RECORD NOTE OF DISCUSSIONS ON THE MEETING HELD ON 16.09.2019 AT 10.30 A.M. BY THE DY. C&AG (HR & TRAINING) WITH THE OFFICE BEARERS OF THE All INDIA AUDIT AND ACCOUNTS ASSOCIATION

- 1. An Agenda meeting by the Dy. C&AG (HR & Training) with the office bearers of the All India Audit & Accounts Association was held on 16.09.2019 at 10.30 A.M. in Committee Room No. 510. List of the participants who attended the meeting is at Annexure A.
- 2. At the outset, the Deputy Comptroller and Auditor General welcomed the representatives of the All India Audit & Accounts Association and hoped that the ensuing deliberations would be fruitful and constructive.
- 3. Discussions commenced thereafter on the 18 Agenda Items.

ANNEXURE- A

LIST OF PARTICIPANTS WHO ATTENDED THE MEETING HELD BY DEPUTY COMPTROLLER AND AUDITOR GENERAL (HR & TRAINING) WITH THE OFFICE BEARERS OF THE AII INDIA AUDIT AND ACCOUNTS ASSOCIATION ON 16.09.2019 AT 10.30 A.M.

S/Shri/Smt.

A W K Langstieh Deputy Comptroller and Auditor

General (HR & Training)

Khalid Bin Jamal Director General (Staff)

V. S. Venkatanathan AC (N)

M Vijaya Shanti (JCM) Administrative Officer

Tapas Bose President (of the Federation)

K C Mathai Vice President (of the Federation)

M. S. Raja Secretary General (of the

Federation)

Anil Kumar Addl. Secretary General (of the

Federation)

Demand No.1: Restructuring of Cadre in IA&AD.

Explanation:

Last restructuring of cadres in IA&AD took place in 1984. We were quite happy when the move for fresh cadre restructuring was initiated in 2018.

Though there was a speed at the initial stage-when the Federations were persuaded to submit their proposal with no loss of time and interaction with Federations were arranged-there seems to be loss of momentum later on.

The staff side has not been informed of the status of the process and report of the Committee has not been shared with the staff side.

We requested that the process of cadre restructuring be completed at the earliest after consultation with the staff side.

Official response to the Demand:

DAI informed that the cadre re-structuring is taking place after a longtime and it requires sufficient time for finalization after taking into account all the aspects. The same is under consideration of Headquarters office.

Demand No.2: 5 times promotion to all cadres from entry level.

Explanation:

The promotional avenues for the Gr. B & C cadres are far and few. Integration of DEOs with the mainstream cadres of IA&AD (i.e. promotion of DEO as Auditor/Accountant) is still pending.

The promotional avenues for a Senior Auditor/Accountant are negligible if he/she does not pass SAS examination. Only 4% posts are earmarked as Supervisor. (10% where the vacancy is more than 15% of the sanctioned strength of AAO, in audit side).

A Sr. Auditor/Accountant spends more than 25 years on an average in the same post and majority retires in the post.

50% of posts of AAOs may be earmarked for seniority cum fitness promotion with a combined gradation list.

Time bound five times promotion from the entry level may kindly be considered for Group B & C cadres of IA&AD to ensure high morale for the personnel

Official response to the Demand:

The issue is under consideration of Cadre Restructuring Committee.

Demand No.3: Promotion of DEO as Auditor/Accountant.

Explanation:

DEO is a cadre that has little promotion avenues as on today, a DEO can expect a promotion only against the vacancies in the EDP posts. It is proposed that the promotional avenues for DEO be opened to the cadre of Auditor/Accountant, integrating it with main stream cadres.

The delay in forward movement of cadre restructuring is casting a demoralization effect on DEO cadre.

Official response to the Demand:

The distribution of DEO grade 'A' and 'B' is in the ratio of 80:20 and the EDP cadre has its own promotional channel from Grade 'A' to Grade 'G'. Moreover, DEOs are allowed to appear in SAS examination.

Demand No. 4: Conduct SAS exam in the old format, grant unlimited number of chances to part II candidates and undo system of negative marks.

Explanation:

In the system that prevailed prior to 2010 i.e. before switching over to online examination, the examinations were conducted in two parts. Though number of chances were limited to 6 for part I (relaxations were considered depending on individual merit of the case), there was no limitation on number of chances for part II of the SAS (SOG) Examination.

It shall be of great help of many candidates if the present limitation of 10 chances (combined) is replaced by earlier pattern of unlimited number of chances for Part-II candidates. This is important in the light of absence of other promotional avenues available to personnel in IA&AD.

The online exam has brought along within the system of negative marks. Also, the online examination does not test the proficiency of the candidates as it was the earlier system. It therefore, proposed that we revert back to old system of SAS exam.

Official response to the Demand:

Ten chances (6 regular plus 4 additional) to qualify nine papers of SAS examination are adequate. The negative marking was introduced in the computer based SAS Exam consisting of multiple choice questions to reduce guesswork. There is a descriptive paper on Drafting in SAS examination.

Demand No. 5: Conduct SAS exam in A&E offices.

Explanation:

SAS examination was restored in A&E offices after a long period (more than 7 years) in the year 2016. Exam was conducted only for two years i.e. 4 attempts were allowed. From 2018 exam was stopped. Normally minimum of 6 attempts are allowed. On basis of that logic atleast two more attempts may be allowed.

Official response to the Demand:

In SAS examination 2019, eligible officials of A&E officers where vacancy is less than 10% are allowed either to write SAS (Civil Audit) exam or SAS (Civil Accounts) exam. In A&E offices where the vacancies in the cadre of AAO are more than 10%, eligible officials are allowed to write only SAS (Civil Accounts).

Demand No. 6: Recruitment of local personnel in all non-gazetted cadres & opening up of unilateral transfer.

Explanation:

Present recruitment policy adopted by the SSC creating a lot of functional difficulties, in addition to social ones. Knowledge/proficiency in the regional language (i.e. the administrative language of the state) is a must for efficient discharge of functions in IA&AD. Recruitments since 2011-12 have provided majority outstation candidates who have no knowledge of regional language.

The refusal of SSC to have regional recruitments has put a big question mark on the quality of work in the days to come.

It is, therefore, suggested that the department may think of mechanism to recruit personnel having flair in the regional language of the respective stations.

We further request that one time transfer may be offered to them to go back to their states and CAG may kindly arrange for local recruitment at regional level which will help the department to perform the duties of the department in an effective manner.

Official response to the Demand:

DoPT has agreed to this department's proposal for adding language proficiency clause in Recruitment Rules. The RR to the post of AAO after incorporating language proficiency clause has been forwarded to the Ministry of Finance for notification.

Unilateral transfers within IA&AD had been dispensed with since 1997. Unilateral transfer would result in huge vacancies in some offices and this would disrupt the functioning of the department. The concerned officers/officials can apply for deputation. It decided that circulars for deputation within the Department and outside the Department will be uploaded on CAG website.

Demand No. 7: (i) Re-designation of supervisor as AAO.

(ii) Grant of NFU at level 9 to Supervisors on completion of 4 years

Explanation:

The post of Supervisor has been carved out of the cadre of AAO (Sections officers in the earlier days). Both discharge the same functions, share equal responsibility. But Supervisor is considered inferior and is denied of Gr. B gazetted status and other promotional avenues available to AAOs.

In CCS, there are three modes of recruitment to Section Officers – by 1. Direct recruitment through Civil Service Exam (20%), 2. Through examination from amongst Assistant Section officers (40%) and 3. Through promotion from Assistant Section officers, the mode being selection (40%).

Only IA&AD denies the equality though same functions are discharged by AAO and Supervisor.

It is therefore proposed that Supervisor may be treated as and at part with AAOs placing them in the same gradation list and extending them the benefit of NFU at Level 9 on completion of 4 years.

Official response to the Demand:

- 1. As per the Recruitment Rules for the post of AAO, only SAS passed officials can be promoted to the post of AAO and non SAS passed officials cannot be promoted as AAO.
- 2. Ministry of Finance has not agreed to the proposal for grant of NFU at level 9 to Supervisors on completion of 4 years.

Demand No. 8: Grant of full functional facilities to Associations.

Explanation:

The facilities as per extant orders of Government of India and endorsed by CAG are many times denied to recognised Association at field level.

May units tend to deny special casual leave for organizational work, posting of Chief Executive and one office bearer at Headquarter., allotment of association room etc.

Implementation of the standing instructions/OMs in this regard by the field offices may kindly be enforced by Headquarters.

Official response to the Demand:

Circular in this regard had already been issued to field offices. However, as per the demand of the Association, a circular would be issued to field offices regarding the grant of functional facilities to Associations.

Demand No. 9: Inclusion of AAOs under JCM scheme.

Explanation:

1966, when the scheme of Joint Consultative Machinery & Compulsory Arbitration was inaugurated, the Section officers of IA&AD were classified as Gr. C and hence a part of the scheme.

The restructuring of cadres in IA&AD in 1984 and subsequent extension of the scheme to A&E offices on the recommendations of the 4 CPC saw 80% of Section Officers being classified as Gr. B Gazetted, excluding them from the JCM Scheme. Implementation of the 6th CPC recommendations placed the whole of the section Officer Cadre in Gr. B Gazetted, thus pushing the whole cadre of the then Section Officer out of the JCM scheme.

It is, therefore, proposed that Department may approach DoPT for the continuance of the erstwhile Section officer (presently Assistant Audit/Accounts Officer) cadre under the scheme of JCM&CA.

(The Section Officers of Central Secretariat, though Gr. B Gazetted, were included in the scheme from the inception itself).

Official response to the Demand:

In IA&AD, all Group 'C' and Group 'B' (Non-gazetted) posts are covered under JCM Scheme as per the provisions of Appendix I of Scheme for JCM.

Demand No. 10: Fixation of pay on promotion as Supervisor after grant of MACP at GP 4600.

Explanation:

A Sr. Accountant/Sr. Auditor on completion of 30 years of service is entitled for 3rd financial up-gradation to Level 7 of the pay matrix (GP 4600 in the pre-revised pay scale) under MACP.

On promotion to the post of Supervisor, his/her pay is fixed at the same stage not at the same cell – in Level 8, thus depriving any financial benefit to the promotee.

Earlier, the promoted person was entitled to get the difference between the Grade Pay i.e. 4800 & 4600 which has been deprived after the introduction of pay matrix and pay level, making the promotion to the post of Supervisor least attractive.

It may be ensured that on promotion to the post of Supervisor, one gets benefits under pay fixation.

Official response to the Demand:

On promotion as Supervisor in the 6th CPC, no pay fixation was available and the difference in grade pay was allowed. In the 7th CPC, the system of Grade Pay has been dispensed with. As such for the officials who have already been granted financial upgrdation to level 7 (GP of Rs. 4600/-) on their promotion as Supervisor, pay will be fixed at the level 8 (GP of Rs. 4800/-) and if no such stage is available in the next above stage.

Demand No. 11: Uniform nomenclature for all cadres upto SAO.

Explanation:

IA&AD might be the only department under GOI that has multiple nomenclatures for doing almost the same nature of duties.

It is proposed that the Department may have the following nomenclatures only-MTS, Audit Assistant (DEO), Auditor, Sr. Auditor, Asstt. Audit Officer and (Sr.) Audit Officer.

Official response to the Demand:

Existing nomenclature of the officials from MTS to Sr. A0 in IA&AD is in accordance with their nature of duties and Recruitment Rules. Therefore, there is no need to change the existing nomenclature of the officials in IA&AD.

Demand No. 12: Filling up of vacancies/recruitment of personnel in the Departmental canteens.

Explanation:

The Departmental Canteen are facing acute shortage of manpower. Many departmental canteens are working with contract workers which again is much below requirement.

It is requested that regular recruitment of local people may be conducted to the departmental canteens. It is, further, requested that the existing contract workers may be regularized against the existing vacancies.

Official response to the Demand:

Revised recruitment Rules of Group "C cadre" has been finalized and communicated to all the field offices and filling up of the vacancies is under consideration. The revised Recruitment Rules for Group "B" cadre is under consideration of HQrs office. Further the existing vacancies are outsourced as per the prescribed criteria.

Demand No. 13: Implement SC judgement in WP (Civil) No. 82 of 2011 to "Civil servants" only, no transfer of Gr. B & C personnel under the cover of the said judgement.

Explanation:

It is seen that some offices are misinterpreting the aforementioned SC judgement and the Headquarters Circular No. 1-Staff Wing/2014, No.-10 –Staff (App-II)/63-2013 dated 06.01.2014, extending its application to Gr. B and C personnel and causing their transfer to far off places.

A close reading of the judgement of the Supreme Court makes it clear that the judgment does not apply to personnel at lower level.

DGCA, Hyderabad has transferred Gr. C and Gr. B (non-gazetted) personnel to far off Vishakhapatnam from Hyderabad.

It is requested that the aforementioned judgement may not be used to punish the lower rank personnel and DGCA, Hyderabad may please be advised to recall the transfer order.

Official response to the Demand:

Due to shortage of staff to conduct the compliance audit of VPT Audit, transfer of 14 officials was made on 16.05.2018. At present there are only two such officials (Auditors) at Vishakhapatnam and they have no grievance or representation against the transfer.

Demand No. 14: Restore sports quota recruitment.

Explanation:

Sports quota recruitment have been stopped again. This is against the declared policy of promoting sports and cultural activities.

Certain games such as Volley Ball were totally ignores in the last recruitments (before it was stopped).

It is requested that IA&AD should be in the forefront of promoting sports and hence recruitment under the head should be restored giving enough space to every stream of sports.

Official response to the Demand:

All the HoDs have been requested vide circular dated 14.04.2019 to send proposals for direct recruitment against sports quota for the calendar year 2019. Requirement for Volleyball players is being assessed

Demand No. 15: Liberal approach on compassionate ground appointments.

Explanation:

The financial limits suggested by the department for determining the eligibility of the dependent applicant is doing much harm to the families of the persons died in harness.

It is requested that the field offices may be directed/advised to take a humanitarian approach while considering applications for compassionate appointment.

Official response to the Demand:

The Department follows the instructions issued by DoPT in this regard. The whole objective of compassionate appointment is to enable the family to tide over the sudden crisis and financial destitution. The requests for compassionate appointment are considered with a balanced and objective assessment of the financial condition of the family. The model evaluation system is based on a number of parameters prescribed in the scheme for compassionate appointment with suitable weights assigned for consideration of the applicants in a fair and objective manner.

The marks obtained in the evaluation system cannot be the only criteria for recommending a case for appointment on compassionate grounds. The marks in the evaluation system only help the DSC to prima facie judge the applicants being considered under the scheme for compassionate appointment. There is no deviation from the rule prescribed by DoPT regarding the compassionate appointment.

Demand No. 16: Prospective application of "Very Good" bench mark for MACPS. Explanation:

On the recommendation of 7th CPC, the bench mark for granting financial upgradation under MACPS has been made very good. The OM in this regard was issued on 25.07.2016.

It is reported that all the office are considering "very good" as the bench mark for the periods prior to 25th July 2016 thus denying the benefit of financial upgradation to good number of otherwise eligible personnel.

Sashastra Seema Bal vide its OM dated 10th January 2019 has made the application of the 7th CPC recommendations on bench mark change with prospective effect.

It is, therefore, proposed that similar directive may be issued to all field offices.

Official response to the Demand:

In cases where MACP falls due on or after 25.07.2016 the bench mark of 'very good' is to be followed. The department is following the rules & orders framed by DoPT from time to time. DoPT has not issued any general order/circular on the lines mentioned in the case of Sashastra Seema Bal order dated 10.02.2019.

Demand No. 17: Grant of additional work to P&T Audit, Nagpur.

Explanation:

Nagpur BAO is the oldest P&T Audit office having a glorious history of around 100 years. The Nagpur BAO, inspite of having shortage of staff, has been achieving target year after year. Till date, the units namely Kalyan & Raigad districts, Goa, Kolhapur, Nashik etc and recently the Meit Y Units namely C-DAC corporate office Pune, CE-MET DG office, C-MET Pune, SDC NIC Pune and ETDC Pune have been transferred to Mumbai BAO. Also, at present no circle office is with Nagpur BAO.

It is, therefore, requested that,

- i) All Meit Y units may be returned to BAO, Nagpur.
- ii) In addition to (i) Chhattisgarh circle may also be allotted to BAO, Nagpur as all the Chhattisgarh units are near to Nagpur and
- iii) To relocate two post of Sr. Audit Officers to Nagpur BAO which were transferred from Nagpur BAO.

Official response to the Demand:

Director General (P&T), Delhi has informed that allocation of audit jurisdiction to the branch offices of Director General (P&T) has been made State wise. In the absence of regular vacancies of Sr. AO/AO in Hyderabad BAO, the two posts of Sr. AO transferred from Nagpur BAO cannot be restored at present. The field level Associations can take up such local/field issues with the respective Heads of Department.

Demand No. 18: Grant of NFU to level 9 to ad-hoc AAOs.

Explanation:

The scheme of Adhoc AAO was introduced in 2009 to alleviate the frustration of the SAS passed candidates.

On implementation of 6th CPC, Adhoc AAOs were also classified a Gazetted. Adhoc AAOs discharge all the functions of a regular AAO.

But they are excluded from grant of NFU to level 9 on completion of 4 years of service at par with regular AAOs. This may please be rectified by extending NFU to Level 9 to Adhoc AAOs at par with regular AAOs.

Official response to the Demand:

SAS is the qualifying examination for promotion as AAO. In some field offices especially in A&E offices sufficient vacancies are not available for granting promotion to the SAS qualified personnel. The RT/Adhoc posts were created to encourage the SAS qualified staff waiting for promotion as AAOs. The AAO (Adhoc/RT) continue to perform the work of the posts, from which the official was appointed as AAO (Adhoc/RT). Such officials are not regular AAOs. Hence granting of NFU is not possible. The benefits of financial up gradation under ACP/MACP are however permissible to AAO (Adhoc/RT).