



August 25, 2025

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

Secretary Rollins:

On behalf of the Food Research & Action Center (FRAC), we appreciate the opportunity to comment on the United States Department of Agriculture's (USDA) reorganization plan, as outlined in the [memorandum SM 1078-015](#) issued on July 24, 2025.

FRAC is the leading national anti-hunger organization working to eradicate poverty-related hunger and undernutrition in the United States. FRAC improves access to the federal nutrition programs through a range of strategies, including advocacy, technical assistance, and state and national partner coordination.

Tens of millions of Americans participate in the federal nutrition programs that the USDA's Food and Nutrition Service (FNS) is charged with administering. The importance of a knowledgeable, experienced, and well-staffed FNS is critical. State agencies that oversee the Supplemental Nutrition Assistance Program, the Special Supplemental Nutrition Program for Women, Infants, and Children, the National School Lunch Program, the School Breakfast Program, the Child and Adult Care Food Program, the Summer Food Service Program, and the Summer EBT Program rely on the critical technical assistance, support, and information that only knowledgeable and experienced staff can provide to ensure that these programs operate successfully and serve the people Congress designed them to serve.

**We are deeply concerned that this proposed reorganization – which was developed without the input of Congress or relevant stakeholders – is more than a relocation or consolidation but rather the dismantling of a department with critical responsibilities. Combined with recent staffing cuts and funding freezes at USDA, this shift will have a long-lasting, negative impact on the agency's ability to administer the federal nutrition programs in an effective and timely manner, resulting in real consequences for the families who depend on these supports to be food secure.**

Relocating thousands of federal employees from the Washington, D.C., area and consolidating the regional offices will result in an outsized loss of expertise and capacity. **Delays in critical services and gaps in oversight are more likely when experienced staff choose to resign rather than move, and when key offices needed for technical support are closed.**

We know this to be true because similar reorganizations at USDA have proven to be disastrous. In June 2019, USDA announced the relocation of most staff at two of its research agencies from Washington, D.C. to Kansas City. [According to the GAO](#), this move disrupted critical work,

decreased productivity, gutted diversity, and resulted in the exodus of staff with decades of experience. The proposed reorganization will see this happen on a larger scale.

**Additionally, reducing the number of regional offices from seven to five will further increase disruptions to services.** These regional offices often provide the first line of support for state and tribal agencies administering the federal nutrition programs, especially those that are under-resourced and rely heavily on the support for compliance and technical assistance. Consolidating the work of seven regional offices into five will take extensive coordination and restructuring that will likely delay the review and approval of key waivers or program management plans.

The responsibility of USDA to administer programs that provide “[a safety net for millions of Americans who are food-insecure](#)” will be more critical than ever over the next few years as the historic cuts to SNAP roll out. This reorganization threatens that goal. Responsive and responsible policymaking necessitates USDA's presence in Washington, D.C., to coordinate with other agencies, policymakers, and the administration.

**We urge USDA to commit to maintaining or expanding its capacity in administering the federal nutrition programs, not reducing it. We also urge USDA to pause the implementation of this reorganization and facilitate a transparent process that includes consultation with Congress, state agencies, national and local partners, and impacted USDA staff, as well as making all public comments related to the reorganization publicly available.**

Sincerely,

A handwritten signature in cursive script that reads "Crystal FitzSimons".

**Crystal FitzSimons**  
President, Food Research & Action Center