

IN THE MATTER OF ARBITRATION BETWEEN

)
 AFGE, AFL-CIO, NATIONAL)
 COUNCIL OF HUD LOCALS 222,)
)
 Union,) FLSA Overtime and Damages
)
 and)
)
 U.S. DEPARTMENT OF HOUSING)
 AND URBAN DEVELOPMENT,)
)
 Agency.)
)

Request for Information Pursuant to 5 USC 7114(b)

The Union requests the following information to be provided within thirty (30) calendar days. The information should be provided in unredacted form, if possible, and sanitized if necessary. The information should be provided in the form in which it is kept, ie, electronically if kept electronically, paper if kept in paper format. The descriptions below are meant to be construed liberally but if there is any ambiguity, please contact Union Counsel as soon as possible and prior to responding.

1. Report titled "The State of Fair Housing: FY 2005 Annual Report on Fair Housing," and for FY 2000 through FY 2004. (See attached sample cover.)
2. Regional Directors Monthly Performance Reports for May 2000, 2001, 2002, 2003, 2004, 2005, and 2006. (We understand this is a monthly report. If May is not available, please substitute another month within the fiscal year.) (See attached sample cover.)
3. If Request No. 1 is not provided, please provide a Full Time Employee (FTE) list for each year since 2000 through present for FHEO on or about January 1st of each year.
4. List of the number of FTEs for each cylinder since 2000 until current, on or about January 1 of each year.
5. All travel data requested in connection with the Travel Grievance filed in June 2000 that is not specifically covered elsewhere in this RFI.

6. Daily vehicle utilization reports for each car used by any GS-360 grades 11-15, since June 18, 2000 (see attached Form HUD 21016).
7. All Daily Vehicle utilization reports for each car used by any GS-10 and below, since June 18, 2000 (see attached Form HUD 21016).
8. All Daily Vehicle utilization reports for each car used by all other bargaining unit employees, since June 18, 2000 (see attached Form HUD 21016).
9. All documents indicating travel on Saturday or Sunday by GS-360 grades 11-15 during hours corresponding to their normal tour of duty, since June 18, 2000.
10. All documents indicating travel on Saturday or Sunday by GS 10 and below during hours corresponding to their normal tour of duty, since June 18, 2000.
11. All documents indicating travel on Saturday or Sunday by all other bargaining unit employees during hours corresponding to their normal tour of duty, since June 18, 2000.
12. All documents indicating travel by any GS-360 grades 11-15 on a weekday, prior to the beginning of their normal tour of duty, since June 18, 2000.
13. All documents indicating travel by any GS-10 and below on a weekday, prior to the beginning of their normal tour of duty, since June 18, 2000.
14. All documents indicating travel by all other bargaining unit employees on a weekday, prior to the beginning of their normal tour of duty, since June 18, 2000.
15. HTMS records indicating time of Departure and time of arrival for GS-360 employees on travel since June 18, 2000.
16. HTMS records indicating time of Departure and time of arrival for GS-10 and below employees on travel since June 18, 2000.
17. HTMS records indicating time of Departure and time of arrival for all other bargaining unit employees on travel since June 18, 2000.
18. All HUD forms 25017 for each bargaining unit employee since May 1, 1998.

Particularized need: The Union believes that the Agency has violated the Grievants' rights to be properly compensated with Overtime Pay for work performed by the Grievants. The Union needs the requested information to prove the underlying facts and contentions in its Grievance.

The information is needed to indicate the amount of employees within the FHEO and 360 series, their corresponding work load and case load. The Union was believes that the work load/case load are indicative of working overtime hours in order to have case turnaround pursuant to HUD regulations.

Travel documents are needed to prove that Grievants did Agency work before their tour of duty, beyond their tour of duty, worked through lunch, on traveling days. These travel documents are also needed to demonstrate that Grievants have done Agency work and traveled on behalf of the Agency on weekends without compensation.

The vehicle logs are required to show the usage of government vehicles outside of normal tour of duty hours without compensation or without proper compensation.

HUD forms 25017 will show the exact tour of duty selected by bargaining unit employees.

NOTICE:

The information requested should be provided as it becomes available and not kept back until it is all ready. In the interest of transparency, it is requested that the Agency provide information to the Union in 15 days, as agreed, as to which documents it intends to provide on time, which it intends to provide but not on time, and which documents it intends to not produce (and why).

Sincerely,

Michael J. Snider, Esq.

Carolyn Federoff, President
AFGE Council of HUD Locals 222