



EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION
EMPLOYEES' PROVIDENT FUND ORGANISATION
MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA
Regional Office, Sham Nagar, Near General Bus Stand, Ludhiana – 141001 (Punjab)

(Regn. No. 33/2015)

Phone: 0161-2440559, 9655565892
Fax: 044 2402206
WhatsApp: EPF Officers' Association (9655565892)
PAN: AAAAE7689J

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

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October 03rd, 2023

To,

**Smt. Neelam Shami Rao, IAS,
Central Provident Fund Commissioner,
Employees' Provident Fund Organisation,
New Delhi – 110 066**

**Subject: Request for urgent intervention for emergent
system revamp and upgradation**

**Reference: EPF Officers' Association letter dated July
26th, 2023.**

Madam,

As you are well aware, EPFO is currently functioning in an archaic software system. This urgent issue has been highlighted by the EPFOA repeatedly, most recently vide letter cited above. Due to routine & regular disruptions as well as archaic systemic procedures, EPFO has been unable to achieve true excellence and our services have invited criticisms from the stakeholders. In fact, it is the sheer hard work and tenacity of EPFO officers and staff that despite these shackles, EPFO has not lost the faith of our subscribers and the Government.

2. However, hard work & tenacity can only go so far before the stress and grind against insurmountable obstacles will bring us to a standstill. It is here that we had expected and hoped that your kind and timely intervention would save the day with some robust correctives. That none has been forthcoming so far indicates that perhaps we have not been able to convey the gravity of the situation. It is also possible that full facts and complete picture has not been conveyed to you regarding severe systemic incapacities, in case such a report was sought.

3. Our current Application software on which bulk of our operations are run is of 2008 vintage. A comparison with other standard softwares indicates that how other softwares have evolved over the years.
 - i. Windows Vista in 2008, now Windows 11
 - ii. IOS 3 in 2008, Now IOS 17
 - iii. Android version 1 in 2008, now Android 14
 - iv. Oracle Database 11g Release 2 in 2009, now Oracle Database 23c.
4. It is only in EPFO where no upgradations have happened. The situation has become particularly alarming in last five years where almost nothing substantive has happened. It would be in fitness of things if an independent comparative system audit with any organisation of similar scale is carried out. This will indicate the huge gaps. A comparative picture vis-à-vis the State Bank of India has been placed before the CBT, EPF.
5. We request you to re-visit the said comparison with SBI or cause a comparison study afresh with organisations like Income Tax Department, GST, LIC or any other similar sized organisation.
6. We understand that CDAC had, sometime in the year 2019 given a comprehensive proposal for system revamp. EPFO had paid consultancy charges for procuring the said recommendation. Inexplicably nothing further has been heard of that proposal. We request that the said proposal may be reviewed and if possible, implemented expeditiously with required modifications. In case it is not found feasible the said CDAC report may be given to any reputed institution such as IIT Delhi to study and ensure its implementation. IIT Delhi is presently undertaking a study of EPFO to recommend rationalisation of offices and assess their manpower requirements. Engaging with IIT Delhi for systemic improvement will bring synergy in charting out future growth of EPFO. It is within existing powers of Chairman CBT, EPF to assign such a study to IITs.
7. It is also brought to your kind notice that officers (and staff) are under extreme duress. System incapacities are not being addressed. In-lieu thereof all activities which can be handled through system are being pushed onto officers to certify. We had brought to your notice how, in the absence of any systemic improvement, a ham-handed and myopic solution of requiring manual certification of various work processes such as claims above a particular value, member profile correction (member particulars and member balances) etc. are pushed to increasingly senior levels. The executive roles of officers have been seriously compromised, yet they are answerable for their executive responsibilities.
8. Latest in this process of sub-optimal solutions is the process of annual account updation for the year 2022-23, which till last year was updated through system. Now it requires manual certification. We understand that it signifies almost complete collapse of system in EPFO, thereby forcing a revert to manual updation.
9. And another new diktat has come from IFD wherein they have directed that as MIS is not getting updated daily they are unable to monitor claims pendency, so field offices in addition to all their other tasks must also now daily update a Google Sheet on claims pendency from the Application Software. There seems to be no thought to the additional manhours that we will spend on this new reporting.

10. It is heart breaking to believe that we are going back to the technological stage where we were many years ago as an organisation. This perverse logic that since we cannot fix the problem through technology upgradation, we should try to fix it by manual intervention will not be able to justify our claim to being a world class organisation.

11. However, if this is a considered decision that computerisation notwithstanding all approvals & reporting shall be manual, then please consider emergent sanction of sufficient number of posts at all levels immediately. We estimate that manpower requirements would go up at least threefold from current levels. Thus, we would require manpower of at least 72,000, up from present 24,000. Obviously, it would be a retrograde step when world is recognising the prowess of India in Digital Public Infrastructure (DPI), and EPFO is preparing for a dive into fully non-digitised, manual system of working.

12. A similar issue related to hardware is non-implementation of the recent DOE circular no. F. No. 03(20)/2022-E.II(A) dated 21.07.2023 on the issue of purchase of laptops/notebooks and similar devices for eligible officers. The Government has recognised the requirement of equipping its officers and staff with capable hardware solutions to enable them to deal with emerging software technologies vide above cited circular. It envisages to provide high quality hardware to even Section Officers in order to make them future-proof hardware-wise. But in EPFO we have not yet implemented this circular and it is learnt that a committee is proposed to study the actual requirement for EPFO. It is submitted that when Govt. of India has already conducted the requisite study and issued a circular which is uniform for all Ministries and Departments, regardless of their financial or technological nature, then why does EPFO need to reinvent the wheel. If this continues the day will not be far when we will have committees to study whether DA enhancements declared by the Government should be implemented in EPFO or not. Therefore we request you to kindly reconsider the matter and issue suitable directions to implement to Govt. directions at earliest.

13. We place our facts and pleadings before you with the request to kindly intervene urgently to ensure time-bound upgrade of systemic capacity. We also submit that pending such an upgrade, performance reviews be mindful of the immense constraints and complete disregard to family and personal life, under which officers (and staff) are delivering exemplary service.

Thanking you.

Yours sincerely,

A. Swami

**[Saurabh Swami]
Secretary-General**