Congress of the United States

Washington, DC 20515

August 13, 2025

The Honorable Brooke Rollins Secretary U.S. Department of Agriculture 1400 Independence Avenue, SW Washington, DC 20250

Secretary Rollins,

On July 24th, without notice or input from Congress or key stakeholders and constituencies, you announced a significant reorganization of the U.S. Department of Agriculture (USDA). The lack of consultation and seeming lack of evaluation and analysis prior to issuing this plan demonstrates a concerning failure to learn the lessons from similar efforts undertaken by USDA during the first Trump administration. As Members of the committee with jurisdiction over USDA, we are deeply concerned that the Department's proposal will make it less effective and significantly hinder its ability to provide the customer service and support our farmers and rural communities deserve. Especially given that the Department has reportedly already lost or forced out 21,600, or one-fifth, of it its employees this year – the second-most workforce reductions of all federal agencies.²

That the Administration did not consult with Congress on a planned reorganization of this magnitude prior to its publication is unacceptable. The 30-day comment period announced on August 1st is appreciated and, on its face, could serve as a meaningful opportunity for stakeholder input.³ However, given the Secretary's recent comments that the plan is "95 percent baked," we are very skeptical and deeply concerned that any feedback provided over the next month will not be seriously considered because the fundamental decisions behind this plan are already set in stone.⁴ These concerns are further supported by the fact that the Department has already selected the "hub" cities for the relocation and that the Department cannot or will not provide any analysis or data backing the selection of these sites, allegedly based on the principle of lower cost of living.

On July 25th, USDA staff informed staff from the Agriculture and Appropriations Committees of the House of Representatives and Senate that the Department had no data or analysis backing up the decisions outlined in the July 24th memo to share with members or our staff. This too is unacceptable. To conduct a 30-day engagement period without providing Congress and stakeholders with sufficient information to fully evaluate this reorganization plan is an insult to both and sends the message the comment period is more about optics rather than substance.

Unfortunately, the Department is failing to learn from the mistakes of the first Trump Administration by already falling short of the paltry substandard process set forth when the Administration relocated just two agencies, USDA's Economic Research Service (ERS) and National Institute of Food and Agriculture (NIFA), outside of the Washington, DC area. The ERS/NIFA move process was criticized by Government Accountability Office (GAO) for "minimally involv[ing] employees, Congress, and other key

¹ USDA, Department of Agriculture Reorganization Plan, SM 1078-015, July 24, 2025.

² Partnerships for Public Service, "Federal Harms Tracker: The Cost to Your Government," updated July 21, 2025.

³ USDA, Secretary Rollins Announces USDA Reorganization, Restoring the Department's Core Mission of Supporting American Agriculture, July 24, 2025.

⁴ Politico, "Rollins 'open' to reorg tweaks," August 4, 2025.

stakeholders in relocating the agencies" and not following all "leading practices for effective agency reforms and strategic human capital management." Yet, while far from perfect, it did at least include a dedicated site selection process and analysis with the support of third-party real estate experts based on critical factors like quality of life, personnel and operation costs, workforce availability, and logistics, despite being a smaller reorganization than that now considered.

About 75 percent of employees affected by the ERS/NIFA relocation from Washington, DC to Kansas City, MO declined the move, resulting in a massive brain drain and significant loss of productivity at both agencies. The 2022 study by the GAO evaluating the relocation found that productivity declined at both agencies – ERS produced fewer reports, NIFA took longer to process grants, and employees at both new locations were significantly less experienced than at the prior location. Additionally, employee diversity at the two agencies declined precipitously: the proportion of Black or African American staff at NIFA declined from 47 percent to 19 percent, the percent of Hispanic or Latino employees was cut in half, and the employees identifying as "other races" decreased.⁷

To proceed in this manner while ignoring both the actual results from previous similar relocation/reorganization efforts and the multiple findings and recommendations by GAO regarding such earlier efforts demonstrates such a high level of indifference as to show a complete lack of respect for the hard working men and women of the Department and the Americans who depend on its services, particularly our farmers and ranchers. How can the Department expect different or better results despite doing less preparation and analysis to relocate significantly larger portions of USDA? It causes us to wonder whether the Department knows that the results will be the same and just does not care. Regardless, we find this entire process, or lack thereof, deeply concerning.

If similar results occur as the result of this reorganization plan, the Department will be paralyzed, and it will be the millions of American famers and families that depend on USDA services who pay the price. Given the magnitude of impact changes of this scale could have, we request answers to the following questions no later than August 20, 2025, so as to give the Committee time to adequately respond within the Department's thirty-day engagement window.

General Questions

- The July 24th memo states that it is "effective immediately and will remain in effect until the earlier of the completion of the USDA Reorganization Plan or the revocation of [the] memorandum." However, on July 25th, USDA staff indicated that this document will not be acted upon for 30 days while the Department seeks congressional and employee feedback and, on August 1st, USDA publicly announced a 30-day public comment period ending on August 26th.8
 - o Please confirm the date of effectiveness and timeline for implementation of the memo.
 - O After the 30-day feedback period ends on August 26th, will there be a period where the memo will not be in effect as USDA makes changes to incorporate congressional and USDA employee feedback?

⁵ GAO, Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce, GAO-23-104709, Dec. 14, 2022; GAO, Evidence-Based Policy Making: USDA's Decision to Relocate Research Agencies to Kansas City Was Not Fully Consistent with and Evidence-Based Approach, GAO-22-104540, Apr. 19, 2022.

⁶ Federal Register, A Notice by the Agriculture Department: Notice of Request for Expression of Interest for Potential Sites for Headquarters Office Locations, August 15, 2018; USDA, NIFA and ERS Relocation: Cost Benefit Analysis, June 13, 2019.

⁷ GAO, Agency Relocations; Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce, GAO-23-104709, Dec. 14, 2022;

⁸ USDA, USDA Opens Public Comment Period on Department Reorganization Plan, August 1, 2025.

- What analysis was done within the Department to rate, rank and select the new "hub" locations? Please provide all documentation.
- Why was a Request for Expression of Interest for Potential Sites and subsequent analysis, similar
 to that conducted by USDA and Ernst and Young to select the location for ERS and NIFA, not
 completed prior to the announcement of the "hub locations" for this reorganization?
- Does the Department have any preliminary assessments, calculations or cost-benefit analysis
 regarding the costs of the reorganization, including consideration of any costs associated with
 additional facilities, quality of life, cost of living, land costs, labor force variables, infrastructure,
 commute times, and, where relevant, access to data centers? If not, we strongly urge USDA to
 conduct and provide cost estimates of this proposed reorganization and to provide that information
 to Congress with a minimum of two weeks to evaluate before acting upon the reorganization plan.
- How does the Department's reorganization plan keep "USDA closer to its customers" and maintain access to services within regions of the U.S. which will no longer have USDA regional offices located within the region (e.g. FNS, NASS)?
- What is USDA's planned timeline for undertaking employee engagement and union engagement for each of the agencies impacted by the reorganization and its proposed closures and relocations? Please provide specific timelines for engaging with employees for all agencies, including those with and without stated timelines for relocations and closures. While we understand that each agency's move has a different timetable, if the 30-day period following the announcement and publication of the reordination plan is intended to allow for congressional and USDA employee feedback, employee engagement should be occurring now to determine if adjustments need to be made
- Please provide current staffing numbers for each impacted agency as of the most recent pay period
 as well as details on how many employees within each agency will be required to move under this
 reorganization plan, including both the 2,600 employees moving outside of the DC-area and the
 employees currently located in regional and local offices who will be required to relocate to "hub"
 cities.
- Please provide organizational charts for all agencies and offices impacted by the reorganization, including details on the physical locations of agency offices and the number and type of employees impacted at each location.
- Please provide a full list of agencies and offices that were exempted from this reorganization plan and the rationale for exclusion. Please provide data and analysis to support USDA's reasoning.
- Previous reports indicated that USDA was targeting as many as 30,000 job cuts through its deferred resignation program and its reduction-in-force plan. Given that the July 24th press release announcing this plan stated that "this reorganization is another step of the Department's process of reducing its workforce," is this reorganization intended to directly or indirectly lead to a reduction in the department's overall workforce? If so, is there a specific reduction in the number of USDA employees at that this reorganization is targeting?
- Will any jobs be eliminated as part of the plan to "consolidate support functions"? Please provide a breakdown by agency and role as well as any analysis or data that USDA used to make these determinations.
- If a current employee chooses not to relocate and instead leaves federal service, is it possible that their position will be eliminated or will the Department seek to fill all vacant relocated positions?
- The July 24th memo states that USDA will "consolidate grants and financial assistance" including, "where feasible, the transfer of grant making and administration functions from USDA offices and agencies that currently have limited capacity to perform such duties to other offices and agencies." Please provide details on the specific agencies for which grant making and administration functions will be transferred away from and to which agencies they will be transferred to.

Agency or Office Specific Questions

Assistant Secretary for Administration

- How many positions will be eliminated from the Office of Small and Disadvantaged Business? *Agricultural Research Service (ARS)*
 - USDA has indicated it will move Office of Partnerships and Public Engagement (OPPE) student programs to ARS. Please provide a full list of the student programs impacted. Additionally, please provide a full list of student programs located outside of OPPE and ARS that will not be relocated.
 - How will the elimination of ARS area offices impact regional partnerships with universities, companies and organizations geographically far from the Office of National Programs?

Civil Rights

• The July 24th memo, states that USDA will "consolidate civil rights functions into the Office of the Assistant Secretary for Civil Rights, which will deliver all statutorily required civil rights functions." Will there be a reduction in the overall staff that currently deliver statutory as well as non-statutory civil rights functions?

Food and Nutrition Service (FNS)

- The July 24th memo states that "FNS will reduce its number of regions from seven to five and align locations with the USDA Hubs and Service Centers over a two-year period." How did USDA determine that a two-year period would be sufficient for relocating or closing all 7 regional offices? Please provide any analysis that informed this decision.
- Based on feedback from USDA staff on July 25th, we understand items in the memo without timelines are "open questions," awaiting congressional and employee feedback. How did USDA reach a decision to take more time and gather more input before establishing timelines for some agencies included in the reorganization and not others? Why was this consideration not given for changes to FNS? Please provide any analysis that informed this decision.
- As of the July 25th briefing, USDA staff indicated that, given the lack of overlap between the new "hub locations" and the existing FNS regional offices, all FNS regional office employees will be asked to relocate. Additionally, while the current Mountain Plains Region (CO, KS, MO, MT, NE, ND, SD, WY) would have two regional offices, there would no longer be FNS Regional Offices in 3 of the 7 current regions, impacting the Northeast Region (CT, MA, ME, NH, NH, NY, RI, USVI), Mid-Atlantic Region (DC, DE, MD, NJ, PA, PR, VA, WV), and Western Region (AK, AS, CA, CNMI, GU, HI, ID, NV, OR, WA) under the reorganization plan.
 - o Is this still consistent with USDA's reorganization plans for FNS? If not, please provide the rationale for any changes to the plan.
 - How does USDA plan to ensure that states in the current Northeast, Mid-Atlantic, and Western regions have sufficient access to regional office support?
 - What kind of analysis was done to ensure that relocating all FNS offices and consolidating from 7 to 5 offices, with no representation in 3 regions, could provide sufficient staff and coverage to operate effectively and support all states? Please provide any analysis that informed this decision.
 - Please provide a new FNS regional office map indicating which "hubs" will serve as regional offices for each state.
- How does this reorganization support effective implementation of H.R.1 and the need to provide thorough technical assistance to states and counties as they implement significant changes to SNAP required by this law, including working to reduce their state error rate?

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⁹ USDA FNS, FNS Regional Offices, accessed August 5, 2025.

- o In the hearing held on this reorganization by the Senate Committee on Agriculture on July 30^{th10}, Deputy Secretary Vaden stated that the reorganization would reduce SNAP state error rates, bring more FNS employees "into the field," provide "more people for individuals in Alabama and every other state to reach out to help with technical assistance." As part of the written response to this question, please provide 1) the number of staff located in FNS regional offices on January 20, 2025, 2) the number of staff in FNS regional offices on July 24th, 2025, 3) the number of staff in DC-area and FNS regional offices the plan proposes to relocate, 4) the anticipated loss of FNS staff due to these relocations and 5) the anticipated length of time it will take to hire and train newly hired staff to replace employees who decline to relocate.
- How does conducting this reorganization within 2 years enable FNS to provide TA and support states and counties in implementing the significant changes required by H.R.1, both effective immediately and for those changes phasing in over the next 2-4 years?
- How many FNS staff currently located at the Alexandria, VA location will be asked to relocate to regional hubs? How is USDA determining which staff or functions should be relocated?
- In order to accommodate an influx of FNS staff to the "hubs," will the Department be required to purchase additional facilities or sign additional leases? If so, please provide the anticipated number of additional facilities needed and the anticipated cost.

Forest Service

- The July 24th memo states that the Forest Service "will phase out the nine Regional Offices over the next year and implementation activities will take into consideration the ongoing fire season." How did USDA determine that a 1-year period would be sufficient to phase out all nine Regional Offices? Please provide any analysis that informed this decision.
- Based on feedback from USDA staff on July 25th, we understand items in the memo without timelines are "open questions," awaiting congressional and employee feedback. How did USDA reach a decision to take more time and gather more input before establishing timelines for some agencies included in the reorganization and not others? Why was this consideration not given for changes to the Forest Service? Please provide any analysis that informed this decision.
- How will the Forest Service reassign staff in existing Regional Offices? Will staff be reassigned to the new hub in Fort Collins, CO or the Fire Sciences Lab and Forest Products Lab? Will any employees be redirected to fill existing vacancies in National Forest Ranger Districts? What are the costs associated with moving employees to their new locations?
- Please provide a new organizational chart for the Forest Service. Where will the roles and responsibilities of Regional Foresters and their offices be located moving forward? Will each National Forest Supervisor report directly to the Chief?
- Did the Forest Service consider the value of existing relationships between its stand-alone Research Stations and nearby universities? How will the Agency ensure that ongoing research and collaboration with these universities be continued when the stations are closed?
- In order to accommodate an influx of new staff, will the Research Station in Fort Collins, Colorado be expanded? Will that require the Forest Service to acquire new facilities or sign additional leases? What analysis has been done to assess the impact of consolidating the Research Stations?
- Does the Department intend to move the Forest Service headquarters away from the Yates Building in Washington, DC?

National Agricultural Statistics Service (NASS)

• How will the consolidation of NASS affect regional surveying and direct farmer relationships?

¹⁰ Senate Committee on Agriculture, Nutrition, & Forestry, Full Committee Hearing "Review of the USDA Reorganization Proposal," July 30, 2025.

- The Census of Agriculture data is collected through a combination of surveys through mail, telephone, personal interviews, and field visits. How does consolidating NASS into five hubs instead of the existing regions affect the viability of field visits?
- Previous relocations of REE personnel have resulted in major loss of experienced staff. How many full-time REE employees are expected to be lost in the near- and long-term?
- If employee numbers dramatically decrease in the short term, which reports would NASS have to discontinue?
- What measures is USDA taking to ensure that the reorganization does not decrease the detail and quality of NASS products?

Natural Resources Conservation Service (NRCS)

- Will NRCS be split amongst the five "hub locations" or will it be located in a single "hub?" If that decision has not yet been made, what factors or analysis will it be based upon?
- Who will lead NRCS offices at each hub location? Will State Conservations be expected to report to these individuals as opposed to the Chief?
- How will the Department consider aligning its new regional structure with existing facilities, staff and functions at the Central National Technology Support Center in Ft. Worth, TX and National Soil Survey Center in Lincoln, NE?
- What safeguards is the Department putting in place to ensure that no NRCS services to farmers are interrupted during any consolidation efforts?
- Does the Department consider NRCS sufficiently staffed to meet the growing demand for participation in conservation programs? How will this reorganization impact NRCS service centers throughout the country?

Tribal Relations

• The July 24th memo, states that USDA will "consolidate tribal relations functions within mission areas and ensure the Office of Tribal Relations delivers all statutorily required tribal relations functions." Will there be a reduction in the overall staff that currently deliver statutory as well as non-statutory tribal relations functions?

Given the potential impact of this reorganization plan on nearly every function of USDA, on 2,600 employees in the DC, Maryland, and Virginia areas as well as a significant number of employees across the United States in regional offices, and the millions of American famers and families that depend on USDA services, and the short, 30-day timeline the Department has given Congress for evaluating and providing feedback on this plan, we require answers to the preceding questions no later than August 20, 2025.

Thank you for your consideration,

Angie Craig

Member of Congress

Ranking Member, Committee on

Agriculture

Shontel M. Brown Vice Ranking Member Committee on Agriculture

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