



September 30, 2025

The Honorable Brooke Rollins  
Secretary of Agriculture  
U.S. Department of Agriculture  
Washington, DC 20250

Re: National Sustainable Agriculture Coalition Comments on Department of Agriculture  
Reorganization Plan (Secretary Memorandum 1078-015; July 24, 2025)

Submitted electronically to [reorganization@usda.gov](mailto:reorganization@usda.gov)

Dear Secretary Rollins,

The National Sustainable Agriculture Coalition (NSAC) offers the following comment in response to the July 24, 2025 Secretary Memorandum (SM) 1078-015 and the comment period publicly initially announced on August 1, 2025 (Release No.: 0185.25), which was subsequently extended to September 30, 2025.

NSAC is a national alliance of over 170 family farm, food, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture. Since its founding in the late 1980's, NSAC has worked tirelessly to build a better, more just, and sustainable food and farm system. All Americans, from farmers to eaters, rely on our food and farm system. For our members and the tens of thousands of farmers they serve nationwide, building a more effective and accountable Department that can simultaneously offer enhanced services, reduced bureaucracy, and cost savings is a critical mission.

The U.S. Department of Agriculture's (USDA) stated goal for the reorganization outlined in SM 1078-015 is "*to achieve improved effectiveness and accountability, enhanced services, reduced bureaucracy and cost savings for the American people.*" NSAC commends this goal and believes that USDA should consistently strive toward its achievement.

However, NSAC believes that the proposal outlined in SM 1078-015 falls short of that aim. While agency reorganizations offer an opportunity to enhance services, effectiveness, and accountability, SM 1078-015 does not provide the necessary details to prove, beyond a reasonable doubt, that it can reach that end goal. Absent those details, NSAC is concerned that the proposal would directly

undermine American farmers and stakeholders nationwide by eroding some of the Department's most essential services - from destabilizing agriculture research to threatening conservation delivery and technical assistance, and hampering access to critical components of the farm safety net.

NSAC offers the following comments in the spirit of building a better USDA for all. We urge you to consider these comments and revise your approach to a reorganization at USDA to avoid outcomes that will only exacerbate the hardship many farmers currently face.

Thank you for the opportunity to comment. We welcome the opportunity to further discuss our recommendations.



Mike Lavender  
Policy Director

**I. The Process USDA Has Followed to Advance this Plan is Flawed and Should Be Overhauled Before Any Reorganization Plan is Finalized**

SM 1078-015 was issued under the authority of Reorganization Plan No. 2 of 1953 (5 U.S.C. app.; 7 U.S.C. 2201 note) ("1953 Reorganization Plan") and the Department of Agriculture Reorganization Act of 1994 (Pub. L. 103-354) (1994 Reorganization Act).

Under the 1953 Reorganization Plan, the Secretary is required to "give appropriate advance public notice of delegations of functions" and "afford appropriate opportunity of interested persons and groups to place before the Department of Agriculture their views with respect to such proposed delegations" before assigning any "major functions or major groups of functions to major constituent organization units of the Department of Agriculture" (1953 Reorganization Plan, Sec. 4(a)-(b)). The 1994 Reorganization Act also requires that the Secretary provide advance public notice with "appropriate opportunity for interested parties to comment on the proposed reorganization action or delegation" (1994 Reorganization Act, Sec. 212(c)).

However, SM 1078-015 falls well short of providing sufficient information for interested parties to appropriately comment on the Secretary's proposed reorganization actions and delegations. In order for interested parties and stakeholders to have sufficient information and thus "appropriate opportunity to comment", USDA should provide publicly available details into its rationale for relocations, including but not limited to answers to the questions below. Once USDA has provided public details to these and other questions, the Department should offer a public comment opportunity of at least 60 days through the Federal Register.

- On what evidence is USDA relying to select the locations announced for regional hub locations?
- What is the full cost of relocating multiple offices and agencies into five new hubs?

- What is the length of leases that the Department anticipates entering into in new regional locations?
- What is the status of National Capitol Region (NCR) leases held by USDA that SM 1078-015 proposes to close?

Following the 2019 relocation of the USDA’s Economic Research Service (ERS) and National Institute of Food and Agriculture (NIFA),<sup>1</sup> the Government Accountability Office (GAO) issued a report titled, *Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce* (GAO-23-104709). GAO considers “leading practices” to be “the key questions that Congress, the Office of Management and Budget, and agencies should consider for the development and implementation of agency reforms.” Examples of these key questions include:

- To what extent has the agency established clear outcome-oriented goals and performance measures for the proposed reforms?
- To what extent has the agency considered the likely costs and benefits of the proposed reforms? If so, what are they?
- How and to what extent has the agency consulted with Congress, and other key stakeholders, to develop its proposed reforms?
- How and to what extent has the agency engaged employees and employee unions in developing the reforms to gain their ownership for the proposed changes?
- How does the agency plan to sustain and strengthen employee engagement during and after the reforms?
- How has the agency assessed the effects of the proposed agency reforms on the current and future workforce? If so, what does that assessment show?

When GAO-23-104709 was published in December 2022, GAO determined that USDA “generally did not follow” or only “partially followed” most of the above aspects of the leading practices. As a result, the 2019 ERS and NIFA relocation gutted both agencies, leading to the departure of hundreds of experienced staff, the loss of decades of institutional knowledge, and a severe and lasting drop in productivity and ability to serve farmers and stakeholders.

USDA has publicly conveyed disparate and competing perspectives on the status of SM 1078-015. In July 2025, Deputy Secretary Vaden stated that the plan contained in SM 1078-015 was “the initial step, not the final one.”<sup>2</sup> Shortly thereafter, Secretary Rollins stated that the plan was “about 95% baked.”<sup>3</sup> Consequently, we remain deeply concerned that the plan - issued prior to any stakeholder consultation or input - has been considered nearly finalized since the time it was released, calling into question whether any input received at this stage will be meaningfully integrated. Therefore, in order to effectively serve and support American farmers, and to avoid disruptions to services they rely on, NSAC strongly recommends that before USDA’s proceeds any further with the reorganization outlined in SM 1078-015, the following criteria be met:

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<sup>1</sup> <https://sustainableagriculture.net/blog/when-usda-cuts-staff-farmers-pay-the-price-lessons-from-the-ers-and-nifa-relocations/>

<sup>2</sup> [https://www.agriculture.senate.gov/imo/media/doc/65b16773-c801-c4ac-da21-f0bbac0ebf74/Testimony\\_Vaden\\_07.30.2025.pdf](https://www.agriculture.senate.gov/imo/media/doc/65b16773-c801-c4ac-da21-f0bbac0ebf74/Testimony_Vaden_07.30.2025.pdf)

<sup>3</sup> <https://www.politico.com/newsletters/weekly-agriculture/2025/08/04/rollins-open-to-reorg-tweaks-00491547>

- **Benefit-Cost Analysis.** **USDA should develop and then release a benefit-cost analysis (BCA) so that farmers, stakeholders, lawmakers, and taxpayers can assess the merits of proposed reorganization.** The BCA should be conducted in a manner consistent with the economic and social science principles articulated in the guidance applicable to relocations in the Office of Management and Budget Circular A-4, as in effect on September 17, 2003.
- **Report Detailing USDA's Answers.** **USDA should develop and publicly release an unredacted report which includes details on the proposed reorganization** by including the following information:
  - Outcomes and improvements that will result from the proposed covered reorganization and relocation, as well as an explanation of how they will result in the anticipated outcomes and improvements and metrics for measuring whether they result in the anticipated outcomes and improvements.
  - A detailed employee engagement plan including a list of stakeholders and a timeline of past and future engagements with stakeholders regarding the proposed reorganization and relocation.
  - An assessment of how the proposed reorganization and relocation may affect stakeholders.
  - A comprehensive strategy for accomplishing the proposed reorganization and relocation, including staffing, resourcing, and financial needs; and an implementation timeline identifying milestones and the persons accountable for meeting such milestones.
- **Public Comment Period.** **After publicly releasing both the BCA and the report described above, USDA should open a 60-day comment period in the Federal Register.** While NSAC appreciates the opportunity for this public comment through USDA, it falls short of a meaningful and transparent opportunity that should be offered for a proposal of this magnitude. In fact, the Administrative Procedure Act - which governs federal rulemaking - suggests that "[matters] of great importance, or those where the public submission of facts will be either useful to the agency or a protection to the public, should naturally be accorded more elaborate public procedures."<sup>4</sup>

## II. **Issue-Specific Comments**

In addition to the process-related concerns highlighted above, we have a wide range of specific questions and concerns about how the reorganization outlined in SM 1078-015 would be carried out. The following comments focus on the four key pillars USDA offered as guides for its reorganization plan. While NSAC is in strong agreement that these principles are important priorities for USDA's effective delivery of services to farmers and communities nationwide, we offer below additional considerations that should be part of any decision based on these principles.

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<sup>4</sup> <https://www.congress.gov/crs-product/R41546>

A. Ensure the Size of USDA's Workforce Aligns with Financial Resources and Priorities (Principle 1)

USDA has already lost at least 18,000 staff since January 2025. More than 15,000 USDA employees left the department through DOGE's so-called Deferred Resignation Program (DRP). The DRP offered federal employees fully paid administrative leave through September 2025 if employees voluntarily resigned from their positions. Approximately 3,876 USDA employees accepted DOGE's first round DRP offer, and an additional 11,298 USDA employees resigned in the second round of DRP. Many of these employees have years of experience and irreplaceable expertise.

In addition to staff who have resigned through DRP, approximately 2,827 USDA staff members separated from the Department between January and March 2025, according to OPM. These separations include employees who quit, experienced a "reduction in force", retired (early, voluntary, or for disability), were terminated due to an expired appointment or contract, transferred out, or had some other separation from the department. The separated employees have an average length of service of more than 12.4 years, with 38% of separated employees having more than ten years of service. The loss of additional staff anticipated as a result of this reorganization will further impair an already beleaguered agency. For USDA to effectively carry out its mission, USDA must retain its key headquarters staff and rebuild the capacity of local service offices including but not limited to the Natural Resources Conservation Service, Farm Service Agency, and the Risk Management Agency - capacity that was severely impacted by the staffing losses incurred through the Deferred Resignation Program and direct firings.

Nowhere has the impact of these staffing reductions been felt worse than in the Conservation Programs administered by NRCS. Successful voluntary conservation programs rely on effective technical assistance and collaboration between farmers and trained NRCS field staff to develop conservation plans and select the best programs and practices for farmers to implement. Even prior to this year's staffing cuts that led to a 22% reduction in NRCS personnel nationwide, NRCS state and district offices struggled with work overloads and too few staff to provide effective on-the-ground technical assistance as well as contract development and administration that farmers need to implement practices and achieve their conservation goals.

USDA's critical role to provide cutting-edge research to help farmers adapt to new environmental and market conditions is also at risk. We believe this reorganization should strengthen, not further undermine, USDA research investments. While the Department as a whole has lost 18% of its staff thus far in 2025, the Agricultural Research Service (ARS) has lost 21%, the National Institute for Food and Agriculture (NIFA) has lost 19%, and the National Agricultural Statistics Service (NASS) has lost an alarming 34%. USDA funded research has helped farmers manage nutrients more effectively for greater net returns and better water quality; restore soil health and long-term fertility; manage pests through more advanced integrated pest management that reduces harm to nontarget organisms and keeps our food supply safer; and improve business management for long term economic viability. Disruptions to USDA research programs will thwart further advances toward these vital goals; any purported savings from the loss of research staffing reductions will be meaningless when considering the costs farmers will carry as a result of the lost expertise and knowledge these agencies provide.

Farmers will also lose if staffing at the Food and Nutrition Service (FNS) is further reduced. There are already pre-existing significant delays in Supplemental Nutrition Assistance (SNAP) vendor application approval for farmers market settings. Further staff reductions prompted by the proposed reorganization will further undermine farmers' ability to access new markets and build economic resilience.

While it is important that USDA can provide services to farmers and stakeholders without overburdening the public, a wholesale reduction in staffing is certain to cause more harm than good. USDA has failed to justify why such massive cuts to the workforce are in the best interest of the population USDA was built to serve, or to explain how they can be done without interrupting critical services to farmers and other stakeholders. The loss of 18,000 employees to date proves otherwise, as farmers and other USDA stakeholders continue to experience delays - and compounding uncertainty - in program delivery, communications, and other key resources.

#### B. Bring USDA Closer to its Customers by Relocating Resources Outside of the National Capital Region (Principle 2)

One of the most significant features of the proposed reorganization is the relocation of the vast majority of National Capital Region staff to five regional hubs. While we agree that ensuring USDA can effectively serve its constituents is of utmost importance, most USDA staff already live and work in the communities they serve. The proposed relocations and consolidations of offices - in addition to the mass loss of staff to date - runs at cross-purposes to this goal. As noted above, we are deeply concerned by the estimated 50-70% of staff expected to decline relocation and the impacts that the loss of expertise and institutional knowledge will have on stakeholders and service delivery. We are also concerned about the proposed closure of several key USDA facilities.

For example, the Secretary's July 24 memorandum includes the Agricultural Research Service (ARS) taking on the administration of services now offered through the Office of Partnerships and Public Engagement (OPPE), vacating the Beltsville Agricultural Research Center "over multiple years to avoid disrupting critical research activities," and elimination of ARS area offices, moving their function to the Office of National Programs. It is difficult to imagine how these changes could possibly enhance USDA research capacity. The Beltsville research center has maintained a Long Term Agricultural Research (LTAR) Network comparing three conventional and three organic farming systems for *sixty years*, during which a tremendous volume of high-quality cutting-edge research has been conducted to improve our understanding of soil health and productivity, nutrient and organic matter dynamics, and optimization of crop production. Phasing out the Beltsville research center would curtail USDA scientists' capacity to build on the legacy of these trials and thereby sacrifice an opportunity to deepen our understanding of the long-term impacts of different farming systems. In addition to the irreparable loss of long-term research sites, Beltsville also houses critical plant genetic resources, likely carrying very significant costs of both transportation and building of the infrastructure required to maintain them. With the added loss of staff anticipated, it is difficult to understand how closing these facilities provides a more effective use of taxpayer funds than simply upgrading and sufficiently staffing current facilities.

#### C. Eliminating Management Layers and Bureaucracy (Principle 3)

We are very concerned about the proposed consolidation and closure of regional offices across the agency, and believe that the loss of many of these locations and consolidation of services will make it harder for farmers and stakeholders to access USDA services and resources, not easier. Our concerns include:

- The five proposed “hubs” and two “core administrative support locations” are not properly distributed and would leave wide swaths of the US unsupported, including many significant agricultural regions. It remains unclear why USDA selected these five locations specifically.
- The proposed reorganization includes downsizing from seven FNS regional offices to the newly named five. Not only will this result in staff loss, it has the potential to increase delays unless there are sufficient staff hired across locations. Staff that are hired in these new locations will need to have great familiarity with diversified direct marketing farming operations to best support them in accepting these benefits, which can often be a significant proportion of farm revenue.
- There are existing efforts underway within the seven FNS regional offices to host training and peer-education opportunities for states operating farmers market nutrition programs. These events have been extremely important to program modernization efforts and allowing for best practices to be shared across state lines leads to responsible use of federal funding. Dropping to five locations has the potential to interrupt these networks.
- Agricultural research is inherently region-specific since climate, soil type, and production system have major impacts on what experimental systems and practices are most likely to yield production, economic, environmental, and health benefits. Therefore, the ARS Area Offices play a vital role in identifying regional priorities and supporting regionally relevant research. For example, crop varieties bred for traits that optimize crop performance in the Northeast may perform poorly in the Southeast or the Great Plains where different traits are needed. The ARS Area Offices can facilitate this important regionalization, a function that one centralized office cannot do as effectively. And asking ARS - now downsized by 21% - to take on the functions of OPPE would only impair the agency further in its efforts to fulfill its research mission.

#### D. Consolidate Support Functions (Principle 4)

We have significant questions and concerns about how the consolidations proposed under Principle 4 will yield better services for farmers and stakeholders. Without more details from the Department about the scale and scope of these consolidations, it is difficult to provide meaningful feedback. However, we note here several concerns, including:

- The proposed reorganization will make the Food Safety Inspection Service’s access to information more difficult if the proposed reorganization centralizes Freedom of Information Act (FOIA), tribal, and other functions.
- The Memo proposes to consolidate grants and financial assistance across the Department. Depending on how this is done, the impacts could be severe for both USDA staff and stakeholders. Indeed, centralization of these functions may in reality add a new bureaucratic and confusing layer for grantees seeking information about their grants, since the centralized grants staff cannot be experts in every single financial assistance or grant program across the Department. Meanwhile, more staff are likely to be needed to manage such a large,

centralized process, and these staff are also likely to still rely on programmatic staff for issue- and program-specific knowledge.

- The Memo proposes to consolidate FOIA functions within the Office of General Counsel, and it is not clear whether this change is significant or minimal in impact. For example, would this change eliminate the positions of existing FOIA officers, resulting in the absorption of FOIA processing responsibilities by the remaining OGC staff? Or is it merely a change in organizational structure? The transparency and information provided by USDA's FOIA officers is invaluable, and it is critical that they retain sufficient staff to process requests throughout this change.
- The Memo also proposes to consolidate all civil rights functions into the Office of the Assistant Secretary for Civil Rights, prompting similar questions. Will staffing be reduced as a result of this move, limiting USDA's ability to respond to civil rights matters promptly and adequately? Will the staffing levels within the Office of the Assistant Secretary for Civil Rights be increased, to ensure there is ample capacity and expertise across the agency to navigate Department-wide civil rights issues? Given USDA's well-documented history of civil rights violations, transparency - especially around civil rights activities - is critical to maintain strong, trusting relationships with farmers from groups who were previously discriminated against. More information about this aspect of the proposed consolidation must be provided to enable stakeholders to provide input and shape the outcome.