

Congress of the United States

Washington, DC 20515

March 28, 2025

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

Dear Secretary Turner,

We write to express our deep concern regarding the staffing reductions and proposed closures at the U.S. Department of Housing and Urban Development (HUD) Regional and Field Offices, particularly in the state of Ohio. These actions will have serious repercussions on HUD's ability to fulfill its mission at a time when the need for federal housing services is greater than ever.

The Columbus Field Office has already lost 13 of its 42 staff members due to a combination of deferred resignations, terminations, and retirements. Furthermore, an additional five employees have announced their retirements before the Reduction in Force (RIF) is set to take effect. The Cleveland Field Office similarly faces uncertainty as staff reductions threaten its ability to provide critical services to Ohioans. Nationally, the Field Policy and Management (FPM) division has been particularly impacted, with all positions at the GS-13 level and below abolished, effective May 18, 2025.¹ Taken together, these workforce reductions significantly weaken HUD's ability to effectively serve the communities – both in the state of Ohio and across the nation – that rely on these offices.

The Administration's staffing reductions and office closures not only undermine HUD's ability to enforce fair housing policies, respond to local housing crises, and administer critical programs, but also place undue strain on the remaining workforce. Field offices carry out essential services, including processing mortgage insurance applications, underwriting mortgage loans, conducting single family mortgage risk reviews, profiles, and market monitoring, collecting local data, managing and distributing federal funds, addressing fair housing claims, enforcing federal regulations and policies, and providing guidance to landlords, tenants, municipalities, and local housing stakeholders. The dismantling of HUD's field presence weakens direct support to state and local governments, housing authorities, and community organizations that depend on federal assistance to address homelessness, housing affordability, and fair housing enforcement.

At a time when the cost of housing continues to rise, homelessness has reached historic levels, and communities face increasing economic uncertainty, HUD must remain a fully staffed and functioning agency. According to the latest gap report, Ohio is facing a shortage of 264,083 rental homes affordable and available to extremely low income households.² The closure of field

¹ *LeadingAge*, "HUD to Cut Field Office Staff by May 18," February 24, 2025. Available at: <https://leadingage.org/hud-to-cut-field-office-staff-by-may-18/>.

² *National Low Income Housing Coalition*, *Housing Needs By State: Ohio*. Available at: <https://nlihc.org/housing-needs-by-state/ohio>.

offices and mass staff reductions will create service gaps that disproportionately harm vulnerable populations, including low-income families, seniors, and people with disabilities. The Cleveland and Columbus Field Offices play a critical role in addressing these challenges, and any reductions in their capacity will have far-reaching consequences for Ohio communities already facing a devastating housing crisis.

Additionally, we remind you that HUD is statutorily required to maintain at least one field office in each state to process loan and mortgage insurance applications.³ Furthermore, HUD is required to carry out and publish a cost-benefit analysis before implementing a plan to reorganize any field offices,⁴ and the agency has historically conducted and published such analyses to assess the impact of past closures.⁵

For example, in 2013, HUD announced the closure of 16 of its 80 field offices, citing a need to save between \$110 million and \$150 million over a 10-year period.⁶ The decision was based on a cost-benefit analysis that weighed financial savings against potential impacts on service delivery. Similarly, in 1986, HUD conducted an economic impact study before closing its Springfield, Illinois office, ensuring transparency and accountability in its decision-making process.⁷ Given this long-standing precedent and statutory requirement of conducting thorough cost-benefit analyses before office closures, we urge HUD to conduct and publicly release similar impact assessments for any proposed closures, including those of the Cleveland and Columbus Field Offices.

Given the severe implications of these proposed changes and the lack of adherence to statutorily required protocols in carrying them out, we respectfully request the following information:

1. A breakdown of planned HUD field office closures and staff reductions across the country, including projected timelines, with specific details on the Cleveland and Columbus Field Offices.
2. An analysis of how HUD plans to maintain service delivery in impacted regions, particularly in Ohio, in the absence of sufficient personnel.
3. Confirmation of whether HUD has conducted an economic impact analysis on the proposed closures, following historical precedent, and if not, an explanation for why this action was deemed not legally required by the Administration. If an economic impact analysis was conducted, we request copies of the relevant analyses for the Cleveland and Columbus Field Offices.
4. Any assessments HUD has conducted regarding the impact of these closures on housing access, homelessness prevention efforts, and fair housing enforcement.

³ 12 U.S.C. §1735f–12(a).

⁴ 42 U.S.C. § 3535(p).

⁵ *Government Accountability Office (GAO), "Housing Programs: Information on HUD's Decision to Close Its Springfield, Illinois, Office,"* GAO-RCED-87-47BR, December 1986. Available at: <https://www.gao.gov/assets/rced-87-47br.pdf>.

⁶ HUD, "Small Office Project FAQs," May 29, 2013. Available at: https://archives.hud.gov/transforming_hud/small_office_project/052913SOP_FAQs.pdf.

⁷ *Government Accountability Office (GAO), "Housing Programs: Information on HUD's Decision to Close Its Springfield, Illinois, Office,"* GAO-RCED-87-47BR, December 1986. Available at: <https://www.gao.gov/assets/rced-87-47br.pdf>.

5. A summary of steps HUD is taking to prevent disruptions to ongoing housing assistance programs and community partnerships.

We urge you to reconsider these harmful reductions and work to strengthen HUD's capacity rather than diminish it. Additionally, we request full transparency regarding the decision-making process for these closures. Thank you for your prompt attention to this matter. We look forward to your response.

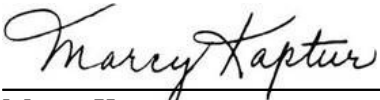
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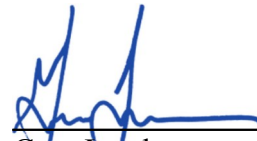
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