



August 26, 2025

Secretary Brooke Rollins  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250  
via electronic mail to [reorganization@usda.gov](mailto:reorganization@usda.gov)

Re: Request for Comment on Department of Agriculture Reorganization Plan Secretary  
Memorandum SM 1078-015

Dear Secretary Rollins:

The Alliance to End Hunger and USDA shared goals

The Alliance to End Hunger is a [coalition](#) of over 100 organizations including Fortune 500 corporations, faith-based organizations, universities, nonprofits, and international organizations. Alliance members share the conviction that ending hunger is both essential and possible. We share in the USDA mission of “ending hunger<sup>1</sup>.” AEH is focused on promoting policies to alleviate hunger, address malnutrition needs, and solve the root causes of hunger at home and abroad. We believe that it takes the combined effort of all sectors to end hunger including the public sector in which the U.S. Department of Agriculture, particularly the Food and Nutrition Service (FNS), plays a crucial role.

We respect the Secretary’s desire to achieve the vision of USDA, what President Lincoln called the “People’s Department.” The primary reason that agriculture is so important to this nation and around the world is that farmers and ranchers produce food for people to eat, on average three times a day every day of every year. Stakeholders in getting food from fields to our plates include the retail businesses that sell food and make it possible for people to participate in the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Program for Women, Infants, and Children (WIC), participants in those programs, and all of us who eat. We have worked with various USDA administrations throughout the Alliance’s existence USDA has provided leadership on food and nutrition, and we have appreciated opportunities to provide feedback and input through program participation and changes.

Alliance to End Hunger Concerns with USDA Reorganization

We are responding to the request for comments based on information available in the July 24, 2025 Secretary [Memorandum](#): SM 1078-015 and in comments made by Deputy Secretary Vaden at the [hearing](#) before the United States Senate Committee on Agriculture, Nutrition, and Forestry on July 30, 2025.

The Alliance is concerned that the drastic reshaping of USDA has been announced with few details, a lack of consultation with members and committees of Congress, and a lack of input from stakeholders.

FNS leads “16 nutrition assistance programs [which] touch the lives of one in four Americans each year, from infants to the elderly. Taken together, these programs comprise America's nutrition safety net, ensuring that no eligible American goes hungry.”<sup>2</sup> With programs touching so many lives, it is of top concern that at least 498 staff members<sup>3</sup>, or approximately one-third of staff, have left FNS since January 2025. The relocation of two USDA agencies during the first Trump administration led to about 50% of staff leaving the agencies<sup>4</sup>, and it is predicted that a similar rate of attrition may be expected from this move. The plan to close Braddock Place, the FNS headquarters, and reduce FNS regions from seven to five and to align locations with the five USDA Hubs and Service Centers is likely to result in the departure of more FNS staff. We request that the USDA provide the rationale and evaluations used to develop the reorganization plan. All stakeholders need to know how the plan to keep “USDA closer to its customers” through the establishment of the hubs will maintain access to services within regions of the U.S. which will no longer have USDA regional offices located within the region.

Drastic staff reductions are coinciding with increased demand for federal guidance and technical assistance required to implement and improve programs in place and recently mandated through Congress. Changes mandated through the passage of H.R. 1 will require states to cover a portion of SNAP food benefits for the first time in the history of the program. We request information on how agency reorganization plans support state agencies in their efforts to reduce error rates, contribute more toward administrative costs, and make participant eligibility changes.


We are also concerned that the reorganization plans together with the drastic staff reductions will exacerbate current challenges that interrupt the smooth functioning and delivery of benefits to WIC participants. WIC state agencies are already experiencing challenges receiving timely and adequate federal funds, along with guidance and technical assistance to implement key policies.

Further, the Alliance is concerned that the reorganization plans together with the drastic staff reductions will put at risk the review, oversight, and approval of technology-related projects for both SNAP and WIC Electronic Benefit Transfer (EBT) systems. The Alliance has been convening partners in retail online food sales to provide feedback and suggestions for improving the SNAP Online Purchasing initiative, which was first launched in 2019 under the first Trump Administration. SNAP online purchasing has provided a critical option for working families, especially in rural communities, who may not live near a grocery store.

The Alliance to End Hunger urges USDA to pause implementation of the proposed reorganization to allow for full planning in consultation with Congress, staff, state agencies, and all stakeholders; reconsider the placement of regional offices; consider and respond to the various questions and concerns that have been brought forward by stakeholders; and work to maintain institutional knowledge and subject matter expertise across all levels of federal food and nutrition program administration.

The Alliance to End Hunger would welcome the opportunity to deepen our partnership with USDA to improve food security and end hunger through your continued administration of 16 major food and nutrition programs.

Sincerely,



Eric P. Mitchell, President  
Alliance to End Hunger

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<sup>1</sup> [Mission Areas | Home](#)

<sup>2</sup> <https://www.fns.usda.gov/>

<sup>3</sup> “More than 15,000 USDA employees take Trump’s offer to resign,” | [Politico](#)

<sup>4</sup> [GAO-23-104709, AGENCY RELOCATIONS: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce](#)