



**PenCom**

# FRAMEWORK FOR THE SUPERVISION OF STATES AND LOCAL GOVERNMENTS PENSION SCHEMES

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**National Pension Commission**

## About this Framework

The Framework for the Supervision of States and Local Governments Schemes sets out the implementation processes and supervisory machinery to be adopted in ensuring effective and smooth operations of the Schemes at the State and Local Government levels, and also for supervising the activities of the State Pension Bureaux by the National Pension Commission.

The Framework is divided into five sections.

Section one is the introduction while section two addresses the implementation process, beginning with setting up of the administrative structure – the Bureaux, to minimum level of automation, establishment of data bank, operation of retirement savings, determination of accrued benefits and modalities for payment of existing pensioners.

Section three sets out the regulations for the operation of other types of schemes such as the Defined Benefits Scheme (DBS) and Contributory Defined Benefits Scheme (CDBS) and the necessity to transfer the assets under such schemes to licensed operators in addition to the need for periodic actuarial valuation of such schemes to ascertain the level of funding.

Section four addresses the issues relating to reporting requirements and it encapsulates the minimum record keeping standards and rendition of returns by the Bureaux.

Section five highlights the regulatory and supervisory framework for overseeing the affairs of the State schemes by the Commission and it sets out the monitoring mechanisms, communication between the Bureaux and the Commission and capacity building of the State operators by the Commission.

The requirements of this Framework are largely consistent with the provisions of the Pension Reform Act, 2004 and are also considered enforceable at the States and Local Governments levels.

This Framework shall be reviewed in line with prevailing conditions as and when the need arises.

All enquiries regarding the content of this Framework should be forwarded to the Director General, National Pension Commission.

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## FRAMEWORK FOR THE SUPERVISION OF STATES AND LOCAL GOVERNMENTS PENSION SCHEMES

### 1.0 Introduction

1.1 The States and Local Governments in Nigeria hitherto operated the Pay-As-You-Go Defined Benefits Pension Schemes (PAYG), which were largely unfunded.

1.2 The PAYG Schemes were saddled with lots of problems ranging from incidences of ghost pensioners to the challenges of identifying bona fide existing pensioners. At the States level, it was not practically possible to determine, with reasonable degree of certainty, the number of pensioners that retired under the States and Local Government Services and those that exited from the system within any given period of time.

1.3 In recognition of these challenges, the Council of States, at its meeting of July 2006, unanimously resolved to adopt the Contributory Pension Scheme for the States and Local Government Councils (LGCs), in line with the philosophy and aims of the Pension Reform Act (PRA) 2004, which is presently operational at the Federal level and Private Sector.

1.4 Pursuant to the development in 3.3 above, a draft State Law was developed by the Commission, to guide States in formulating their pension laws.

1.5 To facilitate effective implementation of the Contributory Pension Scheme, Section 22 (1) of the draft State Law specified the establishment of State Pension Bureaux.

1.6 While States have either commenced or are at various stages in their legislation processes in an attempt at

implementing the CPS, few chose to either implement a Defined Benefits Scheme (DBS) or its variant – the Contributory Defined Benefits Scheme (CDBS).

### 2.0 Implementation Processes for CPS

#### 2.1 Establishment of State Pension Bureaux

2.1.1 The implementation of the Scheme in the States and LGCs shall begin with the proper establishment of the pension offices (i.e. Pension Bureaux).

2.1.2 The Establishment of the Pension Bureaux shall commence after the State Pension Laws have duly been enacted.

2.1.3 The Commission shall oversee the establishment of the Bureaux in each of the 36 States of the Federation.

2.1.4 The Commission shall render both technical and consultative assistance to the Bureaux, on needs basis.

2.1.5 The Bureaux shall operate under the rules, regulations and directives issued by the Commission, from time to time.

2.1.6 For efficient operations, the Bureaux shall have a staff compliment of not less than 18.

#### 2.2 Structure of the Bureaux

2.2.1 The staff compliment of each Bureau shall, in the minimum comprise of:

- i) A Deputy Director, who shall head the Bureau.
- ii) An Assistant Director.
- iii) A Level 14 officer.

- iv) Five (5) Level 10 officers.
- v) Six (6) Level 8 officers.
- vi) Four (4) Level 6 officers.

2.2.2 The Bureaux shall have the following Units:

- i. Finance and Accounts;
- ii. Internal Audit;
- iii. Administration and Personnel; and
- iv. Records.

2.3 Functions of the Bureaux

2.3.1 The Bureaux shall carry out the functions of the defunct State Pension Departments and the Local Government Pension Boards, and shall, in particular:

- i. make budgetary estimates for existing pensioners and officers exempted from the Contributory Pension Scheme;
- ii. receive budgetary allocations and make payments to the pensioners, as and when due;
- iii. ascertain deficits in pension payments, if any, to the existing pensioners or the categories of officers exempted from the new Scheme;
- iv. carry out such other functions aimed at ensuring the welfare of pensioners as the State Government or the Commission may from time to time, direct;
- v. pay gratuity and pension to the existing pensioners and the category of officers exempted under the new Scheme, in accordance with relevant and applicable computations under the existing PAYG Pension Scheme of the State Public Service;
- vi. establish and maintain a database of all pensioners and contributors under the Scheme;

- vii. receive, review and respond to complaints and liaise with the Commission, where necessary, on their resolution;
- viii. coordinate and oversee the activities of the actuaries that shall undertake the actuarial valuation of the past service liabilities of existing employees;
- ix. render periodic reports on the status of contributions and other remittances;
- x. monitor compliance levels and appraise the effectiveness of operations of the Scheme within the State, with a view to making suggestions for improvement to the Commission;
- xi. report to the Commission, latest three (3) working days after the expiration of the 7 working days grace period after the payment of salaries, if the State or Local Government is in default of remittance of any contributions;
- xii. liaise directly with the Commission, on a continuous basis, and serve as a direct point of contact with the Commission; and
- xiii. render returns to the Commission, as may be required from time to time.

2.4 Minimum Automation Requirements for the Bureaux

2.4.1 The Pension Bureaux shall be fully automated with modern ICT and other communication facilities.

2.4.2 The following shall be the minimum ICT facilities that shall be put in place at the Bureaux:

- i. Desk-top computers.

- ii. Servers.
  - iii. Complete database of all categories of pensioners.
  - iv. Printers.
  - v. Telephone/fax lines.
  - iv. Stabilizers/UPS.
  - v. Internet connectivity for electronic returns rendition capability.
- 2.4.3 The Commission shall, upon advice of the readiness of ICT facilities from the Bureaux, carry out an inspection of the facilities installed.
- 2.5 Establishment of Data Bank
- 2.5.1 In pursuance of the objectives specified in Section 20 (e) of the Pension Reform Act, 2004, the Commission shall ensure the maintenance of a data bank of all pensionable employees in the States and Local Governments.
- 2.5.2 In realization of the objective stated in 2.5.1 above, the State and Local Government Pension Bureaux shall immediately, upon the set-up of the Bureaux, collate and forward to the Commission, the following information on every serving employee in the State and Local Governments:
- i. File/Service Number
  - ii. Surname
  - iii. First Name
  - iv. Middle Name
  - v. Sex
  - vi. State of Origin
  - vii. Local Government Council
  - viii. Date of Birth
  - ix. Date of First Appointment
  - x. Expected date of retirement
  - xi. Date of last promotion
  - xii. Grade Level
  - xiii. Step
  - xiv. Salary structure
  - xv. Total emolument
  - xvi. Designation/Rank
  - xvii. PenCom Personal Identification Number (PIN)
  - xviii. Pension Fund Administrator
- xix. Biometrics – Photograph and finger prints
- 2.5.3 The Bureaux shall, on a monthly basis, provide regular update, on the information provided in 2.5.2 above.
- 2.5.4 The Bureaux shall maintain a database of all pensioners of the State and Local Governments, which shall in the minimum, contain information specified in paragraph 4.1.3 of this Framework.
- 2.6 Operation of Retirement Savings Accounts
- 2.6.1 For employees in States that have adopted the CPS, every employee shall open a Retirement Savings Account (RSA), in his name, with a Pension Fund Administrator (PFA) of his choice.
- 2.6.2 The employee may, not more than once in a year, transfer the Retirement Savings Account from one PFA to another, if he/she so wishes, without adducing any reason for such transfer.
- 2.6.3 The employee shall notify the State Pension Bureau, of the PFA chosen by him and the associated PIN assigned to him/her, as well as the designated bank account, into which contributions are to be paid.
- 2.6.4 The rate of contribution shall be a minimum of seven and a half percent (7½%) of the total monthly emolument of the employee, to be contributed by the employer and employee, respectively.
- 2.6.5 In line with the provisions of Section 9 (2) of the PRA 2004, the State or Local Government may agree or elect to bear the full burden of the Scheme, provided that the employer's contribution shall not be less than 15% of the total monthly emolument of the employee.

- 2.6.6 Pursuant to the provisions of Section 9 (6) of the PRA 2004, the rates of the contribution mentioned in 2.6.4 and 2.6.5 above, may, upon an agreement between a State and its employees be revised upwards from time to time and the Commission shall be notified of such revision through the Bureaux.
- 2.6.7 The States or Local Governments shall maintain a life insurance policy in favour of each of its employees, for a minimum of three times the total annual emolument of the employee.
- 2.6.8 An employee, covered under the State Pension Law may, in addition to the total contributions being made by him and his employer, make additional voluntary contributions to his Retirement Savings Account, in line with the guidelines issued by the Commission.
- 2.6.9 The employee shall not have access to his Retirement Savings Account nor have any dealing with the Custodian with respect to the Retirement Savings Account, except through the Pension Fund Administrator.
- 2.6.10 Contributions by the State Government or a Local Government to the Pension of employees in its Service shall be a first charge on the Consolidated Revenue Fund of the State Government or such Local Government and shall be deductible therefrom.
- 2.6.11 Upon receipt of the monthly subvention from the Federation Account, the Accountant General of the State shall set aside an amount, which shall not be less than seven and a half percent (7½%) of the total wage bill of the State and Local Governments as employer's contribution.
- 2.6.12 The Accountant General of the State shall deduct at source, the monthly and voluntary (if any) contributions of each employee in the employment of the State and Local Governments.
- 2.6.13 The Accountant General of the State shall, not later than seven (7) working days from the day the State pays salary, remit an amount comprising both the State's contribution deducted under paragraph 2.6.11 and the employee's contribution deducted in 2.6.12 above, to the bank account specified by the PFA of the employee, to the exclusive order of the PFA.
- 2.6.14 The Accountant General of the State shall also remit any voluntary contributions made by the employee to the bank account specified by the employee's PFA, at the same time the contributions are remitted.
- 2.6.15 The remittance of the contributions mentioned in 2.6.13 and 2.6.14 above shall be forwarded to the PFA's Custodian, along with a detailed listing of the respective amounts contributed in the format specified in form COLL/FM/01 attached to this framework.
- 2.6.16 Upon failure of the State or Local Government to remit as in 2.6.13 and 2.6.14 above, 7 working days after the payment of salaries, the Commission shall mandate the Accountant General of the State to remit the outstanding contributions.
- 2.6.17 Upon failure of the Accountant General of the State to remit following the Commission's mandate, the Commission shall mandate the Accountant General of the Federation to deduct such contribution from the State or Local Government's share of the

- Federation Account and the amounts so deducted be remitted to the respective PFAs, through NIBSS.
- 2.6.18 Where an employee transfers his/her service or employment from one State or Local Government to the Federal Government or to another organization, the same RSA shall continue to be maintained by the employee.
- 2.6.19 The amount in the RSA shall be accessed by the holder upon retirement or attaining the age 50 years, whichever is later, in line with the Regulations for the Administration of Retirement and Terminal Benefits issued by the Commission.
- 2.7 Accrued Benefits of Existing Employees
- 2.7.1 The States and Local Governments shall be required to undertake an actuarial valuation to determine the accrued pension liabilities in respect of each employee/ex-employee.
- 2.7.2 Consistent with the standards deployed at the Federal level, the valuation must be carried out by recognized actuaries acceptable to the National Pension Commission.
- 2.7.3 The determination of the accrued benefits of the State and Local Government employees shall be done as at the commencement of the State Pension Law, on the basis of the terms of contract of service existing before the commencement of the State Law.
- 2.7.4 Each employee shall be issued with a State or Local Government Retirement Benefit Bond (S/LGRRB) for the entire sum of the benefit determined to be due to him/her, as computed under paragraph 2.7.3 above.
- 2.7.5 The Bond shall be issued by the central Bank of Nigeria (CBN) in liaison with the Commission and the State and Local Government Pension Bureaux.
- 2.7.6 The Bond shall be jointly signed by the CBN, the State Accountant General and the National Pension Commission.
- 2.7.7 The States and Local Governments shall bear the cost of printing of the bond certificates.
- 2.7.8 The S/LGRRB shall carry the particulars of the employee which must include, in the minimum, the name and PIN number of the employee.
- 2.7.9 The S/LGRRB shall be issued in quintuplicate. A copy each shall be given to the CBN branch where the State and Local Government Retirement Bond Redemption Fund Account is domiciled, the employee, the PFA concerned and the State or Local Government Bureaux, while the original shall be kept by the Commission.
- 2.7.10 Upon retirement of an employee, the bond shall be redeemed from the State and Local Government Retirement Bond Redemption Fund Account domiciled with the State branch of the Central Bank of Nigeria.
- 2.7.11 Where a State capital does not have a branch of the Central Bank of Nigeria, the State concerned shall open the account in any Central Bank branch, nearest to it.
- 2.7.12 In pursuance of 2.7.10 above, the Bureau shall liaise with the Commission to release the original copy of the Bond to the respective branch of the CBN, where the Retirement Bond Redemption Fund Account is domiciled, for redemption.

- 2.7.13 Pursuant to 2.7.10 above, each State Government shall open Retirement Bond Redemption Fund Account with the state branches of the Central Bank of Nigeria.
- 2.7.14 The Retirement Bond Redemption Fund Account shall not be a chequing account.
- 2.7.15 Following from 2.7.13 above, the State Government or any other individual, government or institution shall not make any withdrawal from the Retirement Bond Redemption Fund Account.
- 2.7.16 Further to 2.7.14 above, the Bond Redemption Fund Account shall only be debited for the purpose of redemption of the S/LGRRB.
- 2.7.17 The proceeds of the bonds so redeemed shall be transferred to the credit of the Retirement Savings Accounts of the employees.
- 2.7.18 Consistent with what obtains at the Federal level, the State Government and each Local Government in the State shall pay into the Redemption Fund Account on monthly basis, 5% of its monthly wage bill that shall be enough to settle the accrued rights of its retiring employees for that particular year.
- 2.7.19 The Central Bank of Nigeria branch shall invest the Funds in the S/LGRRB Account in Treasury Bills and Bonds, under the supervision of the Commission.
- 2.7.20 The Commission shall, upon the failure of the State Government or Local Government to redeem any bond issued within 1 month of its due date, demand such redemption, in writing, from the State Government or such Local Government.
- 2.7.21 Upon the failure of the State Government or a Local Government to redeem the bond within one month of the receipt of the Commission's demand, the Commission shall issue a request to the Accountant General of the Federation to deduct the value of the bond directly from the State or Local Government allocation from the Federation Account.
- 2.7.22 The amount so deducted by the AGF shall be credited to either the Redemption Fund Account with the Central Bank of Nigeria or the Retirement Savings Account maintained by the affected employee with his PFA.
- 2.7.23 Payments into the Redemption Fund shall cease after all Retirement Benefit Bonds issued as per 2.7.4 above, have been redeemed.
- 2.8 Payment of Existing Pensioners
- 2.8.1 Following from the functions specified in 2.3.1 (i) to (vi) above, the Bureaux shall maintain records of all pensioners in the State and Local Governments.
- 2.8.2 The Bureaux shall continue to pay the existing pensioners, as and when due.
- 2.8.3 For consistency and in line with the Federal Government's e-payment initiative, the Commission shall ensure that the periodic payments to pensioners shall only continue to be made through valid bank accounts opened by pensioners with any of the licensed banks.
- 2.8.4 The following specific requirements shall be complied with in realizing a smooth payment system:
- i) All pensioners shall open bank accounts with any of the licensed banks.
  - ii) Monthly budgetary allocations for pension payments shall be

remitted by the States and Local Governments directly to a dedicated account with the Central Bank of Nigeria (CBN) in each State capital.

- iii) The dedicated account, as required in 2.8.4 (ii) above, shall be opened by each Bureaux.
  - iv) All monthly pension payments shall be made by direct remittances from the CBN dedicated accounts to the various pensioners' bank accounts, through NIBSS.
  - v) Detailed records of all allocations received and periodic payments made shall be made available by the CBN to the Bureaux, on a monthly basis.
  - vi) The Bureaux shall render returns to the Commission on payments made to Existing Pensioners, in line with paragraph 4.2.5.
- 3.0 Operation of Schemes other than CPS**
- 3.1 Without prejudice to any other provision in this Framework, any pension scheme in the States existing before the commencement of the State's Pension Reform Law may continue to exist, provided that:
- 3.1.1 For Defined Benefits/Contributory Defined Benefits Schemes
- i. The enabling Legislation has been promulgated into Law by the State;
  - ii. The pension scheme shall be fully funded;
  - iii. The contributions in favour of each employee, together with the attributable income shall be

computed and credited to the retirement savings accounts opened for the beneficiary employees;

- iv. The pension funds and assets shall be fully segregated from the funds and assets of the State and/or Local Government;
- v. The pension funds and assets shall be held by a custodian duly licensed by the National Pension Commission;
- vi. Every employee in the existing scheme shall be free to exercise the option of coming under the Scheme or otherwise and his employer shall compute and credit his RSA with contributions and distributable income earned as at the date the employee exercised such an option subject to the regulations, rules and standards established by the National Pension Commission;
- vii. An employee who elects to opt out of the scheme shall approach any of the licensed PFAs of his/her choice to open an RSA;
- viii. The employee who opens an RSA in 3.1.1 (vi) above shall advise his employer of the details of his RSA and the designated account, specified by the PFA, into which his pension contributions are to be remitted;
- ix. Any amount computed under paragraph 3.1.1 (v) above shall be transferred to the RSA of the employee, maintained with a PFA of his choice;
- x. All subsequent pension deductions on behalf of the employee, together with any voluntary contributions by the employee, shall be remitted by the employer to the designated

- account mentioned in 3.1.1 (vii) above.
- xi. From the commencement of the State law, all investments in assets shall be strictly regulated by the rules, guidelines and standards issued by the National Pension Commission.
  - xii. Notwithstanding 3.1.1 (x) above, the State scheme may continue to maintain its investment portfolio, prior to the commencement of the State Pension Law; and
  - xiii. The States and Local Governments shall undertake to the Commission that the pension fund shall be fully funded at all times and any shortfall would be made up within 90 days.
  - xiv. Upon failure of the State and Local Governments to make good of any shortfall referred in 3.1.1 (xiii) above, the Commission would mandate the Accountant General of the Federation to deduct as source an equivalent amount from the State's and Local Government's share of the Federation Account and remit same to the Custodian of the PFA/PFAs managing the State's and Local Government's Scheme.

### 3.2 Actuarial Valuation of the Fund

- 3.2.1 Any State operating a DB scheme or CDB scheme shall undertake, at the end of every year, an actuarial valuation to determine the adequacy of its pension fund.
- 3.2.2 Consistent with the standards deployed at the Federal level, the valuation must be carried out by recognized actuaries acceptable to the National Pension Commission.

- 3.2.3 All pension schemes existing before the commencement of the new scheme shall submit to the Commission, a statement of affairs, which shall include assets, liabilities, list of members and current statements in the case of contributory schemes and, pensionable salary in the case of defined benefits schemes.

### 3.3 Transfer of Pension Assets

- 3.3.1 As from the commencement of the State Pension law, the respective State shall appoint a PFA or a Lead PFA and not more than three other PFAs to manage its DB/CDB Scheme and Funds and Assets managed by a PFA/PFAs for settlement of pensions and benefits of existing pensioners.
- 3.3.2 The Board of Trustee, Pension Board, etc, as repealed by the new pension scheme, shall transfer the custody of the assets, which it hitherto had, to the Pension Fund Custodian (PFC) nominated by the chosen PFA or Lead PFA.
- 3.3.3 The Commission shall supervise the transfer of all pension funds and assets as in 3.3.2 above.

## 4.0 Reporting Requirements

### 4.1 Minimum records

- 4.1.1 The Bureaux shall maintain basic records that would enable it to effectively carry out the responsibilities specified in Paragraph 2.3.1 (v), (ix) & (xi) of this Framework.
- 4.1.2 The Bureaux shall keep the following minimum records in respect of existing employees of the State:
  - i. Detailed record on information specified in 2.5.2 above, for all existing employees in the service of the State and Local Governments.

- ii. Accurate records of monthly contributions to RSAs of all employees.
- 4.1.3 The Bureaux shall keep the following minimum records in respect of existing pensioners of the State:
- i. Detailed record of information specified in 4.2.5 below, for all existing pensioners;
  - ii. Accurate records of monthly pension payments to all pensioners;
  - iii. Accurate details of bank accounts of all existing pensioners;
  - iv. Adequate records of all budgetary allocations received from the State Treasury;
  - v. For a State implementing a DC Scheme, a list of all pensionable staff (which shall be extinct by the transitional period specified in the State Law); and
  - vi. Pensioners' complaints register, showing status of resolution of such complaints.
- 4.1.4 The Bureaux shall keep the following records of deceased pensioners:
- i. Detailed record on information specified in 4.2.6 below, for all deceased pensioners.
  - ii. Detailed record of all payments made to the Next-of-Kins of deceased pensioners.
  - iii. Record of amounts outstanding in favour of the Next-of-Kins of deceased pensioners.
- 4.2 Rendition of Returns
- 4.2.1 The Bureaux shall render quarterly returns to the Commission.
- 4.2.2 The Bureaux shall render, immediately upon commencement of operations, returns on the comprehensive list of pensionable staff, existing pensioners, deceased pensioners and their next of kin, to the Commission, in the format prescribed in Appendix 1 here attached, on a CD or electronically to the National Data Bank of the Commission.
- 4.2.3 The Bureaux shall render quarterly updates to the Commission, not later than ten (10) days after the end of the previous month, on the information forwarded to it under the provisions of 2.5.2 above.
- 4.2.4 In addition, the Bureaux shall render returns to the Commission, not later than fifteen (15) days after payment of salaries, in respect of contributions made for existing employees. The returns shall include the following information:
- i. Name of employee.
  - ii. Pension Fund Administrator.
  - iii. PIN Number.
  - iv. Contribution: Employer, Employee, Voluntary.
  - v. Month of contribution.
  - vi. Contributions in arrears.
  - vii. Period of contributions in arrears.
  - viii. Biometrics – Photograph and finger prints.
- 4.2.5 The Bureaux shall render monthly returns on pension paid to the Commission, not later than fifteen (15) days after the payment of monthly pensions, which shall in the minimum, contain the following information:
- i. Name of Pensioner
  - ii. Sex
  - iii. Retirement Date
  - iv. Monthly Pension (₦)
  - v. Period of Pension Arrears
  - vi. Number of months in Arrears
  - vii. Pension in Arrears (₦)
  - viii. Gratuity in Arrears (₦)
  - ix. Total Arrears (₦)

- x. Total Payment to Date (~~₹~~)
  - xi. Outstanding Arrears (~~₹~~)
- books and other concerns of the Bureaux.

4.2.6 The Bureaux shall render monthly returns on deceased pensioners to the Commission, not later than fifteen (15) days after the preceding month end, which shall in the minimum, contain the following information:

- i. Names of Deceased Pensioner
- ii. Sex
- iii. Retirement Date
- iv. Date of Demise
- v. Monthly Pension
- vi. Period of Pension Arrears
- vii. Number of months in Arrears
- viii. Pension in Arrears (~~₹~~)
- ix. Gratuity in Arrears (~~₹~~)
- x. Total Arrears (~~₹~~)
- xi. Total Payment to Date (~~₹~~)
- xii. Net Arrears Outstanding (~~₹~~)
- xiii. Next of Kin/Administrator's Name
- xiv. Next of Kin/Administrator's Address

## 5.0 Regulation and Supervision Framework

### 5.1 Monitoring (On-site/Off-site)

5.1.1 In line with the provisions of Section 21 (a) of the PRA 2004, the Commission shall regulate and supervise the activities of the State and Local Government Pension Bureaux through the following mechanisms:

- i) Off-site surveillance: This shall entail analysis of the statutory returns to be rendered by the Bureaux to the Commission as specified in 4.2 above.
- ii) On-site examinations: This shall entail periodic visits to the various State Pension Bureaux by Examiners of the Commission to carry out maiden/routine examinations or spot checks. The examination shall involve the review of the

5.1.2 In achieving effective supervision of the Bureaux, the Commission shall adopt its usual philosophy of consultation and collaboration with a view to achieving voluntary compliance in the implementation of the Scheme by States and the Bureaux.

### 5.2 Communication

5.2.1 This shall complement the monitoring activities.

5.2.2 There shall be a downward flow of information, i.e. from the Commission to the Bureaux, whereby priorities and compliance strategies, including guidelines and enforcement actions shall be communicated.

5.2.3 The Commission shall organize quarterly meetings with all the State and Local Government Pension Bureaux, to share ideas and information, with a view to adopting a uniform set of supervisory strategies for each of the States.

5.2.4 The Commission shall draw up a time-table for the quarterly meetings.

5.2.5 The quarterly meetings shall be reinforced by periodic workshops and seminars at the States, also to be held on geo-political zoning basis.

### 5.3 Capacity Building

5.3.1 The Commission would train and re-train the management and staff of the States and Local Governments Pension Bureaux, to enhance their knowledge and operation of the Scheme and to build capacity.

5.3.2 In pursuance of 5.3.1 above, the Commission would organize quarterly training sessions, workshops and seminars in each of the six geo-political zones of the country.