



**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: 0161-2402206

WhatsApp: EPF Officers' Association (9655565892)

PAN: AAAAE7689J

Email: epfooa@gmail.com

Web: www.epfoa.in

Facebook: Epfoa India

Twitter: @epfoaindia

PRESIDENT

Sh. Navendu Rai

Regional PF Commissioner-I

WORKING PRESIDENT

Sh. Manoranjan Kumar

Regional PF Commissioner –I

SECRETARY GENERAL

Sh. Saurabh Swami

Regional PF Commissioner -I

JOINT SECRETARY  
GENERAL

Sh. Pankaj Verma  
Regional PF  
Commissioner -II

MEMBER,CENTRAL  
EXECUTIVE

Sh. Mayank Raj  
Regional PF  
Commissioner -II

Sh. Avinash Sinha  
Regional PF  
Commissioner-II

Sh. Mukteshwar  
Vyas, Assistant PF  
Commissioner

TREASURER

Smt. Ritu Kanojia  
Regional PF  
Commissioner-II

**February 9<sup>th</sup>, 2026**

**To,**

**Shri Ramesh Krishnamurthy, IRS,  
Central PF Commissioner,  
Employees' Provident Fund Organisation,  
NEW DELHI – 110023**

**Subject: Roadblocks in successful implementation of  
PMVBRY & proposals for consideration – regarding**

**Sir,**

As you are aware EPFO machinery has been involved in propagation of the Pradhan Mantri Viksit Bharat Rozgar Yojana (PMVBRY) right from pre-launch stage when the ELI Scheme was proposed in Union Budget 2024-25. Over the course of past two years we have been actively pursuing employers and employees for Scheme related activities such as scheme & benefits awareness, UAN activation, UAN authentication via FAT, marking date of exit for exited employees, registration of establishments under the PMVBRY, filing of missing ECR since August 2024 (for establishment-wise baseline generation), filing of Zero ECR by exempted establishments, seeding of bank accounts with Aadhar for DBT, pursuing establishments missing threshold of scheme benefits by 5% / 10% to hire more employees, etc. This has been done by holding camps, seminars, webinars, meetings in Rozgar melas, colleges, factories, offices, hotels, industrial clusters, SEZs, industrial associations offices, Trade Unions offices, etc.

**2.** Now after two continuous years of incessant activity, the scheme has finally reached a crucial juncture as the first tranche of benefits is payable in little over one month's time. In view of above, it is of utmost importance that the collective learnings & experience gained is utilized to ensure that the scheme's success is maximised. The EPF Officers' Association (EPFOA) had discussed some of the important issues with you in the meeting held on 22.01.2026, and in continuation of the same, submits following areas of concern, along with possible solutions, that may be considered at earliest: -

**A. PMVBRY Targets**

EPFO Head Office has distributed a monthly target of 10 Lakh beneficiaries for Part-A & 15 Lakh beneficiaries for Part-B of the PMVBRY Scheme to EPFO Regional Offices vide HO Letter dated 25.11.2025. Highest monthly target of 2,64,580 new-joiners & re-joiners has been allotted to Bengaluru Zone, followed by a target of 1,97,367 to Delhi, Uttarakhand, J&K & Ladakh Zone, a target of 1,92,666 to Bandra Zone and so on.

Firstly, it is not understood as to how these targets were allotted to various Zones & Regional Offices. Was any study conducted to consider the ongoing economic activity & growth in individual Zones & ROs? Or the nature of past growth? Or the inherent structural nature of prevalent industries in any area?

These questions regarding the method followed for target fixing are of fundamental importance as the performance of offices is being judged not on basis of their actual or absolute performance in terms of numbers achieved, but rather as percentage against assigned targets. If there has been any error by way of overestimating the target for a Zone or RO, no amount of effort will help that Zone or RO in achieving specified targets.

The issue of error in target fixing arises if we look at the performance of individual Zones against assigned targets. As per data shared by HO during last review meeting, the Zones that have performed well against assigned targets were Rajasthan Zone, Haryana Zone, Delhi, Uttarakhand & Jammu Zone, Gujarat Zone & Pune Zone, while Bandra Zone was at the bottom, and some major Zones such as Thane Zone & Bengaluru Zone were also amongst the lower half. A cursory examination of above reveals that Zones that have geographical areas with scope of increase in economic activity in form of hinterland adjacent to economic hubs are performing very well, while Zones that comprise solely of urban & developed but stable core viz. areas such as Mumbai & Bengaluru are categorized as low performers despite their high absolute numbers. This is solely due to erroneous target fixing. Not much consideration seems to have been given to individual nature & extent of Zones and ROs while allotting targets. New factories &

industries are set up in places where there is scope for doing so, and when such establishments hire employees, the target of Zones or RO covering such areas is easily met. But what is an RPFC located in heart of Mumbai or Bengaluru or Delhi or Hyderabad supposed to do? He cannot very well persuade an established & stable employer to hire more employees beyond what is financially beneficial to him.

Frankly speaking, from above data & assigned targets it seems that EPFO was given a monthly target of 25 lakh and same was simply distributed to field offices without considering whether it is achievable or not. And now that some Zones & ROs are finding it difficult to achieve an arbitrarily assigned target, they are being raked over coals as if they had any say in their unachievable target fixation.

**Solution Proposed:** There is immediate need to re-examine & revisit the mechanism by which individual targets were assigned to Zones & ROs. Furthermore, this mechanism may be communicated to field offices so that actual ground-based feedback may be provided by field offices.

**B. Increasing the number of beneficiaries of PMVBRY**

Sir, please recall that in the review meeting held on 06.02.2026, you have raised the matter of low number of Part A & B probable beneficiaries in some Zones and ROs. When it was intimated that there is lesser scope for increase in numbers in some places, you have directed that then such offices must be ready to certify that there is no further scope of coverage in their jurisdiction. In this regard, it is submitted that at present no office is in a position to certify this as EPFO has long ago abandoned its duty to ensure coverage of all coverable establishments by stopping annual coverage drive exercise. Vide HO circular dated 03.05.2018 it has been specified,

*"(3) If any information is made available to the RPFC-in-charge of the office that a particular establishment has not registered itself for coverage under the EPF & MP Act, 1952 despite being coverable under the Act, the RPFC-in-charge should take initiatives to contact and persuade such establishment for registration through Shram Suvidha Portal. If such establishment is not coming forward for coverage under this Act on its own in spite of persuasion made by the office, permission from CAIU, Head Office should be obtained and then the Enforcement Officer may be deputed to verify the records of the establishment and the establishment should be brought under the ambit of the Act from the date of eligibility in order to ensure extension of social security measures to the employees of such establishment"*

As stated above, RPFC can initiate any action for coverage of an uncovered establishment only when some information becomes available to him, and since EPFO effectively lacks any form of intelligence wing, this information is usually only in form of a complaint from an employee. Barring such complaint, an EO or field functionary cannot even enter any uncovered establishment without prior permission lest some false complaint is filed against him or her. Coverage of an establishment under the EPF Act is now a reactive exercise rather than a proactive exercise. There might very well be a coverable but uncovered establishment existing right next to an EPFO office, but how would an RPFC know this if his EO cannot even enter the premises to verify this?

For about 3000 EPF exempted establishments out of about 7.66 lakh total contributing establishments, annual compliance audits are regularly being done and monitored, while no such compliance audit is mandated for unexempted establishments. If done, it will help in finding out compliance gaps.

**Solution Proposed:** EPFO may initiate a coverage drive backed by robust SOP & clear guidelines which allows field functionaries to visit establishments that have scope for coverage. Such employers may be encouraged to voluntarily apply for coverage. Where employer does not voluntarily come into coverage fold, legal action as per statute should follow. This will not only increase PMVBRY beneficiaries but also give a much-needed boost to flagging EEC.

### **C. Nudging as replacement for Default Management**

While some aspects of the PMVBRY scheme such as establishment registration for availing Part-B benefits are optional for the employer and an individual employer/establishment may very well decide in his wisdom to forgo the benefit by not registering or opting out. However, what is a matter for concern for PMVBRY as well as the goal of universal social security, is that for some time now EPFO has forgone effective default management in favor of only nudging the employers. This is even for the requirement of complying with statutory provisions of the EPF Act and the Code on Social Security, such as regular filing of monthly ECR & depositing EPF dues of employees. Default management is an intrinsic statutory responsibility of EPFO and an effective form of default management indeed includes the nudging aspect, but it would *inter alia* comprise steps as well such as identifying defaulting establishments in order of priority, initial nudging to comply, issuance of legal notices, and if default continues then inevitable inspections (electronic or physical), statutory inquiry, assessment & recovery of default. However, at present, *nudging* in form of phone calls & emails is virtually the entire default management exercise. As has been pointed out by

an earlier letter of the EPFOA, physical inspections have virtually come to a standstill due to ineffective & partially implemented Inspection Scheme, while, e-inspections can only be described as stillborn in EPFO. Field offices cannot even issue notices to defaulting establishment as per current Inspections SOP, since that would require periodic desk review (PDR) of all establishments starting with the oldest EPF code number.

Coming back to the issue of PMVBRY, it is a matter of practical experience that nudging employers has reached its capacity and there is a general sense amongst defaulting employers that ultimately EPFO will not take any legal action. When our field officials call defaulting employers and request them to file missing ECR & deposit pending dues, many do not even pick the call or block our phone number, those who are courteous enough to respond are either non-committal or seek more time. Similarly, our emails are not even acknowledged by defaulters. There is no more nudging left for us to do when defaulters know very well that statutory compliance action will not follow.

Furthermore, kindly consider that as per presentation given by HO during review meeting held on 06.02.2026, almost daily SMS are being sent by EPFO HO to employers & employees on various issues related to PMVBRY. At this point there is such an information overload that no one can claim that he is not aware of the scheme or its requirements.

**Solution Proposed:** Now, therefore, in order to ensure filing of missing ECR for the PMVBRY scheme it is proposed that suitable guidelines may be issued to complete the remaining cycle of default management starting with next step viz. issuance of show cause notices to all such establishments who have not yet filed missing ECR for period starting with August 2024 onwards. Of course, it must be borne in mind that default management exercise in its entirety is a legal exercise and results may not be achieved overnight, however, rest assured if the exercise is taken to its logical end, it will not only ensure ECR filing for PMVBRY, but also secure social security for our members, which is EPFO's *raison d'être*.

#### **D. Issue of DBT & FAT seeding**

EPFO Head Office has in past 2-3 days communicated to field office that about 10% of Part-A beneficiaries do not have DBT enabled bank accounts and thus will not be able to avail the first installment of their benefits under the scheme. Now an immediate pressure has been created to get these accounts DBT enabled by field offices. It is not understood that when DBT enabled bank accounts was such an intrinsic requirement for the scheme, why it was not pushed right from the beginning? This issue should have been widely publicized in all scheme creatives

and publicity activities. Furthermore, as this is for new-joiners who have linked their bank account to UAN in past 5 months, EPFO could have easily checked their DBT status at the time of linking of bank account to UAN & raised a flag in the member portal or even disallowed non-DBT enabled bank account from seeding with UAN. Having missed that crucial step EPF field offices are being pressurized to complete the task, rather than trying any systemic or systematic solution to this issue. Kindly consider that in many cases the employees of an establishment are spread throughout the country and trying to reach them & guide them to enable DBT on their bank account is extremely difficult. This is so particularly when a member fears that he might become a victim of online fraud by performing an action related to his bank account that someone claiming to be from EPFO is asking him to perform on phone.

FAT seeding of pending UANs is also facing exactly same problems.

**Solution Proposed:** Flag and block all such UANs where DBT enable or FAT seeding is pending from any outward transaction, till the member bank accounts are DBT enabled & FAT seeding is completed. All such members may be allowed a software-based option that if s/he does not wish to go for DBT enablement of his/her bank account or FAT seeding of his UAN for any reason, he may opt out of the Part-A benefit of PMVBRY and immediately regain full transaction rights for his/her UAN.

3. Sir, please see the total sanctioned strength of EPFO as in March 2010. The current sanctioned strength is almost same. We are currently having almost 1/4 posts vacant. By any comparison the EPFO workload has increased manifold. We request manpower augmentation and technology support urgently. Pending this augmentation, kindly have a review for various work areas and specify a priority matrix of things which are required to be addressed in priority over others.

4. EPFO as an organization & EPFO officers in particular, have always out-performed all targets & goals in the past, and it is a matter of pride for us that the PMVBRY has been assigned to EPFO by the Government as this reflects the faith that Government has in EPFO as an engine for national employment growth. However, this has also created a responsibility on us to ensure the scheme's success. Therefore, it is of utmost importance that we learn from our experience of past two years and perform immediate course correction where necessary. For failure at systemic & policy level, going after individual field offices and threatening them of adverse action makes for good optics but may not result in actual performance. It is accordingly requested that the proposals

submitted above may kindly be considered at the earliest and urgent action be initiated to ensure successful distribution of the first tranche under the PMVBRY.

Thanking you.

Yours sincerely,



**[Saurabh Swami]**

**Secretary-General**

Copy to:

1. Hon'ble Chairman, CBT, EPF / Hon'ble Minister for Labour & Employment
2. Hon'ble Vice-Chairperson, CBT, EPF / Hon'ble Minister of State for Labour & Employment
3. Hon'ble Co-Vice-Chairperson, CBT, EPF / Secretary, Labour & Employment
4. Hon'ble Members, CBT, EPF.