

NATIONAL SUPPLEMENT 24
Between
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
And
AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
NATIONAL COUNCIL OF HUD LOCALS 222

Subject: HUD Personally Identifiable Information (PII) Protection at Workstations Policy

Scope: The scope of this supplement addresses the implementation of a new HUD policy dated August 4, 2020, regarding the prevention of unauthorized access and disclosure of Personally Identifiable Information (PII), Controlled Unclassified Information (CUI), and confidential medical information, in accordance with the Privacy Act of 1974, as amended (5 U.S.C. 552a), HUD's implementing regulations at 24 CFR Part 0 (Standards of Conduct) and Part 16 (Implementation of the Privacy Act of 1974), and 5 CFR Part 2635 (Standards of Ethical Conduct for Employees of the Executive Branch). The policy applies to personnel in HUD buildings and facilities.

1. **Bargaining Meetings:** Management shall work with the Union to set a mutually agreeable meeting time to begin negotiating within 10 days of receipt of this demand to bargain. All bargaining shall be conducted by telephone due to the COVID-19 pandemic. The Union does not waive its right to demand in-person negotiations in the future.
2. **Ground Rules:** The parties shall abide by the mid-term negotiation ground rules provided by Section 49.06, other than those related to physical facilities and materials (Sections 49.06 (b) and (c)). In lieu of providing physical facilities, the Department shall provide a call-in number for conference calls to be used by the negotiating teams for the duration of bargaining.
3. **Status Quo:** The status quo will remain, and the Department shall not implement any the new policy until all bargaining is completed in accordance with the Agreement.
4. **Policy Changes:** The Department shall make all changes to the proposed policy necessitated by the result of bargaining and shall provide the Union with a copy of the final policy.
5. **Changes Subject to Bargaining:** The Department shall immediately notify the Union any time that changes in law, statute, or government-wide regulations require a modification of the Personally Identifiable Information Protection at Workstations policy. All changes are subject to bargaining.
6. **Policy Number:** The Department shall advise Council 222 of the number assigned to the proposed policy. The Department shall post the finalized policy on the HUDCLIPS website and shall advise the Union when and where the handbook is posted.
7. **No Waiver of Rights:** Neither the proposed policy nor any supplement or other agreement resulting from bargaining over this matter shall diminish or waive any rights

that bargaining unit employees have under the parties' collective bargaining agreement, law, rule, or regulation.

8. Supplement Prevails: When provisions of the Personally Identifiable Information (PII) at Workstations Policy are inconsistent with or contradict this supplement, this supplement shall prevail.
9. Prior Agreements: Nothing in the proposed policy shall contradict, negate, or conflict with any prior agreements related to the use of PIV cards.
10. Training: Management is responsible for providing and updating annual privacy and security awareness training which references the behavior requirements of the PII Protection at Workstations Policy, even though the training may not explicitly refer to the policy by name.
11. FOIA/Privacy Act: The proposed policy shall have no impact on whether a document or file (paper or digital copy) is subject to the provisions of the Freedom of Information Act or the Privacy Act.
12. Practicality: Management shall ensure that all means of protecting digital and hard copy PII data shall be practical and feasible for employees to use.
13. Locked Drawers: Management shall ensure that all employees have access to working locking drawers that are of sufficient size and depth to accommodate sensitive documents that employees handle and have keys to those drawers.
14. Daily Walk-Through: Bargaining unit employees shall not be required to conduct inspections or walk-throughs to check their peers' or supervisors' workstations for policy adherence or violations.
15. IT Support Access: Employees may seek guidance from their supervisors regarding protecting PII data for their non-functioning laptop/computer.
16. Compliance with ADA: The Department shall ensure that all aspects and requirements of the proposed policy comply with the Americans with Disabilities Act and the Rehabilitation Act of 1973, as amended in 1998, including Section 508.
17. Reasonable Accommodations: Implementation of this policy shall not have any effect on any existing reasonable accommodations. The Department shall provide reasonable accommodations that enable disabled employees to comply with the proposed policy.
18. Safety: When an employee requests assistance moving large files of PII materials, management will provide that assistance or appropriate accommodation.

For Management:



Bobby Allen, Chief Negotiator

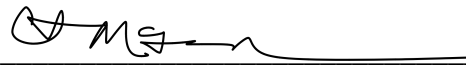
LaDonne L. White

LaDonne White

For the Union:



Jerry Gross, Chief Negotiator



Christopher McLennon

Date: August 4, 2020