings of districts for review. SLBC may undertake a review on recovery in Education loans and place the same in the SLBC meetings for the information of the members. It was also suggested that Revenue Department may evolve a mechanism to review Education loans above Rs. 5 lakhs for focused attention.

6. There exists a mechanism of complaints redressal at the District Level named “Help Desk”. Good number of complaints that could have been solved at the Bank level itself, are brought to the Help Desk. This result increasing the number of complaints and consequent negative impression on Bankers at least by the hands through which such complaints pass, including the District Collector.

A route for complaining may be drawn involving, branches, sanctioning authorities and Controlling Offices, before the cases are referred to the Help Desk.

The Sub-committee suggested that existing system be continued.

7. The Educational Loan Scheme has completed a “decade” since its launch by the govt. of India. Considering the special treatment given in Kerala by Bankers/Students/Parents/Administrators and Public Leaders, it is high time a monitoring study is conducted by an independent Agency immune to the influence of any interested segment.

The subcommittee may please deliberate upon this aspect, come out with the Terms of reference for the study.

The Sub-committee noted that in the 104th meeting of SLBC a decision was taken to undertake a study on Education loan scheme being implemented in the State by involving an external agency. The terms of reference were spelt out therein.

The Sub-committee suggested that the same may be undertaken on a pilot basis in one of the blocks through an external agency.

The meeting concluded with **Sri. Anil Kumar P**, Assistant General Manager, Canara Bank, proposing the vote of thanks.

Participants

1. Sri. G. J. Raju, Deputy General Manager, Reserve Bank of India
2. Sri. C. G. Nair, Deputy General Manager, Canara Bank
3. Sri. P. Manikandan, Deputy General Manager, Dhanlaxmi Bank
4. Sri. V. Raveendran, Assistant General Manager, Reserve Bank of India
5. Sri. N. S. Ramakrishnan, Assistant General Manager, State Bank of India
6. Sri. P. H. Maheswarulu, Assistant General Manager, State Bank of India
7. Sri. Anil Kumar P, Assistant General Manager, Canara Bank
8. Sri. K. Narayana Pillai, Assistant General Manager, State Bank of Travancore
9. Sri. Titus Mathew, Assistant General Manager, Corporation Bank
10. Sri. B. Unnikrishnan, Chief General Manager, Kerala State Co-operative Bank
11. Sri. R. Gireeskumar, Divisional Manager, Canara Bank
12. Sri. P. L. Antony, Deputy Zonal Manager, Catholic Syrian Bank
13. Sri. Sreekumar Menon, Chief Manager, Bank of India
14. Sri. Y. Srinivasulu, Chief Manager, Vijaya Bank
15. Sri. Mukundan T, Chief Manager, NMGB
16. Sri. Jose Thomas, Chief Manager, South Indian Bank
17. Smt. V. Geetha, Chief Manager, Federal Bank
18. Sri. V. R. Muralidhar, LDM, Indian Overseas Bank, Trivandrum
19. Sri. C. R. Gopi Krishnan, LDM, Indian Bank, Kollam
20. Sri. Radhakrishnan Nampoothiri P., LDM, State Bank of Travancore, Pathanamthitta
21. Sri. K. R. Vaidyanathan, LDM, State Bank of Travancore, Alappuzha
22. Sri. K. Jayasankar, LDM, State Bank of Travancore, Kottayam
23. Sri. K. Babu Ganesh, LDM, Union Bank of India, Idukki
24. Sri. K. R. Jayaprakash, LDM, Union Bank of India, Ernakulam
25. Sri. R. Rajagopalan, LDM, Canara Bank, Thrissur
26. Sri. O. Raveendran, LDM, Canara Bank, Palakkad
27. Sri. P. Unnikrishnan, LDM, Canara Bank, Malappuram
28. Sri. Jayanandan A, Senior Manager, Union Bank of India
29. Smt. S. Jayasree, Senior Manager, Syndicate Bank
30. Sri. R. V. Unni, Senior Manager, Bank of Baroda
31. Sri. G. Anil Kumar, Senior Manager, Corporation Bank
32. Sri. K. R. Arun Kumar, Senior Manager, Canara Bank
33. Sri. Dileep K, Senior Manager, Dhanlaxmi Bank
34. Sri. S. Rajeev, Regional Manager, SMGB
35. Sri. A. R. Balachandran, Manager, Reserve Bank of India
36. Sri. Biju Kumar D. S, Manager, Indian Bank
37. Smt. Lakshmy Phalalochanan, Manager, Canara Bank
38. Sri. Harisankar P, Manager, Indian Overseas Bank
39. Sri. S. M. Menon, Product Head, ICICI Bank
40. Sri. Mujahid Y, Regional Relationship Manager, ICICI Bank
41. Smt. Sobha Manoj, Relationship Manager, ICICI Bank
42. Smt. Omana Peter, Deputy Manager, Punjab National Bank
43. Sri. N. S. Subramanian, Deputy Chief Officer, Central Bank of India
44. Sri. O. P. Rajan, Officer, Lead Bank Office, Kozhikkode
45. Sri. Babu Venkitesh K, Officer, Canara Bank