



**EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION**  
**EMPLOYEES' PROVIDENT FUND ORGANISATION**

Ministry of Labour and Employment, Government of India

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Dated: 02.12.2015

To

Shri. D.S. Negi, I.E.S.,  
Director (Social Security)/  
Member, Cadre Restructuring Committee,  
Ministry of Labour & Employment,  
New Delhi

**Sub: Report for Organisational Restructuring in  
EPFO presented before CBT on 24.11.2015 &  
being circulated through EPF website -  
non-inclusion of consensually agreed upon  
points for posts in the report - request for  
reconsideration of the submitted report &  
due inclusion of above points - reg.**

Sir,

This is with reference to the report of the  
Committee for Organisational Restructuring of EPFO  
submitted to the Central Board of Trustees during its  
209<sup>th</sup> meeting held on 24.11.2015, a copy of which has  
been placed on the EPFO national website.

You may kindly recall that the EPF Officers'  
Association (EPFOA) had made a presentation before the  
above Committee on 27.10.2015, followed by a detailed  
discussion, whereby a consensus was reached with the  
Committee members on certain issues which were to be

made a part of the final report. The presentation of the EPF Officers' Association was, broadly speaking, three-fold, (based on the service conditions of IRS (I-T)) viz. (i) Structural anomalies to be removed (ii) Defining of qualifying service for promotion / upgradation to the next post (iii) Creation of new posts in EPFO.

**After due discussion, a consensus was reached by the EPF Officers' Association with the Committee whereby following structure was agreed upon by all present:**

Sl. No.	Pay Band & Grade pay	Proposed Designation	Field of Selection and Minimum Qualifying Service for promotion
1	PB 3 with GP 5400	Assistant PF Commissioner	50% by selection through UPSC, 50% by promotion
2	PB 3 with GP of 6600 / NFSG	Deputy PF Commissioner	Officers in GP 5400 who have completed 4 yrs of regular service
3	PB 3 with GP of 7600	Regional PF Commissioner, Gr.-II	Officers who have completed 9 yrs of service in Group-A of EPFO
4	PB 4 with GP 8700 / NFSG	Regional PF Commissioner, Gr.-I	Officers who have entered 14th year of service in Group-A
5	PB 4 with GP 10000 (SAG)	Additional Central PF Commissioner (by merger of existing posts of Addl. CPFC-I and Addl. CPFC-II)	Officers who have completed 21/22 years of service in Group-A
6	Rs 67000-79000 (HAG)	Additional Central PF Commissioner (HQ)	Officers who have completed at least 30 years of service in Group-A

It was requested by the EPF Officers' Association that at least two posts of HAG level be created for EPFO officers, however, your good-self had intimated that the Hon'ble Secretary has currently agreed to only one post at that level & no posts

of HAG+ level. It was therefore requested by us that the Committee may kindly request the Hon'ble Secretary to sanction at least two posts of HAG level as even currently, EPFO has two posts at top-most level of ACC (HQ), i.e. at Senior Administrative Grade. The Committee had kindly consented to the same.

Further, as regard to the qualifying service for the post of Regional PF Commissioner, Grade-I (NFSG), it was proposed by the CPFC to be kept as at least 18 yrs., however, it was pointed out that this would not be in line with existing service conditions in other services and would in fact take away benefits that are already available to EPF officers. Therefore, it was agreed, by consensus, to keep the qualifying service for RPFC-I (NFSG) as service of 13 years in Group-A in EPFO.

However, now from the above cited report, it is noted with dismay that none of what was agreed upon has been made a part of the final report, rather only an inconsequential number of posts are proposed to be created at various levels.

You may kindly appreciate the fact that the EPF Officers suffer from genuine demoralisation due to lack of cadre progression avenues and currently the officers are getting promotions after serving for over 15-20 years in the same rank. This aspect has been duly noted by all concerned authorities including the Hon'ble Minister at various forums. In fact EPFO Officers have been unsuccessfully trying for cadre restructuring for the past many years, as noted in the report itself. Therefore, by not including the above agreed upon agenda in the final report and by only creating an insubstantial number of posts at higher level, the Committee is closing the door for career progression of EPFO officers for many years to come. This approach shall not benefit anyone especially not the stake holders as it is well known management fact that good performance cannot be obtained from a de-motivated work force.

Even the basis of the norms that have been fixed in the report has not clarified. Such norms should have been fixed after a scientific study of the detailed

functioning of the Organisation. EPFO had hired services of the **National Productivity Council** for precisely this purpose, whose report is still awaited. There are no offices where 25 claims per SSA are currently being settled, then how can such a figure be fixed as an average norm for all offices? When the basis itself is questionable, the number of posts to be created on that basis are definitely incorrect. Further, the norms have been fixed on basis of contributory members, without considering the inoperative accounts (where no contribution has been received for past 3 years) in individual offices. The fact of the matter is that a substantial work load of each office comprises of inoperative accounts as settlement of each of such accounts is a lengthy and time consuming process, involving the APFC (Accounts) too as per the EPF manual provisions. This is so since most of the financial frauds & irregularities in EPFO in the past have taken place while settling such inoperative accounts.

Similarly, for compliance functions, the covered but non-complying establishments have not been considered while devising the norms, when the fact is that actual function of compliance machinery is to focus on these establishments rather than contributing & complying establishments. Similarly, for calculating staff strength required for pension processing, the number of pensioners (as per the Pension Payment Orders) has been considered and the number of Scheme Certificates to be processed by each office have not been considered. For a number of offices, esp. in major cities, processing of Scheme Certificates is a major work load. Another apparent inconsistency in the report is that the Zonal Vigilance Wings seems to have been placed under the supervision of Zonal Addl.CPFCs rather than the CVO. This shall create scope for interference in regular functioning of Vigilance wing at places where the functioning of even the Zonal Addl.CPFC may have to be investigated by Vigilance.

Sir, the above mentioned report, which has been circulated to the CBT members & is also available on EPF website, is being portrayed as the final & approved report of the Committee. In case this is true, then the entire purpose of

Cadre Restructuring has already been defeated. You may have seen from various media reports on the Special CBT, which is proposed to be held on 09.12.2015, it is being reported that *...EPFO shall go restructuring, fill thousands of posts, result in early promotions and enhanced packages for all employees....* (Source: Economic Times, 02.12.2015), when in reality no benefits whatsoever are proposed to be given to the vast majority. This is like a horrible joke being played on EPF Officers.

The EPF Officers' Association has vide letters dated 12.10.2015 & 30.11.2015, addressed to the Hon'ble Secretary (L&E), already given due notice of our collective intention to launch a nation-wide **Satyagraha** movement with effect from 01.01.2016 if no justice is done to EPF officers despite putting in so much hard work, especially since the year 2009. It is our fervent hope that the situation does not deteriorate to that extent. Please do justice to us and include the mutually agreed upon points, as tabled above, in the report that is approved on 09.12.2015.

It is our humble request that the Committee may reconsider its report and deliver on the promises for which the Committee was originally constituted rather than submit a report which shall prove disastrous for all the stake holders of EPFO which very much includes EPFO's own officers & staff.

Thanking you.

Yours faithfully,

*A. Swami*  
( Saurabh Swami )  
**Secretary General**