



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

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**Ajay Kumar Singh, APFC**

Dated : 21.03.2017

To,

Dr. V. P. Joy, IAS  
Central Provident Fund Commissioner  
Employees Provident Fund Organization  
Bhavishya Nidhi Bhawan  
Bhikaji Cama Place,  
New Delhi

Subject: **Defining functions, staff & work norms and fulfilling infrastructural requirements of District Offices headed by APFC as per approved Organizational Restructuring in EPFO - reg.**

Respected Sir,

Please refer to the subject cited above. The 117 District Offices headed by APFCs as Officers-in-Charge have been notified vide EPFO Office Order No. HRM-I/D-1(1)2017/CR/49 dated 27.01.2017 as per approved organizational & cadre restructuring in EPFO. Further, these district offices were provided as options to APFC officers in the online choices for posting in this year's Annual General Transfer (AGT) and recently new batch Direct Recruit APFCs

have been posted to 18 of these District Offices. Sir, in this background, the undersigned would like to bring to your kind attention that though District offices have been notified and APFC officers have been posted in some of these offices, the structural-functional delineation, functional devolution, staff & work allocation norms, administrative-financial delegation, budget allocation and infrastructural norms have not been defined till date.

Sir, as your good self is aware, strengthening of District Offices in EPFO has been one of the key concerns of the CBT members and other stakeholders and the same was highlighted as one of the salient aspect of the approved restructuring in EPFO in the Sub-Committee report on restructuring. Further, in the Anomaly-cum-Implementation Committee Report, it was recommended to provide leadership roles to young officers early in their careers by giving them opportunity to independently head an office (District Office) so that all officers get at least one chance for field experience before promotion. Sir, the key motive behind strengthening of district offices is three fold: **Convenience of members, Increasing Ease of doing business for employers & establishments and Better hassle free compliance.** Therefore, devolution of functions to these new structures and corresponding infrastructure should be in consonance with objectives for creation of district offices, otherwise entire exercise would go futile leading to wastage of the precious financial, human resources of EPFO without achieving the stated objectives.

In view of above, the undersigned would like to put forth following submission to your good self for kind perusal and incorporation in the norms that would be defined for district offices:

1. **Nature & state of current District Offices**

In most cases, current district offices are located at distance of 50 to more than 300 KM from the Regional Offices. In many district offices, even the piped water & toilet facility is not available. Primarily, these district offices were supposed to accept claim documents, grievances, establishment representation on local basis for convenience of members/ establishment and then forward it to Regional Offices for further action. This mechanism didn't solve the intended objective as all actions were being taken from Regional Offices. In fact in reality, they created another bureaucratic layer which had no power and executive machinery but acted as a roadblock in direct communication. In view of the above, District Offices have been decided to be headed by APFC so that they not

merely act as a layer but become actual service delivery and compliance function points for successful execution of the mandate of EPFO.

## 2. **Functional Devolution**

In view of situation explained in point 1 above, it would be appropriate to devolve following functions to District Offices for attaining key objectives. The underlying rationales are also briefly summarized:

- **Claim Settlement: Account & Pension cases:** District Offices were receiving claims and forwarding to Regional Offices for settlement. As they started acting as layers, members started depositing/in warding claims directly at Regional Offices making District Offices redundant for this purpose. Therefore, claim settlement in District offices is must to meet the objective of member convenience and better service delivery. Moreover, with servers of field offices being centralised, the District Offices can run with thin-clients, routers, internet connections (or MPLS) conveniently.
- **Compliance, Damages & Recovery:** As these District Offices are located at distant locations, difficulty is faced in securing compliance. For better Default Management, ensuring follow-up action after inspection, enhancing enrolment of workers, District Offices needs to be empowered as delayed follow up action on compliance leads to increased penal actions and consequent litigation by employers. Further, it is very much inconvenient to employers / representatives from establishments to attend 7A/14B proceedings at Regional Offices often 50-300 KM from Regional Offices. Many a times, representative of establishment had to start a journey at 6 AM to reach to Regional Office to attend the quasi-judicial inquiry at Regional Offices at 11 AM. This problem further gets accentuated in hilly areas and difficult terrains. And thus, absence of employers / establishment representative in many proceedings is observed. Better compliance would require nearness of field office. Further, under changed structure and manpower distribution, in many ROs, most of APFCs, who can conduct quasi-judicial functions, will be posted in District Offices, which makes very difficult to secure compliance and conduct quasi-judicial functions from Regional Offices due to posting of less number of APFCs in RO.

As APFC is a quasi-judicial functionary, it would be logically appropriate to divest compliance and recovery to District Offices headed by APFC. This would further help in better service delivery and account settlement as getting requisite actions from employers for claims or any other service delivery issue, would be easier. This would bring better service delivery to members and ease in doing business to establishment. Therefore, this step would certainly go a long way in

increasing ease of doing business leading to positive perceptible change in the minds of our stakeholders.

- **Grievance Redressal:** Attendance in monthly Nidhi Adalats / Nidhi Aapke Nikat is less mostly because of distance of Regional Offices. Divesting grievance redressal to district offices would bring speed in redressal of grievances. As most of functions like claim settlement and compliance would be with district offices, they would be best equipped to dispose grievances on timely basis.
- **Facilitation Centre :**  
A public facilitation centre with proper facilities and staff is required to cater to the needs stakeholders.
- **Miscellaneous tasks suitable to be divested to District Offices due to nearness:**  
It would be appropriate to divest following additional functions due to its nearness to Industrial Development Centres/Establishments / members.
  - Employees Enrolment / PMRPY
  - KYC (Aadhar & Bank Account) seeding
  - Jeevan Praman Patra digitisation
  - Awareness Programmes & Workshops
  - Any other new initiatives

Further, the ultimate objective should be to continuously strengthen and upgrade the existing District Offices to improve service delivery and facilitate employers for better compliance.

### **3. Human Resources / Infrastructure requirements:**

As there would be complete functional change of District Offices and it would be real representative of EPFO functions, there is need for adequate human resources and office infrastructure. Recently, ESIC has decided to open district offices for extending their services and they have provisioned following office infrastructure.

- Area for Deputy Director Office: 1000-1200 sq ft
- Hiring of vehicle: May be hired on need basis with a ceiling limit of Rs. 12000 per month at initial stage.

The above office requirements are for ESIC offices where ESIC had no presence till date as per mandate i.e. these areas were excluded from ESIC operational area. However, in case of EPFO, establishments are already covered and large number of members already exists in areas where district offices are located. Therefore, requirement for EPFO would be several times more than ESIC. In view of above, initially, following provisions can be made:

- A. **Human Resources:** Based on contributory members and account numbers under jurisdiction of District Offices. For example, if 4 account groups are to be created, 20 SSAs and 4 Section Supervisor and 2 Account Officers needs to be provisioned. Similarly, for compliance 12 SSAs, 2 Section Supervisor, 4 Enforcement Officers may be provisioned. For Damages and Recovery 4 SSA, 1 SS, 1 Enforcement Officer can be provisioned. 2 SSA, 2 DEO, 1 Section Supervisor for facilitation Centre & other miscellaneous works. 1 PA for assisting APFC. 4 MTS/Casual Staff, 2 Security Guard for office.
- B. **Office Infrastructure:** Based on manpower requirement of the District Office, office area of district office can be worked out. Tentatively it can be 3500-4000 sq ft. A functional conference room would also be needed for meeting with stakeholders (employers, employees, visitors) as well as for conducting Nidhi Aapke Nikat. For regular work and promotion of new initiatives, internet, display panels and associated digital infrastructure need to be provided. Corresponding hardware infrastructure like Computers and thin-clients, printers etc would also be required. Simultaneously, as these district offices have already good service and enforcement work load – covered establishment and significant contributory members, one office vehicle can be provisioned on hiring basis for routine field activities apart from need for awareness generation and enrolment drives and other miscellaneous works.

Summarized points and submissions for consideration:

1. District Office should be made effective and functional in real sense instead of doing only ornamental changes.
2. Since as per approved cadre restructuring and EPFO Head office notification, District Offices are headed by APFC, it must be ensured that sufficient functional devolution – especially **Claim Settlement, Grievance Handling, Compliance including 7A hearings, Damages & Recovery, Awareness Generation & Facilitation** is carried out.
3. The staff allocation should be done on service & enforcement work load basis in district offices as per defined norms provided in Anomaly-cum-Implementation Report. The pin codes should be the determining factor for jurisdiction of district offices. Adjoining districts at farfetched location from regional offices can be made part of District offices for operational convenience.
4. Basic infra arrangements – Building (3500-4000 sq ft. tentative), piped and filtered water, Electricity with Backup Generator, Toilet, Water cooler, Air Conditioner, proper seating arrangement/space for public & Internet Connection etc.

5. Appropriate administrative and financial powers may be delegated to APFC heading District Office so that operations can be carried out smoothly.
6. Field Offices may be directed to complete this exercise in a time bound manner not exceeding 3 months.
7. Finance Division may be directed to devolve appropriate funds immediately.
8. Without effective devolution and work-staff-infra norms in district offices, it may lead to wastage of precious human resources at Group A level, demoralization of officers posted in District Offices apart from jeopardizing the very basis of strengthening district offices.

Sir, in view of above detailed submission, it is earnestly requested to kindly intervene and direct the concerned officials for framing and issuing instructions for effective strengthening of district offices by incorporating the suggestions made above. It is requested to urgently issue detailed directions to field offices so that a uniform norm and rational approach can be adopted across the various district offices.

Thanking You.

Yours Sincerely,



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