



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

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Sh. Navendu Rai
Regional PF Commissioner-I

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Regional PF Commissioner -I

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Smt. Ritu Kanojia
Assistant PF
Commissioner

28th September, 2022

To,

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

Sub: Meeting with EPF Officers' Association – regarding

Madam,

The new Executive Body representing the EPF Officers (Commissioners' Cadre) has been elected. We have written to your good office in the past requesting for an appointment at your convenience for discussing the issues important to officers' cadre which require your kind attention. Unfortunately, this request is pending at your desk for more than nine months now.

2. There are issues which have all the requisite approvals and are stuck up only because of administrative inaction. Further, there are aspirational issues, which once addressed will motivate the officers to significantly improve upon the already exemplary performance.

In the first category following require your urgent attention and requisite follow up administrative action: -

- a) **Inordinate delay in promotion to ACC(HQ) and ACC cadre** – DoPT instructions mandate that DPC for promotions for all posts be held regularly and consequential promotion orders issued well in time. In case there are no promotions, a certificate is to be issued that there is no vacancy or there is no officer eligible for promotion. It is more than two and a half years since promotions became due but the same has inexplicably not been allowed for the reasons best known to the authorities.
- b) **Allowing Non-Functional Upgradation (NFU) to eligible officers, pending since 2012** – It is now almost a decade since the required approvals were received. However, no screening for grant of NFU has been done till date even though the MoLE had directed in writing in 2012 itself to constitute committee to complete the process.
- c) **Allowing NFSG to left out eligible officers** – NFSG has been allowed to eligible officers, four years after the approval for same was accorded by Government of India. However, it has been denied in violation of DoPT instructions on issue of VCC which categorically mention that VCC status for NFSG is to be seen on the date of eligibility of individual officers. As because the NFSG was allowed after considerable delay of more than four years, VCC status was erroneously sought on the date of (delayed) screening. That, this is wrong, has been clarified again by MoLE on a reference from EPFO Headquarters. It is requested that orders allowing NFSG to such left out officers may be issued immediately as their screening is already done. Further, timely screening for eligible officers may be done at the earliest.
- d) **Allowing Senior Time Scale on completion of four years of service** for all eligible APFCs immediately. This is due since 2020-21 to the APFCs but the process for grant of STS has not been started till date.
- e) **Up to date Updation and publishing of Seniority List for all grades in the Commissioners' Cadre particularly in the Grades of APFC and RPFC II** - This is necessary to convene DPC for filling all vacant posts and the consequential vacancies by way of **granting due relaxation in qualifying service** as may be required to all eligible officers in Commissioners' Cadre. This will also be in accordance with the recent directives issued by Hon'ble Cabinet Secretary to the Government of India vide DO Letter dated 14.09.2022. This is also in public interest as there are significant vacant posts in all grades of Commissioners' Cadre, thus compromising the ability of EPFO to effectively serve all the stakeholders.
- f) In the year 2017, post cadre restructuring, a group of more than 200 officers were promoted to the cadre of APFC by creating supernumerary posts. That these officers continue to be gainfully employed indicates that there was an actual functional requirement and need of officers, which unfortunately could not be sanctioned on regular basis in 2017, though their promotion order was on regular basis. Therefore, as a special case the service of these officers since April 2017, should be counted as eligible service for all service benefits including promotion to the next higher grade of RPFC II or else requisite relaxation in qualifying service should be allowed to them as these officers recruited through UPSC have got only one promotion in their 23 years of regular and dedicated service to the organisation and thus deserve at least one more promotion to RPFC-II at the earliest.

- g) **Recruitment Rules for Commissioners' Cadre** are not in accordance with those approved by CBT EPF in 2017; neither are they in accordance with extant RRs of central services. EPFOA has submitted a draft composite RR for Commissioners' cadre in 2021. It is requested that these may be notified urgently.
- h) **Prolonged pendency of disciplinary proceedings and consequential block in promotion opportunities to officers next in line** – The extant instructions specify timely completion of disciplinary proceedings and consequent administrative action on the outcome of such proceedings. In EPFO we have a sad spectacle of disciplinary proceedings continuing for years together and therefore, the resultant block in already sparse promotional opportunities. The instructions also state that if disciplinary proceedings are not delayed due to the charged officers, they may be allowed ad-hoc promotion in the subsequent DPCs. This may be allowed immediately. Alternately, the officer next in line may be promoted to ensure administrative continuance in public interest.
- i) **Faulty system of allowing VCC and resultant delays** – VCCs can be denied only when the officer is under suspension, where a charge sheet is issued and disciplinary proceedings are pending and where a prosecution for a criminal case is pending. It is requested that this may be reiterated and ensured in letter and spirit. Further, HR data is now digitised through HR SOFT. Vigilance Division may mark, all officers as not clear from Vigilance angle based on criterion specified above and update the list from time to time. All others should be deemed to be clear from vigilance angle. If this is accepted and implemented there will be no requirement of calling for VCC status, each time when promotion/upgradation is to be given. This would enable administrative authorities to take time bound action in issuing promotion/upgradation orders.
- j) **Refundable advance equal to two months' pay and DA on transfer** – With the approval of Executive Committee (CBT, EPF) this facility was allowed to EPF officers having all India transfer liability in the year 2006. This was important as EPFO officers are not eligible for General Pool residential accommodation. Children of EPFO officers do not get preference in admission in Kendriya Vidyalaya. This refundable advance was approved to provide financial support to transferred officers. It has been arbitrarily withdrawn without approval of competent authority. It should be restored with immediate effect.
- k) **Residential accommodation for EPFO Officers** – Availability of residential accommodation is severely limited to our officers, especially in large metros. The existing HRA/lease entitlements are highly inadequate to procure decent accommodation. Kindly initiate urgent action to allow location appropriate higher lease entitlements to ensure a dignified residential accommodation. It may also be ensured that Board's accommodation, wherever available, is not allotted to officers on deputation to EPFO in priority over own cadre officers. Please note that this is de-hors the extant rules governing residential accommodation.
- l) **Office vehicle for RPFC-Is posted in Zonal Offices and Training establishment** – Office vehicle is allowed to officers in RPFC-I grade and above since 2013. Post organisational restructuring in January 2017, officers in cadre of RPFC-I are sanctioned for ZOs as well as Training establishment. This anomalous situation may be rectified by extending the ambit of 2013 circular to RPFC-Is posted in ZOs and Training establishments.

All the above issues are of routine administrative nature and within the ambit of extant rules in place and therefore, implementable through urgent administrative actions. This is highly important to address them in right earnest to resolve the long-standing grievances of officers in Commissioners' cadre particularly in the light of Special Campaign 2.0 launched by EPFO at the instance of DO letter dated 23.08.2022 issued by Cabinet Secretary for disposal of all pending matters from 2nd October to 31st October, 2022. It is heartening to see that under your esteemed leadership EPFO is taking this campaign in mission mode by dedicating all resources and therefore, it is even more important to instil a sense of belongingness and ownership of the campaign by the officers of EPFO through first addressing their own grievances or at least making them part of the Special Campaign 2.0.

3. The aspirational issues which would require your support and kind consideration are mentioned below: -

- a) **Enhancing strength of Group, A Commissioners' cadre** – The approved recommendations of Second Administrative Reforms Commission state that organisations should become officer centric. Niti Aayog in its report on Strategy for New India @ 75 (2018) has endorsed this recommendation. As is evident from report of Seventh CPC, Group A constitutes 15%-20% of the total cadre strength in large number of Ministries, including MoLE. The corresponding ratio in EPFO is a meagre 6%. It is requested that the ratio may be enhanced to minimum of 10%. This resultant Group A posts as per current total sanction strength will be about 2470. Leaving aside about 450 Group A posts for other than Commissioners' Cadre, there should be minimum of 2000 officers in Commissioners' cadre of EPFO. This may be further sub-divided into JTS (30%), STS (40%- including leave, training, deputation reserve), JAG/NFSG (22%), SAG (8%).
- b) This enhancement would provide requisite number of officers for manning functions, present and anticipated. The resultant promotions down the grade would also address the perceived grievance of lack of promotional opportunities for subordinated grades.
- c) **The Cadre Management monograph of DoPT** mentions that the entry grade in Group Pay (Level 10 - 7th CPC) is normally the probation-cum-training grade. All officers appointed in this scale should be automatically promoted to the next grade (Level 11) on successful completion of probation. This may be replicated in EPFO Commissioner cadre rules and can be ensured once Commissioners' cadre is designed as per point (a) above.
- d) **The new Transfer Policy for Group A Commissioners' Cadre** should adhere to DoPT mandate on spouse and other special considerations (medical, children etc.) and may be modified suitably.
- e) **Operational vehicles in sufficient numbers** may be provided for all offices/officers to handle the increasingly intense engagement of officers in advocacy and outreach. Such an arrangement exists in Central Services and may be replicated.
- f) **To facilitate access to work on real time basis** as per work requirements, Laptops may be allowed to all officers. Instructions may be so issued that officers may purchase the laptop, once every three years and get the amount reimbursed in accordance with specified monetary ceilings.

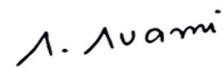
- g) **Transfer entitlements** may be so designed to allow full refund of cost involved in transfer, including for movement of household goods. A special provision may be considered to allow refund of hotel accommodation cost to officers and family members for upto four weeks from date of joining at new station @ admissible at pay level of officer concerned.
- h) A reference may be made to Ministry of Urban Development to notify EPF Commissioners' cadre as an eligible category for allotment of houses out of General Pool accommodation of Government of India.

We have pointed out earlier also that there is great deal of confusion on the role expectation from Officers-in-charge of field offices. Lot of original work in terms of claims approval, change request approval, sundry accounts approvals and authentication of all sorts of reports have been assigned to them in a perverse sort of reverse delegation where pay grades has been erroneously equated with imparting some degree of security and authenticity in ensuring transactional integrity. This leaves very little time on hands of Officers-in-charge to do any meaningful supervisory work. The supervisory responsibility is diluted and yet full accountability for supervisory roles is expected and enforced. We have been repeatedly pointing out that the requisite systemic improvements and long overdue IT enablement is the correct way to ensure system integrity. Also, the whole delegation of administrative and financial powers (last major revamp in 2004) needs an urgent review and revision.

EPFOA again requests for a meeting at an earliest opportunity to discuss the above and like issues which will significantly boost the morale of officers and thus considerably leapfrog the effectiveness and quality of service to the public at large which are mostly the marginalised working class of our society and this go a long way in the process of nation building and ensuring Ease of Living for the people.

Thanking you.

Yours sincerely,



(Saurabh Swami)
Secretary-General