



August 26, 2025

The Honorable Secretary Brooke L. Rollins
United States Department of Agriculture
1400 Independence Ave, S.W.
Washington, D.C. 20250

Secretary Rollins,

My name is Gordon Merrick, and I am the Policy Program Director for the Organic Farming Research Foundation (OFRF), a national nonprofit organization dedicated to advancing research, education, and technical support that directly serves organic, transitioning-to-organic, and organic-curious farmers. Our work connects researchers, Extension staff, Technical Service Providers, and farmers with USDA programs and resources to improve environmental stewardship, farm viability, and building agricultural resilience to both environmental and economic disruptions.

OFRF is deeply concerned about the proposed reorganization plan for the USDA announced in a July 25th [memorandum](#). This plan was developed without input from Congress or impacted agricultural communities and, in combination with recent staffing cuts and funding delays, threatens the capacity of the USDA to fulfill its core research and technical service missions. This restructuring would disrupt the agency's ability to support producers at a time when American agriculture urgently needs increased investment in public research, conservation delivery, and farmer-focused technical assistance – not less.

The proposed consolidation and relocation of staff and functions across the Department would create serious and cascading disruptions for agricultural research, extension, and technical assistance nationwide.

In particular, this plan would harm producers by:

- **Eroding scientific and institutional capacity at the USDA.**

The Research, Education, and Economics (REE) mission area has already experienced significant staffing losses over the past seven months. These losses compound the long-term effects of the 2018 relocation of the National Institute of Food and Agriculture (NIFA) and Economic Research Service (ERS). That relocation resulted in the loss of over 60% of ERS staff and nearly 75% of NIFA employees, including senior scientists, grant officers, and national program leaders, many of whom chose not to relocate to Kansas City.¹

¹ U.S. Government Accountability Office. *Agricultural Research: Information on Employment at USDA's Research Agencies*. GAO-22-104560, March 2022.

Despite continued efforts to rebuild, both agencies have struggled to return to pre-relocation staffing levels and program efficiency.² At NIFA, staff attrition and inexperience have led to recurring delays in the administration of competitive grant programs like the Organic Research and Extension Initiative (OREI) and the Organic Transitions Program (ORG). These delays disrupt academic research timelines, jeopardize collaborative research projects, and undermine trust among grantees and other interested communities.³ The departure of experienced civil servants not only created operational bottlenecks, but also led to a permanent loss of institutional memory that has yet to be recovered. Repeating this top-down restructuring approach now risks deepening the long-term institutional harm already incurred and would directly undercut USDA's capacity to conduct and administer farmer-driven, climate-resilient research.

- **Compromising research administration and funding delivery.**

Ongoing delays in the release of Requests for Applications (RFAs) for NIFA-administered programs, particularly those mandated by Congress, like the Organic Agriculture Research and Extension Initiative (OREI), have created uncertainty for researchers and producers alike. In recent years, RFAs have been released months behind schedule, and the timeline between RFA release and proposal deadline has fluctuated drastically, from 37 to 91 days, creating an unpredictable and inaccessible process for institutions with limited administrative support. With increased staff workloads and fewer experienced program officers available, the integrity and efficiency of competitive grantmaking would be further compromised.⁴

- **Worsening service delays at NRCS.**

NRCS field offices have faced chronic staffing shortages for years, resulting in delayed conservation planning, slower contract execution, and longer wait times for producers and landowners to receive basic technical assistance. This reorganization threatens to further reduce field staff capacity at a time when demand for conservation programs is increasing due to the Inflation Reduction Act and other investments. The loss of locally grounded expertise would reduce NRCS's ability to deliver on its "farmers first" promise and hinder the implementation of regionally adapted conservation practices.

- **Threatening USDA's public-interest science mission.**

USDA's Agricultural Research Service (ARS) oversees many of the nation's most important long-term public research trials and maintains irreplaceable collections of germplasm critical for food security. The closure of research sites, such as the Beltsville Agricultural Research Center, or the loss of experienced scientific personnel,

² *Id.*

³ USDA Office of Inspector General. *Audit Report: National Institute of Food and Agriculture – Management and Oversight of Competitive Grant Programs*, Report No. 91099-0001-41, September 2021.

⁴ *Id.*



would undermine the agency's capacity to conduct long-horizon, climate-adaptive, and ecologically-based agricultural research. In addition, without transparency around how reassignments are being made and which programs or sites are affected, there is growing concern about the politicization of scientific research agendas within USDA.⁵

- **Reducing accessibility and responsiveness to the public.**

OFRF and our partners routinely assist producers in navigating USDA programs—from conservation assistance and research collaboration to grant applications. Staff reductions and reassignment have already limited USDA's ability to respond to basic program inquiries, resolve system errors, and guide applicants through complex application processes. Centralizing services or removing regional access points without clear rationale or community input will further erode USDA's ability to serve producers in rural areas.

We urge USDA to halt this reorganization effort and prioritize a transparent, notice-and-comment process that genuinely strengthens the Department's ability to serve farmers, researchers, and the rural communities that host both of them.

At a minimum, any structural changes should be subject to:

- 1) A **comprehensive cost-benefit analysis** that includes projected service disruptions, long-term impacts to research continuity, and risks to mission delivery;
- 2) A **publicly available justification report** outlining how the proposed changes will improve USDA's core services and avoid impairing its statutory functions; and
- 3) A **formal notice-and-comment process**, including regional listening sessions with agricultural communities and the public.

The future of American agriculture depends on a robust and well-supported USDA. This current Reorganization Plan jeopardizes that future.

Sincerely,

Gordon N. Merrick, J.D., Policy Program Director
Organic Farming Research Foundation

⁵ American Federation of Government Employees (AFGE). *Relocation of ERS and NIFA Hurts Public Science*, Congressional testimony, 2019; AFGE Union letter to Secretary Vilsack, April 2023.