



American Federation of Government Employees National Council of HUD Locals 222

Affiliated with AFL-CIO

451 7th Street, SW, Suite 3142
Washington, DC 20410

Ashaki Robinson Johns, PhD
President

Phone: 202-402-3077
E-mail: Ashaki.Robinson-Johns@hud.gov

July 15, 2020

Bobby Allen
Human Resources Specialist
Employee & Labor Relations Division
Office of the Chief Human Capital Officer
Department of Housing and Urban Development

RE: Demand to Bargain – Proposed Clean Desk Policy

On July 10, 2020, Council 222 (the Union) provided a demand to bargain in response to the Department of Housing and Urban Development's (the Department's or HUD's) July 6, 2020, Article 49 Notice regarding HUD's proposal to implement a new Clean Desk policy. The Union is amending that demand to bargain by adding the following preliminary proposals to the 22 proposals that were previously provided. The proposals below begin with number 23 to ensure clarity when referring to them.

23. Mailroom Access: Management shall provide guidance for mailroom personnel who are required to open mail and determine the appropriate receiving office, and for other personnel who receive documents in transit that may contain sensitive information. The presence of sensitive information such as PII may not be immediately apparent (or recognized as such) by the initial recipient(s). (See Policy section d, first bullet.)
24. Encrypting/Decrypting Devices: Management shall provide training and written guidance on how to encrypt and decrypt documents and mass storage devices. (See Policy section j.)
25. Lockboxes: Management shall provide secure lockboxes or the equivalent to enable employees to deliver sensitive documents to colleagues in the same or different offices when the recipient is not present to receive the file. Management shall distribute the keys to all personnel and offices that may need to access such lockboxes.
26. Key Holders: To ensure that employees are able to carry keys to locking drawers and cabinets, or to shared lockboxes, management shall provide keychain wristlets to employees upon request.
27. IT Support Access: Management shall clarify its policy on protecting sensitive data contained in HUD computers and data collection devices when IT support needs access to the computer to identify and resolve a software or other functional problem.
28. New Software Testing: Employees shall not be held responsible for adhering to this policy when collaboration with external personnel (e.g., IT support, representatives of HUD-held properties) requires shared access to electronic files.

29. Data Protection During Travel: Management shall be responsible for providing personnel with all necessary means to protect sensitive information, whether digital or hard copy, that personnel need to access, use, or carry while on official travel or while conducting field work. This applies to local travel as well as overnight travel.
30. Support for Remote Employees: Management shall ensure that sufficient IT support is provided to employees who work in remote areas, such as REAC Quality Assurance personnel, to prevent the loss or compromising of sensitive data.
31. Practicality: Management shall ensure that all means of protecting digital and hard copy sensitive data shall be practical and feasible for employees to use.
32. Safety: For safety purposes, no employee shall be required to lift large hardcopy files above shoulder height or to place them or lift from storage that is below knee level, unless such requirements were identified in the job application and position description before the employee was hired. Large files are those that weigh 5 pounds or more or are more than 2 inches thick.
33. Reasonable Accommodations: Implementation of this policy shall not have any effect on any existing reasonable accommodations. Management shall provide reasonable accommodations for any employee who is unable to lift or carry the hard copy documents to the necessary storage container.

These, along with the initial 22 proposals, are preliminary proposals only, and the Union reserves the right to amend or add proposals in accordance with Article 49 of the collective bargaining agreement. I will serve as the Chief Negotiator for this matter.



Jerry Gross
Steward
AFGE Council 222
jerry.gross@hud.gov