



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

Ministry of Labour and Employment, Government of India

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Dated : 23.09.2016

To

Dr. V. P. Joy, I.A.S.,  
Chairman (Anomaly Redressal cum Implementation  
Committee)  
Central Provident Fund Commissioner  
Employees' Provident Fund Organisation  
New Delhi

Subject: **Implementation of Organisational and  
Cadre Restructuring in EPFO - reg.**

Reference : EPFOA Letter dt. 09.09.2016 on resolution  
of issues/anomalies in the Cadre  
Restructuring in EPFO – reg.

Respected Sir,

Please refer to the subject and EPFOA letter dt.  
09.09.2016 cited in the reference above. Thereafter, the  
undersigned also had the pleasure of having a meeting with  
your goodself wherein the resolution passed by the newly  
elected Executive Body of EPFOA, on above subject, in its  
meeting dated 19.08.2016, attended by its office bearers was  
also deliberated.

Sir, at the outset, I would like to make it very clear that the incumbent EPFOA is in favour of immediate implementation of the long pending cadre restructuring in EPFO. Further, as per discussion with your goodself, please find below the vital issues, prepared after taking inputs from various stakeholders of EPF Officers' community, that need to be addressed along with suggestions for solutions that we pray to be incorporated through the Anomaly Redressal cum Implementation Committee under your Chairmanship. These may kindly be incorporated in the existing Cadre Restructuring format and implementation orders may be issued for implementation of cadre restructuring in EPFO at the earliest. For convenience, the issues / anomalies along with solutions are summarized in tabular format below:

<b>Sl. No.</b>	<b>Relevant portion (Issue / Anomaly) in the Anomaly Redressal cum Implementation Committee Report to be addressed</b>	<b>Brief description of the issue / anomaly</b>	<b>Solution Proposed</b>	<b>Relevant changes to be incorporated through the Anomaly Redressal cum Implementation Committee</b>
1.	Creation of new post of DPFC at 6600 GP without any structural / organizational reorientation at APFC/DPFC level in field offices. Functionally the DPFC & APFC posts are same.	The new post of DPFC at 6600 GP, functionally same as APFC is being created without appropriate reorientation of the field offices structure. Presently, the work division in field offices at APFC level is done purely on discretionary basis without any set criteria, norm or defined work load, having strong bearing on the efficiency of the system. To substantiate, presently, compliance division in field offices are divided into compliance circles purely on discretionary basis without any consideration to the service delivery component. This leads to	Every field office should comprise of Integrated Circles (Integrating service delivery and compliance functions in field offices) instead of the present system of only Compliance Circles under each APFC/DPFC. The Integrated Circle under APFC / DPFC comprising of defined number of establishments (with weightage to number of subscribers) as per the norm set by implementation Committee may be created in field offices. Every APFC / DPFC posted in field office shall essentially head	The Integrated Circle (Integrating service delivery and compliance functions) under every APFC / DPFC in field offices is approved in-principle. Every APFC / DPFC posted in field office shall essentially head an Integrated Circle to perform the service

		<p>unsatisfactory service to the various stakeholders, widens compliance gaps, increases organizational cost apart from adding to delay and avoidable coordination issues between compliance and service delivery functions which seriously hampers the efficacy of the system. With creation of post of DPFC at STS level, having same functionality as that of APFC, the situation will further worsen. The unstructured, irrational work profile management in field offices at APFC/DPFC level must be addressed to improve service delivery and bridge the huge gaps in compliance functions apart from putting in place a system of checks and balances to avoid misuse of power and improve the overall work culture and ethical standards of the organization.</p>	<p>an Integrated Circle to perform the service delivery and compliance functions pertaining to the Integrated circle and report to RPFC (OIC). Profiles (other than service delivery and compliance) can be rationally allocated between APFC/DPFC. This will ensure a lifecycle approach to an establishment where all the tasks ranging from compliance to service delivery will be carried out under single window. This will facilitate employers and employees and will go a long way in improving EPFO's perception and ranking in Ease of doing business index.</p>	<p>delivery and compliance functions pertaining to the Integrated circle. The detailed modalities of integrated circle system under APFC / DPFC to be worked out and orders to be issued along with implementation of cadre restructuring.</p>
2.	<p>It is recommended that offices having less than 1 lac monthly contributing members be headed by Deputy PF Commissioners. There are 35 such offices. It is recommended that all such</p>	<p>The earmarking of 35 DPFC headed offices is a welcome step. But the threshold of 1 lac contributing members for making it RPFC headed is impractical since the contributing members keep fluctuating on month to month basis and with this rider, even a situation can arise where a RPFC headed office becomes</p>	<p>The present earmarking of 35 DPFC headed offices by the Implementation committee may be kept. The rider condition of upgrading DPFC headed offices to RPFC on crossing the threshold of 1 lac may kindly be removed/not operationalized considering the fact that number of</p>	<p>The following portion in the report may either be removed or not operationalized – "It is recommended that all such offices be upgraded to RPFC</p>

	<p>offices be upgraded to RPFC level offices once they cross the threshold of 1 lac contributing members.</p>	<p>DPFC headed if there is decrease in contributing members below 1 lac. This will lead to avoidable confusion and administrative chaos. Further, the rider of 1 lac is also in contradiction to the very purpose outlined in the report itself which stipulates for DPFC headed offices for providing leadership roles to the young APFCs by giving them opportunity to independently head offices. Such criteria seem to be against principles of efficiency and motivation, because motivated efforts for increasing members can lead to change of office status. Therefore, this may kindly be relooked.</p>	<p>contributory members is dynamic phenomena and creating this caveat is neither rational nor justified and may lead to promote undue adhocism. . There can be situation where RPFC headed offices reduces to 1 lac threshold. Instead, once the DPFC headed offices reach the threshold of 2 lacs, more DPFC headed offices should be created to broaden the opportunity and motivation for each level of officers. This will ensure and fulfill the objectives set in the report of providing leadership role to young APFCs and also provide opportunity of heading offices to departmental promotee APFCs .</p>	<p>level offices once they cross the threshold of 1 lac contributing members.”</p>
3.	<p>No profile, powers defined for DPFC. DPFC only redesignation of APFC (STS)</p>	<p>The Sub-Committee Report on Cadre Restructuring prepared under Chairmanship of AS (L&amp;E) and approved by the CBT made it very clear that DPFC is a promotion post for APFC cadre. Further, due to upgradation of RPFC-II, the vacuum created at STS level is supposed to be filled by DPFC but no work profile of this newly created post has been done</p>	<p>DPFC should be a substantial promotion post (60 % of combined cadre of APFC &amp; DPFC) for APFCs with 4 years of regular service, as recommended by the Sub-Committee Report on Cadre Restructuring headed by AS (L&amp;E) and approved by CBT instead of mere change in designation. This would also be in sync with equivalent</p>	<p>DPFC to be a promotion post for APFC and it will exercise all legal, administrative and financial powers hitherto exercised by RPFC-II. DPFC should</p>

		and even legal, administrative and financial powers have not been defined. This will have serious repercussion in the efficient administration and delivery of services in the field offices.	position of Deputy Commissioner in Income Tax. DPFC should exercise all legal, administrative and financial powers hitherto exercised by RPFC-II. Notifications to this effect should be issued. This will fill the vacuum created by upgradation of RPFC-II and ensure administrative continuity with least disturbance in the existing structure. This is very much required as DPFC has also been proposed to be OIC of 35 offices.	be notified as Inspector, Recovery Officer. Notifications to this effect should be issued along with implementation.
4.	Gradation of field offices based on seniority	_____	Due regard should be given to seniority by earmarking big field offices to officers of senior batches.	Due regard should be given to seniority by earmarking big field offices to officers of senior batches.
5	NFU	_____	Since very less number of JS level posts have been approved, NFU implementation should be made part of Implementation Committee report so that senior officers stagnating can at least get financial benefit as available to other Organized central Services, as per provisions of section 5D of EPF & MP Act, 1952 and decision of the 72 <sup>nd</sup> Executive Committee, EPF granting	NFU implementation should be made part of Implementation Committee report. Cadre Restructuring to be carried out on a continuous periodic basis preferably within 5 years.

			<p>parity to EPF Officers with IRS (IT). Further, considering the fact that this is the first Cadre Restructuring, yet to be realized in the history of EPFO, it should be carried out on a continuous periodic basis preferably within 5 years. Also, exercise should be done post cadre restructuring for having more posts at JS level as per ideal pyramidal structure recommended by DoPT considering the exponential increase in the workload in the horizontal as well as vertical dimensions in EPFO.</p>	
6	District offices under APFC	Existing infrastructure of district offices need to be dramatically improved for making it a reality.	Till the time necessary infrastructure and modalities are not in place, District Office may form part of the proposed integrated circle jurisdiction under APFC/DPFC placed at respective field offices.	Till the time necessary infrastructure and modalities are not in place, District Office may form part of the proposed integrated circle jurisdiction under APFC/DPFC placed at respective field offices.

Sir, the above issues are not complex in nature but have strong bearing on the organizational efficiency, effectiveness and its sustainability. These are very minute alterations and enabling provisions which will go a long way in establishing appropriate structure, systems and processes synchronising the ongoing cadre restructuring exercise with organizational effectiveness under your esteemed leadership. It is our firm belief that these issues can be easily addressed by the Anomaly Redressal cum Implementation Committee under your Chairmanship and can be incorporated in the existing framework of cadre restructuring by giving in-principle approval in the implementation order itself and detailed modalities can be worked out after issuance of implementation orders.

Therefore, it is again respectfully submitted to you to kindly incorporate above issues in the existing cadre restructuring format and simultaneously issue implementation orders of the same at the earliest.

Thanking You

Yours Sincerely,



**(Abhaya Nand Tiwari)**  
**Secretary General**