



American Federation of Government Employees Local 476

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August 13, 2025

MEMORANDUM FOR: Daniel Raymond
Employee and Labor Relations

FROM: Ashaki Robinson, PhD President /s/
AFGE Local 476

SUBJECT: Clarification of Missing Information – § 7114(b)(4)
Request

Your August 12, 2025, email states that it is “unclear what information” the Union claims is missing from the Agency’s August 8, 2025, response.

For clarity, the following deficiencies remain unresolved:

1. Office Symbol vs. Organizational Code

The Agency provided an “Organizational Code,” which is not equivalent to the requested “Office Symbol.” The Union specifically requested the Office Symbol (or equivalent code) necessary to identify functional alignment and reporting structure (e.g. PIH, PDR, OGC).

2. Location-Specific Identification

The “Duty Station” field does not permit the Union to distinguish which employees are physically assigned to the Los Angeles DEC, the Washington, DC Field Office, and Headquarters. The Union requires a data element—such as office symbol, sub-location code, or other location-specific identifier—that allows sorting by these offices.

3. Certification of Data Currency

The Agency has not confirmed that the data is current as of July 22, 2025, the date of the

Union’s request. Without this assurance, the Union cannot verify accuracy or rely on the data for representational purposes.

4. Completeness of the List

The Agency has not confirmed whether the list contains all bargaining unit employees, nor addressed whether any employees may have been omitted due to coding errors, incomplete records, or other exclusions.

Comparison of Union Request vs. Agency Response – § 7114(b)(4) Information Request

Union Requested Element	Agency’s Provided Data (per Aug. 8 Response)	Deficiency / Why Response is Incomplete
1. Full Name	Excel Column A – “Employee Name”	Meets request. No deficiency noted.
2. Bargaining Unit Status	Excel Column L – “Bargaining Unit Status”	Meets request. No deficiency noted.
3. Code/organization or office symbol	Excel Column I – “Organizational Code”	Not the same as Office Symbol. The Union requested “Office Symbol” (or equivalent) to identify functional alignment and reporting structure. For example PIH, PDR, OGC etc.
4. Official Position Title	Excel Column C – “Position Title”	Meets request. No deficiency noted.
5. Pay Plan, Occupational Series, and Grade	Excel Columns D, E, F – “Pay Plan,” “Series,” “Grade”	Meets request. No deficiency noted.
6. Duty Station	Excel Column M – “Duty Station”	Insufficient to determine physical assignment to LA DEC, DC Field Office, or HQ. Requires location-specific identifier (e.g., office symbol, sub-location code) to sort employees by actual office location.
Certification of Data Currency	Not provided	No statement that the data is current as of July 22, 2025. Currency confirmation is necessary for representational accuracy.
Confirmation of Completeness	Not provided	No statement on whether all bargaining unit employees are included or whether omissions occurred due to coding errors, incomplete records, or other reasons.

Summary:

The missing or incomplete elements—Office Symbol, location-specific identifiers, currency confirmation, and completeness verification—are necessary for the Union’s statutory duties under 5 U.S.C. § 7114(b)(4). The CBA minimums do not limit these obligations.

Statutory Obligation Reminder

The above items are required under 5 U.S.C. § 7114(b)(4). The Union’s statutory request is not constrained by the CBA’s minimum data provisions. The Agency’s references to CBA Sections 14.06(2) and 5.07 are not relevant to the scope of this statutory obligation.

Next Steps

The Union renews its request for the complete, current, and usable information as outlined above. Please provide the missing data or a written statement confirming that no such data exists **no later than five (5) business days** from receipt of the Union’s correspondence on August 12, 2025.