

August 25, 2025

Secretary Brooke Rollins
Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

RE: USDA Reorganization Plan (SM 1078-015)

Dear Secretary Rollins,

Thank you for the opportunity to provide feedback and insight on the U.S. Department of Agriculture (USDA) Reorganization Plan. We appreciate USDA for seeking out the perspectives of all those who would be impacted by the potential reorganization.

The National CACFP Association (NCA) is a national platform for the Child and Adult Care Food Program (CACFP) and our community of CACFP and SFSP stakeholders includes sponsoring agencies, child care centers, family home providers, schools and afterschool programs, Head Start, tribal nations and State agencies.

NCA would like to provide comments on USDA's reduction in force in the National Capital Region (NCR), as well as the relocation and reduction in the number of Food and Nutrition Service (FNS) regions from seven to five.

Principle 2: Bring USDA Closer to Its Customers by Relocating Resources Outside of the National Capital Region

To ensure USDA is located closer to the people it serves while achieving savings to the American taxpayer, USDA will relocate much of its Agency headquarters and NCR staff from the Washington, D.C. area to five hub locations. At the conclusion of implementation, it is USDA's goal to retain no more than 2,000 employees within the NCR.

NCA appreciates USDA's goal to bring USDA closer to the people they serve and create more opportunity for Child Nutrition Program operators to communicate directly with USDA. However, NCA is concerned that USDA will not be able to maintain the same level of staffing and support through the reorganization process. By relocating over half of USDA's NCR staff (65%), there will also be a high risk of attrition among long-time FNS employees with critical institutional knowledge and programmatic expertise. It is crucial that FNS maintain current staffing levels in order to ensure key functions of FNS go uninterrupted, such as USDA rulemaking, guidance and resource creation, and timely technical assistance.

The Secretary's memorandum states that the department has already lost over 15,364 employees through the deferred resignation process. This significant loss of staff is already placing a strain on existing USDA employees which has resulted in a delay in responses to State agencies and Child Nutrition Program operators. Any further reduction in staff, as a result of relocation, could be harmful to the integrity of Child Nutrition Programs.

In 2019, USDA relocated the Economic Research Service (ERS) and the National Institute of Food and Agriculture (NIFA) from the NCR to Kansas City, Missouri. A report from the United States Government Accountability Office (GAO) describes how this relocation affected ERS and NIFA human resources and productivity. The report states that, “the agencies lost over half of their staff, with vacancies in key positions,” following their relocation. GOA also reported that the decline in managerial roles impacted the agencies’ ability to make hiring decisions. In addition, GAO outlines how the relocation of the agencies resulted in a loss of experienced staff, creating a shift in institutional knowledge. Prior to relocation, GAO estimates that 84% of ERS staff and 82% of NIFA staff had been permanently employed for more than 2 years, however after relocation only 34% of ERS and 21% of NIFA had been employed for more than 2 years. As a result, the vast majority of staff were new to the agencies, which likely caused a lag in historical and programmatic knowledge within the agencies.

The GAO also reported that after two years, the “agencies’ workforce size and productivity had largely recovered.” However, from NCA’s experience, it takes two years for a person to learn all of the intricacies and truly understand the CACFP. Therefore, if this relocation results in a two year lag in hiring, followed by two years of training for staff to be fully versed in Child Nutrition Programs, FNS will be lacking a comprehensive staff with programmatic knowledge for up to four years.

The relocation of ERS and NIFA in 2019 is a clear case study that can be a map for what will potentially happen should USDA move forward with its Agency-wide relocation plan. USDA cannot risk the potential loss of half its staff, subsequent lag in hiring, and major loss of institutional and programmatic knowledge. This could have negative effects on the successful operation of Child Nutrition Programs.

Principle 3: Eliminating Management Layers and Bureaucracy

The Food and Nutrition Service 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.

FNS Regional Offices (FNSRO) are key to the success of Child Nutrition Programs, by working directly with States in their region to provide technical assistance and support and communicating with the USDA national office to enforce and provide guidance on federal program requirements. FNSROs are also responsible for approving State requests to add State-level regulations and flexibilities, as well as ensuring that States do not create overly burdensome administrative requirements for Child Nutrition Programs.

By reducing FNS regions from seven to five, each FNSRO will be responsible for the oversight of a larger number of States. As regions are redrawn, there will likely be a significant lag in communication between FNSROs and State agencies as staff are reallocated, leadership structures are recreated, new communication channels are set up and points of contact are redetermined. This relocation also poses the threat of further attrition of FNSRO staff which will result in a larger workload on remaining staff members – limiting their availability to provide timely responses and technical assistance to State agencies.

The suggested hub locations for the five regional offices are also of concern. Only one of the five hubs is in a State where a current FNSRO is located, meaning that nearly all FNSRO staff will have to relocate to a different State. Relocation of such magnitude will be costly and time-consuming and could result in further delays in communication between FNSROs and State agencies. There will also likely be a reduction in FNSRO workforce as staff choose not to uproot their families. This attrition will result in a loss of institutional knowledge and expertise. The process for replacing these staff could also take a long time, leaving key rolls empty and putting Child Nutrition Program integrity at risk.

In addition, the five hub locations are not sufficiently distributed across the United States. Multiple of the current USDA regions will no longer have an office in their area. For instance, there will be no hubs in the current Northeast, Mid-Atlantic, or Western regions – which represent 13%, 10%, and 19% of CACFP operators respectively. On the other hand, there will be two hubs in the current Mountain Plains Region (representing 7% of CACFP operators), and one in each of the Southeast, Midwest Region, and Southwest Regions. The States selected for the regional hubs are not States with the highest number of CACFP operators: North Carolina ranks 12th, Indiana 19th, Missouri 24th, Colorado 30th, and Utah ranks 31st (see Appendix A). If USDA is true to its goal of “ensuring USDA is located closer to the people it serves,” then these hub locations do not achieve this goal in regard to Child Nutrition Programs which are more dispersed throughout the country.

NCA is fully committed to supporting the USDA and the Child Nutrition Program Community and appreciates the opportunity for this important dialogue to uphold the integrity and effectiveness of Child Nutrition Programs.

Sincerely,



Lisa Mack
President and CEO
National CACFP Association

Appendix A: Fiscal Year 2024 CACFP Total Outlets

	State/Territory	Total CACFP Outlets
1	California	19,957
2	New York	10,764
3	Texas	10,344
4	Illinois	6,513
5	Florida	6,462
6	Louisiana	5,819
7	Minnesota	4,499
8	Massachusetts	4,227
9	Michigan	3,912
10	Pennsylvania	3,798
11	Ohio	3,122
12	North Carolina	3,052
13	Georgia	3,015
14	Virginia	2,591
15	Arizona	2,588
16	Maryland	2,583
17	Kansas	2,426
18	Washington	2,195
19	Indiana	2,154
20	Tennessee	2,134
21	Oklahoma	2,092
22	New Mexico	1,800
23	Wisconsin	1,784
24	Missouri	1,783
25	New Jersey	1,726
26	Oregon	1,717
27	Nebraska	1,675
28	Iowa	1,672
29	Kentucky	1,496
30	Colorado	1,437
31	Utah	1,366
32	Arkansas	1,251
33	Alabama	1,227
34	Connecticut	1,143
35	Mississippi	1,077
36	South Carolina	1,060
37	West Virginia	941
38	Puerto Rico	829
39	North Dakota	798
40	Delaware	619
41	Maine	544
42	Montana	527
43	Nevada	497
44	South Dakota	437
45	Vermont	364
46	Hawaii	324
47	Rhode Island	306

	State/Territory	Total CACFP Outlets
48	Alaska	294
49	Wyoming	285
50	District of Columbia	278
51	Idaho	254
52	New Hampshire	190
53	Guam	23
54	Virgin Islands	19