

August 26<sup>th</sup>, 2025

The Honorable Brooke Rollins Secretary, U.S. Department of Agriculture 1400 Independence Avenue, S.W. Washington, D.C. 20250

Subject: NANA Coalition Public Comment in Response to USDA Reorganization Plan

Dear Secretary Rollins,

As undersigned members of the <u>National Alliance for Nutrition and Activity (NANA) coalition</u>, a network of more than 520 local, state, and national organizations dedicated to improving public health and reducing the burden of chronic disease, we urge you to reconsider the reorganization of the United States Department of Agriculture (USDA) outlined in <u>Secretary Memorandum: SM 1078-015</u>.

As discussed in Deputy Secretary Vaden's recent <a href="https://www.neers.com/hearing">hearing</a> before the United States Senate Committee on Agriculture, Nutrition, and Forestry, there are major concerns about how this proposed reorganization will impact the Department of Agriculture's "ability to respond to wildfires, administer critical nutrition programs, protect civil rights and meet the needs of our farmers." In terms of costs and consequences, experience with the 2019 relocation of the National Institute of Food and Agriculture (NIFA) and the Economic Research Service (ERS) gives a clear example of what the nation can expect from this reorganization. The <a href="https://www.com/congressional-neers.com/cong

We, the undersigned organizations, encourage you to immediately halt the reorganization process, and not initiate any further plans until the requested stakeholder feedback is considered. We ask that no further reorganization steps are undertaken until detailed plans are published to ensure farmers are not negatively impacted and American families are not left hungry, underserved and struggling by any proposed changes.

The USDA is at the very heart of this nation's nutrition policy. Dramatic staffing changes proposed by the USDA will have ripple effects on households, communities, schools, states, and American society broadly. This is especially critical given that the Food and Nutrition Service (FNS), which administers our largest nutrition assistance programs, including the Supplemental Nutrition Assistance Program (SNAP), the School Breakfast Program (SBP), the National School Lunch Program (NSLP), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), is a major focus of SM 1078-015. Your memo mandates the rapid closure of

the FNS headquarters in Alexandria, Virginia and the relocation of FNS staff to locations outside of the D.C. metro area. We have four specific concerns with these plans:

- 1. We are deeply troubled by the impact of this reorganization on the millions of people who utilize federal nutrition programs. Continuing instability within the federal workforce is likely to create chaos and confusion for state agencies who administer these programs and will negatively impact children, families, and older adults.
- 2. These changes will result in the loss of valuable civil servants and the consequent loss of expertise. This will impede effective communication with state governments as major administrative and financial changes happen to SNAP as outlined in the One Big Beautiful Bill Act. Building on that specific issue, we are concerned about the elimination of regional offices in the Northeast and West Coast, which will move FNS staff farther away from many of the WIC agencies they support.
- 3. Similarly, state WIC agencies rely on close collaboration with FNS regional and national office staff to support program administration, including management and disbursal of program resources, guidance and technical assistance to implement policy changes, oversight to support program integrity operations, and more. FNS staff must work closely with state agencies to monitor program costs and ensure appropriate allocation of funds across states. This work requires a high degree of skill, experience, and strong relationships with state staff. Staff loss in these key roles can have devastating consequences, leaving FNS without the ability to conduct core functions.
- 4. FNS produces and promotes evidence-based nutrition guidance. The loss of expertise will undermine transparency by impeding operations for a range of critical informational resources such as MyPlate.gov, FoodData Central, and Nutrition Evidence Systematic Review (NESR) and could interfere with the development of science-based dietary guidelines.

The public servants who work for FNS are charged with the critical work of feeding our country, especially our children and families. Now, they are being distracted from doing their jobs due to a relocation requirement which upends their entire lives and impacts their families. Further, these major changes come after over 15,000 USDA employees have "voluntarily elected deferred resignation," leaving even fewer federal employees to complete the work.

A hasty reorganization of USDA is likely to deal a devastating blow to critical programs that are already understaffed, harming American families and farmers. The seventeen undersigned national, state, and local organizations therefore express our deep concerns with the proposed reorganization and request an immediate pause to the proposal. We would welcome an opportunity to meet with you to share these concerns. Thank you for your attention to this matter.

## Sincerely,

Advocates for Better Children's Diets
Academy of Nutrition and Dietetics
American Society for Nutrition
Center for Biological Diversity
Center for Science in the Public Interest
Chef Ann Foundation
Coalition for Healthy School Food
Food Research & Action Center

FoodCorps
Healthy Schools Campaign
Louisiana Food Policy Council
MomsRising
National Association of Nutrition and Aging Services Programs (NANASP)
National Education Association (NEA)
National WIC Association
Partnership for a Healthier America
Pilot Light