

To

Shri. Anil Malik
Joint Secretary (FOREIGNERS)
Major Dhyan Chand National Stadium
Outer India Gate, New Delhi-110001

Subject: Extension for linking FC registered bank accounts with PFMS compliant banks to 31 March 2018

Respected Sir,

I am writing on behalf of the members of Voluntary Action Network India, the national platform for Indian Voluntary Organizations pertaining to the notification vide 2/21022/58(951)/2017 released by your august department on 21 December 2017. Sir as you are aware the notification stipulates the deadline for shifting FC designated bank accounts of Voluntary Organizations to PFMS compliant Banks by 21 January 2018.

Sir, this is a very small period for such an onerous transition and entails various difficulties for Voluntary Organizations. As you know opening FC designated bank accounts is not an easy process requiring documentation and multiple-tier level clearances. The problem is compounded with regards to Voluntary Organizations at the grass roots that are confronted with diffused banking facilities at village and tehsil level and thus face difficulty in shifting to notified PFMS banks. Similarly there are many operational constraints encountered by banks in opening FC designated bank accounts and lack of understanding among bank officials of the procedural modalities especially when it involves the use of link accounts at regional levels. Additionally owing to the year end, many Voluntary Organizations are involved in consolidating and filing their FC-4 Annual Returns and thus face challenge in opening new bank accounts. It has also been noticed that many banks who are PFMS compliant are not included in the notified list issued by the department.

It is with this plea that we submit to your humble consideration to extend the date of the deadline to 31st March 2018 for integrating FC bank accounts with PFMS compliant banks. This will not only grant time for Voluntary Organizations to smoothly transition to new bank accounts but will give ample time for banks to implement the order. Please bear in mind that we as the Voluntary Sector welcome this move by the department as it supports transparency and accountability however the time allotted for the process is not enough and may throw room for human error which is not desirable under FCRA rules.

It is hoped that you would grant us this extension and allow us time to spread this information as many grassroot Voluntary Organizations would not be aware of this notification.

Thank you for your time and consideration

Best Regards,