



September 12, 2025

VIA ELECTRONIC MAIL

Mr. David Traynor
Acting Chief Human Capital Officer
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, DC 20224

**RE: National Institutional Grievance and Unfair Labor Practice Charge —
Violations of the 2022 National Agreement and 5 U.S.C. § 7116(a)(1) and (5)**

Dear Mr. Traynor:

The National Treasury Employees Union (NTEU) hereby files this national institutional grievance against the Internal Revenue Service (IRS or agency) pursuant to Article 42, Sections 2 and 3 of the parties' 2022 National Agreement (2022 NA) and the 2025 Addendum to the 2022 NA. As set forth below, the IRS has violated Article 47, Sections 1 and 2; 5 U.S.C. § 7116(a)(1) and (5); and any other section, article, law, rule, or regulation that may apply by unilaterally implementing a reorganization establishing the Treasury Common Services Center (TCSC). Because the actions taken by the IRS at the direction of the Treasury Department are continuing in nature, this grievance is continuing and applicable to all unilateral actions taken by the IRS to implement the reorganization.

On or about August 26, 2025, the Department of the Treasury announced via email that it would conduct a reorganization "by formally establishing the Treasury Common Services Center (TCSC) within the Office of Management." The announcement indicated that the TCSC would consolidate "human resources (HR) processing, common information technology (IT) functions, and operational services such as acquisition and travel into a unified service delivery model "and "develop a common 'Treasury Way'." The communication also stated that Departmental Offices within Treasury would coordinate with bureau HR offices to identify personnel who would be realigned into the TCSC.

On or about September 2, 2025, NTEU became aware that the IRS informed certain employees, including those in the Office of Online Services, that they would be reassigned to the TCSC and moved to the Department of Treasury as a part of the reorganization.

The agency violated Article 47, Sections 1 and 2 of the 2022 NA by implementing this unilateral change to the conditions of employment of affected bargaining unit employees without providing NTEU with notice and an opportunity to bargain. The agency's failure to provide notice and an opportunity to bargain also constitutes an unfair labor practice (ULP) under 5 U.S.C. § 7116(a)(1) and (5) of the Federal Service Labor-Management Relations Statute (statute).

Mr. David Traynor
September 12, 2025
Page Two

To remedy these violations, NTEU hereby requests that the IRS immediately: (i) cease and desist from violating Article 47 of the 2022 NA and 5 U.S.C. § 7116(a)(1) and (5); (ii) rescind any and all personnel actions taken in implementing the reorganization and establishment of the TCSC; (iii) restore the *status quo ante*; (iv) post a notice to all bargaining unit employees, signed by the Commissioner of the IRS admitting that by its actions the IRS has violated the statute; (v) make any adversely affected bargaining unit employees whole; and (vi) grant to impacted bargaining unit employees and NTEU any other appropriate remedies that are authorized by law, rule and regulation.

NTEU requests a meeting pursuant to Article 42, Section 3 of the 2022 NA within twenty (20) workdays of this filing. Our representative in this matter will be Assistant Counsel Jack Jarrett, who may be reached via e-mail at jack.jarrett@nteu.org.

Sincerely,



Doreen P. Greenwald
National President

cc: Allan Feldman, IRS
Geralda Larkins, IRS
Jack Jarrett, NTEU
Ken Moffett, Jr., NTEU
Rani Rolston, NTEU