



National Council of HUD Locals

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
AFFILIATED WITH AFL-CIO

Council 222 P.O. BOX 9762 ALEXANDRIA, VA 22304

April 28th, 2025

The Honorable Emanuel Cleaver, II
U.S. House of Representatives
2217 Rayburn House Office Building
Washington, DC 20515

Dear Congressman Cleaver,

On behalf of the American Federation of Government Employees (AFGE) National Council 222 and the 5300 HUD bargaining unit employees we represent, I wish to extend my deepest gratitude to you and your staff for meeting with us on Thursday, April 24th, to discuss the critical challenges facing the Department of Housing and Urban Development workforce.

We are especially grateful for your powerful presence and remarks at the HUD rally on March 3rd in front of the Department. Thank you also for signing the Congressional Labor Caucus letter to President Trump urging him to rescind the Executive Order eliminating federal collective bargaining rights and thank you for cosponsoring H.R. 2550, the "Protect America's Workers Act."

Your leadership as Ranking Member of the Subcommittee on Housing and Insurance, and your distinguished tenure on the House Committee on Financial Services, have been instrumental in shaping national housing policy and protecting the interests of both federal employees and the communities we serve. Your decades of public service, from your historic election as Kansas City's first African American mayor to your eleven terms representing Missouri's Fifth Congressional District, reflect a career marked by vision, compassion, and transformative results. The Green Impact Zone, your bipartisan housing reforms, and your stewardship as Chair of the Congressional Black Caucus are just a few hallmarks of your unwavering commitment to equity and opportunity for all Americans.

During our meeting, we discussed the far-reaching implications of impending office closures, the forced relocation of government employees-including those with approved disabled staff members with reasonable accommodations-and the looming threat of reductions in force (RIFs). We shared data and personal accounts illustrating how these decisions not only disrupt the lives of dedicated public servants but also jeopardize HUD's ability to deliver essential services to the American public. The impact on morale, staffing



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shortages, and the erosion of institutional knowledge threaten to undermine HUD's mission at a time when affordable housing is more critical than ever.

We are especially grateful for your attention to the rights of employees with disabilities and your advocacy for fair and lawful treatment under the Americans with Disabilities Act and our collective bargaining agreement. Your willingness to listen, engage, and act on behalf of those who too often go unheard of is a testament to your legacy of inclusive leadership.

Preliminary data on the impact of office closures and staff cuts:

Program Office	Onboard as of 1/21/5	Day 21 Headcount	Day 120 Headcount	% Reduction
CPD	936	892	150	84.00%
FHEO	572	532	134	76.50%
PDR	196	182	48	75.50%
OCAO (incl FO:15)	261	234	131	50.00%
OCHCO	219	194	110	50.00%
OCPO	147	142	74	50.00%
ODEEO	19	19	10	50.00%
PIH	1529	1397	765	50.00%
OLHCHH	55	50	28	49.30%
FPM	372	311	205	45.00%
HSNG	2532	2360	1,418	44.00%
OCFO	246	237	143	42.00%
OGC	628	600	365	41.80%
DM (All Offices)	61	59	37	39.00%
OCIO	270	248	188	30.20%
GNMA	270	250	243	10.00%
Grand Total	8313	7707	4,047	51.32%

As discussed, we have enclosed the following documents for your review:

- Letters to Secretary Turner addressing the urgent concerns of employees with disabilities (attached).
- The survey results highlight the effects of these changes on workforce morale and HUD's capacity to fulfill its mission (attached).



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As Congress considers potential budget reconciliations, we urge you to oppose any cuts to federal employee benefits. We'll be in touch with your staff on this issue very soon. We remain committed to working with you to amplify the voices of HUD employees, elevate their stories, and ensure they have the tools they need to serve our most vulnerable neighbors. Please let me or our legislative representative, Fiona, know how we can support your work.

Thank you for your steadfast support and for championing the federal workers and the communities we serve. We look forward to continued collaboration as we work together to ensure HUD remains a beacon of hope, stability, and opportunity for all.

Sincerely,



Antonio F. Gaines
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April 28, 2025

To: Scott Turner
Secretary
U.S. Department of Housing and Urban Development

Via: Lori Michalski
Chief Human Capital Officer
U.S. Department of Housing and Urban Development

Dear Ms. Michalski,

I write to you as President of AFGE National Council 222, representing the interests and rights of 5300 HUD bargaining unit employees. I must express grave concern regarding the implementation of Phase 4 of HUD's Return to In-Person Work plan, particularly as it impacts employees with disabilities who have approved Reasonable Accommodations (RAs).

Immediate Harm to Employees with Disabilities

Approximately 80 HUD employees with severe disabilities—who have already undergone the rigorous RA process and received formal approval from management and the HUD RA Branch—are now being instructed to prepare for involuntary relocation, in some cases to offices slated for closure, and in direct contradiction to their medical providers' recommendations. These employees are being told to uproot their lives with a month's lead time, despite their approved accommodation and the absence of any new information justifying such a review or revocation of their previously approved RA's.

This is not only a violation of the trust placed in the Department's accommodation process, but also a direct threat to the health, stability, and livelihoods of some of HUD's most vulnerable employees and in direct contradiction to the Presidents orders to adhere to all laws and regulations.

Legal and Contractual Protections

HUD's own policies, as well as federal law, are clear:

The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 strictly prohibit discrimination against employees with disabilities and require employers to provide reasonable accommodations unless doing so would impose an undue hardship... undue hardship. Once a reasonable accommodation has been approved, it cannot be revoked or altered



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absent new, material information or a change in the employees' condition, as recognized by both the ADA and HUD's own policies.

The current practice of instructing employees with severe disabilities-who hold valid, HUD-approved reasonable accommodations-to prepare for relocation, including to offices scheduled for closure and against explicit medical advice, is inconsistent with:

- **Article 9 and Article 45 of the AFGE-HUD Collective Bargaining Agreement**, which guarantees equal employment opportunity and prohibit discrimination based on disability, and specifically protect the integrity of approved reasonable accommodations.
- **Article 45 section 45.05 of the AFGE-HUD Collective Bargaining Agreement** states Once a permanent disability has been established it will not be subject to further medical documentation or revocation.
- **The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act**, both of which require that accommodations be honored unless a legitimate, documented hardship exists, and that any review or revocation must be based on new, relevant information-not administrative preference or reorganization alone³.
- **HUD's own written commitments** to workplace accessibility and non-discrimination, as well as the Department's obligation to act in good faith and in partnership with the Union on any changes affecting bargaining unit employees³.

Federal Directives and Agency Guidance

While the January 20, 2025, Presidential Memorandum, "Return to In-Person Work," directs agencies to end most remote work, it explicitly states:

"This memorandum shall be implemented consistent with applicable law."

This means all return-to-office actions must comply with the ADA, the Rehabilitation Act, and collective bargaining agreements.

OPM January 23rd, 2025 Memo

Further, the Office of Personnel Management's January 23, 2025, guidance reiterates that agencies must honor reasonable accommodations for employees with disabilities and that such employees may be exempted from in-person requirements when supported by medical documentation.

"The agency head or acting agency head should revise their agency's telework policy issued under 5 U.S.C. § 6502(a)(1)(A) to state that eligible employees must work fulltime at their



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respective duty stations unless excused due to a disability, qualifying medical condition, or other compelling reason certified by the agency head and the employee's supervisor."

This is the case for approved RA's.

Contractual Protections

The AFGE-HUD contract contains clear language:

"Section 45.05 - Previously Approved Accommodation. Once a permanent disability has been established it will not be subject to further medical documentation or revocation. "

Additionally, the CBA details:

The policy, procedures, and terminology established in this Article are in conformance with the governing law, rule, and regulations, including but not limited to:

- (1) The Rehabilitation Act of 1973;
- (2) The Americans with Disabilities Act of 1990 (ADA), as amended by the ADA Amendments Act of 2008;
- (3) Executive Order 13164;
- (4) EEOC's regulations implementing the ADA (29 CFR part 1630); and
- (5) Handbook 7855.1, dated April 2003. **Request for Immediate Action**

These government laws and policies are codified protections and frameworks, not in dispute, and are designed to protect the rights of these individuals from additional harm and duress.

I respectfully urge you, as Chief Human Capital Officer, to:

- **Formally acknowledge and honor all existing, HUD-approved reasonable accommodations for remote work.**
- **Cease all actions requiring employees with validated accommodations to prepare for relocation or office closure, especially when such actions contradict medical guidance.**
- **Provide prompt, written notification to the Union of any intent to relocate employees with approved accommodations, and ensure full Union involvement in all such processes, as required by Article 49 (Mid-Term Bargaining) of the CBA3.**

Should you have any questions or require further clarification, I am available to discuss this matter directly at your earliest convenience.



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HUD's mission is best served when we uphold the law, our contractual commitments, and our shared values of equity and inclusion. I trust you will act swiftly to ensure that employees with disabilities are treated with the dignity, respect, and legal protection they deserve.

Sincerely,

/s/ Antonio Gaines

Antonio F. Gaines
President
AFGE National Council 222

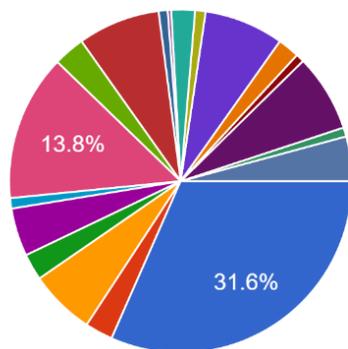
Survey Data Analysis

Introduction

This survey data is the result of a workplace impact survey sent to 5300 HUD bargaining unit employees (of the 8000 total employees) of HUD, with 1500 responses at a 28% response rate. The results reveal that workers who were healthy and performed well before these events and are now sustaining high levels of severe distress and anxiety, impacting their efficiency and productivity due to recent executive orders and OPM communications. Employees report significant challenges to their work-life balance, productivity, decreased efficiency and this is impacting previously well employees mental health. Key concerns include increased commuting costs, childcare arrangements, and potential loss of flexible work schedules. Many fear job insecurity and feel undervalued. The sudden shift to full-time office work is disrupting established routines and creating financial burdens. Employees express difficulty focusing on their duties due to constant uncertainty and this directly impacts efficiency. There's a notable decrease in morale, productivity, efficiency and job satisfaction.

Which local are you in?

1,522 responses



- 476 Headquarters-D.C.
- 3258 Region 1 - New England - Bang...
- 913 Region 2 - New York/New Jersey...
- 3122 Region 3 - Mid-Atlantic - Baltimo...
- 2032 Region 3 - Mid-Atlantic - Philade...
- 3380 Region 3 - Mid-Atlantic - Richm...
- 1568 Region 4 - SE Caribbean - Atlant...
- 1568 Region 4 - SE Caribbean - Knox...

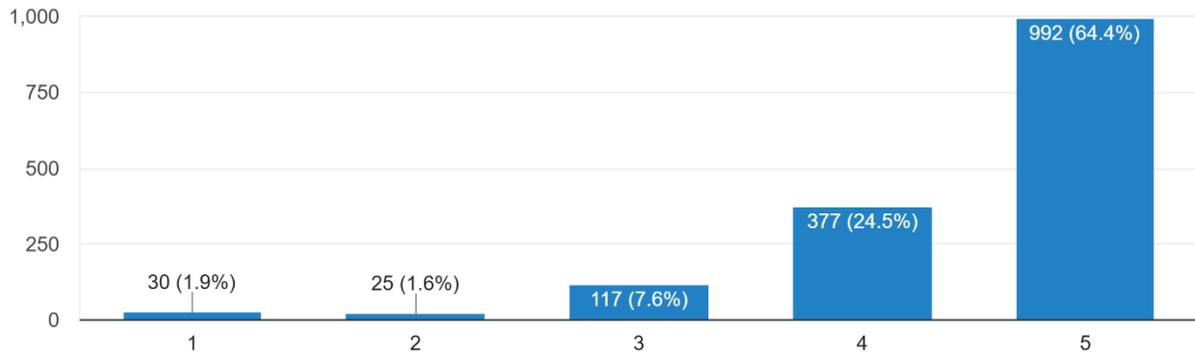
▲ 1/3 ▼

1. Stress Levels:

- The average stress level reported by employees is very high, with most responses in the 4-5 range on a 5-point scale.
- Over 80% of respondents indicated a stress level of 4 or 5.

Rate your current level of workplace-related stress on a scale of 1-5 (1 being minimal, 5 being severe)

1,541 responses



2. Work Challenges:

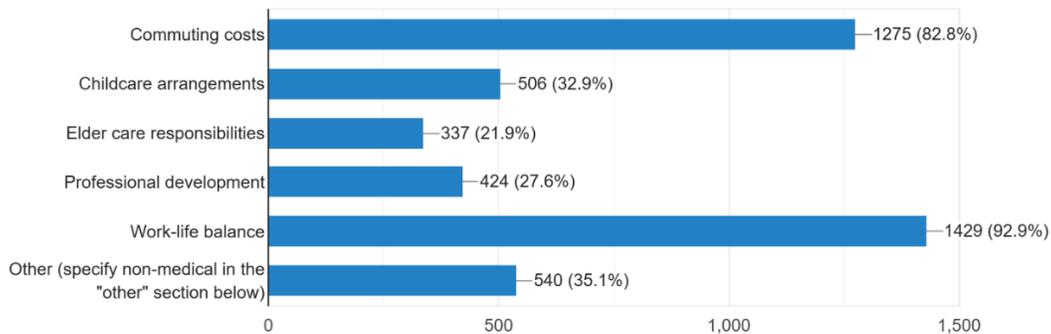
- Top challenges reported:

1. Commuting costs (mentioned by ~75% of respondents)
2. Work-life balance (mentioned by ~70% of respondents)
3. Childcare arrangements (mentioned by ~40% of respondents)
4. Professional development (mentioned by ~30% of respondents)

Note: respondents could answer multiple questions so the totals will exceed 100%

What immediate work-life challenges would you face if required to modify your current work arrangement? Select all that apply:

1,539 responses

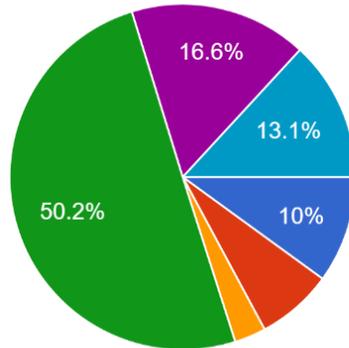


3. Reasonable Accommodations:

- Approximately 60% of respondents have never requested a reasonable accommodation
- About 20% have a pending or approved reasonable accommodation
- **Around 10% have had a reasonable accommodation denied**

What is your current reasonable accommodation status? (Select one)

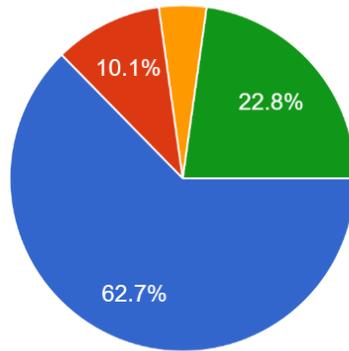
1,499 responses



- I have an approved reasonable accommodation
- I have a pending reasonable accommodation request
- I have had a reasonable accommodation denied
- I have never requested a reasonable accommodation and do not need one
- I have never requested a reasonable...
- Other (use the space below and do n...

If you have a pending request, how long has it been in process? (Select one)

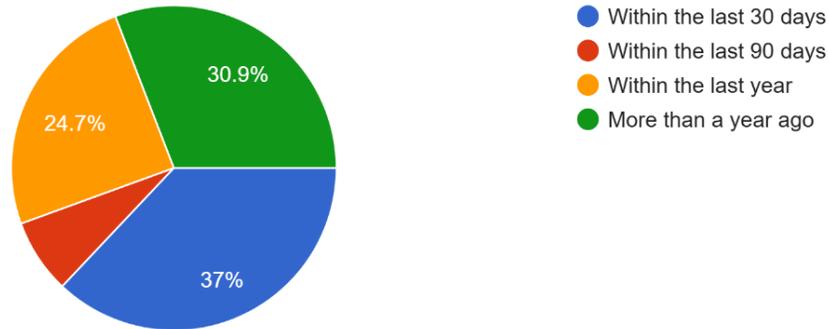
158 responses



- Less than 30 days
- 31-60 days
- 61-90 days
- Over 90 days

If you had a reasonable accommodation denied, when was the denial issued? (Select one)

81 responses



Have you been asked to resubmit or provide additional documentation for an existing reasonable accommodation? (Yes/No)

533 responses



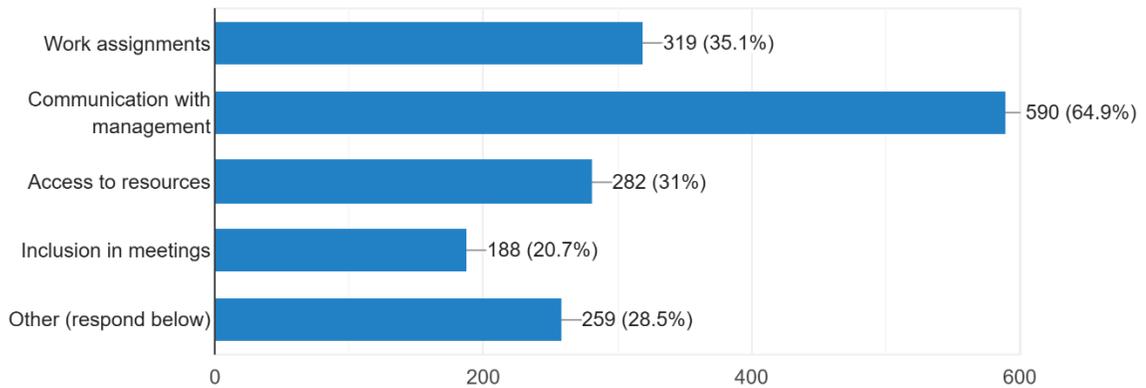
4. Impact on Work:

- Over 90% of respondents reported that the recent executive orders and OPM communications are negatively affecting their ability to perform daily work duties and is directly impacting efficiency.

Note: respondents could answer multiple questions so the totals will exceed 100%

Since receiving the OPM communication, have you experienced any changes in:

909 responses

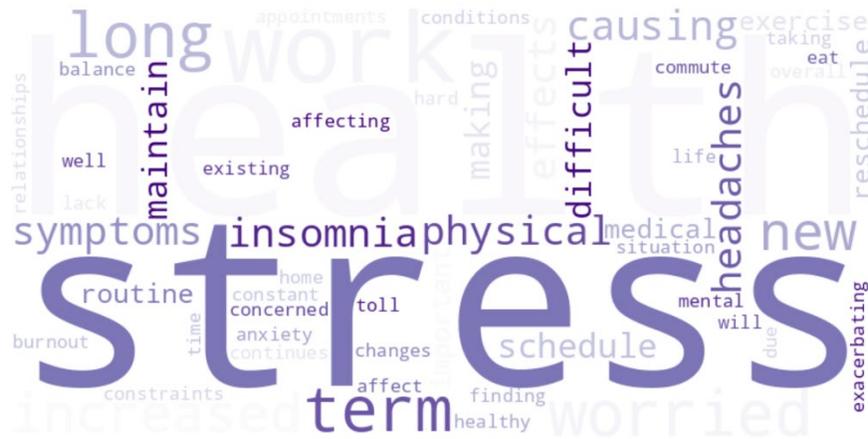


- "I'm having to dip into my savings just to cover the new work-related expenses."
- "The sudden changes are forcing me to reconsider my long-term financial plans."
- "I'm worried about how these changes will affect my retirement savings."
- "The added costs are particularly challenging as a single-income household."
- "I'm having to cut back on other areas of my budget to accommodate work expenses."



5. Negative Impacts to Health and Well-being:

- "The stress is causing physical symptoms like headaches and insomnia."
- "I'm worried about the long-term health effects of this increased stress."
- "The new schedule is making it difficult to maintain my exercise routine."
- "I've had to reschedule important medical appointments due to work changes."
- "The constant anxiety is exacerbating my existing health conditions."
- "I'm finding it hard to eat healthy with the new time constraints."
- "The stress is affecting my relationships both at work and at home."
- "I'm concerned about burnout if this situation continues long-term."
- "The lack of work-life balance is taking a toll on my mental health."
- "I'm worried about how the increased commute will affect my overall well-being."

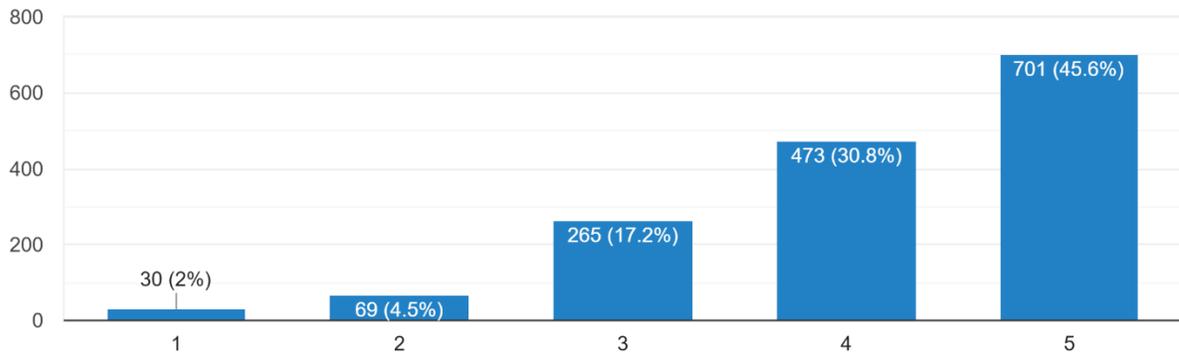


5. Union Communication:

- The average rating for AFGE National Council 222's communication is approximately 4 out of 5, indicating generally positive feedback.

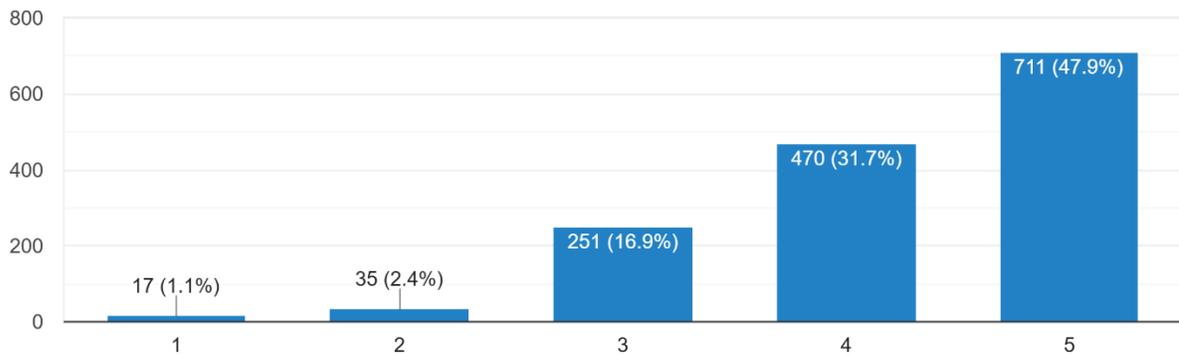
How would you rate AFGE National Council 222's communication regarding recent OPM developments? (Scale 1-5)

1,538 responses



Please rate the survey from 1 (ineffective) to 5 (effective)

1,484 responses



Assessment of Impacts

1. Negative Mental Health Impacts: The AFGE National Council survey was sent to over 5300 bargaining unit employees. The response of 1500 members reveals a significant negative impact on **employees' mental health**, who were previously well, with high levels of stress, anxiety, and uncertainty reported. Many employees are experiencing sleep disturbances, difficulty concentrating, and increased irritability. The constant state of uncertainty is leading to heightened anxiety levels, with some employees reporting panic attacks or the need for increased mental health support. **This deterioration in mental health to previously healthy employees is likely to have long-term consequences if not addressed promptly.**

2. Decreased Work Performance and Efficiency: Many employees report difficulty concentrating and decreased productivity due to the constant distractions and stress caused by the new policies. This decrease in productivity is manifested in missed deadlines, increased errors, and a general slowdown in project completions. The quality of work and efficiency is also suffering as employees struggle to focus on complex tasks. There's a growing concern that this decline in performance could have long-term impacts on career progression and departmental efficiency.

3. Increased Financial Strain: Increased commuting costs and childcare expenses are creating financial burdens for many employees. This unexpected financial pressure is forcing some employees to consider second jobs or to dip into savings. The financial stress is particularly acute for those who may need to relocate closer to their office. **There's a growing concern that these increased costs effectively amount to a pay cut, which could lead to retention issues in the long term.**

4. Decreased Work-Life Balance: The sudden change in work arrangements is disrupting established routines and creating challenges in managing personal and professional responsibilities. Many employees are reporting difficulties in maintaining family commitments, pursuing personal interests, or managing household responsibilities. This disruption is particularly challenging for employees with caregiving responsibilities, whether for children or elderly family members. The long-term consequences of this imbalance could include increased burnout rates and decreased job satisfaction.

5. Decreased Job Satisfaction: There is a noticeable decrease in job satisfaction, efficiency and morale, with many employees feeling undervalued and uncertain about their future. This decline in satisfaction is manifesting in decreased engagement in non-essential work activities and a reluctance to take on new projects or responsibilities. There's a growing sense of disillusionment with federal service, which could lead to increased turnover rates. The long-term impact on institutional knowledge and continuity of operations could be significant if experienced employees choose to leave.

Conclusion

The survey results of 1500 AFGE members at HUD reveal a workforce in **crisis due to recent executive orders and OPM communications**. Federal employees at HUD, who were previously healthy, are experiencing severe stress, anxiety, and decreased productivity, with many reporting reduced efficiency due to difficulty focusing on their daily tasks. The sudden shift to full-time office work is causing significant disruptions to established work-life balances, creating challenges related to childcare, elder care, and commuting costs.

Key impacts include:

- 1. Negative Mental Health Impacts:** Widespread reports of previously well employees feeling new levels of anxiety, depression, and sleep disturbances.
- 2. Decreased Productivity and Efficiency:** Significant decreases in work output and quality due to constant distractions and stress.
- 3. Increased Financial Strain:** Increased commuting costs and childcare expenses creating unexpected burdens.
- 4. Decreased Work-Life Balance:** Disruption of long-established routines and personal responsibilities.
- 5. Decreased Job Satisfaction:** Sharp decline in morale, with many feeling undervalued and uncertain about their future.
- 6. Negative Impacts to the Physical Health of Previously Well Employees:** Reports of stress-related physical symptoms like headaches and fatigue of previously well employees.
- 7. Decreases Team Dynamics:** Strained communication and collaboration within teams.
- 8. Career Development:** Concerns about job security impacting long-term career planning.
- 9. Decreasing Organizational Culture:** Shift towards a perceived lack of support and increased vulnerability.
- 10. Decreased Trust in Leadership:** Decreased confidence in upper management and government leadership.

Urgent action is needed to address these impacts and provide clear guidance, flexible work arrangements, and support for employees during this transition period.