



American Federation of Government Employees
National Council of HUD Locals 222

Affiliated with AFL-CIO

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February 17, 2022

MEMORANDUM FOR: Sonya Gaither, Director, Employee and Labor Relations Division

James M. Fox, Chief, Employee and Labor Relations Headquarters
Branch

FROM:

Jerry Gross, Midterm Bargaining Committee Co-Chair, AFGE Council
222

SUBJECT:

Grievance of the Parties/Unfair Labor Practice Charge, Request for
Information Pursuant to 5 U.S.C. § 7114(b)(4), and Demand to
Bargain: OGC New Financial Disclosure Requirement

AFGE Council 222 (the Union) has recently learned that the Department of Housing and Urban Development (HUD) Office of General Counsel (OGC) determined that numerous attorney positions are to be added to the list of those required to file confidential financial disclosure statements, the Office of Government Ethics (OGE) Form 450. The new requirement for individual attorneys to disclose their personal financial information is a change in conditions of employment. Under Article 49, Section 49.02, of the AFGE-HUD collective bargaining agreement (CBA), management is required to “transmit to the Union its proposed changes relating to personnel policies, practices, and general conditions of employment.” Section 49.03(4) identifies the information that management is obligated to provide to the Union when there is a change in policy or past practice.

Due to HUD’s failure to provide proper notice to the Union and to negotiate in good faith over a proposed change in conditions of employment, the Union is filing this Unfair Labor Practice grievance of the parties, which is provided below. In support of that grievance, the Union also includes a request for information pursuant to 5 U.S.C. § 7114(b)(4). To ensure that the Union’s rights are preserved, a demand to bargain with preliminary proposals is also included below.

You are requested to cease and desist from imposing a new requirement that bargaining unit employees submit financial disclosure statements until such time as management provides the Union with proper notice of a change in conditions of employment and the parties complete any bargaining required.

I. Grievance of the Parties/Unfair Labor Practice Charge

On February 8, 2022, Amy L. Brown, Deputy General Counsel for Housing Programs, notified approximately 17 attorneys by email that the Agency’s Alternate Designated Agency Ethics Official and senior managers had reviewed all OGC employees’ positions to determine whether they should be required to file OGE Form 450 financial disclosure statements. See Enclosure 1. As a result of that review, OGC had determined that it was “necessary and appropriate for all

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program counsel to be added to the list” of those employees who are obligated to file the financial disclosure statements.

The Union files this Grievance of the Parties pursuant to CBA Article 51, Section 51.15, charging HUD with violating the CBA and committing unfair labor practices by failing to notify the Union of the agency’s intent to change its policy and past practice regarding the attorneys’ requirement to disclose personal financial information and failing to provide the Union with an opportunity to bargain over the impact and implementation of OGC’s decision to expand financial reporting requirements. It is clear this is more than a de minimis change in conditions of employment given the potential disciplinary consequences for not filing the confidential financial disclosure form or providing false information in the form. HUD thereby violated Article 49, including but not limited to Sections 49.02 and 49.03, and the Federal Service Labor-Management Relations Statute, 5 U.S.C. Chapter 71 (the Labor-Management Statute), including but not limited to §§ 7116(a)(1) and 7116(a)(5) by:

1. interfering with, restraining, or coercing any employee in the exercise by the employee of any right under this chapter; and
2. failing to consult or negotiate in good faith with the Union.

Meeting. The Union is not requesting a meeting with you for resolution pursuant to Section 51.15(2) of the CBA.

Remedies. The Union requests the following remedies for HUD’s violations of the CBA and the Labor-Management Statute:

1. A finding that the Agency committed unfair labor practices by violating §§ 7116(a)(1) and 7116(a)(5).
2. An order directing the Agency to specifically acknowledge its violations in an electronic message/posting to all bargaining unit employees and pledging to not violate the Labor-Management Relations Statute in the future.
3. An order directing the Agency to pause its implementation of the new policy while it provides appropriate notice to the Union in accordance with CBA Article 49, Sections 49.02 and 49.03, provides the information requested below, and engages in bargaining with the Union if the Union issues a demand to bargain.
4. Attorneys’ fees related to the preparation and conduct of arbitration, if arbitration is necessary, as well as the full costs of arbitration, including but not limited to arbitrator’s fees, reporting services, and the travel expenses and per diem of Union witnesses who travel to the arbitration site to testify.
5. Any other remedy available to the fullest extent of the law, rule, regulation, policy, past practice, the HUD-AFGE Agreement and arbitrator’s award.

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In accordance with Article 51, Section 51.15(3) of the CBA, your written response is required within thirty days of receipt of this grievance.

II. Request for Information

The Union requests that HUD provide the information identified below pursuant to 5 U.S.C. § 7114(b)(4). The Union requests information that relates to bargaining unit employees but recognizes that some information may be more general and apply to both bargaining unit and non-bargaining unit personnel.

1. List of all OGC employees in Headquarters and field offices who are newly identified as being obligated to file OGE Form 450. This list should include all OGC bargaining unit personnel who had not previously been required to file the confidential financial disclosure statement and will now be required to do so as a result of being identified during the review by the Agency's Alternate Designated Agency Ethics Official and senior managers. Please include all personnel so identified since January 1, 2021. For each affected employee, please provide the employee's:

- a. Name, title, office and geographic location.
- b. Copy of the employee's position description.
- c. List of the functions performed by the employee that make the employee subject to financial reporting.
- d. Amount of time that the employee performs the functions listed as a percentage of total work time.
- e. Identification of those functions listed for which the employee is authorized to issue decisions, apply judgment, or otherwise act without being subject to supervisory review, and those for which the employee is required to submit the action to a supervisor for review and/or signature.
- f. Date the employee was hired.
- g. Date the employee was notified of the new OGE Form 450 requirement.
- h. Date the employee was or will be obligated to file the OGE Form 450 for the first time.
- i. Information about any other changes affecting the employee, such as but not limited to changes in position sensitivity designations.

Statement of Particularized Need: The Union requires this information for the following reasons:

(1) [*Why the Union needs the requested information*]: The Union requires the requested information to determine the extent to which HUD has violated the CBA, including but not limited to Article 49, Sections 49.02 and 49.03, and committed unfair labor practices,

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including but not limited to violations of §§ 7116(a)(1) and (5). The Union also needs the requested information in order to determine which bargaining unit employees have been affected by the Agency's actions, whether the Agency's actions have been applied fairly and equitably and consistently with all applicable laws and regulations. Please be advised that for a § 7114(b)(4) information request, a union is not required in its statement of particularized need to describe the exact nature of any alleged misapplication or violation of policy, procedure, law or regulation by the agency. *See Health Care Financing Administration and AFGE Local 1923*, 56 FLRA 156 (March 17, 2000).

(2) [*How its use of the information relates to the Union's representational responsibilities*]: The Union will use the information as evidence to support its Grievance of the Parties regarding OGC's unfair labor practices and violations of the collective bargaining agreement, laws, and regulation. This information will be used to assess the extent to which HUD violated its contractual obligations, to determine how to support and pursue that grievance, and, if necessary, to assess whether to arbitrate or settle that grievance. The Union also needs the documentation requested to meet its preponderance of evidence burden of proof that HUD OGC management in fact violated the Federal Service Labor-Management Relations Statute and the HUD-AFGE collective bargaining agreement as alleged in the Grievance of the Parties and possibly in arbitration.

2. Documents related to how the determinations were made regarding new financial disclosure obligations. This should include:

- a. Information on the criteria applied to determine which personnel and positions would be required to file OGE Form 450, including but not limited to all government-wide statutory and regulatory requirements as well as agency policy.
- b. Copies of all memos, studies, reviews, correspondence, and other evaluations related to how the personnel and positions were identified.

Statement of Particularized Need: The Union requires this information for the following reasons:

(1) [*Why the Union needs the requested information*]: The Union requires the requested information to determine the extent to which HUD has violated the CBA, including but not limited to Article 49, Sections 49.02 and 49.03, and committed unfair labor practices, including but not limited to violations of §§ 7116(a)(1) and (5). The Union also needs the requested information in order to determine whether employees are being treated fairly and equitably as required by CBA Article 6, Section 6.01, and whether any other provisions of the CBA and the Labor-Management Statute were violated. Please be advised that for a § 7114(b)(4) information request, a union is not required in its statement of particularized need to describe the exact nature of any alleged misapplication or violation of policy, procedure, law or regulation by the agency. *See Health Care Financing Administration and AFGE Local 1923*, 56 FLRA 156 (March 17, 2000).

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(2) [*How its use of the information relates to the Union's representational responsibilities*]: The Union will use the information as evidence to support its Grievance of the Parties regarding OGC's unfair labor practices and violations of the collective bargaining agreement, laws, and regulation, and to determine whether to expand that grievance beyond what has been stated above. This information will be used to assess the extent to which HUD violated its contractual obligations, to determine how to support and pursue that grievance, and, if necessary, to assess whether to arbitrate or settle that grievance. The Union also needs the documentation requested to meet its preponderance of evidence burden of proof that HUD OGC management in fact violated the Federal Service Labor-Management Relations Statute and the HUD-AFGE collective bargaining agreement as alleged in the Grievance of the Parties and possibly in arbitration.

3. Information related to identification of conflicts of interest before imposition of the OGE Form 450 requirement. This should include:

- a. A description or list of how potential conflicts of interest were identified before imposition of the new financial disclosure requirement.
- b. A list of any conflicts of interest identified during the past three years, and information on whether they were disclosed before or after an employee began work on the related matter.
- c. A list of any harm (e.g., the subsequent reversal or invalidation of Agency actions or decisions) caused by conflicts of interest due to the lack of OGE Forms 450.

Statement of Particularized Need: The Union requires this information for the following reasons:

(1) [*Why the Union needs the requested information*]: The Union requires the requested information to determine the extent of the impact of the new financial disclosure requirement to enable it to make decisions related to bargaining over the new policy and procedures, and to determine if requested remedies for the Union's grievance are appropriate or need to be modified. The Union requires the information for the past three years to cover both a period when HUD offices were open before the COVID-19 pandemic as well as the two-year period during which HUD personnel were on maximum telework, as those two periods may have significantly different data. Please be advised that for a § 7114(b)(4) information request, a union is not required in its statement of particularized need to describe the exact nature of any alleged misapplication or violation of policy, procedure, law or regulation by the agency. *See Health Care Financing Administration and AFGE Local 1923*, 56 FLRA 156 (March 17, 2000).

(2) [*How its use of the information relates to the Union's representational responsibilities*]: The Union will use the information to develop appropriate bargaining proposals and to modify proposed remedies to the grievance, if necessary, in accordance with 5 U.S.C. § 7114(b)(4)(B) for a full and proper discussion, understanding, and negotiations of subjects within the scope of

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collective bargaining. In *Internal Revenue Service, Washington, D.C. and Kansas City, MO*, 50 FLRA 661 (1995), Footnote 13, regarding a union's particularized need, the FLRA stated:

However, **a request need not be so specific as, for example, to require a union to reveal its strategies** or compromise the identity of potential grievants who wish anonymity. See, for example, *NLRB v. FLRA*, 952 F.2d at 530 ("Necessarily, the bargainers are not obliged to reveal their strategies[.]"); *American Federation of Government Employees, AFL-CIO v. FLRA*, 811 F.2d 769, 774 (2d Cir. 1987) (court acknowledged that protecting the identity of potential grievants is a justifiable union consideration). Moreover, **the degree of specificity required of a union must take into account the fact that, in many cases, including the one now before us, a union will not be aware of the contents of a requested document.** [emphasis added]

4. Information related to potential disciplinary or adverse actions that may result from an employee's failure to file the OGE Form 450. This should include:

- a. A list of all possible disciplinary or adverse actions related to either late filing or failure to file the financial disclosure statement.
- b. The basis for each disciplinary or adverse action listed for late filing or failure to file the financial disclosure statement.
- c. A copy of any information or notices provided to affected employees regarding such possible disciplinary or adverse actions.

Statement of Particularized Need: The Union requires this information for the following reasons:

(1) [*Why the Union needs the requested information*]: The Union requires the requested information to determine the extent of the impact of the new financial disclosure requirement to enable it to make decisions related to bargaining over the new policy and procedures, and to determine if requested remedies for the Union's grievance are appropriate or need to be modified in accordance with 5 U.S.C. § 7114(b)(4)(B) for a full and proper discussion, understanding, and negotiations of subjects within the scope of collective bargaining. Please be advised that for a § 7114(b)(4) information request, a union is not required in its statement of particularized need to describe the exact nature of any alleged misapplication or violation of policy, procedure, law or regulation by the agency. See *Health Care Financing Administration and AFGE Local 1923*, 56 FLRA 156 (March 17, 2000).

(2) [*How its use of the information relates to the Union's representational responsibilities*]: The Union will use the information to develop appropriate bargaining proposals and to modify proposed remedies to the grievance, if necessary, in accordance with 5 U.S.C. § 7114(b)(4)(B)

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for a full and proper discussion, understanding, and negotiations of subjects within the scope of collective bargaining. Please be advised that for a § 7114(b)(4) information request, a union is not required in its statement of particularized need to describe the exact nature of any alleged misapplication or violation of policy, procedure, law or regulation by the agency. *See Health Care Financing Administration and AFGE Local 1923*, 56 FLRA 156 (March 17, 2000). In *Internal Revenue Service, Washington, D.C. and Kansas City, MO*, 50 FLRA 661 (1995), Footnote 13, regarding a union's particularized need, the FLRA stated:

However, **a request need not be so specific as, for example, to require a union to reveal its strategies** or compromise the identity of potential grievants who wish anonymity. *See, for example, NLRB v. FLRA*, 952 F.2d at 530 ("Necessarily, the bargainers are not obliged to reveal their strategies[.]"); *American Federation of Government Employees, AFL-CIO v. FLRA*, 811 F.2d 769, 774 (2d Cir. 1987) (court acknowledged that protecting the identity of potential grievants is a justifiable union consideration). Moreover, **the degree of specificity required of a union must take into account the fact that, in many cases, including the one now before us, a union will not be aware of the contents of a requested document.** [emphasis added]

5. Information related to disciplinary or adverse actions taken that arose from an OGC employee's financial conflict of interest. This information should include any and all instances of criminal, civil, or administrative actions taken during the last three years that are related to financial conflicts of interest pursuant to 18 U.S.C. § 208, related regulations, and any other law, rule, or regulation. Please provide the following information and documents, which may be redacted to remove an employee's name:

- a. A copy of all proposed and final notices of disciplinary actions taken, related to financial conflicts of information.
- b. A list of all disciplinary or adverse actions taken for which there is no copy of the written notice, identifying the reason(s) for the action and the employee's office.
- c. A list of all disciplinary or adverse actions proposed but not taken for which there is no copy of the written notice, identifying the reason(s) for the action and the employee's office.

Statement of Particularized Need: The Union requires this information for the following reasons:

(1) [*Why the Union needs the requested information*]: The Union requires the requested information to determine the extent of the impact of the new financial disclosure requirement to enable it to make decisions related to bargaining over the new policy and procedures, to determine if the Agency's policies related to financial conflicts of interest are applied fairly and equitably, and to determine if the Union's grievance and requested remedies are appropriate or need to be modified in accordance with 5 U.S.C. § 7114(b)(4)(B) for a full and proper discussion, understanding, and negotiations of

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subjects within the scope of collective bargaining. Please be advised that for a § 7114(b)(4) information request, a union is not required in its statement of particularized need to describe the exact nature of any alleged misapplication or violation of policy, procedure, law or regulation by the agency. *See Health Care Financing Administration and AFGE Local 1923*, 56 FLRA 156 (March 17, 2000). The Union requires the information for the past three years to cover the period when HUD offices were open before the COVID-19 pandemic as well as the two-year period during which HUD personnel were on maximum telework, as those two periods may have significantly different data. Management may sanitize any personal identifiers and data subject to the Privacy Act.

(2) [*How its use of the information relates to the Union's representational responsibilities*]: The Union will use the information to develop appropriate bargaining proposals and to modify its grievance and proposed remedies, if necessary, in accordance with 5 U.S.C. § 7114(b)(4)(B) for a full and proper discussion, understanding, and negotiations of subjects within the scope of collective bargaining. Please be advised that for a § 7114(b)(4) information request, a union is not required in its statement of particularized need to describe the exact nature of any alleged misapplication or violation of policy, procedure, law or regulation by the agency. *See Health Care Financing Administration and AFGE Local 1923*, 56 FLRA 156 (March 17, 2000). In *Internal Revenue Service, Washington, D.C. and Kansas City, MO*, 50 FLRA 661 (1995), Footnote 13, regarding a union's particularized need, the FLRA stated:

However, **a request need not be so specific as, for example, to require a union to reveal its strategies** or compromise the identity of potential grievants who wish anonymity. *See, for example, NLRB v. FLRA*, 952 F.2d at 530 ("Necessarily, the bargainers are not obliged to reveal their strategies[.]"); *American Federation of Government Employees, AFL-CIO v. FLRA*, 811 F.2d 769, 774 (2d Cir. 1987) (court acknowledged that protecting the identity of potential grievants is a justifiable union consideration). Moreover, **the degree of specificity required of a union must take into account the fact that, in many cases, including the one now before us, a union will not be aware of the contents of a requested document.** [emphasis added]

Deadline to Provide Requested Information: Please provide the requested information no later than March 2, 2022, as the Union will require the information in order to prepare for bargaining. The Union notes that it is an Unfair Labor Practice in violation of 5 U.S.C. §§ 7116(a)(1), (5) and (8) not to timely furnish documentation in response to an information request under 5 U.S.C. § 7114(b)(4), which the FLRA defines as timely to meet the Union's representational responsibilities. *See Bureau of Prisons, Lewisburg Penitentiary and AFGE Local 148*, 11 FLRA 639 (1983); *Department of Defense Dependent Schools and North Germany Area Council, Overseas Education Association*, 19 FLRA 790 (1985); and *Department of Transportation, Federal Aviation Administration and National Air Traffic Controllers Association Local 171*, 57 FLRA 604 (2001). Please be advised that in *Department of Transportation, Federal Aviation*

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Administration and National Air Traffic Controllers Association Local 171, 57 FLRA 604 (2001), the **FLRA found that the agency committed an Unfair Labor Practice even though the union submitted the information request under 5 U.S.C. § 7114(b)(4) only five days prior to the arbitration hearing and the agency provided the information on the day of the arbitration hearing as it was untimely for the union to meet its representational responsibilities.**

As a reminder, the Federal Labor Relations Authority held in *National Labor Relations Board*, 38 FLRA 506, 523 (1990) (NLRB), *aff'd sub nom. NLRB v. FLRA*, 952 F.2d 523 (D.C. Cir. 1992), that § 7114(b)(4)(C) “does not exempt from disclosure guidance, advice, or counsel to management officials concerning the conditions of employment of a bargaining unit employee, for example: the personnel[] policies and practices and other matters affecting the employee's working conditions that are not specifically related to the collective bargaining process.” The FLRA reiterated that position in *Department of the Army, Army Corps of Engineers, Portland District, Portland, Oregon and United Power Trades Union*, 60 FLRA 413, 416 (2004), again stating explicitly that “Section 7114(b)(4)(C) does not exempt from disclosure guidance, advice, or counsel to management officials concerning the conditions of employment of bargaining unit employees.”

Furthermore, the Union hopes that HUD does not resort to its usual assertion that “The union has failed to establish a particularized need for the above information.” The Union has clearly articulated why the Union needs the requested information and how its use of the information relates to the Union’s representational responsibilities. As the Authority has stated: “We reject the argument that a union has failed to articulate its need with requisite specificity, where . . . the information request referenced a specific agency action and specified that the union needed the information to assess: (1) whether the agency violated established policies, and (2) whether to file a grievance, even though the union did not explain exactly how the information would enable it to determine whether to file a grievance.” *Department of Veterans Affairs, Veterans Affairs Medical Center, Decatur, Ga. and NFFE, Local 2102*, 71 FLRA 428, 430 (2019).

Finally, you are reminded of your obligation to inform the Union explicitly if any requested information does not exist.

Please send all responses to jerry.gross@hud.gov and ricardo.miranda@hud.gov.

III. Demand to Bargain.

Although HUD has failed to provide the Union with proper notice of its intent to change conditions of employment for bargaining unit employees of the Office of General Counsel, the Union wishes to ensure that its right to demand to bargain are preserved. The Union therefore demands to bargain over OGC’s new requirement that bargaining unit employees who did not previously have to provide OGC Forms 450 must now or in the future do so, and provides the following preliminary proposals:

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1. Management shall pause in its imposition on OGC bargaining unit employees of the new financial disclosure obligation until it has provided appropriate notice to the Union in accordance with CBA Article 49, Sections 49.02 and 49.03, provided the information requested above, and completed bargaining with the Union.
2. In accordance with 5 CFR § 2634.904, management shall require only those OGC bargaining unit employees to complete and submit OGE Forms 450 who personally and substantially participate in taking a Government action by issuing decisions or exercising significant judgment without substantial supervision and review.
3. Before collecting any OGE Forms 450 from affected employees, management shall provide the employees and the Union with information related to the collection, storage, and securing of the OGE Forms 450, including but not limited to who will collect the forms and have access to the information contained in them.
4. At least 30 days before any submission deadline, management shall provide affected employees with all training and guidance necessary for the employees to accurately complete OGE Form 450.
5. Employees shall not be subject to any benefits, disadvantages, or adverse actions based on information provided in the OGE Form 450, so long as they have completed the form accurately to the best of the employees' knowledge. This shall include opportunities for promotion, performance ratings, and training opportunities, as well as the nature of work assignments barring any conflicts of interest.
6. Employees will be held harmless for errors or omissions in the OGE Form 450, provided that employee notifies management of conflicts of interest if and when they arise.
7. Upon receipt of OGE Forms 450, management shall be responsible for ensuring that employees are not assigned work that would create conflicts of interest.
8. AFGE Council 222 and AFGE Locals may reopen negotiations concerning OGC bargaining unit employees' requirement to file OGE Forms 450, Confidential Financial Disclosure Reports, to consider problems or conditions arise after implementation and are not expressly addressed in this Supplement. Renegotiations will be limited to issues not already expressly covered by this Supplement.

These are preliminary proposals only, and the Union reserves the right to bargain or amend or add proposals, in accordance with Article 49 of the collective bargaining agreement.

Thank you for your prompt response to the Union's grievance of the parties/unfair labor practice charge, request for information, and demand to bargain. Please send all responses to jerry.gross@hud.gov and ricardo.miranda@hud.gov.

Enclosure:

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1. Email from Amy L. Brown, Deputy General Counsel for Housing Programs, February 8, 2022, Subject: Updates to positions required to file 450 financial disclosures

cc: Amy Brown, Deputy General Counsel for Housing Programs, Office of General Counsel
Gayle Bohling, Deputy General Counsel for Operations, Office of General Counsel
Dara Powell, Acting Director, Administration Management and Human Resources Division,
Office of General Counsel
Salvatore Viola, President, AFGE Council 222
Ricardo Miranda, Midterm Bargaining Committee Co-Chair, AFGE Council 222

From: Brown, Amy L <Amy.L.Brown@hud.gov>

Sent: Tuesday, February 8, 2022 2:59 PM

To: Whitehead, Carey C <Carey.C.Whitehead@hud.gov>; Morgan, Lynn M <Lynn.M.Morgan@hud.gov>; Varrieur, Brian M <Brian.M.Varrieur@hud.gov>; Drummond, Makani D <Makani.D.Drummond@hud.gov>; Goldfarb, Ian B <Ian.B.Goldfarb@hud.gov>; KOJIMA, DORI A <Dori.A.Kojima@hud.gov>; Johnson, Ebony A <Ebony.A.Johnson@hud.gov>; Hartshorn, Maureen M <Maureen.M.Hartshorn@hud.gov>; Bourque, Catherine B <Catherine.B.Bourque@hud.gov>; Longosz, Vickie S <Vickie.S.Longosz@hud.gov>; Hall, Jeffrey A <Jeffrey.A.Hall@hud.gov>; Washington III, Richard J <Richard.J.WashingtonIII@hud.gov>; Lutz, Hugh <Hugh.Lutz@hud.gov>; Reizes, David M <David.M.Reizes@hud.gov>; Bailin, Rori <Rori.Bailin@hud.gov>; Waigand, Heather A <Heather.A.Waigand@hud.gov>; Buenavista, Adrienne S <Adrienne.S.Buenavista@hud.gov>

Cc: Sanders, Nicola <Nicola.Sanders@hud.gov>; Thompson, Alyce W <Alyce.W.Thompson@hud.gov>; Sims, Howard L <Howard.L.Sims@hud.gov>; Pitts, Sharon M <Sharon.M.Pitts@hud.gov>; Forrester, Althea M <Althea.M.Forrester@hud.gov>; Bohling, Gayle E <Gayle.E.Bohling@hud.gov>; Powell, Dara <Dara.A.Powell@hud.gov>

Subject: Updates to positions required to file 450 financial disclosures

Because it had not been done in a number of years, the Agency's Alternate Designated Agency Ethics Official, along with senior managers, undertook a review of all OGC employees to determine whether their position should cause them to file 450 financial disclosures. As a result of that re-evaluation, several positions have been identified as subject to filing requirements that have not filed in the past. Due to the functions and work performed by program counsel in Headquarters, OGC has determined that it is necessary and appropriate for all program counsel to be added to the list so that we are in full compliance with agency ethics rules. You will be contacted by the ethics office regarding the specifics of filing a 450 and they will be able to answer any questions you may have about that process.

Thank you for your attention to this matter.

Amy L. Brown
Deputy General Counsel for Housing Programs

The information in this communication may be confidential and privileged, is intended only for the use of the recipient(s) named above, and may be subject to additional legal nondisclosure requirements. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please re-send it to the sender and delete the original message and any copy of it from your computer system. Thank you.