



National Council of HUD Locals

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
AFFILIATED WITH AFL-CIO

Council 222

FOIA Request for HUD Contract Compliance

September 15, 2025

Freedom of Information Act Officer

U.S. Department of Housing and Urban Development
451 7th Street, S.W., Room 10139
Washington, D.C. 20410

Re: Freedom of Information Act Request – Records Relating to HUD Compliance with AFGE National Council 222 Collective Bargaining Agreement

Pursuant to the Freedom of Information Act (5 U.S.C. § 552), the Collective Bargaining Agreement (“CBA”) between AFGE National Council 222 and HUD, and applicable federal labor relations statutes and regulations, we hereby submit this formal request for records and information necessary to assess HUD’s adherence to the CBA. This request is made in support of union oversight responsibilities and in preparation for a report to Congress regarding the current state of contract compliance.

Background and Purpose of the Request

AFGE National Council 222 is the exclusive representative of bargaining unit employees at HUD, as recognized under Article 1 of the CBA and 5 U.S.C. § 7103 et seq. The union is charged with ensuring that HUD management complies with all terms and conditions of the CBA, which governs employee rights, working conditions, and labor-management relations. The CBA and federal labor law grant the union broad rights to request and receive information necessary for contract administration, representation, and oversight.

Recent concerns regarding HUD’s adherence to the CBA have prompted AFGE National Council 222 to conduct a comprehensive audit of contract compliance. The results of this audit will be presented to Congress and other oversight bodies to ensure transparency, accountability, and the protection of employee rights. The requested records are essential to verify HUD’s compliance, identify any instances of noncompliance, and support corrective action where necessary.



National Council of HUD Locals

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
AFFILIATED WITH AFL-CIO

Council 222

Target Parties and Responsible HUD Entities

This request is directed to all HUD offices, divisions, and officials with responsibilities or records relevant to CBA compliance, including but not limited to:

- **Office of General Counsel:** Responsible for legal interpretation, compliance, and oversight of labor relations and contract administration.
- **Office of Human Resources:** Maintains records on personnel actions, grievance procedures, training, and employee benefits.
- **Office of Federal Procurement:** Oversees contracting out, OMB Circular A-76 processes, and related labor-management documentation.
- **Employee and Labor Relations Division:** Administers labor-management forums, grievance procedures, and official communications with the union.
- **Regional and Local Management Offices:** Implement CBA provisions at the field level, maintain records of labor-management meetings, and oversee working conditions.
- **Office of the Secretary and Deputy Secretary:** Issues directives, policies, and compliance certifications affecting bargaining unit employees.
- **Any other HUD officials or offices with custody of records, reports, or communications relating to CBA adherence, violations, or corrective actions.**

This request encompasses all actors and entities within HUD who participate in, oversee, or document matters relating to the administration and enforcement of the CBA with AFGE National Council 222.

Document Sources and Types of Records Requested

This request seeks comprehensive production of all records, documents, and data maintained by HUD that are relevant to the administration, enforcement, and oversight of the Collective Bargaining Agreement ("CBA") with AFGE National Council 222. The following categories of records are included, without limitation:



National Council of HUD Locals

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
AFFILIATED WITH AFL-CIO

Council 222

- **Internal Compliance Reports:** All periodic or ad hoc reports prepared by HUD or its offices assessing compliance with the CBA, including self-audits, management reviews, and internal control assessments.
- **Audit Findings and Investigative Reports:** Any internal or external audit findings, inspector general reports, or investigative documents addressing CBA adherence, violations, or corrective actions.
- **Correspondence:** All written or electronic communications between HUD management, the Office of General Counsel, Office of Human Resources, Employee and Labor Relations Division, regional/local offices, and AFGE National Council 222 regarding CBA interpretation, implementation, compliance, or disputes.
- **Meeting Minutes and Agendas:** Records of labor-management forums, grievance meetings, collaborative conflict resolution sessions, and any other meetings where CBA compliance or related issues were discussed.
- **Policies, Directives, and Guidance:** All HUD-issued policies, directives, memoranda, or guidance documents that reference, interpret, or implement provisions of the CBA, including any changes to working conditions, personnel policies, or labor-management practices.
- **Contractual Documentation:** Copies of the CBA, supplements, memoranda of understanding, amendments, and any related contractual instruments governing labor relations between HUD and AFGE National Council 222.
- **Records of Violations and Corrective Actions:** Documentation of any identified noncompliance with the CBA, including records of investigations, findings, remedial actions, and communications regarding resolution or enforcement.

This request encompasses all formats (paper, electronic, email, database, audio, or video) and all records maintained, created, or received by HUD or its officials in the regular course of business or in response to union inquiries, grievances, or oversight activities.



National Council of HUD Locals

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
AFFILIATED WITH AFL-CIO

Council 222

Specific Information and Data Points

To facilitate a thorough audit and oversight, the following specific records and data points are requested:

- **Grievance Logs and Case Files:** Complete logs and files of all grievances filed by AFGE National Council 222 or bargaining unit employees since [EFFECTIVE DATE], including status, outcomes, and related correspondence.
- **Compliance Assessments:** Any formal or informal assessments, scorecards, or evaluations of HUD's adherence to CBA provisions, including metrics, findings, and recommendations.
- **Internal Memoranda and Communications:** All internal HUD memoranda, emails, or communications discussing CBA compliance, interpretation, or any issues of noncompliance, including communications among management, legal counsel, and labor relations staff.
- **Union Communications:** All correspondence, notices, or reports sent to or received from AFGE National Council 222 regarding CBA administration, grievances, requests for information, or contract enforcement.
- **Reports to Oversight Bodies:** Copies of any reports, certifications, or disclosures submitted to Congress, the Office of Inspector General, the Federal Labor Relations Authority (FLRA), or other oversight entities regarding CBA compliance or labor-management relations.
- **Documentation of Noncompliance or Violations:** Records of any identified violations of the CBA, including investigative findings, disciplinary actions, corrective measures, and communications regarding resolution.
- **Records of Labor-Management Forums:** Agendas, minutes, attendance lists, and outcomes of labor-management forums, collaborative conflict resolution sessions, and other meetings addressing CBA-related matters.
- **Training and Program Records:** Documentation of employee training, career development programs, and other initiatives required or referenced by the CBA.



National Council of HUD Locals

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
AFFILIATED WITH AFL-CIO

Council 222

If any responsive records are maintained in databases or information systems, please provide data extracts or reports containing the requested information.

Procedural and Delivery Instructions

Please provide all responsive records in electronic format (PDF, Word, Excel, or other accessible digital media) wherever possible. If certain documents are only available in hard copy, please indicate this and provide instructions for physical delivery or inspection.

We request that all records be produced within thirty (30) calendar days of receipt of this request. If additional time is required, please provide a written explanation and estimated completion date.

Please acknowledge receipt of this request in writing within five (5) business days, and identify the FOIA officer or designated point of contact responsible for processing this request. If any portion of the requested records is withheld, redacted, or deemed exempt from disclosure, please specify the legal basis for such withholding and provide a detailed index of withheld materials.

All communications regarding this request should be directed to:

Antonio F. Gaines
AFGE National Council 222
President
Phone : 770-882-7729
Email : Antonio.Gaines@hud.gov
451 7th St. SW Suite 3142
Washington, DC 20410

Should clarification or further specification be required, please contact the undersigned promptly to ensure timely and complete fulfillment of this request.

Legal and Regulatory References

This request is made pursuant to the Freedom of Information Act, 5 U.S.C. § 552, which guarantees public access to federal agency records, subject to applicable exemptions.



National Council of HUD Locals

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
AFFILIATED WITH AFL-CIO

Council 222

The union's right to information is further supported by the Collective Bargaining Agreement between AFGE National Council 222 and HUD, including Article 1 (Recognition), Article 3 (Labor Management Forum), Article 4 (Rights and Obligations of the Parties), and Article 6 (Employee Rights and Standards of Conduct), which collectively establish the union's authority to request information necessary for contract administration and oversight,. Additionally, the Federal Service Labor-Management Relations Statute, 5 U.S.C. § 7114(b)(4), requires agencies to furnish data to the exclusive representative that is reasonably available and necessary for full and proper discussion, understanding, and negotiation of subjects within the scope of collective bargaining.

The union's request is consistent with all applicable statutes, regulations, and contractual provisions governing labor-management relations, transparency, and accountability.

We appreciate your prompt attention to this request, which is essential for ensuring transparency, accountability, and the protection of employee rights. Should you require clarification or further information, please contact [Union Contact Name], [Title], at

Respectfully submitted,



Antonio F. Gaines
AFGE National Council 222
President
Phone : 770-882-7729
Email : Antonio.Gaines@hud.gov
451 7th St. SW Suite 3142
Washington, DC 20410
www.afgecouncil222.com