



EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION
EMPLOYEES' PROVIDENT FUND ORGANISATION
MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA
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Smt. Ritu Kanojia

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Commissioner

November 11th, 2024

To

**Shri Ramesh Krishnamurthy, IRS,
Central Provident Fund Commissioner,
Employees Provident Fund Organisation,
NEW DELHI-110023**

Subject: Congratulatory Note on appointment as CPFC

Sir,

With great enthusiasm and hope, we, the EPF Officers' Association, welcome your appointment as the Central PF Commissioner in EPFO. While holding additional charge of CPFC, you have very ably demonstrated deep understanding of the issues and problems plaguing our Organisation and have already put into motion several undertakings that aim to provide long term solutions.

We hope to work with you in improving the services to our stakeholders and making EPFO a world class Organisation.

We would also like to bring to your kind attention some long pending issues that deeply concern the officers' cadre of EPFO and hope that you may grant us an appointment at your earliest convenience so as to brief you in detail. A proposed agenda is attached for your kind consideration.

Thanking you.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'S. Swami'.

[Saurabh Swami]
Secretary-General

AGENDA

A. ADMINISTRATIVE ISSUES

1. Allowing **Non-Functional Upgradation (NFU)** to eligible officers - pending since 2012 – It is now almost a decade since the required approvals for NFU were received. However, no screening for grant of NFU has been done till date even though the MoLE had directed in writing in 2012 itself to constitute committee to complete the process. It is requested that screening for grant of NFU be conducted and eligible officers granted same at the earliest.
2. Allowing **NFSG** to left out eligible officers – NFSG has been allowed to eligible officers in EPFO by a delay of four years after the approval for same was accorded by Government of India. However, it has been denied to some officers on issue of VCC, in violation of DoPT instructions. The rule position mentions very clearly that VCC status for NFSG is to be seen as on the date of eligibility of individual officers. As the NFSG was allowed after considerable delay of more than four years from the date of eligibility, VCC status was erroneously sought on the date of (delayed) screening. That, this is wrong, has been clarified again by MoLE on a reference from EPFO Headquarters. It is requested that orders allowing NFSG to such left out officers may be issued immediately as their screening is already done. Further, timely screening for other eligible officers may be done at the earliest as no screening for allowing NFSG has been done after 2021.
3. Grant of **Senior Time Scale** on completion of four years of service for all eligible APFCs immediately. This is pending for long since year 2020. The screening committee constituted for recommending names of eligible Officers for grant of STS has already submitted its report in 2022. It is requested that orders granting STS to all eligible officers may be issued immediately as their screening is already done. Further, timely screening for eligible officers may be done in future also.
4. **Rationalisation of EPFO's manpower:** There is an urgent need to augment EPFO's manpower to ensure efficient administration and service delivery. Since the last cadre restructuring in 2016, EPFO has witnessed a significant rise in workload due to massive increase in the number of covered establishments and EPF subscribers. IIT Delhi was tasked with conducting an organizational review to rationalize the manpower requirements of EPF offices over a year ago. We kindly request that this study be expedited and completed within the next two months to facilitate timely decision-making.

5. **Statutory Classification of Posts:** The classification of posts within EPFO into Groups A, B, and C was formally notified by the Central Government in 1962 and is recognized both under the EPF & MP Act and the SS Code. However, the new EPF Officers and Staff Regulations approved by the CBT in February 2024 have inexplicably removed this classification, without prior circulation or discussion. This hasty decision has severely impacted morale. We urge you to recall these regulations and restore the statutory classification in accordance with the legal mandate.

6. **Laptop instructions** – Department of Expenditure (DoE) vide its OM dated 21.07.2023 has superseded instructions issued vide earlier OM bearing No. 08(34)/2017-E.II(A) dated 20.02.2018 and OM NO. 3(6)/2020-E..II(A) dated 27.03.2020 and issued fresh instructions on purchase of laptops etc. The revised instructions of DoE vide its OM dated 21.07.2023 has only been partially implemented in respect of Head Office, Zonal Offices and Training institutes. It is requested to expedite the issuance of order to implement the revised instruction for Regional Offices, District Offices and SSOs. Further it is observed that many a times the device allocated is not as per functional requirement needs of the officer. In view of this, instructions may be issued to enable officers to purchase the laptop as per his/her choice, once every four years and get the amount reimbursed in accordance with specified monetary ceilings.

7. **Recruitment Rules (RR)** for Commissioners' Cadre are not in accordance with those approved by CBT EPF in 2017; neither are they in accordance with extant RRs of central services. EPFOA has submitted a draft composite RR for Commissioners' cadre in 2021. A committee of officers was also constituted for this purpose by EPFO and the committee has already submitted its report. However, despite that composite Recruitment Rules for Commissioner Cadre have not been finalised. It is requested that these may be notified urgently.

8. **Prolonged pendency of disciplinary proceedings** and consequential block in promotion opportunities to officers next in line – The extant instructions specify timely completion of disciplinary proceedings and consequent administrative action on the outcome of such proceedings. In EPFO we have a sad spectacle of disciplinary proceedings continuing for years together and therefore, resultant blockage in already sparse promotional opportunities. The instructions also state that if disciplinary proceedings are not delayed due to the charged officers, they may be allowed ad-hoc promotion in the subsequent DPCs. This may be allowed immediately. Alternately, the officer next in line may be promoted to ensure administrative continuance in public interest.

9. **Faulty system of allowing VCC** and resultant delays – VCCs can be denied only when the officer is under suspension, where a charge sheet is issued & disciplinary proceedings are pending and where a prosecution for a criminal case is pending. It is requested that this may be reiterated and ensured in

letter and spirit. Further, HR data is now digitised through HR SOFT. Vigilance Division may mark officers as not clear from Vigilance angle based on criterion specified above and update the list from time to time. All others officers should be deemed to be clear from vigilance angle. If this is accepted and implemented there will be no requirement of calling for VCC status, each time for promotion/financial upgradation/deputation/foreign visits purposes. This would enable administrative authorities to take time bound action in issuing promotion/upgradation orders.

10. Refundable advance equal to two months' pay and DA on transfer

– With the approval of Executive Committee (CBT, EPF) this facility was allowed to EPF officers having all India transfer liability in the year 2006. This was important as EPFO officers are not eligible for General Pool residential accommodation. Further, children of EPFO officers do not get preference in admission in Kendriya Vidyalaya. This refundable advance was approved to provide financial support to transferred officers. It has been arbitrarily withdrawn without approval of competent authority. It should be restored with immediate effect.

11. Residential accommodation for EPFO Officers –. Group A officers of EPFO face significant challenges related to accommodation upon their transfer every three years, particularly in Metros and Class X cities where suitable quarters are often unavailable and lease and HRA provided are highly inadequate to procure decent accommodation as compared to prevailing rents and attached brokerage and huge security deposit strings. Ensuring access to appropriate housing will not only alleviate the difficulties faced by our officers during transfers but also enhance their overall morale and productivity, allowing them to focus on their essential duties without the added stress of housing issues. Kindly initiate urgent action to allow location appropriate higher lease entitlements with provisions of brokerage and security deposit to ensure a dignified residential accommodation. Further, EPFO may purchase more number of residential accommodation for group 'A' officers in metro cities. It may also be ensured that Board's accommodation, wherever available, is not allotted to officers on deputation to EPFO in priority over own cadre officers. Please note that this practice is de-hors the extant rules governing residential accommodation.

12. Office vehicle for RPFC-Is posted in Zonal Offices and Training establishment – Office vehicle is allowed to officers in RPFC-I grade and above since 2013. Post organisational restructuring in January 2017, officers in cadre of RPFC-I are sanctioned for ZOs as well as Training establishment. This anomalous situation may be rectified by extending the ambit of 2013 circular to RPFC-Is posted in ZOs and Training establishments.

It may kindly be appreciated that all the above issues are of routine administrative nature and within the ambit of extant rules in place and therefore, implementable through decisive administrative actions.

B. ASPIRATIONAL ISSUES

1. **Enhancing strength of Group 'A' Commissioners' cadre** – The approved recommendations of Second Administrative Reforms Commission state that organisations should become officer centric. Niti Aayog in its report on Strategy for New India @ 75 (2018) has endorsed this recommendation. As is evident from report of Seventh CPC, Group 'A' constitutes 15%-20% of the total cadre strength in large number of Ministries, including MoLE. The corresponding ratio in EPFO is a meagre 6%. It is requested that the ratio may be enhanced to a minimum of 10%. The resultant Group A posts as per current total sanction strength will be about 2470. Leaving aside about 450 Group A posts for other than Commissioners' Cadre, there should be minimum of 2000 officers in Commissioners' cadre of EPFO. This may be further sub-divided into JTS (30%), STS (40%- including leave, training, deputation reserve), JAG/NFSG (22%), SAG (8%).

This enhancement would provide requisite number of officers for manning functions, present and anticipated. The resultant promotions down the grade would also address the perceived grievance of lack of promotional opportunities for subordinated grades.

2. The **Cadre Management monograph of DoPT** mentions that the entry grade in Group Pay (Level 10 - 7th CPC) is normally the probation-cum-training grade. All officers appointed in this scale should be automatically promoted to the next grade (Level 11) on successful completion of probation. This may be replicated in EPFO Commissioner cadre rules and can be ensured once Commissioners' cadre is designed as per point (1) above.

3. Extension of **CGHS coverage/Medical Coverage**: CGHS benefits are available to EPFO officials in select cities only such as Delhi and Jaipur. We kindly request your esteemed efforts to extend CGHS facilities to all other cities for Group A officers of EPFO. Given the crucial role these officers play in implementing social security measures across the country, it is essential that they have access to comprehensive healthcare services, regardless of their posting locations. Expanding CGHS coverage will significantly enhance the well-being of our officers and enable them to perform their duties effectively, ultimately benefiting the workforce they serve. Alternatively, we suggest moving to medical reimbursement policy for officers in line with facility provided in UIDAI and Competition Commission of India (CCI

4. **Transfer entitlements** may be so designed to allow full refund of cost involved in transfer, including for movement of household goods. A special provision may be considered to allow refund of hotel accommodation cost to officers and family members for upto four weeks from date of joining at new station @ admissible at pay level of officer concerned.

5. **Reimbursement of cost of mobile phone every two years:** In EPFO, work in offices require active use of mobile devices for authentication as all OTPs related to activities in Accounts and pension like Appendix-E, VDR special, PPO generation etc are received in officers' mobile phones beside mobile phone being used more and more as an active mode of communication and sharing of documents. Therefore, we propose a monetary limit of 25000 (in line with facility available in UIDAI) every two years for officers for purchase of mobile phones for all Group 'A' officers.

6. **Opening of new offices not merely by proportionality bifurcation of available manpower resources but as per work needs:** It has been observed that with the increase in workload of certain offices like Noida, Pune, etc, these offices have become unmanageable with the current manpower resources of Group 'A' officers and the offices are being bifurcated and new offices are being opened. Further for the very same purpose some DOs are being converted into Regional Offices. But it is very ironic to observe that the ground on which the old offices has becomes unsustainable i.e. less manpower resources vis-à-vis workload, is not factored in while bifurcating the offices. No increase in sanctioned and posted strength of Group 'A' officers is done in proportion to work load increase. Instead the existing manpower is simply divided defeating the very purpose for which new offices have been created. It is therefore proposed that, while bifurcating offices and creating new ones, a commensurate increase in the sanctioned strength of Group 'A' officers and other officials be ensured.

7. **Opening of new training institutes-**Training of EPFO manpower is very crucial in increasing the productivity of its employee. We have learnt that a Zonal Training Institute at Lucknow and few Regional Training institutes like Hyderabad, Bangalore, Thiruvananthapuram and Ahmadabad are being proposed to be opened. We appreciate the step; however, the number of training institute are still very less taking into the factor the workforce we are required to train and the dynamic nature of changes in EPFO. Therefore, we propose the opening of one Regional Training institutes in every big state where Zonal Training Institute is not situated.

8. **Opening of new guest houses/holiday homes-** EPFO has a limited number of places where officer's guest house is available. We propose officers guest houses in every Zonal/ Regional Offices with facility of mess which will cater to the needs of officers for official and personal visits. This will not only be

cost saving for organization (as hefty amount has not to be reimbursed for boarding purpose on tour) and officers but will be also be convenient for officers regarding nearby accessibility of guest house.

9. We have pointed out earlier also that there is great deal of confusion on the **role expectation from Officers-in-charge** of field offices. Lot of original work in terms of claims approval, change request approval, sundry accounts approvals and authentication of all sorts of reports have been assigned to them in a perverse sort of reverse delegation where pay grades has been erroneously equated with imparting some degree of security and authenticity in ensuring transactional integrity. This leaves very little time on hands of Officers-in-charge to do any meaningful supervisory work. The supervisory responsibility is diluted and yet full accountability for supervisory roles is expected and enforced. We have been repeatedly pointing out that the requisite systemic improvements and long overdue IT enablement is the correct way to ensure system integrity. Also, the whole **delegation of administrative and financial powers** (last major revamp in 2004) needs an urgent review and revision.
