



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
471 7th Street, SW
Washington, D.C. 20410

Office of the Chief Human Capitol Officer
Employee and Labor Relation Division

June 4, 2025

TO: Veronica Bobbitt, Chief Steward, AFGE National Council of Locals 222;
On behalf of Antonio F. Gaines, President, AFGE National Council of
Locals 222

FROM: Daniel Raymond, Labor Relations Branch Chief, Employee and Labor
Relations Division

SUBJECT: Response to Demand to Bargain of the Agency's implementation of
Trusted Workforce 2.0 and the Record of Arrest and Prosecution Back
(Rap Back) Program

Introduction:

On May 28, 2025, Ms. Veronica Bobbitt, Chief Steward for AFGE National Council of Locals 222, submitted a Demand to Bargain (DTB) on behalf of Mr. Antonio Gaines, President, AFGE National Council of Locals 222, to Lori Michalski, Chief Human Capitol Officer, demanding to bargain the Agency's implementation of Trusted Workforce 2.0 and the Record of Arrest and Prosecution Back (Rap Back) Program.

Ms. Bobbitt alleges the basis for submitting the demand to bargain was the Agency-wide notice sent on May 13, 2025. (Attachment A) However, the Union was made aware of the Agency's implementation of the Trusted Workforce Initiative and Rap Back program during the Labor Management Forum held on April 23 – 25, 2024. Specifically, AFGE National Council of Locals 222 received an overview briefing of Trusted Workforce 2.0 and Rap Back during the timeframe labeled as "OCHCO Section" on April 24, 2024, between 9:00am and 10:00am Eastern Time. (Attachment B) This overview included an implementation timeline with milestones set for October 2024, September 2025 and March 2026. Additionally, the Agency sent out notices to all HUD employees relating to the Trusted Workforce Initiative Implementation on June 27, 2024, August 1, 2024, August 6, 2024, August 20, 2024, and September 25, 2024. (Attachment C) Consequently, it is well established AFGE 222 knew or should have known of the Agency's implementation of the Trusted Workforce Initiative to include Rap Back over one year ago. Therefore, in accordance with AFGE CBA Section 49.04, this May 28, 2025, Demand to Bargain is well outside the fifteen (15) days the Union has to submit preliminary proposals. This Demand to Bargain is untimely and the Union has waived it's bargaining rights by failing to submit proposals in the agreed upon timeframe in CBA Article 49. As such, the Agency respectfully declines to bargain.

Enclosures:

Attachment A – 5/13/2025, HUD Email to all employees regarding Trusted Workforce 2.0 and Rap Back

Attachment B – HUD Personnel Security Division’s Labor Management Forum Briefing Slides to AFGE 222 from 4/24/2024

Attachment C – HUD Emails to all employees regarding Trusted Workforce 2.0 and Rap Back, 6/27/2024; 8/1/2024; 8/6/2024; 8/20/2024; 9/25/2024