National Council of HUD Locals
American Federation of Government Employees
Affiliated with AFL-CIO
Council 222 P.O. BOX 9762 ALEXANDRIA, VA 22304

DATE: November 10, 2026

TO: Labor Relations, Office of the Chief Human Capital Officer; U.S. Department of Housing and Urban Development

FROM: Dr. Ashaki Robinson, President, AFGE National Council of HUD Locals 222 /s/

THROUGH: Veronica Bobbitt, Executive Vice President, AFGE National Council of HUD Locals 222 /s/

SUBJECT: Cease-and-Desist Demand and Demand to Bargain — Implementation and Continued Rollout of the HUGS Recipient Portal

I. PURPOSE AND DEMAND

The American Federation of Government Employees (AFGE) National Council of HUD Locals 222 (Council 222 or the Union) demands that the Department of Housing and Urban Development (HUD or the Agency) cease further implementation and mandatory rollout of the HUGS Recipient Portal (HUGS) insofar as these activities change bargaining-unit employees' (BUEs') conditions of employment, pending satisfaction of applicable notice and bargaining obligations. This demand is made pursuant to Article 49 of the HUD–AFGE Collective Bargaining Agreement (Agreement) and 5 U.S.C. §§ 7106(b)(2)–(3), 7114(b), and 7116(a)(1) and (5). Council 222 demands bargaining over negotiable procedures and appropriate arrangements associated with implementation already undertaken and any further rollout.

II. BACKGROUND

On October 28, 2026, HUD's Office of Community Planning and Development (CPD) conducted an in-person orientation concerning HUGS for headquarters and field employees. Council 222 maintains that HUD provided no Article 49 notice of the HUGS implementation decision, its effect on BUEs' conditions of employment, or an opportunity to bargain before affected work processes were introduced. Notice of an orientation is not implementation notice. The separate question of notice of the October 28 meeting is addressed in another Council grievance and is not the subject of this demand.

Based on information presently available, Council 222 understands that HUGS changes grant monitoring, evaluation, execution, and related administrative workflows. Its rollout appears to involve additional processing, review, approval, and coordination across program offices. Work-product completion may depend on other personnel, recipients, or system functions outside an individual BUE's control. These circumstances raise substantial concerns involving workload, deadlines, training, reporting, performance evaluation, and responsibility for errors or delays. The Council seeks the underlying implementation records to determine the precise scope, timing, and affected positions; it does not concede that any unverified change has occurred.

III. CONTRACTUAL AND STATUTORY BASIS

A. Article 49 — Notice and Bargaining

Article 49 governs applicable notice and bargaining procedures for proposed changes affecting BUEs. Council 222 maintains that HUD failed to provide Article 49 implementation notice or an opportunity to bargain. An orientation announcement does not identify the proposed workplace changes or substitute for the required bargaining process.

B. Substantial Impact on Conditions of Employment

Council 222 disputes any contention that HUGS is merely a de minimis administrative update. Its reasonably foreseeable effects include changed workflows and interoffice dependencies; additional review and approval steps; new or revised employee and recipient reporting; workload and deadline changes; new training or access requirements; and possible use of system-generated data in performance assessments. Taken together, these anticipated effects are substantial, not insignificant. The Union reserves its position as implementation records and employee evidence are obtained.

C. Management Rights — 5 U.S.C. § 7106

Council 222 recognizes HUD's statutory rights concerning technology and methods of performing work. Those rights do not automatically eliminate bargaining over negotiable procedures under § 7106(b)(2) or appropriate arrangements under § 7106(b)(3).

D. Labor Relations — Agency Coordination

HUD is responsible for complying with the Statute and Agreement regardless of whether CPD consulted Labor Relations (LR). As HUD's designated labor-relations function, LR should advise program leadership on Article 49 obligations, coordinate timely Union notice, and establish effective internal procedures to evaluate workplace changes before rollout. The Council does not assert that this advisory role independently creates a separate statutory cause of action absent applicable authority.

E. Unfair Labor Practice — 5 U.S.C. § 7116

Implementing a change with legally sufficient effects on BUE conditions of employment without satisfying applicable notice and bargaining obligations may violate 5 U.S.C. § 7116(a)(1) and (5). Council 222 reserves other claims if supported by additional facts and applicable law. This demand does not adjudicate the separate October 28 formal-discussion issue.

IV. CEASE-AND-DESIST DEMAND

Council 222 demands that HUD: (1) suspend further HUGS implementation and mandatory use affecting BUE working conditions pending satisfaction of applicable notice and bargaining obligations; (2) maintain or restore affected working conditions to the extent required by law and the Agreement; (3) refrain from imposing new HUGS-based performance metrics, deadlines, or

accountability measures pending bargaining over negotiable procedures and arrangements; (4) provide formal Article 49 notice specifying affected positions, offices, functions, and dates; (5) bargain in good faith; and (6) direct LR to coordinate with CPD and all affected program areas to ensure management receives guidance on Article 49 requirements.

V. FORMAL DEMAND TO BARGAIN

Council 222 hereby demands bargaining concerning implementation already undertaken and the continued rollout of HUGS. The attached seven preliminary proposals address transition procedures, workflow responsibility, position-duty changes, access, reporting, accountability, and implementation sequencing. The Council reserves its right under applicable Article 49 provisions to amend or supplement proposals as information is received and negotiations proceed.

VI. RESPONSE REQUESTED

Council 222 requests written acknowledgment and a substantive response to the cease-and-desist demand within five business days of receipt. Identify authorized bargaining representatives; confirm whether HUGS functions have been activated or made mandatory; and specify the dates, functions, affected offices, and positions. Confirm whether further implementation affecting BUE conditions of employment will be held pending applicable bargaining. Agency responses and bargaining correspondence shall be directed to Veronica Bobbitt, Executive Vice President, AFGE National Council of HUD Locals 222, at president@afgehud911.org, with a copy to Council President Dr. Ashaki Robinson through the Council's designated correspondence channel.

Nothing herein waives Council 222's right to pursue a Grievance of the Parties, unfair labor practice charge, or other remedy, subject to applicable election-of-procedure requirements, including 5 U.S.C. § 7116(d).

Attachments: (1) Preliminary Bargaining Proposals — HUGS Implementation; (2) Supplemental Request for Information — HUGS Implementation.