



March 20, 2024

VIA ELECTRONIC MAIL

The Honorable Kiran Ahuja
Director
U.S. Office of Personnel Management
1900 E Street, N.W.
Washington, D.C. 20415

RE: Petition for Rulemaking on Agency Relocations

Dear Director Ahuja:

The National Treasury Employees Union (NTEU) writes in support of Democracy Forward’s petition for rulemaking to OPM, filed on December 22, 2023, regarding agency relocations. NTEU urges OPM to act promptly on the petition, which would establish safeguards against ill-advised and inefficient agency relocations.

During the last administration, several agencies abruptly relocated important bureaus and offices. These were transparent efforts to gut the workforce.¹ Those agencies failed to engage with employees or to follow other sound management practices in carrying out the relocations.² The moves, unsurprisingly, led to a loss of staff, productivity, and efficiency.³ Employee morale was hurt, expertise was lost, and diversity was weakened.

These problems must not reoccur. The petition would establish important guardrails. Agencies would be required, for example, to engage with employees regarding potential relocations. Agencies would also be required to find that any move would not result in long-term

¹ See Eric Katz, *Mulvaney: Relocating Offices is a “Wonderful Way” to Shed Federal Employees*, Gov. Exec., Aug. 15, 2019.

² See GAO, GAO-22-104247, *Better Workforce Planning and Data Would Help Mitigate the Effects of Recent Staff Vacancies*, at 13, 25-26 (Nov. 2021).

³ See *id.* at 15 (at one agency, 77% of employees slated for relocation separated from their positions); *id.* (staff reported that key vacancies led to delays); GAO, GAO-23-104709, *Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on its Workforce*, at 13 (Dec. 2022) (at two offices, more than 50% of employees slated for relocation separated from their positions); *id.* at 19 (relocation led to “decreased productivity” such as fewer journal articles, research reports, and grants); Juliet Eilperin, *Trump Officials Moved Most Bureau of Land Management Out of D.C.*, Wash. Post, Jan. 28, 2021 (relocation “deprived the agency of needed expertise and disrupted its operations” and a disproportionate number of Black employees left).

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vacancies or cause a significant reduction in skilled employees or diversity. These protective measures would help ensure that any relocations are not taken for improper reasons, such as undermining our civil service. Federal employees and the public deserve a stable, professional workforce.

NTEU urges you to act on the pending petition. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Doreen P. Greenwald". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Doreen P. Greenwald
National President