

**RECORD NOTE OF DISCUSSIONS ON
THE AGENDA MEETING HELD ON 28.10.2022 AT 11.30 A.M. BY
THE DY. C&AG (HR, IR & Co-ordn.) WITH THE OFFICE
BEARERS OF THE NATIONAL AUDIT FEDERATION (NAF).**

1. An Agenda meeting by the Dy. C&AG (HR, IR & Co-ordn.) with the office bearers of the National Audit Federation (NAF) was held on 28.10.2022 at 11.30 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 (HR, IR & Co-ordn.) welcomed the representatives of National Audit Federation and hoped that the ensuing deliberations would be fruitful and constructive.
3. Discussions commenced thereafter on the Agenda Items.

ANNEXURE- A

**LIST OF PARTICIPANTS WHO ATTENDED THE MEETING HELD BY
DEPUTY COMPTROLLER AND AUDITOR GENERAL (HR, IR & Coordn.)
WITH THE OFFICE BEARERS OF THE NATIONAL AUDIT FEDERATION
ON 28.10.2022 AT 11.30 A.M.**

S/Shri/Smt.

Parveen Mehta	Deputy Comptroller and Auditor General (HR, IR & Co-ordn.)
K.S. Subramanian	ADAI (Staff)
Ritika Bhatia	Director General (Staff)
Nasir Khan	Sr. Administrative Officer (Staff JCM)
Amal K. Das	President, NAF
Jai Shankar Kumar	Secy. General, NAF
K.V. Subbarao	Addl. Secy. General, NAF
Kuldeep K. Sharma	Treasurer, NAF

Demand No.1: Implementation of Long Term Plan without further delay.

Explanation:

On the recommendation of the Committee on Rationalization of staff in Audit Offices, Short Term Plan (STP) was rolled out in audit offices. STP had envisaged audit coverage of High Risk units only. Accordingly, the then existing sanctioned strength was rationalized by decreasing 3774 posts.

In order to cover audit of all units, manpower requirement was presented in Long Term Plan (LTP). It is very much desirable for the department that it moves towards implementing the LTP at the earliest.

LTP does not recommend curtailing the strength in any cadre but in STP cadre strength was curtailed in many offices.

Federation requested that Long Term Plan is implemented without further delay.

Official response to the Demand:

DAI informed that the steps to formulate/review Long Term Plan have been initiated. Committee on Determining Optimal Sanctioned Strength of the IA&AD has been constituted to determine the optimum Sanctioned Strength of the department, covering all functions and wings. The Committee's report is expected shortly and on receipt it will be examined & necessary action taken.

Demand No.2: Filling up vacancies in all cadres.

Explanation:

At present 12 percent vacancy in Sr. AO cadre alone exists. Despite joining of new direct AAOs and better result in SAS examinations, still there is a shortage of 15 percent in AAO cadre. Similar situation is there in Sr. Auditor (11%) and Auditor (26%) cadres.

With exponential growth in Government expenditure, expansion of welfare schemes, continuous launch of projects across all sectors, it is necessary to have sufficient resources to cover major areas of concerns and provide reasonable assurance to all stakeholders.

Audit programmes are being planned with smaller teams and lesser man days. The department is getting loads of RTI applications and general complaint cases. With increasing expectations of quality and reliable work from all stakeholders, overall scenario has left little space to err thus making us more vulnerable.

Thus, there is urgent need of filling up vacancies in all cadres. All necessary steps may be taken to fill up the vacancies in the department.

Official response to the Demand:

Medium Term Recruitment Plan has been prepared for the period from 2021-2025, to minimize the vacancy position below 5% in all cadres in phased manner by 2025-27. Requisitions for CGLE 2022 and 2023 have been placed with SSC. We are expected to receive the dossiers against those requisitions by December 2023 as informed by the DoPT. The vacancy position is thus expected for improve significantly in the next 15 months.

This agenda item may be treated as closed.

Demand No.3: Cadre Review Exercise.

Explanation:

The measures suggested by the Cadre Review Committee are inadequate to deal with the problems of stagnation in our department.

To resolve this issue, more promotional avenues are explored and the number of posts in the cadre of Assistant Supervisor, Supervisor is increased.

Further, the delay in implementation of recommendation pertaining to promotion of Sr. AO in Level-11, 12 & 13 is causing great dissatisfaction and dismay.

Federation demands that recommendations of the Cadre Review Committee are implemented in a time bound manner.

Official response to the Demand:

Recommendation of Cadre Review Committee (CRC) in respect of Group B & C have already been implemented/under implementation. To ensure a pyramidal structure for the non-gazetted (Ar./Acctt.) cadre, re-distribution of posts has been done among the different levels. The recommendation of CRC in respect of the proposal regarding creation of posts in Level-11, 12 & 13 is under process.

Demand No. 4: Grant of Level-9 after 4 years of service to AAO (Adhoc/RT).

Explanation:

AAO (Adhoc/RT) are SAS qualified officers who are waiting for promotion for many years, because of shortage of vacancy in their offices.

Irrespective of job-description for them, in real practice, duties performed by AAOs (RT) are not of any lesser standard than of any regular AAO in any office.

Before the merger of AO and Sr. AO, AAOs (RT) were considered for empanelment to the post of AO at par with other AAOs. They are eligible to appear in incentive examination (RAE) and CPD).

Federation demands that benefit of NFU in Level-9 is extended to AAOs (Adhoc/RT) also.

Official response to the Demand:

AAO (Adhoc) is not a regular promotion as it is not against any vacant post/sanctioned strength unlike the AAO and AAO (RT). As per the T&C for giving the financial benefit, service rendered on ad-hoc basis will not count as regular service in AAO cadre for the purpose of seniority, promotion, eligibility for appearing in departmental examination (i.e. incentive/CPD examination) etc. AAO (Ad-hoc) are assigned duties as decided by the HoD, and not given full supervisory charge. NFU is granted only to AAO on completion of 4 years of regular service in the cadre. AAO (RT) is not comparable to AAO (Ad-hoc) as AAO (RT) is a created post while AAO (Ad-hoc) is personal to an employee.

Demand No. 5: Transfer – Posting and Deputation policy.
(i) Inter state transfer.

Explanation:

At present, no Inter state transfer is permitted and requested for formulation of a suitable mechanism.

New recruits leave this Department and join other services.

Official response to the Demand:

All the Gr. B & C cadre posts in IA&AD are decentralized. Unilateral transfer (absorption) within IA&AD and from Ministries/Departments to IA&AD are dispensed with effect from 1997. However, due to deficit in Civil Audit offices, absorption of SAS (Civil Audit) passed A&E officials were allowed in Civil Audit Offices. Further, deputation within IA&AD is being allowed liberally & mutual transfers are also in vogue. Attrition rate in IA&AD of new recruits cannot be related to transfer policy.

Demand No. 5: Transfer – Posting and Deputation policy.
(ii) Inter state transfer (Contd...).

Explanation:

Candidates passing SAS examination (in civil audit offices) should be given chance to opt for any another audit office of their choice similar to the candidates passing SAS (Audit) from A&E office.

Official response to the Demand:

The proposal of Federation was considered and Competent Authority accorded approval to this effect and appropriate orders have been issued vide Hqrs. Circular dated 08.09.2022.

Demand No. 5: Transfer – Posting and Deputation policy.
(iii) Intra office transfer.

Explanation:

Not to remain in any particular section/wing for more than five years without specific approval of AG/PDA.

Non-compliance with the instructions of Hqrs office.

Official response to the Demand:

The intra-office transfer and posting is governed by the guidelines/instructions issued vide Hqrs circular dated 06.01.2014. The instructions are subject to administrative convenience and exigencies of the concerned office also. However, these instructions will be reiterated for strict compliance and mechanisms to monitor its implementation will be formulated.

Demand No. 5: Transfer – Posting and Deputation policy.
(iv) Mutual transfer.

Explanation:

Withdraw the para (viii) of Hqrs circular dated 6.6.2013 – mutual transfer is permitted only once in the entire service of an official.

Official response to the Demand:

Modalities for Mutual Transfer issued vide Hqrs circular dated 06.06.2013 are being examined to explore the feasibility of further relaxation, if any.

**Demand No. 5: Transfer – Posting and Deputation policy.
(v) Mutual transfer (Contd...).**

Explanation:

In case of officials recruited under sports quota, mutual transfer is allowed during the first 10 years of service and between the same disciplines of sports. This condition may be liberalized by allowing the mutual transfer after 10 years of service and between different disciplines of sports.

Official response to the Demand:

A Committee has been constituted for revision of guidelines on sports quota recruitment and this aspect will also be examined by the Committee.

**Demand No. 5: Transfer – Posting and Deputation policy.
(vi) Deputation.**

Explanation:

Encouragement of deputation and be permitted in all cadres where deficit in the cadre is under the limit of 15% in that office.

Official response to the Demand:

The deputation demand is circulated to all the field offices of IA&AD. As per administrative convenience, field offices are recommending the name of eligible and willing officials for deputation. Deputation policy for outside of IA&AD has been finalized and deputation are allowed in the cadre where vacancy is up to 15%. Deputation policy was issued vide letter No. 1050-Staff (App.I)/ 05-2022 dated 28.06.2022.

Demand No. 6: Examination – Training Reforms.

Explanation:

- i. Questions pattern should be concepts and understanding based and not the memorizing types. Depending upon the subjects and requirement of actual audit, evaluation method may include objective and subjective questions.
- ii. At the end of a computer-based test, provisional score should be displayed. If possible, option of providing print of the answer sheet may also be considered..
- iii. Departmental examinations should be conducted on MCQ pattern.
- iv. Removal of negative marking in RAE and CPD examinations and reduction of time-gap between CPD examinations.
- v. The training for staffs and officers should be organized at professional and specialized institutes like IIM, FMS, IIT, ICAI, ICWA, IILM, IIPA etc.

Official response to the Demand:

i. *The suggestion is appreciated. A committee set up to review SAS Exam papers and syllabus has submitted its report. The CAG of India has accepted the recommendations of the committee headed by ADAI (Staff) to comprehensively review the Subordinate Audit/Accounts Services (SAS) Exam syllabus, papers & the pattern of Questions and has approved the **revised syllabus etc** of the Subordinate Audit/Accounts Services (SAS) Examination. The revised syllabus of SAS Examination shall be implemented from the Examination-2 of 2024.*

The revised syllabus has been circulated to all Heads of Department of IA & AD offices/DG(Staff)/DG(HQ)vide Exam wing Circular No. 18 of 2022 dated 27.10.2022. The same has also been uploaded on CAG's website (cag.gov.in>Departmental Examinations>Syllabus & Books).

DG (Training) has been requested that pre-examination training module for candidates appearing in the new dispensation (i.e. from Exam-2 of 2024) in accordance with the revised syllabus, may be prepared.

ii. *The overall results cannot be declared immediately due to the necessity of importing/linking data in terms of pass/fail/exemption of previous exam paper for all the candidates which involves analysis of data given by the previous vendor. However, the matter will be taken up with the outsourced agency to check the technical and other aspects of the issue and readiness to show marks of a particular paper in a particular exam, within the overall terms and conditions of the original contract.*

iii. *Circular in this regard has already been issued vide Hqrs exam wing circular dated 6.01.2022.*

iv. *In computer based testing with MCQ, negative marking is required to compensate and limit guess work. Further exams are of incentive in nature. The interval has already been reduced from 5-4-3 to 4-4-3 in 2016.*

v. *Specialized trainings are organized for SAOs/AAOs at reputed external training partners like OP Jindal Global University, Sonipat and National Institute of Financial Management since 2015. A new policy of self nomination scheme for SAO/AAO for Executive Development Programme at Indian Institute of Management was initiated in October 2019 and implemented from March 2022, for 2022-23, 19 Courses approved to be conducted at IIM Ahmedabad, Indore, Lucknow, Kolkata and Bangalore. CPD Pre-examination training is being organized to SAOs/AAOs at OP JGU, NIFM & iCISA. Mid-career Training programmes (MCTP) have commenced for SAO/AAO since March 2022 at RTIs/RTCs/NIFM. During 2022-23, 2 external institutes i.e. OP Jindal Global University & ASCI, Hyderabad were roped in for MCTP level 4.*

Demand No. 7: Promotion of AAO to Sr. AO

Explanation:

Delay in promotion of AAO to SAO consequent on the re-classification of SAOs in IA&AD as Group "A".

Official response to the Demand:

- 1. Promotion of eligible AAOs to Sr. AOs for the panel year 2020, promotion orders have been issued in respect of 44 cadre controlling offices, 6 proposals are with UPSC, 3 proposals are ready with Hqrs. Office to be submitted to UPSC, 4 proposals are under examination and 22 cadre controlling offices have intimated there is no DPC proposal for panel year 2020.*
- 2. Further, the combined panel year 2021 & 2022, 02 DPC proposals for in respect of O/o PAG (Audit-I), Kerala & PAG (A&E) Kerala were submitted. UPSC had suggested some modifications in the format. Accordingly, proposals in modified format are ready for submission to UPSC.*
- 3. A new issue raised by the UPSC of reviving "deemed abolished posts" that had been vacant for over 2 years, has recently been resolved.*
- 4. Faster DPC clearances are expected as a result.*

Demand No. 8: Re-designation of Asstt. Supervisor, Supervisor & AAO.

Explanation:

Federation has requested for re-classifying AAO as AO, Supervisor as AAO and Assistant Supervisor as Section Officer. This request does not involve any monetary considerations but results in satisfaction of holding higher post at the time of retirement one will retire with accomplishment and satisfaction.

Official response to the Demand:

The designations like AO, AAO etc. are used in several other accounting departments and there is a need to ensure uniformity across the departments in the level linked to a designation. Against this backdrop, the Association's proposal will be examined.