



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

Ministry of Labour and Employment, Government of India  
Bhavishya Nidhi Bhawan, Sham Nagar, Near General Bus Stand,  
Ludhiana, Punjab - 141 001  
(Regd No. 33/2015)

Phone: 0161 - 2421211, 9646744171  
Fax: 0161 - 2402206  
WhatsApp: EPF Officers' Association (9646744171)  
PAN: AAAAE7689J

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

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Ex-MP (RAJYA SABHA)

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**Ajay Kumar Singh, APFC**

Dated : 09.02.2017

To,

Smt. M Sathiyavathy, I.A.S.  
Hon'ble Secretary (Labour & Employment)  
Chairperson (Executive Committee, EPF)  
Ministry of Labour & Employment, Govt. of India  
Shram Shakti Bhawan  
Rafi Marg, New Delhi

Subject: **Non-adherence to cadre restructuring modifications as approved and conveyed by Ministry to EPFO- seeking appointment with Hon'ble Secretary (Labour & Employment) - reg.**

Ref : EPF Officers' Association (EPFOA) letter dated 06.02.2017

Respected Madam,

Please refer to EPFOA letter dated 06.02.2017 cited in the reference above. As your goodself is aware, the Ministry has given its approval to the cadre restructuring proposal in EPFO with certain modifications which primarily include - retaining the existing administrative structure of RPFC-I & RPFC-II and revising the sanctioned

strength of APFC & RPFC-II to 452 & 299 respectively to suit the pyramidal structure. Consequent to above modifications, the two basic premise in the earlier proposed restructuring i.e. renaming of APFC (STS) to DPFC and merger of RPFC-II & RPFC-I to RPFC, based on which Sub-Committee & Anomaly cum Implementation Committee Reports were made have been fundamentally altered. This required a revisit and appropriate adjustment during implementation of cadre restructuring in EPFO by the Implementation Committee in the portions pertaining to DPFC to conform to the existing administrative arrangement of RPFC-II & RPFC-I. But it is seen that cadre restructuring is being implemented in EPFO disregarding the modifications approved by the Ministry. The implementation orders for administrative arrangement of field offices have been issued keeping DPFC i.e. APFC (STS) as the basis instead of existing structure of RPFC-II as approved by the Ministry.

Madam, it is being assumed by the implementing authorities that replacement of RPFC-II in place of DPFC by the Ministry was just for namesake, without any value addition to the restructuring proposal. In spite of the fact, that the RPFC-II is a promotional post for APFC, instead of filling it from its feeder cadre (APFC), the vacant RPFC-II posts are being illegally operated to promote lower cadre officials (AO/EOs) to APFC. This may perpetually block the promotional opportunities of incumbent APFCs. Further, the cadre restructuring has approved 299 posts of RPFC-II (from existing 226) keeping in view the organizational needs and requirement. However, most of the posts at the level of RPFC-II (about 240-250) will be lying vacant after restructuring and it is difficult to comprehend a situation wherein how a handful of about 50-60 RPFC-II (out of which 35 RPFC-II will head field offices) against 299 sanctioned posts will be able to carry out the tasks and functions in Head Quarter, Field Offices, Zonal Offices and National Training Academy / Zonal Training Institutes considering the key administrative, financial and legal role performed by RPFC-II in EPFO. Further, it is pertinent to point that at present, there are no vacant posts available at the APFC grade so that eligible AO/EOs facing stagnation can be granted promotion to the grade of APFC as desired by CBT.

In such an extraordinary situation which is leading to creation of an administrative vacuum at the level of RPFC-II on one side and acute stagnation faced by AO/EOs on the other and considering the fact that cadre restructuring has never happened before in the history of EPFO, it would be prudent and just in public interest to relax requisite qualifying service, as a one time measure, for promotion from APFC to RPFC - II through initial constitution clause in the RRs of RPFC-II or through a separate relaxation. Many promotee APFCs have rendered more than 5 years of service including adhoc service. Also some of the direct recruit APFCs have already completed 3 years of regular service and others too

will be completing soon. In any case, senior time scale is granted to APFCs in 4 years and also almost all Group A services nowadays have qualifying service criteria of 4 years instead of 5 years for promotion to Senior Time Scale grade.

In view of above submissions, it is earnestly requested to kindly allow appointment to the undersigned, preferably on 13<sup>th</sup> February 2017 (Monday) for apprising the above critical issues to your goodself for urgent intervention to avert any irreparable loss that may occur to the promotional avenues of the promotee and direct recruit APFCs of EPFO. Further, it is requested to direct Implementation cum Anomaly Committee for convening a meeting at the earliest for resolution of above issues and implementation of restructuring as per modified form approved by the Ministry..

Thanking You.

Yours Sincerely,



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