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August 21, 2025

The Honorable Brooke L. Rollins Secretary U.S Department of Agriculture 1400 Independence Ave, SW Washington, DC 20201

Dear Secretary Rollins:

We are writing regarding the July 24, 2025, announcement of the reorganization plan at the U.S Department of Agriculture (USDA or the Department). In a memorandum, you laid out plans for the "consolidation, unification, and optimization of functions" within the Department. We are concerned that this abrupt announcement of the reorganization plan comes without full details or substantiation regarding how the reorganization would improve program operations and efficiency. Unfortunately, the proposal also comes at a time when the Trump Administration has already failed in its service to families and farmers, delaying or halting the distribution of vital federal funding across several programs.

The last major USDA staff relocation occurred in 2019 when the Department relocated most staff positions at two of its research agencies—the National Institute of Food and Agriculture (NIFA) and the Economic Research Service (ERS)—from Washington, D.C. to Kansas City, Missouri. This relocation occurred despite widespread concern from community organizations that such a massive relocation would undermine the quality and breadth of the Department's work, negatively impacting farmers, ranchers, consumers, and researchers. At the time, Department

³ Nat'l Sustainable Agriculture Coalition, *USDA Programs Freeze*, Progressive Farmer, (Apr. 30, 2025), https://sustainableagriculture.net/blog/usda-programs-freeze-what-we-know/.

¹ Memorandum from the Sec'y of Agric. (July 24, 2025) https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf.

² *Id*.

⁴ U.S. Gov't Accountability Off., GAO-22-104540, Evidence-Based Policy Making: USDA's Decision to Relocate Research Agencies to Kansas City Was Not Fully Consistent with an Evidence-Based Approach (2022), https://www.gao.gov/products/gao-22-104540.

⁵ See, e.g. Letter from National Farmers Union expressing concern with USDA reorganization plans (May 16, 2019), https://nfu.org/wp-content/uploads/2019/05/05-16-19-NFU-Letter-to-Congress-on-NIFA-and-ERS.pdf; Press Release, American Statistical Association, American Statistical Association Maintains Agriculture Secretary Perdue's Upheaval of USDA Research Arm Not in the Best Interest of Rural America, US Food and Agriculture (2019), https://www.amstat.org/asa/files/pdfs/pressreleases/2019-USDA FinalistResponse.pdf; Press Release,

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officials claimed that this would improve their ability to attract and retain qualified staff without the burden of a high cost of living, place the Department's resources closer to stakeholders, and lower agency employment costs and rent. However, the relocation resulted in 75 percent of employees declining to move and ultimately leaving the agencies. A 2022 report from the Government Accountability Office (GAO) showed that after the relocation ERS produced fewer key reports, and NIFA took longer to process grants. GAO also revealed that two years after the relocation, the majority of the agencies' workforce was comprised of new employees with less experience compared to the prior workforce. Alarmingly, GAO also found that there was a sharp decline in the number of Black or African American staff at both ERS and NIFA; as of Fiscal Year 2021, those levels had still not returned to pre-relocation levels. When the Deputy Secretary of Agriculture, Stephen Alexander Vaden, recently appeared before the Senate Committee on Agriculture, Nutrition, & Forestry, he conceded that there were lessons to be learned from ERS and NIFA relocation. However, given the history of the ERS and NIFA relocation, there is no reason to believe that a widespread relocation will not have similar negative impacts on operations, agency capacity, and diversity of the workforce.

The process surrounding the reorganization plan has not been transparent, nor has the Department clearly articulated how it is handling input from farmers, community partners, antihunger advocates, and state and local officials. While there is a 30-day public comment period, 12 there are mixed messages regarding the extent to which feedback is being considered and how the plan is actively evolving. While you have asserted publicly that the plan is about "95% baked", 13 the Deputy Secretary noted in a Congressional hearing, "the vision and the plans laid out here [in the memorandum] can change." 14 When a Senator asked about specific impacts on subagencies that could be relocated, the Deputy Secretary's answer was that those lists have not been finalized. 15 The Department has not issued any updated memoranda reflecting changes to the published plan; therefore, there is confusion on how the public and interested stakeholders—

National Sustainable Agriculture Coalition, Written Statement on Examining the Impacts of Relocating USDA Research Agencies on Agriculture Research Subcommittee on Biotechnology, Horticulture, and Research (Jun 5, 2019), https://sustainableagriculture.net/wp-content/uploads/2019/06/ERS_NIFA-Hearing-testimony-june2019.pdf. ⁶ GENEVIEVE K, CROFT. CONG. RSCH. SERV., IFI 1527, RELOCATION OF THE USDA RESEARCH AGENCIES: NIFA AND ERS (2020) https://www.congress.gov/crs_external_products/IF/PDF/IF11527/IF11527.3.pdf. ⁷ *Id*.

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⁸ U.S. Gov't Accountability Off., GAO-23-104709, Agency Relocations: Following Leading Practices will Better Position USDA to Mitigate the Ongoing Impacts of its Workforce (2022) https://www.gao.gov/assets/gao-23-104709.pdf.

⁹ *Id.* at 13.

¹⁰ *Id*. at 17.

¹¹ Senate Agriculture, Nutrition and Forestry Committee Holds Hearing on USDA Reorganization Proposal, Proquest (Jul. 30, 2025) [hereinafter Hearing before the S. Comm. on Agric.]

https://congressional.proquest.com/congressional/docview/t39.d40.tr07300125.o08?accountid=45336.

¹² Press Release, U.S. Dep't of Agriculture, USDA Opens Public Comment Period on Department Reorganization Plan (Aug 1, 2025),

 $[\]underline{https://www.usda.gov/about-usda/news/press-releases/2025/08/01/usda-opens-public-comment-period-department-reorganization-plan.}$

¹³ Grace Yarrow, Rollins 'open' to reorg tweaks, Politico, (Aug. 4, 2025)

https://www.politico.com/newsletters/weekly-agriculture/2025/08/04/rollins-open-to-reorg-tweaks-00491547.

¹⁴ Hearing before the S. Comm. on Agric., *supra* note 11, at 11.

¹⁵ *Id*.

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including Members of Congress—can adequately and comprehensively comment on a seemingly evolving plan that is not publicly available.

In addition to the abovementioned process concerns, we want to express opposition to the proposed changes, specifically those targeting the Food and Nutrition Service (FNS). FNS was established in 1969 shortly before the first White House Conference on Food, Nutrition, and Health. ¹⁶ FNS is a critical component of the Department and administers 16 federal nutrition assistance programs. 17 These programs include those authorized by statutes within the Committee's jurisdiction, including the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the Summer Food Service Program (SFSP) and the Child and Adult Care Food Program (CACFP).¹⁸ These programs serve as lifelines for families across the country and have consistently been shown to improve health outcomes and reduce food insecurity. ¹⁹ They have the complementary benefit of continuing investment in American agriculture and supporting American farmers.²⁰ In the memorandum, the Department details how FNS will reduce its number of regional hub locations over a two-year period and reduce staff presence in the D.C. area. 21 However, the existing seven regional offices are strategically located throughout the country to ensure that support is available in various geographic areas.²² Since many FNS employees will be unable or unwilling to relocate, this plan would assuredly result in fewer FNS employees available to serve its critical mission as well as disruptions in Congressionally authorized benefits and services.

In light of these concerns, we request that you please respond to the following by no later than September 4, 2025:

- 1. Detail the rationale and criteria used for downsizing USDA staff to no more than 2,000 employees within the National Capital Region (NCR), as well as the rationale and criteria used for any downsizing of FNS staff.
 - a. Explain what—if any—consideration has been given to the talent or institutional knowledge that will be lost from the employees that are unable or unwilling to relocate.
- 2. Provide the relevant stakeholders and officials that were consulted regarding the decision to downsize the number of regional FNS offices and relocate these offices.

¹⁹ *Id*.

¹⁶ Food & Nutrition Services, *FNS Nutrition Programs*, U.S. Dep't of Agric. (last modified Mar. 10, 2025), https://www.fns.usda.gov/about-fns.

¹⁷ Food & Nutrition Services, *FNS Nutrition Programs*, U.S. Dep't of Agric. (July 2025), https://www.fns.usda.gov/programs.

 $[\]overline{^{18}} Id.$

²⁰ Id

²¹ Memorandum from the Sec'y of Agric., *supra* note 1, at 2. The Department's footprint in the Washington, D.C. metropolitan area and its suburbs includes the 6,500-acre Beltsville Agricultural Research Center in Prince George's County Maryland. *Id.*

²² Food & Nutrition Services, *FNS Regional Offices*, U.S. Dep't of Agric. (July 2025) https://www.fns.usda.gov/fns-regional-offices#mwro; Offices are located in Boston, MA; Robbinsville, NJ; Atlanta, GA; Dallas, TX; Chicago, IL; Denver, CO; and San Francisco, CA. *Id*.

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- 3. Provide the proactive steps the Department intends to take to mitigate any disruption in FNS program operations throughout the reorganization.
- 4. Provide a detailed analysis of the estimated annual costs and savings associated with the reorganization plan over the course of the next five years.
 - a. Provide estimates regarding any disruptions to Department-administered benefits and services.
 - b. Provide information on any delays, disruptions, and cancellations for Department-issued data or research products.
- 5. Confirm whether the Department intends to make all public comments related to the reorganization publicly available.
 - a. Explain how these comments will be considered while moving forward with reorganization plans.

Please send all official correspondence and information related to these requests to the Committee's Democratic staff at EWDOversight@mail.house.gov.

Sincerely,

ROBERT C. "BOBBY" SCOTT

Ranking Member

SUZANNE BONAMICI

Ranking Member

Subcommittee on Early Childhood, Elementary, and Secondary Education