



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 O/o CGA, Min.
of Finance's letter No. 23003/1/2020-NGE-CGA /270 dated: 29th August, 2022)

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Auditor

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AICAOA/NEC/2023-24/131

Date: 4th Oct.' 2024

To,

The Controller General of Accounts
Mahalekha Niyantak Bhawan,
E-Block, GPO Complex, INA,
New Delhi-110023.

**Sub.: Incorporation of suggestions on Transfer Policy of Sr. AOs
dated 12.02.2024-Reg.**

Respected Sir,

I am writing this letter on behalf of the All India Civil Accounts Officers (Sr. AOs & PAOs) Association (AICAOA) to draw your attention to the issues faced by Sr. AOs due to current transfer policy dated 12.02.2024 and to emphasize the need for incorporating the suggestions put forward by the AICAOA vide letter no. AICAOA/Transfer Policy/2023-24/118 dated 15.03.2024 (Attached).

It has been observed that, in the absence of suitable transferrable matches (in terms of tenure) and the limited number of offices in Tier II, Tier III, and Tier IV Class cities, many officials are being subjected to undue hardship and victimization. They are being transferred out of station under the guise of "rotational transfer," without any transfer request from outside to their current place of posting and at an average age of 53-54, suffering from various health ailments, and burdened with heavy family responsibilities. It has also been seen that no readiness list is being published by O/o CGA and transfer orders are being issued abruptly. This practice is highly detrimental to the morale and well-being of the affected officials.

The provision of rotational outstation transfer in case of non availability of suitable substitute puts officials at Tier II, Tier III and Tier IV Class Cities at disadvantageous position in comparison to their counterparts in Tier I Class cities and therefore this discrimination must be addressed as suggested by AICAOA.

It is a matter of serious concern that recent transfers of Senior Accounts Officers (Sr. AOs) have been carried out as per the new transfer policy however recognized association of Sr. AOs (staff side) has not been given any opportunity to be heard/ consulted before finalizing and acting upon the new transfer policy dated 12.02.2024. This practice contradicts the established norms and undermines the representation of the association in policy decisions, leading to a perception of opaqueness and disregard for the welfare of staff.

Further, I would also like to draw your attention to Para 7.12 to 7.14 of the High Power Lal Committee report, which explicitly recommends the re-distribution of posts of the Indian Civil Accounts Service (ICAS) outside Delhi to ensure closer supervision of accounting work and internal audit. Recommendations of High Power Lal Committee report vide Point 54 of Chapter VIII - Summary of Conclusions and Recommendations is re-produced below:

“Of the total Staff of the Civil Accounts Organisation of about 9000, about 4500 are posted outside Delhi. However, of the total cadre of the ICAS of 147, only 18 posts are sanctioned for operation outside Delhi. It is recommended that ICAS posts should be re-distributed so as to provide for closer supervision outside Delhi of accounts work and internal audit and for rendering advice to Executive Officers. Wherever any Ministry/Department has three or more PAO’s at any location/State/Region, an ICAS Officer of appropriate status should be posted to supervise the accounts and audit work. Such a decentralisation/re-distribution is necessary to enrich their experience and would be in a direction of better fulfilling the role envisaged for this Service.”

Unfortunately, this recommendation has not been acted upon, and almost 95% of ICAS posts continued to be concentrated in Delhi. This situation has prevented ICAS Officers from gaining firsthand experience of the practical challenges faced by outstation postings, thereby widening the gap in policy implementation and understanding. **AICAOA strongly demands postings of ICAS Officers outside Delhi as per the above recommendations of High Power Lal Committee.**

In view of the above, I request that the suggestions of AICAOA vide letter dated 15.03.2024 may be incorporated into the transfer policy, ensuring a fair and balanced approach that considers the unique challenges faced by officials due to unjust transfer policy.

Addressing these issues proactively will go a long way in fostering a sense of equity, reducing undue hardships, and maintaining the morale and productivity of the entire workforce.

I trust that the matter will receive your kind attention and due consideration.

Encl: As above.

Yours sincerely,



(Kaushal Mishra)
Secretary General (AICAOA)

Copy to the Secretary (Expenditure), Ministry of Finance, Room No. 129-A, North Block, New Delhi for information and necessary action.



(Kaushal Mishra)
Secretary General (AICAOA)



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AICAOA/Transfer Policy/2023-24/118

Date: 15.03.2024

To,

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

Sub: Comments on Transfer/Posting Policy of Sr. AOs dated 12.02.2024- Reg.

Respected Sir,

Reference is invited to your Office Memorandum No. A-32014/4/2021/ MF.CGA(A) /Group 'B'/Policy/HR-III/1463 dated 12th February' 2024 on Transfer/Posting Policy of Sr. AOs dated 12.02.2024.

On behalf of AICAOA, I would like to extend our sincere gratitude and appreciate the considerable attention paid to incorporating many of the suggestions and recommendations put forth by AICAOA vide it's letter dated 30.11.2023. However, while we are grateful for the acknowledgement of our recommendations, we regret to note that some of the major suggestions of AICAOA have not been considered in the final Transfer/Posting Policy dated 12.02.2024. These recommendations were carefully crafted to address the practical problems faced by Sr. AOs during their outstation/ rotational postings.

We have prepared comments (enclosed), on the transfer policy dated 12.02.2024 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. **I request you to re-consider the suggestions of AICAOA so that concerns of officers are adequately addressed.**

We are eager to discuss the suggestions outlined in our transfer policy suggestions. AICAOA has endeavoured 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)
Secretary General (AICAOA)

Encl: As above (7 Pages).

Parawise Comments on Transfer/Posting Policy issued vide OM No. A- 32014/4/2021/ MF.CGA(A) /Group 'B'/Policy/HR-III/1463 dated 12th February' 2024

Para	Transfer Policy provision	Consequences	Recommendations
1.3	Constitution of CSB will be approved by CGA and all such orders will be published on CGA's website	There is no provision for inclusion of any member of AICAOA in CSB. As a result the transfer orders could become arbitrary and unilateral	One representative from each recognised association should be inducted into CSB in ensure transparency.
2.3	Irrespective of any of the provisions of the policy, all officers having completed 3 tenures at a station are liable to be transferred within the zone	Officers can be unnecessarily disturbed merely because they have completed 3 tenures at a station even when there is no necessity to accommodate any official	This para is arbitrary in nature and not to be implemented under any circumstances and should be removed, as there is enough protection given under para 9.1.2 and 9.1.3 to accommodate officials at their choice station. Rotational transfers should be confined to within the station as far as feasible.
4.3	Officials superannuating within 1 year shall be given due consideration to the extent administratively feasible at the time of promotional outstation transfers	It is very hard for the officials even at the age of 58 to move out of the station just for sake of one promotional increment. Para 3 (ii) of Transfer Policy issued by DoPT vide No. 21/19/2022-CS.I (P) dated 02.11.2022 (Copy enclosed) also provisions for exemption of transfer on promotion within two (2) years of Retirement.	On Promotional transfers Officials superannuating within 2 years should be given due consideration to the extent administratively feasible. Para 3 (ii) of Transfer Policy issued by DoPT vide No. 21/19/2022-CS.I (P) dated 02.11.2022 (Copy enclosed) also provisions for exemption of transfer on promotion within two (2) years of Retirement.

Para	Transfer Policy provision	Consequences	Recommendations
8.1	CCAS posts have been distributed in six zones for rotational transfers	There appears to be no rationale in introducing Zonal system for rotational transfers. In some zones like South Zone, the extreme points are located at distance of more than 1500 Kms. Zonal system of transfers are in place in Ministries/Departments like CBIC, CBDT where their Cadre Controlling Authorities are also located Zone wise unlike CGA organisation where the Cadre Controlling Authority is located centrally. Besides causing undue hardship to the officials, Zonal system on rotational transfers serves no purpose either to the officials or to the administration. Additionally it can be used as tool to harass or victimize officials in the name of rotational transfers by successive Cadre Controlling Authorities.	Zonal system for rotational transfers should be abolished completely.
8.2	For rotational transfers, in case of non-availability of eligible substitute at the station or in case of single ministry station, the officer is liable to be posted anywhere in the zone to the extent possible	<p>This para appears to be draconian for officials posted in stations where either few or single Sr.AO posts exists. As per the said para, the official completing just one tenure is liable to be posted anywhere in the Zone on rotational transfer if the substitute is not available in the same station or in case of single ministry station.</p> <p>Take for instance, A and B are places located adjacent to each other but fall in different Zones. In such a scenario the officials completing one tenure in both A and B, if the suitable substitute is not available in those stations, are liable to be posted in extreme opposite directions causing extreme hardship to both the officials. Instead the officials can be interchanged between A and B causing least hardship to both the officials.</p>	<p>Zonal system for rotational transfers should be abolished by introducing suitable clause to the effect that:</p> <ol style="list-style-type: none"> 1. In case of single ministry stations upon completion of tenure for rotational transfers, the official shall be posted to the nearest possible place or within 300 Kms., whichever is nearer to the extent possible 2. In case of multiple ministry stations, the official completing tenure for rotational transfers should be allowed to wait until substitute is available.

Para	Transfer Policy provision	Consequences	Recommendations
8.3	An officer in a particular grade will serve maximum of one tenure in each ministry/department at a station and thereafter shall be eligible for rotational transfer within the zone	<p>This clause, if not removed, again prove draconian to the officials posted where only a few Sr.AO posts exists.</p> <p>Take for instance if 2 posts of Sr.AO are available at a particularly station, the 2 officials having completing their tenure in both the ministries, on rotational transfers both are liable to be posted outside the station anywhere in the zone unnecessarily and resultant vacancies in both the posts at that station shall be filled up by forceful postings from other stations, which again appears to irrational</p> <p>Again this clause if not removed can be used as a tool to harass and victimize officials in the name of rotational transfers by successive Cadre Controlling Authorities.</p> <p>As stated earlier, in South Zone, the extreme points are located at distance of more than 1500 Kms. How can the posting of officials on rotational transfers be justified to a station which is at a distance of more than 1500 Kms. even in the same zone, overlooking the officials in the other zone which may be at a distance of 200 to 300 Kms.</p>	<p>The cap imposed under para 8.3 of transfer policy to serve maximum of one tenure in each ministry at a station should also be removed by inserting suitable clause to the effect that:</p> <p>In case of rotational transfers, the officials should be rotated between/among ministries to the extent possible in the same station.</p>
9.1.2(b)	For officers who are due to retire within 1 year, upon completion of tenure, in case there is no vacancy in the station(s) opted, the officer with longest continuous stay over and above prescribed tenure in any grade at that station shall be transferred to accommodate the request of such officers to the extent possible	<p>Again it is very hard for the officials at the age of 58 to to retire at outstation and not able to settle down properly at home station.</p> <p>Para 4 (i) of Transfer Policy issued by DoPT vide No. 21/19/2022-CS.I (P) dated 02.11.2022 (Copy enclosed) also provisions for exemption of rotational transfers within two (2) years of Retirement.</p>	<p>Officers who are due to retire within 2 year, upon completion of tenure, in case there is no vacancy in the station(s) opted, the officer with longest continuous stay over and above prescribed tenure in any grade at that station shall be transferred to accommodate the request of such officers to the extent possible.</p> <p>Para 4 (i) of Transfer Policy issued by DoPT vide No. 21/19/2022-CS.I (P) dated 02.11.2022 (Copy enclosed) also provisions for exemption of rotational transfers within two (2) years of Retirement.</p>

Para	Transfer Policy provision	Consequences	Recommendations
9.2	Before completing the prescribed tenure, request for transfer shall be considered only in exceptional cases	It may so happen that the vacancies created/arise before completion of tenure who are posted outside, may be got eaten up by junior officials who may seek local postings.	Before completing the prescribed tenure , the request of officers <u>who have at least completed 50% of the prescribed tenure shall be considered as “on own request” and no TA will be allowed,</u> will be considered as per their seniority subject to the availability of clear cut vacancy in that station.
13.3	Officers of all grades within 1 year of superannuation shall be exempted from outstation rotational transfers.	Again it is very hard for the officials at the age of 58 to move out of the station on rotational transfers. Para 3 and Para 4 of Transfer Policy issued by DoPT vide No. 21/19/2022-CS.I (P) dated 02.11.2022 (Copy enclosed) also provisions for exemption of rotational transfers within two (2) years of Retirement.	Officers of all grades within 2 years of superannuation should be exempted from outstation rotational transfers. Para 3 and Para 4 of Transfer Policy issued by DoPT vide No. 21/19/2022-CS.I (P) dated 02.11.2022 (Copy enclosed) also provisions for exemption of rotational transfers within two (2) years of Retirement.

Kaushal

**(Kaushal Mishra)
Secretary General (AICAOA)**

No. 21/19/2022-CS.I(P)

Ministry of Personnel, Pension and Public Grievances
Department of Personnel and Training
Government of India

Lok Nayak Bhawan, New Delhi

Dated the 2nd November, 2022

OFFICE MEMORANDUM

Sub: Consolidated guidelines on Rotational Transfer Policy (RTP) for Central Secretariat Service – Regarding.

The Central Secretariat Service (CSS) is managed centrally in CS.I Division of Department of Personnel & Training (DoPT) for all matters relating to appointment, promotion, posting/transfer etc. CSS provides a permanent bureaucratic set up in the Central Secretariat and officers of the service provide continuity in the Central Secretariat. As a part of the cadre management, the officers of the Service can be posted to any Ministry/Department under Central Secretariat and other offices participating in CSS in Delhi and also located outside Delhi.

2. In order to manage transfer/ posting of the officers of the CSS in a definite framework, a Rotational Transfer Policy (RTP) has been in existence for quite some time. As various amendments in the policy have since been made at different times, it is felt to consolidate the same and accordingly, the consolidated guidelines with certain amendments on RTP in CSS have been drawn up and annexed herewith for information and compliance.



(P.B. Sahu)

Deputy Secretary to the Govt. of India

To:

All Cadre Units of CSS through website of DoPT.

**Consolidated Guidelines on Rotational Transfer Policy (RTP) for
Officers of Central Secretariat Service (CSS)**

1. Grouping of Ministries/ Departments

- (i) Ministries/ Departments have been divided into two groups — **Group 'A' and Group 'B'** vide **Annexure-I**. If an officer has served his tenure in Group 'A', he/she will be eligible for transfer to Group 'B' and vice versa.
- (ii) However, an officer posted in Group 'A' Ministry/ Department may also opt for posting to another Ministry/ Department in Group 'A' on promotion. On his posting in the new Ministry/ Department in Group 'A', tenure will be counted afresh for future transfer under RTP.

2. Tenure

The minimum tenure required in a particular Ministry/ Department to be eligible for transfer from one cadre to another is as under:

S. No.	Grade	Tenure
(i)	Assistant Section Officer (ASO)	7 years
(ii)	Section Officer (SO)	7 years
(iii)	Under Secretary (US)	6 years
(iv)	Deputy Secretary (DS)/ Director/ Joint Secretary (in-situ)	5 years

3. Transfer on promotion and exemption thereof

- (i) On promotion, an officer at any level shall be posted out of the Ministry/ Department if he/she has served in the same Ministry/ Department in any capacity for a period exceeding the prescribed tenure for the promotion post.
- (ii) **If the officer is due for superannuation within two years**, he/she will be retained in the same Ministry/ Department against an existing vacancy of the promotional post. In case of no vacancy of the promotional post, then the officer will be transferred to another Ministry/ Department.
- (iii) **If the officer is due for superannuation within six months on promotion**, he/she will not be transferred as in such a short period one cannot be expected to contribute usefully in another Ministry/ Department. Further, such a transfer may result in delay in finalisation of pension papers. Such an officer will be retained in the same Ministry/ Department against an available vacancy of the promotional post. In the absence of a vacancy, the post held by him/her will be upgraded on personal basis by keeping one post in another Ministry/ Department vacant so as not to exceed the cadre strength. On retirement, the post will revert to its original level.

4. Officers exempted from transfer under RTP

- (i) Officers of all grades within two years of superannuation will be exempted from rotational transfers.
- (ii) Officers likely to be promoted within one year shall be exempted from the RTP as on promotion officers are transferred if they have completed the prescribed tenure for the promotional post.

5. Offices exempted under RTP

Officers serving in PMO, Cabinet Secretariat, O/o Solicitor General & Attorney General, Addl. Solicitor General will be exempted under RTP. It is considered necessary that these offices may be allowed to retain officers of choice beyond the prescribed tenure under RTP. However, before issue of transfer orders under RTP, these offices will be notified about the officers matured for transfer and if the office concerned decides to retain any of the officers also keeping in view the willingness of the officers concerned, it will inform DoPT and such officers will be exempted from RTP. This exercise will be repeated every year.

6. Surrender of Officers

- (i) Unilateral surrender or relieving of officers on any ground is not allowed as surrender or relieving of an officer poses several problems to the Cadre Controlling Authority. If an officer is not performing, Ministries/ Departments concerned are expected to initiate appropriate action either to penalize or to reform the officer. Moreover, the officer surrendered/ relieved has to be posted somewhere and it will be difficult for the Ministry/ Department, where he/she is posted to work with such an officer. If situation warrants that an officer has to be surrendered/ relieved, then a request should be made to DoPT with detailed reasons and DoPT will consider the request on merits, whether to transfer the officer or not.
- (ii) If despite the instructions, any Ministry/ Department surrenders an officer unilaterally, then such surrender would be presumed to have been made along with the post and the sanctioned strength of the concerned Ministry/ Department would be reduced accordingly and no replacement would be provided to the cadre unit concerned for one year. After expiry of one year, the position will be reviewed for restoration of the post and posting of an officer.

7. Posting of Officers on return from Deputation/Long Leave/Long Term Training

- (i) An officer of any grade is required to report to CS.I Division (DoPT) on his/her return from deputation/long leave/long term training and will be posted to any Ministry/ Department based on the administrative exigencies. In such cases, this posting will be treated as a fresh tenure. In case it is decided that an officer is to be posted back to the same Ministry/ Department he last served, then his tenure will be limited to the balance period of the tenure prescribed for the