M/s ALLEN CAREER INSTITUTE PRIVATE LIMITED

Authority for Advance Ruling — Rajasthan

ADVANCE RULING NO. RAJ/AAR/2026-27/11 Dated **30.07.2026**

Q Questions Before the Authority

- Whether Notification No. 13/2020-Central Tax dated 31 March 2020 as amended from time to time is applicable to the Applicant in case of supplies to parents, guardians or business enterprises registered for GST purpose who are liable to pay consideration.
- Whether applicability of Notification No. 13/2020-Central Tax dated 31 March 2020 (as amended from time to time) is affected by lack of clarity regarding admissibility or otherwise of input tax credit in the hands of the recipient or without any further obligation to investigate the recipient's business purpose, ITC eligibility, or the nature of the expenditure?

F Facts

The applicant is an education institution providing coaching services to students. They intend to issue GST-compliant e-invoices to parents, guardians, or business enterprises who are registered under GST and are liable to pay the course fees. The applicant sought clarity on whether they are mandatorily required to issue e-invoices in such cases and if they must verify the recipient's eligibility for input tax credit.

H Held

Applicability of Notification 13/2020	**Applicable**	Only where the recipient is a registered person liable to pay consideration.
Obligation to verify recipient ITC	**None**	Supplier compliance is independent of recipient ITC eligibility.

R Reasoning

The ruling turned on the interpretation of Section 2(93)(a) of the CGST Act, which defines a recipient as the person liable to pay consideration. The authority reasoned that the obligation to issue e-invoices under Rule 48(4) and Notification No. 13/2020 is triggered by the status of the recipient as a registered person and the supplier's turnover. It emphasized that the GST framework **segregates supplier-side compliance** from the recipient's entitlement to input tax credit. Consequently, the supplier is not required to investigate the recipient's business purpose or ITC eligibility to fulfill their own statutory obligations.

P Provisions Relied On

- Section 2(93)(a) of the CGST Act, 2017
- Section 31(2) of the CGST Act, 2017

Section 97(2) of the CGST Act, 2017	Rule 48(4) of the CGST Rules, 2017
Notification No. 13/2020-Central Tax dated 21 March 2020	

! For the Practitioner

This ruling confirms that service providers are not required to perform due diligence on a recipient's ITC eligibility to comply with e-invoicing mandates. It settles that the **supplier's compliance is independent** of the recipient's tax position. However, it does not decide whether a specific parent or guardian qualifies as a 'recipient' in a given contract, leaving that as a fact-dependent determination for each transaction.

Source

Summary prepared from the published order, which is a scanned document. It is a reading aid and not the authority: where the two differ, the order governs. Verify every provision against the original before relying on it.

Original order: www.gstcouncil.gov.in -> 9-order_allen_institute_30_july_2026.pdf

Prepared 04-09-2026.