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EMPLOYEES' PROVIDENT FUND ORGANISATION
MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA
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November 27th, 2025

To

**Shri Ramesh Krishnamurthi, IRS
Central P.F. Commissioner
Employees' Provident Fund Organisation
New Delhi 110023**

Subject: Strong dissent of the EPF Officers against the proposed induction of officers on deputation in EPFO – Demand for immediate removal of deputation clause from the TOR of CR Committee constituted vide order dated 25.11.2025 – Regarding.

Sir,

The EPF Officers Association (EPFOA) is sending this communication to register our strong dissent and vehement opposition to the proposal being formulated to induct officers on deputation into EPFO's regular functioning vide HO Order no. HRD-I/15/2025/CadreRestructuring/1464 dated 25.11.2025.

2. This issue of deputation officers in regular functioning of EPFO has been used in the past by management to browbeat and subdue legitimate career aspirations of EPFO officers, but we have fought tooth & nail against this issue in all forums. Earlier, deputation officers were inducted and posted in EPFO offices as ACC, RPFC-I, etc., the EPFOA had challenged this matter before court and got favourable judgement from Hon'ble CAT in 2007. Another case under Writ Jurisdiction of Quo Warranto has been filed by EPFOA against improper appointment of deputation officers and is currently pending before Hon'ble High Court of Punjab & Haryana.

3. However, despite all justified opposition and logic, whenever there is talk of Cadre Restructuring (CR) in EPFO, the bogey of deputation is brought back to life! During the previous CR exercise in 2017, the same issue of deputation was resurrected by the then CPFC in a DO letter to the then Secretary (L&E) calling for posting deputationists in EPFO. The EPFOA had strongly opposed the issue at that point of time also.

4. Now again when fresh CR exercise is being pursued by us for past few years, this deputation issue has been revived. The MOL&E, CBT as well as EPFO had earlier formed committees for examining the CR issue but deputation was not included in their mandate, then it is not understood what is the reason behind including this issue in the most recent committee's TOR?

5. When deputation postings has not helped but rather harmed multiple large national-level Govt. organisations, then why would EPFO management pursue the same for EPFO? The current state of organisations such as FCI, Air India, BSNL/MTNL, etc. where senior hierarchy comprises mostly deputationists does not inspire confidence that EPFO would somehow escape their fate if we follow the same path. EPFO requires long-term planning and execution, which only cadre officers are in a position to provide. Organisations such as ONGC, LIC, SBI, etc. have their own cadre of officers and have consistently delivered. This is analytical and in sync with existing best practice of national level Govt. organisations such as Central Board for Direct Taxes (CBDT), Central Board of Excise & Customs (CBEC), etc. There exists no precedent in All India or Central Services of appointments on deputation to cadre posts. Central services - IAS, IPS, IRS, IA &AS, IRAS etc. have long maintained cadre integrity by keeping cadre posts reserved for cadre officers; deputation is strictly regulated, temporary, and not meant for direct appointment to core cadre positions. The ideal way to cater to future challenges will be to have mid-career trainings and grooming talent from within by building domain expertise through exposure as advocated by 2nd Administrative Reforms Commission. Successful organisations nurture their own cadre to develop expertise through training; they don't rely on borrowing hired experts on short term contract from outside to succeed.

6. The official reason mentioned in the above cited office order dated 25.11.2025 is to bring in talent, best practices, administrative innovations, and cross sectoral expertise in EPFO. However, this reason does not hold any water when we consider the specialised nature of EPFO as an organisation. Not many organisations in the country perform multifarious functions similar to us where we are at the same time a regulator cum law enforcer like Income Tax as well as a service provider like LIC or SBI. Therefore, when an officer joins us on deputation, he takes a very long time to understand functioning of EPFO before he is able to contribute effectively, which is time & resource wasted on part of the organisation. Truth be told there have been officers on deputation who never understood basic EPF scheme provisions or even the difference between Forms 19 & 20 but have happily spent their entire deputation

tenure with us. Furthermore, due to our unique nature of work most officers on deputation do not have any significant cross sectoral experience which can enrich EPFO. Of course, it is not our place to impugn the capabilities of officers in other services, but the truth remains that being an effective IAS or IRS officer does not automatically make one an expert in say EPFO fund management or EPFO accounting process. What makes one an expert is the requisite training and valuable life long experience. Even the Hon'ble Supreme Court on October 28th, 2025, while dismissing Centre's Review Petition in the Central Armed Police Forces (CAPF) case ruled against deputations in CAPF and directed for phased reduction of deputation IPS officers. This very much underlines the fact that core business activity of an organisation cannot be run by deputation officers.

7. The Central Government has, in recent years, recognized the value of lateral appointment for identified subject matter expert posts (e.g., in NITI Aayog, Finance, Commerce) but only for specialized functional areas. Where deputation officers can actually contribute in EPFO functioning is in specialised wings which require special or technical education/training which may not be available in regular cades of EPFO. And that's exactly why deputation already exists in these wings of EPFO and we are benefitting from the talent, best practices, administrative innovations and cross sectoral expertise. In EPFO, such needs may arise in Information Technology, Actuarial, Legal, or Physical Facilities Divisions. Lateral appointments should be targeted and merit-based, not a backdoor to routine cadre posts. Regular administrative and regulatory roles in EPFO require cultivated, long-term internal experience, not temporary induction.

8. Sir, EPFO officers have been working tirelessly despite multiple handicaps in terms of manpower crunch and technical issues for past many years, we worked through COVID lockdowns, delivered on Government schemes such as PMRKY, ABRY and now the Pradhan Mantri Viksit Bharat Rozgar Yojana. But we know very well how dim our career progression prospects are, with most of us due to retire at much lower ranks as compared to counterparts in other services. Once in a while an exercise like Cadre Restructuring ignites a faint hope that may be our efforts will be recognised and we may get one or two promotions more than we ever expected. Therefore, repeatedly resurrecting deputation issues at such times is a cruel joke. If we get officers on deputation not only will it block posts that should have legitimately gone to an EPFO officer, and create cascading career delays right down the ranks, but it also creates an absurd situation where an outsider officer who may well be much junior in age as well as service will be placed at a senior level. This highly demotivates ranks of EPFO officers who have to report to him.

9. Therefore, there is no legitimate or justifiable reason for deputation in regular cadre of EPFO, except that for some incomprehensible reason the top management seems to prefer having deputationists running EPFO rather than EPFO officers. Why this is so when the deputationist officers have no skin in the game and thus no stake in future of the organisation is beyond comprehension. Or maybe this is exactly why deputationists are preferred!

10. What has been shocking in above cited HO order is the false promise of sending EPFO officers & staff on deputation to other organisations including Govt. departments. This is like a lollipop being held out to a gullible child! What authority does a committee of retired officers have to provide any framework for sending EPFO officers on deputation to other Government departments? Will this committee prevail upon the Central Government to make EPFO a participative organisation in Central Staffing Scheme? Will we be able to be appointed as Director & Joint Secretary in the MOL&E through Appointments Committee of Cabinet orders just because this committee of retired DOP&T officers has recommended it? If the answer to this is no, then what is the point in adding this point in the TOR, if not to hoodwink us into believing that deputation will be two-way street and swallow this bitter pill!

11. The current exercise of EPFO Head Office is one in a long line of fruitless committee game being played with our career:

- a) IIT Delhi was hired as external consultant at considerable public expense to undertake this very study, with no mention of its report or findings.
- b) An internal committee of EPFO officers and employees previously studied the same subject. Its recommendations are neither referenced nor placed before stakeholders.
- c) Committee of the Central Board of Trustees (CBT): A Board-constituted committee on cadre restructuring was to submit its report by March 2025. No status update, closure, or rejection of this mandated report is evident.
- d) Instituting a new committee, while bypassing the expertise and efforts of earlier committees and disregarding the Board-initiated process, raises questions of due process and good governance. Furthermore, has there been any responsibility fixing or accounting for the man-hours and money spent on above committees before this latest committee was constituted?

12. There is no evidence that the new committee's constitution or its terms were approved by the CBT, a statutory violation and a breach of due process. Unfortunately, when it comes to CR, this is not first time that CBT is not being kept in loop regarding misuse of its authority. During previous CR in 2017, the CBT had approved 2 deputation posts at level of ACC(HQ), however, when the Recruitment Rules (RR) for ACC(HQ) were notified, the deputation seats were fixed at 20% instead of 2! This was a blatant violation of the authority & jurisdiction of CBT. Furthermore, the presence of external members without domain exposure to EPFO's unique hybrid regulatory and service functions risks repetition of past errors, as seen with the previous committee's ill-advised removal of statutory classifications. An act that has led to current regulatory confusion and efforts by MOL&E, UPSC, and DOP&T to undo the resulting damage.

13. Sir, we sincerely implore you to consider that if EPFO becomes a deputationist organisation, we will lose the very essence that makes us a productive, flexible and high-performing organisation. EPFO officers deserve much better than this shabby treatment being meted out to us. Therefore, it is requested that the deputation clause must be immediately removed from the TOR of the committee constituted

vide above cited HO order dated 25.11.2025, and no meetings of the committee may be convened till the same is done. It is also requested to examine as to why the power & jurisdiction of CBT have been violated & usurped by constituting a new committee for CR without due approval or knowledge of the CBT, esp. when the CBT had already constituted a Sub Committee for this very purpose.

14. It is humbly submitted that if this issue is not satisfactorily resolved at the earliest EPFO officers would have decide on next course of action including all means of constitutional agitations and legal remedies available to us in a General Body Meeting of the EPFOA.

Thanking you.

Yours sincerely,



[Saurabh Swami]
Secretary-General

Copy to:

1. Hon'ble Chairman, CBT, EPF / Hon'ble Minister for Labour & Employment
2. Hon'ble Vice-Chairperson, CBT, EPF / Hon'ble Minister of State for Labour & Employment
3. Hon'ble Co-Vice-Chairperson, CBT, EPF / Secretary, Labour & Employment
4. Hon'ble Members, CBT, EPF.