M/s. Master Minds, D.No.5-25-72, 3/11, Brodipet, Guntur (unregistered). The listing names M/s Ocean Sparkle Limited, which does not appear in the document.

Authority for Advance Ruling — Andhra Pradesh

AAR No.08/AP/GST/2020 dated 05.03.2020 (per the scanned order; the li… Dated **24.02.2020**

Q Questions Before the Authority

- Whether the supply of education services, as per the curriculum prescribed by statutory authorities or government, to the applicant's students for obtaining CA-Foundation, CA-Inter, CA-Final, CMA (ICWA)-Foundation, CMA-Inter, CMA-Final and Intermediate qualifications/certificates, duly recognised by those authorities, is exempt under Notification No.12/2017-CT (Rate) dated 28.06.2017, entry 66(a), as amended.
- Whether charges for accommodation provided to students on these courses are exempt under Notification No.12/2017-CT (Rate) dated 28.06.2017, entry 14, as amended, read with Circular No.32/06/2018-GST dated 12.02.2018, since the hostel charge is below Rs.1,000 per day.
- Whether charges for catering, by supplying food to students on these courses, are exempt under Notification No.12/2017-CT (Rate) dated 28.06.2017, entry 66(a), as amended.

F Facts

The applicant is a proprietary coaching institution in Guntur preparing students for the CA, CMA (ICWA) and Intermediate examinations. It had earlier service tax disputes over the same coaching, and the service tax department dropped some demands and confirmed others. It also provides hostel accommodation and food to these students and seeks to carry the educational-institution exemption into GST.

H Ruling

Coaching for CA-Foundation, CA-Inter, CA-Final, CMA (ICWA) Foundation, Inter and Final, and Intermediate, under entry 66(a)	**Not eligible for exemption under entry 66(a) of Notification No.12/2017-CT (Rate)**	The applicant is not an educational institution as defined, because the coaching is not education as part of a curriculum for obtaining a recognised qualification. The applicant is not affiliated to ICAI or ICWAI, issues no completion certificate, and its coaching is not mandatory for the examinations.
Accommodation charges for students, under entry 14 read with Circular 32/06/2018-GST	**Not eligible for exemption under entry 14 of Notification No.12/2017-CT (Rate)**	The exemption was refused on the ground that the applicant is not an educational institution. The below-Rs.1,000-per-day threshold was not separately decided.
Catering charges for supplying food to students, under entry 66(a)	**Not eligible for exemption under entry 66(a) of Notification No.12/2017-CT (Rate)**	The food-supply exemption for educational institutions under CBIC Circular 85/04/2019-GST does not apply because the applicant is not an educational institution.

Prepared as a reading aid. Where this summary and the original order differ, the order governs.

The authority held that the applicant is not eligible for the exemption under entry 66(a) for the coaching services. It also held that the applicant is not eligible for the accommodation exemption under entry 14 or the catering exemption under entry 66(a), because the applicant is not an educational institution. The coaching does not lead to a recognised qualification, so the services are not education as part of a curriculum for obtaining a recognised qualification.

R Reasoning

The authority read the definition of educational institution in Notification No.12/2017-CT (Rate) and found that it requires education as part of a curriculum for obtaining a qualification recognised by law. It held that CA and CMA coaching does not lead to the grant of any recognised qualification. Coaching is not mandatory for the examinations, and students can prepare on their own. The authority also noted that the applicant has no affiliation, MOU or authorisation with ICAI or ICWAI, and issues no completion or study certificate. It therefore found the applicant not to be an educational institution, and the food and accommodation exemptions fall away with that finding. The order also discusses the earlier service tax position under Section 66D(l)(ii) of the Finance Act, 1994 and Notification No.25/2012-ST, and distinguishes IIT and EAMCET coaching.

P Provisions Relied On

- Section 97(2) and Section 98(4) of the CGST Act, 2017 and the APGST Act, 2017
- Notification No.12/2017-CT (Rate) dated 28.06.2017, entry 66(a) and (b), as amended by Notification No.2/2018-CT (Rate) d…
- Notification No.12/2017-CT (Rate) dated 28.06.2017, entry 14 (accommodation)
- Definition of 'educational institution' in Notification No.12/2017-CT (Rate)
- Circular No.32/06/2018-GST dated 12.02.2018 (accommodation threshold)
- CBIC Circular No.85/04/2019-GST dated 01.01.2019 (food supplied by educational institutions)
- Section 66D(l)(ii) of the Finance Act, 1994 (negative list, pre-GST)
- Notification No.25/2012-ST, entry 9 and clause 2(oa)
- Notification No.33/2011-ST (pre-GST exemption for commercial coaching)

! For the Practitioner

This is a Guntur order refusing the educational-institution exemption to a commercial CA and CMA coaching centre. A practitioner advising a coaching institute should check whether it is affiliated to or authorised by the statutory body and whether its course leads to a recognised qualification, since the order relies on both. The order does not decide the position for a school, college or institution that is formally part of the curriculum, and it is not binding outside Andhra Pradesh. The listing details do not match the scanned document, so confirm the order number, date and applicant before relying on it.

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 -> aar_no.8-2020_mater_mind_0.pdf

Prepared 18-11-2026.

About Patron Accounting LLP

Patron Accounting LLP is a CA and CS-led accounting and compliance firm working with businesses across India since 2019 — bookkeeping, GST, income tax, payroll, company and LLP compliance, audit and the certificates banks and regulators ask for.

Pune (HQ)
RTC Silver, B4-708, Sai Satyam Park, Wagholi, Pune, Maharashtra 412207

Mumbai
104, Rajshila Building, 597 J.S.S. Road, Marine Lines, Mumbai 400002

Delhi
3rd Floor, B-6/154-155, Sector 5, Rohini, Delhi 110085

Gurugram
Pioneer Urban Square, B109, Golf Course Ext Road, Sector 62, Gurugram…

Ahmedabad
Phoenix Tower, 1107, near Commerce Six Road, Drive In Road, Navrangp…

Talk to us: **+91 94594 56700** | sales@patronaccounting.com | patronaccounting.com