



EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION
EMPLOYEES' PROVIDENT FUND ORGANISATION
MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA
Regional Office, Ambattur, R-40A, T.N.H.B. Office Complex, Mogappair Road,
Mugappair (E), Chennai 600 037

(Regn. No. 33/2015)

Phone: 044 26561127, 9655565892
Fax: 044 26350544
WhatsApp: EPF Officers' Association (9655565892)
PAN: AAAAE7689J

Email: epfoa@gmail.com
Web: www.epfoa.in
Facebook: Epfoa India
Twitter: @epfoaindia

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January 4th, 2022

To,

**Ms. Neelam Shami Rao, IAS,
Central Provident Fund Commissioner,
Employees Provident Fund Organisation,
NEW DELHI 110 066**

**Subject: Representation before the Sub-Committee on HR/
Establishment matters - regarding**

Madam,

A Sub-Committee of CBT has been constituted on HR/ Establishment matters vide orders dated 27-11-2021. The mandate of the Sub-Committee is to advise on HR/Establishment matters of EPFO (including speedier promotions for Group B & C officials). We understand that an impression has been created that promotions etc. of Group B & C cadres are a neglected area in EPFO and Group A employees get preferential treatment. The only way to test this allegation is to see what DOP&T prescribes as minimum qualifying service before next upgradation/promotion, the comparable real-life experience in various Government organisations.

2. DOP&T vide orders dated 24th March 2009 has specified the minimum qualifying service for movement from one pay scale to another. Following is relevant in the context of the deliberations: -

TABLE 1

SI No.	From (Grade Pay)	To (Grade Pay)	DOP&T Prescribed Minimum qualifying service (no. of years)	Position in EPFO
GROUP B & C				
1.	LDC / Rs. 1,900	Rs. 2,400	8 years	No recruitment at LDC level
2.	Rs. 2,400	Rs. 2,800	5 years	Rs.2,400 abolished & all shifted to Rs.2,800 as a one-time measure.
3.	Rs. 2,800	Rs. 4,200	6 years	SSA direct recruitment at Rs. 2,800. After 4 years, 80% promoted to Rs.4,200
4.	Rs. 4,200	Rs 4,600	5 years	9 years total service. For other organisations, new recruit join in Rs. 2,400 GP and require 11 years to reach Rs.4,600 GP.
5.	Rs 4,600	Rs. 4,800	2 years	<p>5 years. However, all existing Section Supervisor (Rs.4,200 GP) at time of cadre restructuring were placed in Rs.4,600 GP.</p> <p>All EO/AO in GP (Rs 4,600/-) were placed en-bloc in GP Rs 4,800/-. After four years they are eligible for Non functional upgradation to Grade Pay Rs 5400/-.</p> <p>It is pertinent to mention that Inspectors in Income Tax Department and Customs & Central Excise continue to be in GP Rs 4,600/-.</p>

3. Therefore, the actual upgradations/ promotions allowed to officials in Group B & C cadres in EPFO may be verified against the DOP&T prescribed benchmark. Above shows that the upgradations/promotions allowed in EPFO to Group B & C cadres compares very well and in fact exceeds the promotional avenues available in comparable Government organisations and with the specified benchmarks. Above details have been submitted by us only to dispel the myth that Group

B & C cadres of EPFO have been discriminated against and EPFOA welcomes the efforts to extend more service benefits to EPFO staff if the Sub-Committee so deems fit.

4. The qualifying service for Group A posts as per above mentioned orders are as under:-

TABLE 2

SI No.	From (Grade Pay)	To (Grade Pay)	DOP&T prescribed Minimum qualifying service (no. of years)	Position in EPFO
GROUP A				
1.	APFC / Rs. 5,400	Rs. 6,600/-	5 years	5 years
2.	Rs. 6,600/-	Rs. 7,600/-	5 years	5 years
3.	Rs. 7,600/-*	Rs 8,900/-	6 years	6 years + 20 years' service in Group A
4.	Rs 8,900/-	Rs. 10,000/-	2 years	4 years

{* NFSG in Grade Pay Rs 8,700 is admissible to those officers having GP of Rs 7,600 and who have entered the 14th year of Group A service.}

5. The extant statutory provisions specify that the pay scales etc of officers in EPFO shall be in accordance with those available to Central Government employees drawing corresponding scales of pay. In this regard, it is submitted that the pay scale of Rs 8,900 is an incongruous pay scale and not found in comparable Central Government departments. This grade is required to be merged with GP Rs 10,000 to bring EPF Officers' pay grades in accordance with similarly placed Central Government employees.

6. As regards the promotions available to EPFO officers, they should be eligible for SAG level posts in 18th year of their service. However, it is a theoretical minimum and no officer reaches that grade before 25 years of Group A service. The extant recruitment rules of SAG grade in EPFO **erroneously prescribes minimum 24 years of Group A service for appointment by promotion. This needs to be aligned as per DOP&T specifications.**

7. The time taken for promotion to senior grades was analysed by Seventh Central Pay Commission for various Central services and details are as under:-

TABLE 3

Non-Technical Group 'A' Services		
SERVICE	No. of Years for Promotion	
	SAG	HAG
Indian Audit and Account Service	16	25
Indian Postal Service	21	29
Indian Civil Accounts Service	22	31
Indian Defence Accounts Service	18	28
Indian Railway Personnel Service	23	33

Indian P&T Accounts and Finance Service	20	33
Indian Custom and Central Excise Service	21	33
Indian Railway Accounts Service	23	33
Indian Railway Traffic Service	23	33
Indian Revenue Service (IT)	21	34
Average years for promotion	20.8	31.2

8. DOP&T has specified the model cadre structure vide OM No. I-11011/1/2009-CRD, December 14, 2010, which, when compared with the existing cadre structure of Group A in EPFO reveals a highly skewed distribution.

TABLE 4

Sl No.	DOP&T specified distribution	Actual position in EPFO
1.	30% in Time Scale (Junior+ Senior);	73% in Time Scale (Junior+ Senior)
2.	30% in Junior Administrative Grade (Ordinary Grade),	23% in Junior Administrative Grade (Ordinary Grade)
3.	20% in JAG (Selection Grade) i.e. NFSG	17% in JAG (Selection Grade) i.e. NFSG
4.	17% in Senior Administrative Grade (SAG)	1% in Senior Administrative Grade (SAG)
5.	3% in HAG, Higher HAG+ and Apex Scale together	NIL

A simple redistribution of existing vacancies as per the DOP&T specified ratios would go a long way in easing cadre stagnation in Group A officers (Commissioner-cadre) in EPFO. **It is submitted that an officer joining in Group A should reasonably expect at least four to five promotions during his/her entire service career, which is presently almost absent in EPFO.**

9. A recalculation of staffing requirements in accordance with extant norms would result in almost 100% increase over the existing sanctions. However, since work processes are bound to change with increasing automation, the staffing requirement would necessarily have to be on modified parameters. If so desired, we can submit calculations accordingly. There are various operational and functional issues which require consideration as regards staffing of EPFO field offices are concerned. We would like to make a detailed presentation on same and seek a suitable opportunity accordingly.

10. A major concern requiring immediate attention is promotion of officers in the grade of APFC, especially departmental promotees. In the year 2017 approximately 288 officers were promoted against supernumerary posts as they had not got any promotion for almost 19 years. It is requested that the service rendered by this group of officers in Group A may be allowed to be counted as eligible service for the purpose of future service benefits. This, it is submitted, would considerably reduce the conflict between direct recruit and promotee officers.

11. It is requested that the EPFOA may kindly be provided an opportunity to make detailed presentation on above representation as per your earliest convenience.

Thanking you.

Yours sincerely,

S. Swami

**[Saurabh Swami]
Secretary-General**