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April 30, 2025

The Honorable James Comer
Chairman
Committee on Oversight
2157 Rayburn House Office Building
Washington, DC 20515

The Honorable Gerald Connolly
Ranking Member
Committee on Oversight
2157 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Comer and Ranking Member Connolly,

On behalf of the more than 355,000 members of the International Association of Fire Fighters (IAFF), I would like to share our comments on some of the Committee's proposed sections in the FY 2025 Budget Reconciliation Committee Print. As you continue your important work, please accept our appreciation for the thoughtful, and deserved, considerations given to our brother and sister IAFF federal fire fighters and other Special Category Employees (SCEs). As you know, ten thousand federal fire fighters protect DOD installations, VA hospitals, and other facilities worldwide. These fire fighters dedicate their careers to the protection of life and property and work under demanding conditions. They experience occupational hazards unlike any other federal worker.

For these reasons, the Federal Employee Retirement System (FERS) provides certain enhanced retirement benefits and calculations to these men and women. President Donald J. Trump has also recognized the unique work environment and attendant risks faced by fire fighters and has exempted them from many of the executive orders which have re-evaluated collective bargaining agreements, hiring stances, and other policies regarding federal personnel not working in emergency response positions.

As you further develop Title IX of the FY 2025 Reconciliation bill, the IAFF offers the following comments in support of fire fighters and other SCEs:

- 1) **Sec. 90001** – This section would raise the FERS retirement contributions for many federal employees. As you know, federal fire fighters already pay an increased contribution rate due to their unique plan within the FERS system.

Implementing a contribution increase for federal fire fighters with no accompanying pay raise would constitute a pay cut for our members who already earn wages markedly lower than many of their local and state government counterparts. Additionally, they continue to work at least 72 hours per week, another marked difference from city, county, and municipal fire fighters. The recruitment and retention crisis currently being experienced would worsen if their pay is further cut. We appreciate the exemption you provided for federal fire fighters and other SCEs from these changes and urge you to retain it.

- 2) **Sec. 90002** – The IAFF appreciates the Committee’s actions to exempt federal fire fighters and other SCEs who reach the mandatory retirement age from proposals to eliminate the FERS annual annuity supplement. As your announcement notes, SCEs (including fire fighters) are subject to a mandatory retirement age. This supplement is essential to their secure and dignified retirement. We encourage you to broaden this exemption to cover all federal fire fighters and other SCEs subject to the mandatory retirement age, but who may retire before reaching such age. The demands of our jobs result in many federal fire fighters retiring before they want to. A career’s worth of injuries, exposures, and other health conditions, simply makes reaching the current mandatory retirement age impossible. These retirees need the annuity to maintain a secure retirement following their service. Thank you again for exempting some fire fighters from this provision, but please broaden this exemption to cover all fire fighters and SCEs.
- 3) **Sec. 90003** – This section would recalculate federal pension payments by basing an employee's FERS benefit on their five highest earning years (high-5) rather than their three highest earning years (high-3). As you correctly noted in your comments on Section. 90002, fire fighters and some other federal employees face a mandatory early retirement age. This disadvantages these personnel under a high-5 system as it reduces the end of their careers, often when personnel earn their highest wages. I appreciate the special considerations you gave to federal fire fighters by not including them in this section. We urge you to maintain this exemption for fire fighters and SCEs.

Thank you for considering these comments. The men and women serving in the federal fire service provide a unique and invaluable service to our nation. As you develop Title IX of the upcoming reconciliation bill, we urge you to fully exempt fire fighters and other SCEs from provisions that negatively impact their wages and pensions. The IAFF sincerely appreciates the exemption for fire fighters you included in Section 90001 and 90003 and urges you to extend this exemption for all fire fighters and SCEs in Section 90002. I stand ready to provide any additional information as you thoughtfully consider the members of the IAFF.

Sincerely,



Edward A. Kelly
General President