



**UNITED STATES OF AMERICA  
FEDERAL LABOR RELATIONS AUTHORITY  
CHARGE AGAINST AN AGENCY**

**FOR FLRA USE ONLY**

Case No.

Date Filed

**1. AGENCY AGAINST WHICH CHARGE IS BROUGHT**

a. Name of Charged Agency (include address, city, state, & ZIP)  
U.S. Department of Housing and Urban Development  
451 7th St. SW  
Washington, DC 20410

b. Agency Representative (include name, title, address)  
Towanda Brooks, Chief Human Capital Officer  
451 7th St., Room 2254  
Washington, DC 20410

tel. 202 402-6955 fax  
e-mail towanda.a.brooks@hud.gov

**2. CHARGING PARTY**

a. Name of Charging Party (include address, city, state, & ZIP)  
AFGE Council 222 of HUD Locals  
451 7th St. SW, Room 3172  
Washington, DC

b. Charging Party Representative (include name, title, address)  
Ashaki Robinson Johns, Regional Vice President  
Council 222 of HUD Locals  
451 7th St. SW, Room 3143  
Washington, DC 20410

tel. 202 402-7545 fax  
e-mail ashaki.robinson-johns@hud.gov

**3. BASIS OF THE CHARGE**

a. Set forth a clear and concise statement of the facts constituting the alleged unfair labor practice, including date and location of the particular acts.

On July 31, 2014 the HUD AFGE Council 222 ("Council") submitted a demand to bargain and information request on the impact and implementation of the transfer of financial management systems to the Department of Treasury Administrative Resource Center ("New Core") (see exhibit A). New Core has been separated into 3 phases and currently is in the process of implementing phase 1 (Core Financial and Administrative Services). Within phase 1 there are 4 planned releases 1) Travel & Relocation 2) Time and Attendance 3) Financial Management and Procurement and 4) Grant and Loan Accounting. The first two releases were bargained and implemented by Management. Currently Management is implementing release 3 without bargaining.

The Council and HUD Management have had regular meetings to discuss New Core since at least 9/25/2014 on Release 3 of New Core (see attachment B). In these meetings the Union repeatedly questioned Management on the impact and implementation of New Core on bargaining unit employees throughout HUD. These meetings were inconclusive and at no time did Management provide definitive answers on the plans for employees when release 3 was implemented.

On August 11, 2015 Management sent out an announcement that New Core Release 3 would be "going live" in October 2015 (See attachment C). On August 27, 2015, Management responded that they had met their obligation to and would not bargain the

b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated? (1)  (2)  (3)  (4)  (5)  (6)  (7)  (8)

c. Have you or anyone else raised this matter in any other procedure? No  Yes  If yes, where?

Grievance Procedure  Federal Mediation and Conciliation Service  Federal Service Impasses Panel  
 Equal Employment Opportunity Commission  Merit Systems Protection Board  Office of Special Counsel  
 Other Administrative or Judicial Proceeding  Negotiability Appeal to FLRA  Other \_\_\_\_\_

**4. DECLARATION**

I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]

In Person  1st Class Mail  Fax  Commercial Delivery  Certified Mail  e-mail (see reverse)

Ashaki Robinson Johns

September 4, 2015

Type or Print Your Name

Your Signature

Date

Continuation Sheet – Charge Against the Agency

impact and implementation of New Core (see attachment D).

On August 31, 2015 and September 2, 2015 Management sent notifications to the Council and AFGE Local 476 of their intent to suspend the telework of employees that would be involved in the close out of all tasks related to New Core's Release 1 as well as to assist in the "kickoff of New Core's Release 3" (see attachments E and F).

The US Department of Housing and Urban Development is in violation of 5 U.S.C. 7116 (5)

The Department violated Subsection (5) by refusing to negotiate in good faith with Council 222 when it stated that it had met its obligation to bargain the impact and implementation of New Core release 3 with the Council.

Relief Requested

1. That the Agency be required to comply with their bargaining obligation and come to the bargaining table in response to the July 21, 2015 Demand to Bargain;
2. That the Agency be required to post an electronic notice of their violation of the Statute on the homepage of HUD's internal website "HUD at Work";
3. That the agency cease and desist the implementation of New Core Release 3 until the completion of bargaining;
4. Any other relief deemed appropriate to make the Union whole

Point of Contact for this Action:

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