



September 30, 2025

U.S. Department of Agriculture  
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To whom it may concern:

On behalf of the National Family Farm Coalition (NFFC), we write to oppose the U.S. Department of Agriculture's (USDA) proposed reorganization, as promulgated in the memo SM-1078-015. This letter offers comments on the reorganization plans.

NFFC is an alliance of grassroots farmer- and advocate-led groups across 42 states, representing the rights and interests of independent farmers, ranchers, and fishermen. NFFC is based in Washington, D.C., and our 31 state, national, and regional farm and rural organizations are bound by a common belief that communities have the right to determine how their food is grown and harvested; that everyone in the food system should receive fair prices or wages; that all producers have equitable access to credit, land, seeds, water, markets, and other resources; and, that our food and agriculture policy must support sustainable farming, ranching, and fishing practices.

Since our founding in 1986, NFFC has advocated for strengthening and improving programmatic offerings across the USDA, as they offer critical support and resources for farmers. By almost any measure, the services provided by USDA, and particularly Agricultural Cooperative Extension, are the best in the world, and we believe it is important to build on this legacy. As a means of advancing this legacy, we have historically offered long-standing suggestions of how USDA programming can and should be improved, particularly when it comes to providing equal access and service provision to all farmers, regardless of farm size, scale of operation, race, gender, etc. In turn, NFFC opposes current attempts to downsize or privatize these essential public services.

Principle 1 of the reorganization plan states that the parts of this reorganization that reduce the USDA's workforce are in order "[t]o make certain USDA can afford its workforce." While we are heartened by the statement that "USDA is not conducting a large-scale workforce reduction," we are nevertheless concerned that the reduction in staff through deferred resignation to date and the possibility of future reductions in force will have a negative impact on farmer access to

*NFFC's mission is to mobilize family farmers, ranchers, and fishermen to achieve fair prices, vibrant communities, and healthy foods free of corporate domination.*

USDA services. This framing echoes USDA's and the Office of Management and Budget's justification in the fiscal year 2026 budget request, where cuts to agencies including the Farm Service Agency were justified by low staffing, as opposed to using the budget process as an opportunity to request funding that could be used to reduce turnover and incentivize USDA staff performance.

NFFC recognizes the effects that staffing shortages at USDA, and especially the Farm Service Agency (FSA), have long had on access to critical financial products like farm loans, well before the announcement of this reorganization or reductions due to deferred resignation. We echo the concerns of other organizations that highlight how such shortages would affect services at the Natural Resources Conservation Service (NRCS). We urge the USDA to use discretion in employing strategies to reduce USDA staffing levels, whether they are voluntary for staff or via reductions in force as approved by the Deputy Secretary. NFFC also wishes to challenge the idea that "temporary funding" funded increases in USDA's workforce and salaries. While a pandemic prompted Congress to authorize new funding for USDA staff, salaries, and programs, this funding addressed longstanding concerns that were only laid bare by the pandemic and provided long-needed funding for in-demand and oversubscribed programs and services that small farmers have expressed a strong desire to see continue.

Principle 2 of the reorganization plan's focus on relocations is also cause for concern. For starters, of the five hubs included in the plan for relocating staff out of the National Capital Region, none are slated for the Northeast, where several NFFC member organizations and the farmers they represent have a presence and participate in agriculture. At the very least, we would welcome clarity as to why those locations were chosen.

NFFC is also concerned about the effect of relocations on employee retention and the impact these relocations would have on U.S. farmers, ranchers, consumers, and researchers. In 2019, we expressed concern about the USDA's relocation of the Economic Research Service and the National Institute of Food and Agriculture for the disruptions they would pose for ERS's and NIFA's operations and the burden on available funding such moves would pose. Like this reorganization plan, the relocation of ERS and NIFA was done without stakeholder or Congressional input.

In hindsight, NFFC's concerns were confirmed by, among other sources, a 2023 report from the Government Accountability Office, which concluded that "ERS's and NIFA's workforce size and productivity temporarily declined following the agencies' 2019 relocation" and that "[c]oinciding with the loss of staff in fiscal years 2019 and 2020, ERS produced fewer key reports, and NIFA took longer to process grants." Longer term and potentially more concerning effects include the loss of professional experience and institutional knowledge at both agencies. We are concerned that this reorganization plan would repeat the same problems of the 2019

relocations, but at a much more magnified scale and across USDA mission areas, at the expense of farmers and taxpayers alike.

While Principle 3 endeavors to eliminate bureaucracy by reducing or eliminating stand-alone regional offices, NFFC worries that such reductions counter the reorganization plan's stated goal of bring USDA closer to its customers and would mitigate farmer access to USDA programs. The aforementioned relocation of USDA research functions was highly opposed by farmer organizations when it was announced because it undermined staffing levels and the strength and dependability of those services, and Principle 3 risks doubling down on that approach to potentially disastrous effects.

Principle 4 seeks to "reduce duplication and provide consistency" across USDA by consolidating support functions. However, we worry that the effectiveness of some processes that address fairness and transparency within USDA (civil rights, FOIA, etc.) that benefit farmers *because* they exist across USDA agencies would be undermined by efforts to consolidate them. Additionally, agency-specific support functions that are sensitive to regional differences or that rely on specific relationships with the range of producers that the USDA works with mitigate against making the USDA a "one-size-fits-all" department that sidelines the needs of family farmers in favor of large-scale ones.

NFFC has previously advocated for more oversight of the USDA's Office of the Assistant Secretary for Civil Rights, given the USDA's historical pattern of disadvantaging some farmers over others. Without more mechanisms for accountability, we worry that consolidating all civil rights functions to a single Office would delay or deny justice for staff, farmers, and others who have faced or will face discrimination by the USDA, even if this centralization will maintain statutorily required civil rights functions. In a similar vein, the consolidation of Freedom of Information Act activities across the department into the Office of General Counsel threatens to reduce access to transparency by farmers, organizations, and taxpayers, and particularly in instances where specific interests or organizations are affecting USDA decision-making.

In April of this year, NFFC expressed its opposition to USDA's office closures and mass layoffs, among other efforts to shrink the agency's footprint "at a time when demand for its services already exceeds capacity, and many fear we are on the brink of a new farm crisis driven by persistently volatile prices and declining farm income." For similar reasons, we oppose this reorganization plan and urge greater transparency and stakeholder engagement in decision-making around something as consequential as a departmental reorganization. We appreciate the opportunity to comment on the USDA's reorganization and would welcome the chance to discuss our concerns with it more.

Sincerely,  
the National Family Farm Coalition