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, Council of HUD Locals 222 /s/

SUBJECT: Supplemental Request for Information — HUGS Implementation and Continued Rollout

AUTHORITY: 5 U.S.C. § 7114(b)(4); Article 49, HUD–AFGE Collective Bargaining Agreement

PURPOSE AND PARTICULARIZED NEED

Council 222 requests existing, normally maintained records reasonably available to HUD to identify the actual and reasonably foreseeable effects of HUGS on BUE conditions of employment. The records are needed to evaluate Article 49 compliance, determine affected positions and work processes, develop and refine negotiable procedures and appropriate arrangements, and assess potential remedies for any implementation without required bargaining. The specific need for each category is explained below. This request supplements, and does not replace, the Council's November 7, 2026, RFI.

I. SOPs and Operational Guidance — Requests 1–4

Particularized need: To compare the procedures BUEs followed before HUGS with those required after rollout and to develop transition, training, and workload proposals.

1. Current, proposed, revised, and superseded HUGS SOPs.
2. Pre-HUGS SOPs governing functions HUGS replaces or modifies.
3. Implementation manuals, directives, desk guides, and employee instructions.
4. Existing change logs or records identifying procedures eliminated, consolidated, or transferred.

II. Workflow and Business Processes — Requests 5–8

Particularized need: To identify who controls each stage of grant processing, where BUEs depend on other offices, and what procedures are necessary to prevent unfair attribution of delays or errors.

5. Current and proposed workflow diagrams, process maps, and decision trees.
6. Records describing processing, approval, monitoring, evaluation, and closeout stages.
7. Responsibility matrices showing roles or offices for each stage.
8. Records of changes in approval authority, escalation, deadlines, or interoffice coordination.

III. Organization and Position Duties — Requests 9–13

Particularized need: To determine whether implementation changes reporting relationships or assigned duties and to formulate procedures for communicating, clarifying, and transitioning those changes.

9. Organizational charts and reporting structures immediately before HUGS and current or proposed charts for affected offices.
10. Records of organizational, supervisory, or reporting changes related to HUGS.
11. Current and proposed PDs for affected BUE positions.
12. PD comparisons, classification reviews, and position-management assessments addressing HUGS.
13. Records of duties transferred, added, removed, or consolidated.

IV. Security and Access — Requests 14–16

Particularized need: To assess whether access prerequisites or position-designation changes affect employees' ability to perform assigned work and to bargain over procedures for training, credentialing, and access delays. System permissions are distinct from security clearances.

14. User-access policies, role-based permission matrices, and access approval procedures.
15. Records identifying affected positions and any new or upgraded clearance, position-sensitivity, investigation, or credential requirements, including prior and proposed designations.
16. New or revised cybersecurity training, certifications, access restrictions, or security duties.

V. Program Office Participation — Requests 17–20

Particularized need: To determine whether HUGS transfers work between offices and creates dependencies requiring negotiated workflow and accountability procedures.

17. Existing lists or records identifying all participating HUD program offices.
18. Records of functions assigned to each participating office.
19. Interoffice agreements, responsibility matrices, and operating instructions.
20. Records identifying functions reassigned between program areas.

VI. Reporting and Performance — Requests 21–25

Particularized need: To assess added reporting workload, duplicative submissions, recipient-related duties, and whether HUGS-generated metrics may affect BUE performance accountability.

21. Existing and proposed BUE reporting requirements, frequency, deadlines, data, and approving officials.
22. Records of reports added, replaced, consolidated, or eliminated.
23. Current and proposed grant-recipient reporting, certification, documentation, and submission requirements.
24. Records assessing effects of recipient reporting changes on employee review, monitoring, verification, or technical assistance.
25. Records of dashboards, productivity metrics, automated monitoring, and employee-level reporting.

VII. Implementation and Labor Relations — Requests 26–31

Particularized need: To establish the dates and scope of actual or mandatory implementation, identify whether HUD assessed bargaining obligations, and determine whether prospective or remedial bargaining is warranted.

26. Approved implementation plans, rollout schedules, activation dates, and mandatory-use dates.
27. Impact, workload, business-process, or change-management assessments addressing employees.
28. Existing communications between CPD leadership, LR, and other responsible management officials concerning Article 49 notice or bargaining for HUGS.
29. Any Article 49 notice or bargaining correspondence HUD contends it provided to Council 222.
30. Records of decisions to activate HUGS, retire legacy processes, or require new procedures.
31. Existing records identifying the management official or component that evaluated whether HUGS required Article 49 notice and bargaining.

VIII. PRODUCTION AND RESPONSE

Provide responsive records in their existing electronic formats, including editable SOPs, spreadsheets, diagrams, and charts where maintained. If no responsive record exists for a request, please say so; if a record is withheld, identify the category and the legal basis for withholding. The Council requests acknowledgment within five business days of receipt and production within ten business days of receipt, or a written explanation with a definite rolling-production schedule. These are requested timeframes, subject to any controlling contractual requirements; they are not asserted as automatic statutory deadlines.

Agency responses and bargaining correspondence shall be directed to Veronica Bobbitt, Executive Vice President, 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.

The Council reserves all contractual and statutory rights concerning HUGS notice, bargaining, information access, and remedies.