Congress of the United States

Washington, DC 20515 March 27, 2025

The Honorable Scott Turner Secretary U.S. Department of Housing and Urban Development 451 7th Street SW Washington, DC 20410

Dear Secretary Turner:

We write to express concern about reports that the Department of Housing and Urban Development (HUD) is considering closing nearly two-thirds of the Department's field offices, leaving most states and the District of Columbia without critical sites or staff.¹ These reports follow the unlawful mass termination of probationary federal employees, HUD's announcement that employees at GS-13 and below in the Office of Field Policy and Management would be terminated, and reports that the Department plans to cut its agency-wide workforce by at least half.² We urge you to immediately reverse any plans to implement these short-sighted and illegal efforts that undermine the ability of HUD to accomplish its mission and legal obligations.

The United States faces a severe fair and affordable housing and homelessness crisis. HUD is the Federal agency responsible for national policy and programs that address America's housing needs, improve and develop communities, and enforce fair housing laws, deeply impacting millions of families across the nation.³ HUD field offices collect local data to inform policymaking, administer and oversee department programs, manage and distribute funding, enforce department regulations and policies, provide guidance and support to local stakeholders, and play a critical role in developing and maintaining local relationships that ensure the success of initiatives and projects. In many cases, state and local stakeholders operate with limited capacities and require HUD assistance. HUD currently has at least one field office in every State and the District of Columbia to help implement the Department's important mission at the local level.⁴

Reports that HUD is planning the illegal closure of field offices are extremely concerning. HUD is expressly required by law to maintain a field office in every state.⁵ Federal law also requires HUD to conduct and publish a cost-benefit analysis before implementing any "plan for the reorganization of any regional, area, insuring, or other field office of the Department."⁶ This analysis is required to include, but not be limited to, an analysis of the impact on the local economy, an estimate of the effect of reorganization on the availability, accessibility, and quality of services provided, and credible evidence substantiating the impact of reorganization on department costs.⁷ These legal requirements are designed to protect the Department and the nation, including taxpayers, HUD's business, nonprofit, and government partners, thousands of patriotic civil servants, and millions of families who rely on the services that HUD field offices provide.

¹ Bloomberg, Trump Administration Plans to Eliminate Dozens of Housing Offices, March 5, 2025,

https://www.bloomberg.com/news/articles/2025-03-05/hud-plans-to-eliminate-dozens-of-state-and-local-field-offices.

² NPR, HUD Employees are Bracing for what they Hear will be 'Drastic' Staff Cuts, February 14, 2025, https://www.npr.org/2025/02/14/g-s1-

^{49177/}hud-employees-are-bracing-for-what-they-hear-will-be-drastic-staff-cuts

³ 42 USC § 3531

⁴ HUD, Field Office Locations, accessed March 14, 2025, https://hudgis-hud.opendata.arcgis.com/datasets/HUD::hud-field-office-locations/about

⁵ 12 USC §1735f–12

⁶ 42 USC §3535(p)

⁷ Id.

In last year's report on top management challenges, the HUD Office of Inspector General noted that HUD "still faces capacity challenges that affect its ability to oversee grantees, contractors, and financial services counterparties; provide high-touch technical assistance; and modernize its programs and IT systems."⁸ Despite this reality, a February 11, 2025, Executive Order directed agency heads, including HUD, to "promptly undertake preparations to initiate large-scale reductions in force (RIF)."⁹ A subsequent memo from the Office of Management and Budget (OMB) and the Office of Personnel Management (OPM) to agency heads directed each agency to submit Agency RIF and Reorganization Plans to OMB and OPM by Thursday, March 13, 2025.¹⁰

We strongly urge HUD to maintain existing field offices with adequate staffing levels and to fully and immediately reinstate civil servants who have been illegally terminated. We also ask for responses to the following information request no later than Wednesday, April 2, 2025.

- 1. Please provide a copy of any formal analysis conducted by HUD's Office of General Counsel regarding HUD's plans to close field offices, including an analysis of how such plans align with existing legal requirements that HUD maintain an office in each state.
- 2. Please provide a copy of the cost-benefit analysis of field reorganizations required at 42 U.S.C. 3535 that HUD has conducted as part of its plans to close field offices. Please indicate when this analysis will be published in the Federal Register and detail any additional actions the agency has already taken to alter, reduce, or reorganize field offices.
- 3. Please provide any formal analysis HUD has performed regarding the impact of reported office reductions on the Department's ability to:
 - a. Collect data used to inform HUD's policy decisions and department strategies.
 - b. Administer, monitor, and oversee complex programs including ensuring compliance with regulations and policies.
 - c. Manage and distribute federal funding and ensure these funds are used appropriately.
 - d. Enforce department policies related to fair housing, including investigating complaints related to violations of the Fair Housing Act.
 - e. Provide technical assistance to local and state agencies, non-profit organizations, and other department stakeholders.
 - f. Conduct public outreach including educating the local community and developing partnerships with local organizations to address housing and community development challenges.
- 4. Please identify the DOGE Team Lead at HUD and the name and employing agency of all DOGE Task Force members working under the team leader.
- 5. Please provide a copy of all HUD and DOGE documents reflecting any plans to reduce, alter, or eliminate HUD programs, functions or offices.
- 6. Please provide a copy of all HUD and DOGE documents reflecting any staff reduction that has already taken place and future staff reduction plans by program office and further disaggregated by field office and Washington, DC headquarters. Indicate whether the Department plans to eliminate or backfill each impacted position.
- 7. Please provide copies of HUD's formal Agency RIF and Reorganization Plans as submitted to OMB.

⁸ HUD OIG, Top Management Challenges Facing the U.S. Department of Housing and Urban Development, October 15, 2024, https://www.hudoig.gov/sites/default/files/2024-10/hud-oig-fy-2025-tmc-report_final_508_1.pdf

⁹ White House, EO Implementing The President's "Department of Government Efficiency" Workforce Optimization Initiative, February 11, 2025, https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-department-of-government-efficiency-workforce-optimization-initiative/

¹⁰ OPM, OPM and OMB Memorandum providing guidance on Agency RIF and Agency Reorganization Plans (ARRP), February 26, 2025, https://www.opm.gov/policy-data-oversight/latest-memos/guidance-on-agency-rif-and-reorganization-plans-requested-by-implementing-thepresident-s-department-of-government-efficiency-workforce-optimization-initiative.pdf

We thank you for your prompt attention to this urgent matter.

Sincerely,

Emanuel Cleaver, II Member of Congress

Hakeem Jeffries Member of Congress

Nydia M. Velázquez Member of Congress

Nikema Williams Member of Congress

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David Scott Member of Congress

Alex Padilla United States Senator

Charles E. Schumer United States Senator

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Elizabeth Warren Ranking Member Committee on Banking, Housing, and Urban Affairs

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Tina Smith United States Senator

Adam B. Schiff United States Senator

Cleo Fields Member of Congress

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Danny K. Davis Member of Congress

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Paul D. Tonko Member of Congress

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Rashida Tlaib Member of Congress

Frank J. Mrvan Member of Congress

Frederica > Wilson

Frederica S. Wilson Member of Congress

Ron Wyden

Ron Wyden United States Senator

Bernard Sanders United States Senator

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Ben Ray Luján United States Senator

Chris Van Hollen United States Senator

Cory A. Booker United States Senator

Jacky Rosen United States Senator

Joyce Beatty Member of Congress

Nanette Diaz Barragán Nanette Diaz Barragán

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Gwen S. Moore Member of Congress

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Garv C. Peters United States Senator

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Sylvia R. Garcia

Jasmine Member of Congress

Stephen F. Lynch Member of Congress

Betty McCollum Member of Congress

Robert J. Menendez Member of Congress

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Mark Jalaam

MARK TAKANO Member of Congress

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Marc A. Veasey Member of Congress

Haley M. Stevens Member of Congress

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Terri A. Sewell Member of Congress

Troy A. Carter, Sr. Member of Congress

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Kristen McDonald Rivet Member of Congress

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Ju Tokuda Member of Congress

Juan Vargas Member of Congress

Greg Landsman Member of Congress

Raja Krishnamoorthi Member of Congress

R. Meclice

Jennifer L. McClellan Member of Congress

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Laura Friedman Member of Congress

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Doris Matsui Member of Congress

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