



**ALL INDIA CIVIL ACCOUNTS OFFICERS
(Senior Accounts Officers and Pay & Accounts Officers)
ASSOCIATION**

**(Recognised by Govt. of India as per CCS (RSA) Rules, 1993 vide CGA's letter
No. 23003/1/2020-NGE-CGA /270 dated: 29th August, 2022)
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AICAOA/Transfer-Policy/2023-24/110

Date: 30th Nov., 2023

To,

The Controller General of Accounts
Mahalekha Niyantak Bhawan,
E-Block, GPO Complex,
New Delhi.

Sub: Comments on Draft Transfer/Posting Policy- Reg.

Respected Sir,

Reference is invited to your Office Memorandum No. A-32014/4/2021/MF.CGA(A)/ Group 'B'/Policy/HR-III/1286 dated 1st November' 2023 on the aforesaid subject. On behalf of AICAOA, I would like to pay my utmost gratitude and thanks for acknowledging our suggestion as outlined in point no. 2 of our earlier letter no. 78 dated 13.04.2023 pertaining to the preparation of a comprehensive data bank containing all relevant career details.

Furthermore, vide our letter dated 13.04.23, AICAOA had proposed the exploration of developing a software application for transparent transfer postings. We are encouraged to highlight the existence of a similar software solution, the 'Santosh App,' currently employed by the CRPF for managing transfer postings of almost 2 lakhs employees. Given the success of such applications in other organizations, we believe that adopting a similar tool within our organization would significantly enhance the efficiency and transparency of the transfer posting process.

We have prepared comments on the draft transfer policy(enclosed), taking into account the challenges and practical problems faced by individual officers in ground during outstation postings. Further, administrative requirements, administrative exigencies and human resource management necessities for smooth operation of the Cadre, aligning with the vision and mission of our organisation have also been considered while preparing proposed draft Transfer Policy.

We are eager to discuss the suggestions outlined in our draft transfer policy letter. Our association has endeavored to cover all aspects and consider perspectives from both the official as well as administrative angles. We believe that a discussion with the authorities, if facilitated, would provide an opportunity to address concerns from both staff and administrative sides concurrently.

Yours sincerely,

(Kaushal Mishra)

Encl: As above (5 Pages).

Comments on Draft Transfer Policy

“Comments are offered in ***Bold , Italics & Underlined Letter*** in Comments/ Suggestions Box”

Sl. No.	Para No.	Provision in draft Transfer/ Posting Policy	Comments/ Suggestions
1.	1 (iii)	Constitution / reconstitution of the CSB will be approved by CGA and all such orders will be published on the CGA’s website.	Constitution / reconstitution of the CSB will be approved by CGA and all such orders will be published on the CGA’s website. <i><u>One member from each recognized Association will be included in CSB to maintain transparency.</u></i>
2.	1 (iv)	The frequency of the meeting of CSB will depend upon necessity, and would usually be held once in a quarter.	The frequency of the meeting of CSB will depend upon necessity, and would usually be held once in a quarter <i><u>failing which reasons thereof will be uploaded on public domain for information to all within 15 days of last day of quarter.</u></i>
3.	2 (i)	Transfer outstation promotion: AAOs on promotion as Sr.AOs and Accountants / Senior Accountants, LDCs, Stenos, DEOs etc. on promotion as an AAO, consequent to qualifying the AAO (Civil) Examination, will be posted outside their existing place/ station of posting. However, the same shall be done considering – (a) station- wise vacancies (b) request of officers who have been promoted earlier and posted away from their choice station and have completed their prescribed tenure of outstation posting (c) Choice of station for posting exercised by the officer and (d) administrative exigencies.	Transfer outstation promotion: AAOs on promotion as Sr.AOs and Accountants / Senior Accountants, LDCs, Stenos, DEOs etc. on promotion as an AAO, consequent to qualifying the AAO (Civil) Examination, will be posted outside their existing place/ station of posting.. However, the same shall be done considering – (a) station- wise vacancies (b) request of officers who have been promoted earlier and posted away from their choice station <i><u>and have completed one year of prescribed minimum tenure of outstation posting.</u></i> (c) Choice of station for posting exercised by the officer and (d) administrative exigencies. [Remark: Para 8.1 of Draft Transfer Policy envisages consideration of deputation after rendering 1 year of Service at Outstation. In the same line, 1 Year minimum service has been proposed for considering qualifying service/ prescribed minimum tenure for consideration of transfer cases.]

4.	2.1 (i)	Option for choice of five station, with 3 being Primary Options & 2 being Secondary Options in the prescribed proforma will be required to be filled in by the officers in the promotion zone and submitted not later than 30 days from the notification of the vacancy position in public domain. At the time of allocation of station, first the primary options of all officers shall be considered. Thereafter the secondary options shall be considered. This shall be done in order of seniority, subject to availability of vacancies.	Option for choice of five station, with 3 being Primary Options & 2 being Secondary Options in the prescribed proforma will be required to be filled in by the officers in the promotion zone and submitted not later than 30 days from the notification of the vacancy position in public domain. <u>While deciding such transfers/postings, station-wise final vacancy list will be published and options/choices of promotee officers will be called for to operate the final transfer/posting list within the published list only.</u> At the time of allocation of station, first the primary options of all officers shall be considered. Thereafter the secondary options shall be considered. This shall be done in order of seniority, subject to availability of vacancies.
4.	2.2 (iii)	Superannuation within one year : On promotion as AAO/Sr.AO, an officer superannuating within one year will be adjusted in the same station as possible. In case the cadre controlling authority is not able to operate this provision due to administrative exigencies, then the officer will be offered promotion wherever the vacancy exists.	Superannuation within two year: On promotion as AAO/Sr.AO, an officer superannuating within two year will be adjusted in the same station as possible. In case the cadre controlling authority is not able to operate this provision due to administrative exigencies, then the officer will be offered promotion to <u>nearest station where</u> the vacancy exists.
5.	2.2 (v)	-- [Remark: No provision made in draft Transfer Policy dated 1st November' 2023]	Add point (v) below 2.2 (iv) as mentioned below: <u>Exemption as provided to main care giver vide DoPT OM No. F. No. 4.2011/ 3/ 2014- Estt.(Res) dated 08.10.2018 shall be given due consideration for posting in their existing serving station to the extent administratively feasible subject to availability of vacancies.</u>
6.	3 (ii)	If the representations are not considered, the officer shall be deemed relieved by 30th day from the issue of transfer order.	If the representations are not considered, <u>reasons thereof/decision will be conveyed to the individual in writing</u> and the officer shall be deemed relieved by 30th day from the issue of transfer order/ <u>10 days from the date of receipt of reply on his representation, whichever is later.</u>

7.	5 (ii)	The officer will serve maximum one tenure in each ministry at any station.	The officer will serve maximum one tenure in each ministry at any station <u>subject to availability of other Ministries.</u>
8.	5 (iii)	Normally on rotational transfer, the tenure in a Ministry/Deptt. would be three years except CPAO, PFMS, INGAF where tenure would be five years. The tenure in O/o CGA will be at the discretion of CGA.	Normally on rotational transfer, the tenure in a Ministry/Deptt. would be three years except <u>CPAO, PFMS (Hqrs.), New Delhi, INGAF, New Delhi and CGA</u> where tenure would be five years. [Remark: Tenure at O/o CGA should also be fixed as undue long stay of an official in a sensitive post at one place has the potential of developing vested interests.]
9.	5 (iv)	Transfer amongst the officers posted in O/o CGA, CPAO, PFMS, and INGAF may be done in case of administrative requirement irrespective of tenure limitation .	Transfer amongst the officers posted in CPAO, PFMS, and INGAF may be done in case of administrative requirement irrespective of tenure limitation <u>with recorded reasons.</u>
10.	5 (vii)	Rotational transfer of officers will be done upon completion of stipulated tenure within the station. In case of non-availability of eligible substitute at the existing station, the officer is liable to be posted to any other station within the Zone to the extent possible .	Rotational transfer of officers will be done upon completion of stipulated tenure within the station. In case of non-availability of eligible substitute at the existing station, <u>rotational transfer will be done after availability of eligible substitute.</u>
11.	5 (viii)	The CCAS posts have been distributed in six zones viz. North Zone, South Zone, East Zone, West Zone, Central Zone & NER Zone (Annexure -II). The metro cities of Delhi, Mumbai and Kolkata include the area falling within urban agglomeration (U.A.) as per details below: <ul style="list-style-type: none"> ➤ Delhi UA includes Faridabad, Noida & Ghaziabad ➤ Mumbai UA includes Thane, Nhava Sheva, Raigad (Belapur) and Navi Mumbai. ➤ Kolkata UA includes Kalyani, Krishna Nagar, Rajarghat. 	AICAOA strongly recommends for deletion of this provision.

12.	5.1 (i)	Officers of all grades within one year of superannuation will be exempted from outstation rotational transfers.	Officers of all grades within two years of superannuation will be exempted from outstation rotational transfers.
13.	5.1 (iii)	Criteria for exemption for outstation posting in case of promotion (para3.2) shall also be followed in case of outstation rotational transfer from the existing station to the extent possible.	Criteria for exemption for outstation posting in case of promotion (para 2.2) shall also be followed in case of outstation rotational transfer from the existing station to the extent possible. [Remark: There is no Para 3.2. Further, Para 2.2 suits here thus suggested for correction.]
14.	6.1 (i)	On completion of full tenure of posting on promotion as AAO and Sr.AO an officer can exercise an option indicating 5 preferences of choice of stations duly prioritized for posting. The option may be submitted not later than 30 days from the notification of the vacancy position in public domain.	On completion of full tenure of posting on promotion as AAO and Sr.AO an officer can exercise an option indicating upto 5 preferences of choice of stations duly prioritized for posting. The option may be submitted not later than 30 days from the notification of the vacancy position in public domain. [Remark: Any Outstation posted officer should not be imposed to submit 5 options necessarily, if he is willing to wait till availability of vacancy as per his seniority].
15.	6.1 (iii)	In case there is no vacancy in the station(s) opted, a person with longest continuous stay over and above two tenures at the station will be transferred to accommodate the request of such officers subject to the condition that the officer is seeking posting on one of the following grounds:- a- Self or any dependent family member at the station being requested is terminally ill. b- The officer is due to retire within two years. c- Spouse posted at the station choice	In case there is no vacancy in the station(s) opted, a person with longest continuous stay over and above two tenures at the station will be transferred to accommodate the request of such officers. [Remark: No condition required for posting back at choice station/home station, if vacancy exists.]

16.	6.2 (iv)	<p style="text-align: center;">--</p> <p>[Remark: No provision made in draft Transfer Policy dated 1st November' 2023]</p>	<p>Add 6.2 (iv) as below:</p> <p><u><i>Request for transfers before completion of the prescribed tenure shall be considered after completion of at least one year of service subject to availability of vacancy and seniority.</i></u></p> <p>[Remark: Para 9 of OM No. A-32014/1/2022/MF.CGA(A)/Gr B/Vol.III/224 dated 14.05.2008 issued from O/o CGA itself also provisions for consideration of transfer requests before completion of tenure keeping in view availability of vacancies and inter-se-seniority.]</p>
17.	6.2 (v)	<p style="text-align: center;">--</p> <p>[Remark: No provision made in draft Transfer Policy dated 1st November' 2023]</p>	<p>Add 6.2 (v) as below:</p> <p><u><i>Exemption as provided to main care giver vide DoPT OM No. F. No. 4.2011/ 3/ 2014- Estt.(Res) dated 08.10.2018 shall be given due consideration for posting in their existing serving station to the extent administratively feasible subject to availability of vacancies.</i></u></p>

Kaushal

(Kaushal Mishra)
Secretary General (AICAOA)