



**JOINT COUNCIL OF ACTION**  
**INCOME TAX EMPLOYEES FEDERATION &**  
**INCOME TAX GAZETTED OFFICERS' ASSOCIATION**  
A-2/95, Manishinath Bhawan, Rajouri Garden, New Delhi-110 027



*Joint Convenors :*

**K. P. Rajagopal**  
098-682-77455  
[itefcentral@gmail.com](mailto:itefcentral@gmail.com)

**Bhaskar Bhattacharya**  
089-021-98888  
[secgenitgoachq@gmail.com](mailto:secgenitgoachq@gmail.com)

No.N-1/M15/14-15/

Dated: 4<sup>th</sup> February, 2015

To

**The Chairman,**  
**Tax Administration Reform Commission,**  
Ministry of Finance, Government of India,  
3rd Floor, Tower -I, NBCC Plaza,  
Sector -3, Pushp Vihar, New Delhi - 110 017

Sir,

*Sub: Meeting with the delegation of Joint Council of Action of the Service Associations of Income Tax Department on the recommendations of TARC - regarding*

On behalf of the Income Tax Gazetted Officers' Association (representing the officers of the Department other than the directly recruited IRS Officers) and Income tax Employees Federation (representing the entire non-gazetted employees), we express our gratitude for allowing us an audience before you on 04.02.2015. Together we must say that we represent more than 95% of the personnel of the Department.

We take this opportunity to bring to your kind notice the following major issues which need the attention of the Commission:-

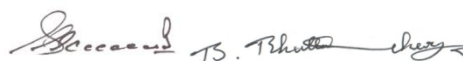
1. Provide more financial & administrative autonomy to CBDT.
2. No merger of CBDT & CBEC as it will create disturbance in horizontal integration of staff and officers of the two Departments. Moreover functioning of both the departments is quite different.
3. There should be representations of all stake holders including representatives of recognised associations in the functioning of CBDT.
4. The Chairman, CBDT, when appointed, should have at least one year normal service left.
5. Make the senior management level more accountable and ensure they don't resort to risk aversion.
6. Provide proper infrastructure like assessee friendly work ambience and state-of-the-art computer/peripherals/ on line connectivity, even the facility to work away from office, to the field level officers so that proper tax payer services can be provided.
7. At least 2% of tax collection should be earmarked for the infrastructural development of the Department and for the welfare of the employees.
8. Dispense with LTU as the experiment failed.
9. Develop in-house specialization for technology development, research on economy, planning & statistics.

10. The performance of officer/staff must be judged on the overall ability to dispense with all areas of jobs and not only on achieving budget target.
11. Provision for 360 Degree appraisal in APARs at all levels.
12. Provide opportunity to officers & staff to augment their skills by sponsoring upgradation training. Foreign Training schedules to be planned for the middle and lower level of management as well as field-officers and not for the Apex level who become due for retirement shortly.
13. Vigilance matters should be disposed off within a fixed time frame.
14. Similar promotional opportunities for all cadres strictly following DoPT devised DPC Calendar. The average delay in holding the DPC for the promotion from ITO to the ACIT cadre is 19 months. The stagnation in ITO cadre has reached 14 years against the residency period of 3 years.
15. Separate Policy for filling up of all vacant posts in a time bound manner to augment Revenue Collection. At present, in Pr.CIT/CIT cadre, 186 out of 935 posts are vacant. In Addl.CIT/JCIT cadre, 548 out of 1575 posts are vacant. Similarly, 1026 out of 2914 posts are vacant in AC/DCIT cadre.
16. The discrimination with the promotee officers should be removed. At present, most of the significant posts in assessment and investigation side are held by the direct recruit IRS officers, with short experience. This is due to control of direct recruit IRS officers in CBDT and senior administrative posts. The promotee officers, with long experience in the department, are mostly posted in lesser important posts. Thus their experience and expertise is not properly utilised. It is adversely affecting the tax collection.
17. The position of vacancies in ministerial staff is much worse since Staff Selection Commission is not providing adequate staff. This is hampering the normal functioning of the field offices. Therefore alternative measures for filling of vacancies are to be explored.
18. Cadre review/ Restructuring in every 5-years to cope up with the emerging challenges to detect tax evasion.
19. Greater integration of information from all government agencies nominating ITD as the Nodal Agency just as the case of PAN and CBIN.
20. Greater powers in line with those enjoyed by the officers in ED, DRI and Service Tax Department for tackling serious tax offenders and collecting arrear tax demand.
21. ITD should be entrusted to handle the cases in connection with the Prevention of Money Laundering Act.
22. Fix responsibility on Chartered Accountant for false/ wrong certifications as well as on ICAI in case of failure to act upon the erring members.

We solicit your kind attention in respect of the above issues, which not only motivate the entire cross-section of officers and the ministerial staff down the line and so, but are also bound to increase the revenue collection of the Income Tax Department.

Thanking you,

**Yours sincerely,**



**(KP Rajagopal) (Bhaskar Battacharya)**  
**Joint Convenors**