

August 28, 2025

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

RE: UnidosUS's Comment on USDA Department Reorganization Plan, Secretary Memorandum SM 1078-015¹

Submitted electronically via email at reorganization@usda.gov.

Dear Secretary Rollins,

UnidosUS is writing to you today in opposition to the U.S. Department of Agriculture (USDA)'s proposed reorganization plan released on July 24, 2025.

UnidosUS, previously known as NCLR (National Council of La Raza), is the nation's largest Hispanic² civil rights and advocacy organization. Through its unique combination of expert research, advocacy, programs, and an Affiliate Network of more than 300 community-based organizations across the United States and Puerto Rico, UnidosUS simultaneously challenges social, economic, and political barriers facing Latinos at the national and local levels.

We believe the USDA's reorganization plan would jeopardize the vital basic needs programs that on which so many families rely, especially in the Latino community.

In 2023, nearly **22% of Hispanic households** did not have enough food to eat.³ This stark reality underscores why programs like the Supplemental Nutrition Assistance Program (SNAP) and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) are so critical. Because so many Latinos work in low-wage jobs that pay too little to support a family, they are particularly likely to need and qualify for assistance. Hispanics thus comprise a large portion of participants in these programs—**1 in 6 SNAP participants⁴** and **more than 43% of WIC beneficiaries.⁵**

The USDA's proposal to relocate more than 2,500 employees to regional hubs⁶ threatens to dismantle the fundamental system designed to help food-insecure individuals and families. The plan would further hamper the Department's operations and ability to effectively administer vital programs critical for the well-being of Americans. The recent massive layoffs, hiring freezes, and deferred resignation program have contributed to more than 15,000 employees leaving the Department,⁷ including nearly one quarter of all employees in the USDA's Food and Nutrition Service (FNS). FNS is responsible for administering USDA's more than 16 federal food and nutrition assistance programs that reach

1 in 4 Americans over the course of a year,⁸ including millions of Latino families. This plan would lead to a significant loss of experienced staff—the experts who are needed to provide essential, timely support to state agencies, Congressional leaders, retailers, rural healthcare organizations, and community partners. This echoes the failed 2019 relocation of the Economic Research Service (ERS) and National Institute on Food and Agriculture (NIFA), which was costly and disruptive. According to a 2022 Government Accountability Office (GAO) report,⁹ the move by ERS and NIFA to Kansas City, MO, resulted in a significant loss of experienced staff, with more than half of employees choosing to resign rather than relocate. This led to a loss of institutional knowledge, a failure to produce key reports, and harmful delays in processing grants. Similar results, but on a much larger scale, are likely to follow from this new reorganization.

This plan would also create dangerous gaps in communication and oversight, hindering the USDA's ability to respond to emergencies and ensure program integrity.

The massive restructuring and relocation of USDA staff would create disruptions in communication between local, state, and federal agency staff responsible for tracking and monitoring program and policy implementation. For example, leadership at FNS may be unable to learn in real time from regional staff about system delays in emergency SNAP benefit issuance to inform a targeted response.

The reduction and relocation of regional staff and offices overseeing state and local agency operations and emergencies would also increase the risk of states' failure to comply with federal law, to reduce payment error rates, and to meet quality control measures. These problems would be especially significant right now, given the forthcoming implementation of SNAP-related provisions under H.R. 1.¹⁰ The reorganization plan runs counter to achieving its intended purpose of “improved effectiveness and accountability, enhanced services, reduced bureaucracy and cost savings for the American people”¹¹ It would result in more severe cuts to the federal workforce responsible for monitoring waste, fraud, and abuse in government programs.¹² The plan would also limit the capacity of the Department to review and approve SNAP Electronic Benefit Transfer (EBT) systems. The plan's approach in consolidating the Department's civil rights functions could also result in delays in responding to civil rights violations among program participants.

The USDA's proposal, along with recent Congressional actions to slash SNAP, will further weaken the Department's capacity to ensure that programs operate efficiently and reach all eligible Americans, including Hispanic children and families. Without meaningful input and consultation from key stakeholders, staff, and Congressional leaders, USDA's reorganization plan was announced less than a month following the passage of H.R. 1's historic cuts to federal food and nutrition basic needs programs. These concurrent changes will impact state budgets and agency operations and trigger tens of thousands of additional employee separations and office closures. The plan carries serious implications for the federal, state and local workforce responsible for developing and executing guidance on new provisions that will require federal and state agency staff training and funding. State agencies will also be responsible for implementing major policy changes, such as expanded

work requirements related to both SNAP and Medicaid, at the same time the federal workforce is being slashed and state and local governments work on navigating budget challenges as a result of H.R.1.¹³ Nearly 14 million children are dually enrolled in Medicaid and SNAP; this means that any change to USDA, SNAP, and Medicaid will severely impact the health and well-being of millions of American children, with a disproportionate impact on Latino children.¹⁴ The planned reorganization also puts at risk FNS's ability to review and approve SNAP authorized retailers in a timely manner, a result that may limit the availability of grocery stores that accept SNAP benefits in Latino communities.

Instead of bringing the USDA "closer to its customers," the restructuring of USDA will push community partners and stakeholders away. Under this plan, all eight FNS offices would close, with employees moving to new office locations, including a new national headquarters and five new regional offices. The proposed closure and restructuring of USDA regional and field offices would make it more difficult for stakeholders, including state agencies, Governors, state policymakers, retailers, farmers, and community organizations, to engage directly with USDA experts and staff. Non-governmental partners are crucial messengers for federal food and nutrition assistance programs and can relay information from the ground to inform policy development and implementation.

The USDA's reorganization plan raises serious questions about the Trump Administration's supposed commitment to program integrity. The proposed reorganization would gut federal offices and lead to the firing of experienced personnel critical both to preventing waste, fraud and abuse and to making sure millions of eligible Americans, including members of the Hispanic community, have full and equal access to food and nutrition assistance programs. The unprecedented loss of institutional knowledge in a time of significant policy and program change would result in application and issuance delays among SNAP participants, including eligible Latino families, as well as greater difficulty securing program integrity. In addition, the Trump Administration's recent actions to share SNAP participation data with the Department of Homeland Security (DHS) on top of the Department's restructuring, will contribute to massive confusion, misinformation, and a chilling effect among Latino families eligible for SNAP and other basic needs assistance.¹⁵

By causing incorrect denials of benefits to eligible people as well as incorrect grants of benefits for which people are not eligible, the proposed restructuring will create multifaceted damage to program integrity. Such integrity suffers when eligible people are prevented from receiving assistance for which they qualify, not just when ineligible people receive assistance. Each result involves erroneous eligibility outcomes, errors that will substantially increase, in both directions, as a direct result of the proposed reorganization.

The Latino community is facing unprecedented challenges, and this reorganization would only exacerbate them. The resulting confusion and potential for application delays will make it harder for eligible families to get the help they need. We urge USDA to reverse course. **We ask you to halt this plan and commit to a more collaborative, transparent**

process that prioritizes the needs of millions of Americans, including Hispanic families, who depend on USDA programs. UnidosUS urges the USDA to conduct a thorough, thoughtful analysis with meaningful input from external stakeholders. It is critical that USDA leadership have a strong understanding of the proposal's serious implications for food and nutrition program access within the Latino community and then to take all the action required to prevent major system disruptions and communications gaps. We also call on the USDA to hold meaningful, consistent stakeholder engagement to hear from community partners directly affected by the reorganization. We urge USDA to commit to maintaining and expanding its capacity to effectively administer federal nutrition programs, rather than, via the proposed restructuring, reduce its capacity to achieve key program goals.

Sincerely,

Carmen Feliciano
Vice-President for Policy and Advocacy, UnidosUS

¹ <https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf>

² The terms "Hispanic" and "Latino" are used interchangeably by the U.S. Census Bureau and throughout this document to refer to persons of Mexican, Puerto Rican, Cuban, Central and South American, Dominican, Spanish, and other Hispanic descent; they may be of any race.

³ <https://ers.usda.gov/sites/default/files/laserfiche/publications/109896/ERR-337.pdf?v=98227>

⁴ <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-FY23-Characteristics-Report.pdf>

⁵ <https://fns-prod.azureedge.us/sites/default/files/resource-files/wic-ppc-2022-summary.pdf>

⁶ <https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf>

⁷ <https://www.reuters.com/world/us/more-than-15000-usda-employees-have-taken-trump-financial-incentive-leave-2025-05-04/>

⁸ <https://www.fns.usda.gov/about-fns>

⁹ <https://www.gao.gov/products/gao-23-104709>

¹⁰ <https://www.congress.gov/crs-product/R48552>

¹¹ <https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf>

¹² <https://www.whitehouse.gov/fact-sheets/2025/02/fact-sheet-president-donald-j-trump-reins-in-government-waste/>

¹³ <https://governoroffice.colorado.gov/governor/news/governor-polis-calls-special-session-address-budget-hole-created-federal-bill>

¹⁴ https://unidosus.org/wp-content/uploads/2025/05/unidosus_childrenunderattack-1.pdf

¹⁵ <https://oag.ca.gov/news/press-releases/attorney-general-bonta-sues-trump-administration-over-illegal-demands-states>