



May 14, 2026

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

Dear Secretary Turner:

On behalf of the undersigned unions, representing millions of workers, including thousands working in facilities across our country that supply key products and materials needed for housing construction and related infrastructure, we write to urge the Department of Housing and Urban Development (HUD) to take key steps to improve the implementation and application of Build America, Buy America (BABA) for federally assisted housing projects.

The labor movement strongly supports Buy America policies because they align federally funded infrastructure investments with our values and shared policy priorities, ensuring America's workers have the first shot to supply the materials and products used to construct our public infrastructure. By reinvesting our taxpayer dollars in the United States, Buy America policies support family- and community-sustaining jobs at domestic factories that operate under stronger labor, environmental, and safety standards than competitors overseas. When implemented effectively, Buy America delivers economic benefits for union workers and communities while supporting timely project delivery.

Successful Buy America implementation depends on a transparent, predictable process that engages stakeholders to identify supply chain gaps and, when necessary, issue narrow waivers to keep projects moving. While other federal agencies have demonstrated that Buy America can be administered in this manner, HUD's current approach has produced avoidable uncertainty for funding recipients, manufacturers, and factory workers. Prolonged timelines for waiver determinations are delaying affordable housing projects and creating uncertainty around financing and construction schedules.

Housing projects rely on a range of manufactured products, including HVAC equipment, electrical equipment, elevators, and life-safety systems. The most common concerns we hear from project sponsors stem from delays and uncertainty in the review of project-specific waiver requests for these types of manufactured products – not for iron, steel or construction materials.

At the same time, HUD's reliance on broad general waivers risks clouding the market signals that incentivize companies to expand capacity and address supply chain gaps. Many of the manufactured products required for housing, as well as their upstream supply chain components, are already produced in the United States by our members. Improving the speed

and transparency of the project-specific waiver process, while limiting general waivers to narrowly defined and time-limited circumstances, would allow short-term constraints to be addressed without undermining incentives for domestic production, investment, and job creation.

It is critical that HUD adopt a more targeted, transparent, and predictable waiver process that ensures timely project delivery while supporting the domestic manufacturing goals of Buy America. Without timely administrative improvements, HUD risks undermining housing delivery, construction and manufacturing jobs, and the domestic manufacturing investments that BABA is intended to support. Prompt action using the authorities and tools Congress has already provided in BABA would correct this course and ensure the law is implemented as intended.

To address these challenges, we urge HUD to:

1. Issue a Request for Information focused on housing relevant manufactured products to gather input from manufacturers, labor, and project sponsors on domestic capacity and supply-chain constraints, and to use that information to inform timely, evidence-based waiver decisions.
2. Accelerate project-specific manufactured product waiver requests into public notice and comment more quickly, consistent with BABA's requirement that proposed waivers be posted for a 15-day public comment period, rather than allowing requests to remain under internal review for extended periods.
3. Use general waivers more strategically by limiting them to clearly defined manufactured products where repeated project-specific waivers demonstrate a short-term supply constraint, making them time-limited (for example, 18–24 months), and formally reviewing market conditions at the end of the waiver period to determine whether an extension, modification, or sunset is warranted.
4. Improve transparency by enabling recipients to track the status of waiver requests, with dates, through each stage of review (e.g., received, under HUD review, posted for public comment, Made in America Office review, and final determination) on HUD's website and/or [MadeinAmerica.gov](http://MadeinAmerica.gov).
5. Allocate sufficient resources for HUD to administer Buy America effectively, including staffing, technical expertise, and systems needed to process waivers in a timely, transparent, and predictable manner – consistent with approaches used by EPA and other agencies.

Taken together, these steps would speed project delivery, provide greater certainty to recipients, and support good jobs throughout the manufacturing supply chains that support housing construction. We oppose statutory changes that would undermine Buy America, including broad carve-out exemptions or so-called “shot clock” mechanisms that would deem

waivers automatically approved after an arbitrary deadline. Such approaches would weaken domestic content requirements, bypass meaningful public input, and erode the market signals needed to support long- term domestic manufacturing investment. The challenges facing HUD's housing programs stem from implementation and administrative failures, not from shortcomings in the statute itself, and they can and should be addressed using the authorities Congress has already provided.

We stand ready to work with HUD to improve BABA implementation to deliver housing faster while maximizing benefits for America's workers.

Sincerely,

American Federation of Labor and Congress of Industrial Organizations (AFL-CIO)  
Communications Workers of America (CWA)  
International Association of Machinists and Aerospace Workers (IAM)  
International Brotherhood of Boilermakers (IBB)  
International Brotherhood of Electrical Workers (IBEW)  
International Union of Electronic, Electrical, Salaried, Machine and Furniture Workers–  
Communications Workers of America (IUE-CWA)  
United Steelworkers International Union (USW)