



August 26, 2025

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The Honorable Brook L. Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Submitted via email to reorganization@usda.gov.

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

Dear Secretary Rollins:

The American Federation of State, County & Municipal Employees (AFSCME) and the American Federation of Government Employees (AFGE) are pleased to respond to the U.S. Department of Agriculture (USDA) request for comments on the USDA Reorganization Plan. As AFL-CIO affiliate unions representing thousands of USDA workers, we strongly oppose the reorganization plan and urge the administration not to relocate units and their staff, especially those units and their workforces described below whose presence at USDA headquarters is already maximally effective and efficient. If the department continues with a reorganization, we urge USDA to immediately halt the plan and reassess any reorganization only after completing a transparent process that includes consultation with Congress, state agencies, national and local partners, the USDA workforce (including AFSCME and AFGE) and the communities they serve. Ultimately, the law requires that reorganization of the USDA receive affirmative congressional authorization, and, in the absence of such authorization, the reorganization should not move forward. But to the extent the USDA is determined to proceed in the absence of congressional authorization, it should consider the specific concerns expressed below.

AFSCME members provide the vital services that make America happen. With 1.4 million members in communities across the nation, serving in hundreds of different occupations — from nurses to corrections officers, child care providers to sanitation

workers — AFSCME advocates for fairness in the workplace, excellence in public services and freedom and opportunity for all working families. AFGE represents more than 800,000 federal and District of Columbia employees who work in almost every federal agency and every function of government. Combined, AFSCME and AFGE represent thousands of public servants who work every day on behalf of the American people as employees of USDA.

The work of USDA employees is essential for ensuring that American farmers, ranchers, foresters and others in the agriculture industry have access to the resources and programs they require; helping rural communities improve access to broadband; providing states and localities with the additional resources needed to fight wildfires and maintain forestland; maintaining a safe food supply; and administering essential nutrition programs to seniors, families, disabled Americans, veterans, students and young children in child care programs. Coordination among well-staffed D.C.-based headquarters office and field staff is crucial for advancing the agency’s mission effectively and efficiently. This sudden reorganization plan imperils these vital services by threatening to upend the lives of thousands of workers who make them possible — which will result in the loss of extraordinary experience and expertise due to high anticipated rates of attrition — and also by eviscerating essential connections between USDA political appointees at D.C. headquarters and agency staff at field offices around the country.

Overall, USDA’s reorganization plan does not appear to be based on a well-reasoned and substantiated analysis. For example, to justify the reorganization and resulting staff cuts, USDA has suggested that the agency’s workforce and salary growth, of 8% and 14%, respectively, over the last four years was excessive — but this growth lags behind that of the private sector over the same period. From January 2021 to January 2025, private sector jobs grew 11.83% and average hourly earnings in the sector grew 19.75%.¹ Furthermore, the memo states that more than 15,000 USDA employees have “voluntarily elected deferred resignation” as a result of prior steps this year in “the Department’s process of reducing its workforce.” And the memo contemplates relocating about 2,600 positions. Yet the memo argues, “USDA is not conducting a large-scale workforce reduction” through this reorganization. That is not true. In light of USDA’s relatively smaller workforce and wage growth over the long term compared with the private sector, its 15% workforce reduction as a result of department initiatives already undertaken this year, and anticipated attrition of staff who do not accept a geographic reassignment, any rational analysis of the plan would conclude that it is a large-scale gutting of the department.

USDA’s assumptions about the attrition that will result from the mass relocation of positions are unrealistic and irrational. In commenting on the expected attrition during testimony before the U.S. Senate Committee on Agriculture, Nutrition and Forestry, USDA Deputy Secretary Stephen Vaden stated that he thought “a significant percent more than a majority [of affected

¹ AFSCME analysis of U.S. Bureau of Labor Statistics data retrieved Aug. 20, 2025, at <https://data.bls.gov/multi-screen?survey=ce>.

USDA employees] will come” when their positions are relocated outside the NCR.² This is contradicted by USDA’s actual recent experience with relocating the Economic Research Service (ERS) and the National Institute of Food and Agriculture (NIFA) in 2019, which is discussed in more detail below. Internally, USDA itself assumed an attrition rate of 65% to 75% if ERS were to move outside the NCR — far more than what Deputy Secretary Vaden stated in his testimony — and indeed those forced position relocations resulted in both ERS and NIFA losing more than half its staff. This upheaval came with a significant, harmful loss of staff experience and, as a result, of research critical to the nation’s agricultural industry.³

The memo is also wrong in arguing that the plan will save money. The administration argues that it will achieve cost savings by relocating staff from the National Capital Region (NCR) to five hub locations in North Carolina, Missouri, Indiana, Colorado and Utah. As the U.S. continues to experience record high vacancy rates of office buildings,⁴ the memo fails to show how it is going to ensure that it can achieve this savings by selling federal NCR buildings in this high-vacancy area — and use that savings to add space in other geographic areas that are also experiencing high vacancy rates.

The relocation and reorganization plan threatens the effectiveness of USDA programs benefiting farmers, ranchers and foresters.

AFSCME members in the NCR are already positioned in the ideal location to maximize the effectiveness and efficiency of their job duties. It is critical that the agency not relocate their positions so that they can continue to serve the American people efficiently and effectively. It is also crucial for the agency to confirm which employees will remain in the NCR as soon as possible to reduce uncertainty over their future job locations. Such uncertainty could lead to unnecessary and harmful attrition for the agency as workers justifiably look for stability for their families by exploring alternate employment outside the agency.

AFSCME members employed in the Foreign Agricultural Service (FAS) help advance the administration’s policies to expand U.S. agricultural and international markets for the benefit of American farmers, ranchers and producers. There is no reason for FAS workers based in the U.S. to work outside of the NCR, where they can more easily coordinate with other federal agencies

² “USDA says reorg disfavors layoffs, predicts most employees will accept relocations: A significant percent more than a majority will come” to new locations, Agriculture Department official says,” Government Executive, July 30, 2025, <https://www.govexec.com/workforce/2025/07/usda-says-reorg-disfavors-layoffs-predicts-most-employees-will-accept-relocations/407100/>.

³ “Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce,” Government Accountability Office, December 2022, Publicly Released January 13, 2023, <https://www.gao.gov/assets/gao-23-104709.pdf>.

⁴ “A new working order: Reimagining offices in a hybrid world: US vacancy rate of office buildings sits at a historic high four years after COVID-19 upended the industry,” Moody’s, Sept. 10, 2024, <https://www.moody.com/web/en/us/insights/data-stories/us-commercial-real-estate-vacancies-downtown-vs-suburbs.html>.

whose work, like that of FAS, focuses on international relations and continue to collaborate with FAS staff stationed in more than 80 U.S. embassies around the world. Moving FAS employees out of the NCR “to be closer to the people it serves” would directly harm U.S. farmers by moving these employees away from the actual locus of their core work. This is especially irrational at a time when America’s greatly unsettled trading relationships are disrupting agricultural exports⁵ FAS is not currently mentioned in the reorganization plan, and we urge USDA to maintain all FAS operations in the NCR so that these public servants can most effectively promote international markets for U.S. farmers.

AFSCME also represents NCR employees of the Farm Service Agency (FSA), Risk Management Agency (RMA), and Farm Production and Conservation (FPAC) Business Center. NCR-based AFSCME members employed by the FSA and RMA help establish and implement policies for the nationwide programs administered by these agencies; field staff, not these NCR-based staff, are responsible for engaging directly with the farmers, ranchers and others served by these programs. The FPAC Business Center is the operations center for political appointees and FPAC mission area staff, including the FSA, RMA and Natural Resources Conservation Service. These workers deliver core infrastructure services, such as budget, IT and financial management, and are a critical link, providing expert advice and services, between political appointees — who are required to remain in the NCR — and FPAC mission area offices and employees around the country, including county offices that by statute must remain in the counties. It would make no sense to move these USDA staff to five hubs scattered nationwide where they can be of limited use to political appointees who rely on them to be successful in their jobs supporting farmers, ranchers and foresters by helping coordinate nationwide activities. The attrition of these FPAC staff resulting from relocation would undermine the FPAC mission area nationwide. Farmers currently experience long wait times at understaffed USDA offices and often go months waiting for loan approvals or other FPAC benefits. Staff attrition and the attendant loss of expertise resulting from relocations would exacerbate these already long delays. Congress authorizes funds and other FPAC benefits for farmers to cope with ongoing natural and market challenges. However, without expert and efficient staff — like AFSCME members currently based in the NCR — to coordinate the programs and support delivery of the funds in close consultation with political appointees, many farmers may needlessly suffer.⁶ Neither FPAC, RMA nor FSA is currently mentioned in the reorganization plan, and we urge USDA to keep their current staff here in the

⁵ “Ask an Economist: Why key agricultural trade partners are important for the farm sector and food prices: Associate Economist Ty Kreitman explores how major changes to trade relationships could lead to reduced agricultural revenue and higher prices for consumers.” TEN Magazine, Federal Reserve Bank of Kansas City, July 15, 2025, <https://www.kansascityfed.org/ten/ask-an-economist-why-key-agricultural-trade-partners-are-important-for-the-farm-sector-and-food-prices/>.

⁶ “When USDA Cuts Staff, Farmers Pay the Price: Lessons from the ERS and NIFA Relocations,” National Sustainable Agriculture Coalition, May 12, 2025, <https://sustainableagriculture.net/blog/when-usda-cuts-staff-farmers-pay-the-price-lessons-from-the-ers-and-nifa-relocations/>.

NCR so that they can continue to offer their considerable expertise to USDA, helping the agency to most efficiently and effectively serve U.S. farmers.

AFSCME members working in USDA Rural Development (RD) help improve the economy and quality of life in rural America. Those employed by the RD within the NCR work in the Rural Utilities Service (RUS), Rural Business Cooperative Service (RBCS), Office of External Affairs (OEA), Innovation Center (IC) and the Office of the Chief Risk Officer (OCRO). NCR-based employees of the RUS and RBCS process program applications, a function that is appropriately centralized and does not include interaction with public clients. Notably, RUS and RBCS already employ field staff located throughout the U.S. whose responsibilities include working directly with the public. NCR-based AFSCME members employed by the OEA, IC and OCRO similarly perform specialized jobs that are not public facing or do not require engagement with clients who would benefit from relocating these staff outside the NCR. Although the reorganization plan does not mention RD, if its NCR-based staff are required to relocate, it would come at a high cost due to the loss of many staff with specialized knowledge acquired through many years of service. We urge USDA to confirm that RD operations and positions currently in the NCR will remain there.

AFSCME also represents USDA employees who work in the Office of Hearings and Appeals (OHA), including the National Appeals Division (NAD) and the Office of Administrative Law Judges (OALJ). None of these offices are mentioned in the reorganization memo, and they provide quintessential headquarters functions that would suffer if positions are relocated outside the NCR. In particular, OHA/NAD brings to bear extensive experience and independence administering a fair, transparent and impartial mechanism to resolve challenges to benefits decisions made by administrative law judges from around the country, without direct interaction with local participants in the process. There is no reason to relocate these employees, given the nature of their work — which is based on impartiality, not closeness to particular constituencies — and every reason not to risk attrition of such a specialized and important workforce. We thus urge USDA to confirm that all OHA, NAD and OALJ operations currently in the NCR will remain here.

AFSCME members employed in the Office of Operations (OO) of the Headquarters Office provide centralized services to the USDA Headquarters and the George Washington Carver Center in the NCR, such as mail management, printing and internal customer service. These internal services are rationally and appropriately located in the NCR. Neither OO nor any of the functions it comprises are mentioned in the reorganization memo. We urge USDA to confirm that OO's operations in the NCR will remain there.

AFGE represents thousands of USDA employees around the nation at multiple USDA agencies and components, including, but not limited to, D.C.-based employees of the ERS, the NIFA and the Food Safety and Inspection Service (FSIS). ERS and NIFA are currently in the NCR

after a botched relocation in 2019.⁷ The new threat of a relocation of ERS, NIFA and FSIS employees would pose a direct and catastrophic threat to our nation's food supply and to the farmers, ranchers and other agricultural interests who rely on USDA for a multitude of services. The ERS and NIFA are essential scientific agencies that conduct vital agricultural, climate and economic research. FSIS safeguards the safety of our meat and poultry supply. Forcing these employees to relocate under threat of job loss will destroy service delivery.

In his recent testimony to the Senate Agriculture, Nutrition and Forestry Committee, Deputy Secretary Vaden claimed that the department estimates attrition of less than half of the employees, but history teaches us that this is false.⁸ USDA's 2019 relocation of ERS and NIFA to Kansas City resulted in a mass exodus of experienced scientists. It did not follow best practices for evaluating the relocation, underestimated costs and failed to account for massive attrition and disruptions to agency operations.⁹ The GAO report shows that, before the relocation, USDA itself internally assumed an attrition rate of 65% to 75% if ERS were to move outside the NCR. Both ERS and NIFA lost more than half of their staff, taking years to recover and leaving years of research projects abandoned.

The relocation caused tenured staff losses that continue to have reverberating effects. Before the relocation, at the end of fiscal year (FY) 2018, the majority of ERS (84%) and NIFA (82%) permanent full-time staff had been there for more than two years.¹⁰ However, because of staff departures and hiring in FY 2019 and FY 2020, by the end of FY 2021, the majority of ERS (66%) and NIFA (79%) permanent full-time staff had worked there for two years or less. The loss of experienced staff translated to declines in productivity and performance. As a result, both divisions cancelled or delayed vital reports on which the agricultural industry relies. In the immediate wake of the move, one USDA researcher described the impact: "It's a gap that we can't fill. We can't hire fresh Ph.D.s and fill that gap."¹¹

⁷ Bob Ortega, Kyung Lah, Allison Gordon and Nelli Black, "What Trump's war on the 'Deep State' could mean: 'An army of suck-ups'," CNN, April 27, 2024, <https://www.cnn.com/2024/04/27/politics/trump-federal-workers-2nd-term-invs/index.html>. "Evidence-Based Policy Making: USDA's Decision to Relocate Research Agencies to Kansas City Was Not Fully Consistent with an Evidence-Based Approach, GAO-22-104540," Government Accountability Office, April 21, 2022, <https://www.gao.gov/assets/gao-22-104540.pdf>.

⁸ "USDA says reorg disfavors layoffs, predicts most employees will accept relocations: A significant percent more than a majority will come" to new locations, Agriculture Department official says," Government Executive, July 30, 2025. <https://www.govexec.com/workforce/2025/07/usda-says-reorg-disfavors-layoffs-predicts-most-employees-will-accept-relocations/407100/>.

⁹ "Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce," Government Accountability Office, December 2022, Publicly Released January 13, 2023, <https://www.gao.gov/assets/gao-23-104709.pdf>. Data in the remainder of this paragraph are from this report.

¹⁰ "Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce," Government Accountability Office, December 2022, Publicly Released January 13, 2023, <https://www.gao.gov/assets/gao-23-104709.pdf>. Data in the remainder of this paragraph are from this report.

¹¹ Jesse Naranjo, "200 ERS vacancies after Kansas City move," Politico, Feb. 27, 2020, <https://www.politico.com/news/2020/02/27/200-ers-vacancies-after-kansas-city-move-117764>.

The overall results of the relocation were devastating: The agency never fully recovered its full capacity. As of September 2024, ERS staffing levels remained 15% below pre-relocation levels.¹² This new relocation effort — far broader in scope — could repeat and amplify that damage, not just for ERS and NIFA, but also for FSIS and other critical mission areas, including those where AFSCME members are employed.

Across the agency, the reorganization plan threatens a repeat of the 2019 relocation upheaval — compounding the loss of irreplaceable expertise¹³ that the department has already experienced this year. Federal scientists, economists, and public health experts will not simply pick up and move at the snap of a finger. Affected federal employees will consider the needs of their families and their community roots. Losing the deep knowledge that staff developed over the course of time while participating in longstanding institutional teams and systems will be enormously costly in terms of dollars and ability to carry out USDA's mission. This relocation plan will not "reposition" these employees, it will drive them out of public service altogether.

Many USDA workers facing relocation are nearing retirement or have spent decades building their expertise. Others are mid-career scientists who will be forced to abandon the federal mission entirely for private or academic jobs rather than uproot their families for lower pay in unfamiliar locations. Once lost, that talent cannot be replaced overnight — if ever.

The hollowing out of USDA's workforce is not a theoretical risk. It is a documented outcome, backed by workforce attrition data from the department's last relocation attempt. This plan threatens to permanently degrade USDA's ability to deliver science-based solutions to the climate crisis, global food insecurity, farm resiliency and economic development in rural America.

The memo's proposed closure of the Beltsville Agricultural Research Center (BARC) would be especially irrational. BARC is already a highly efficient and productive operation. According to USDA, BARC is the department's largest research facility, a world leader as a diversified center for agricultural research and the only research center in the Mid-Atlantic and Northeast.¹⁴ Its closure will leave this large geographic area without a research center and will translate to the loss of decades of important long-term field studies and the potential shutdown of

¹² "When USDA Cuts Staff, Farmers Pay the Price: Lessons from the ERS and NIFA Relocations," National Sustainable Agriculture Coalition, May 12, 2025, <https://sustainableagriculture.net/blog/when-usda-cuts-staff-farmers-pay-the-price-lessons-from-the-ers-and-nifa-relocations/>. Data from FedScope, U.S. Office of Personnel Management, <https://www.fedscope.opm.gov/>.

¹³ Andrea Hsu, "After paying people to leave, one federal agency is scrambling to fill positions," All Things Considered, National Public Radio, May 3, 2025, <https://www.npr.org/2025/05/03/nx-s1-5384961/usda-deferred-resignation-federal-workers-aphis>.

¹⁴ "Celebrating 100 Years of Agricultural Research," USDA Ag Research Magazine, April 2010, <https://agresearchmag.ars.usda.gov/2010/apr/research/>.

the National Agricultural Library. Further, relocating other scientific research, e.g., the electron and confocal microscope facility, will be difficult and costly.¹⁵

The proposed closure of BARC is representative of another fundamental flaw in the proposed reorganization: It will not necessarily “bring USDA closer to its customers” since it will move thousands of USDA staff far away from the Northeast, Mid-Atlantic and West Coast states, which have abundant agriculture. Farmers’ associations in these regions have raised the alarm that “there are only three regions being represented in this reorganization, meaning many regions of the country, including the Northeast, will very likely be less well served by USDA staff.”¹⁶ Moreover, as the largest agricultural producer in the nation, California, which has 11%¹⁷ of U.S. receipts for all commodities, especially stands to lose USDA services. Mid-Atlantic states also produce a meaningful share of U.S. commodities: Combined, New York, New Jersey, Pennsylvania, Delaware, Maryland, Virginia and West Virginia have 5.4% of all commodities receipts. Without a regional office, they will also be left scrambling for USDA services.¹⁸

The reorganization threatens the effectiveness of the USDA’s food and nutrition programs and millions of individuals and families they serve.

AFSCME members in state and county governments also serve millions of individuals and families in need of food assistance provided through USDA programs. They play critical roles in administering SNAP, school meals and the Special Supplemental Nutrition Assistance Program for Women, Infants, and Children (WIC). AFSCME also represents K-12 school food service workers who prepare and serve meals funded by the national school meal programs and home-based child care providers who, in order to feed children in their care, rely on Child and Adult Care Food Program (CACFP) funds tied to school meal programs. Further, many AFSCME members’ families include individuals who are enrolled in these programs.

Effective and efficient administration of food assistance programs depends in part on timely, accurate support from USDA staff to the agencies that administer these programs across the country. For example, seven Food and Nutrition Service (FNS) offices provide the first line of technical support and guidance to state and local agencies regarding complex SNAP administrative provisions. In the coming years, there will be increased need for their support as state and local agencies implement changes in SNAP rules that were enacted in the One Big Beautiful Bill Act

¹⁵ Eric Stokstad, “USDA reorganization will cut agricultural and forest research,” Science Insider, July 25, 2025, <https://www.science.org/content/article/usda-reorganization-will-cut-agricultural-and-forest-research>.

¹⁶ Maddie Kempner, “USDA Plans Major Reorganization: What’s at Stake and How to Speak Out,” Northeast Organic Farming Association of Vermont, NOFA-VT, Aug. 18, 2025, <https://www.nofavt.org/about/blog/usda-plans-major-reorganization-whats-stake-and-how-speak-out#:~:text=Combined%20with%20recent%20staffing%20cuts,emaling%20reorganization@usda.gov>.

¹⁷ “Farm Income and Wealth Statistics - Cash receipts by commodity State ranking,” Economic Research Service, U.S. Department of Agriculture, Feb. 6, 2025, <https://data.ers.usda.gov/reports.aspx?ID=4058>.

¹⁸ “Farm Income and Wealth Statistics - Cash receipts by commodity State ranking,” Economic Research Service, U.S. Department of Agriculture, Feb. 6, 2025, <https://data.ers.usda.gov/reports.aspx?ID=4058>.

and work diligently to lower their error rates to avoid having the federal government shift SNAP benefit costs onto them.

The reorganization plan, however, could weaken the nation's food assistance infrastructure if it disrupts the skilled, knowledgeable workforce that provides these support services. Relocating thousands of federal employees from the NCR and consolidating regional offices will result in an outsized loss of expertise and capacity. Delays in critical services and gaps in oversight are more likely when experienced staff with specialized knowledge resign or retire rather than move, and when critical offices needed for technical support are dismantled. Such losses also will likely delay the review and approval of key waivers or program management plans.

Struggling WIC state agencies that have already suffered staff losses will also feel the brunt of the reorganization. The National WIC Association reports that the administration's actions had already undermined the agency's capacity to deliver timely support to state WIC agencies, including the distribution of congressionally appropriated funds.¹⁹ The plan will result in significant harm to the struggling WIC program and the low-income mothers and children it serves.

The reorganization plan could jeopardize access to the information necessary to achieve robust agricultural, food and nutrition systems.

The reorganization also requires the consolidation of Freedom of Information Act (FOIA) and "related information management functions" within the office of General Counsel. The FOIA program plays an important role in ensuring program integrity by allowing the public to stay informed about the federal government's operations, something that will take on greater importance if the USDA implements the proposed reorganization. While the memo does not address specific impacts to FOIA program staffing, we urge USDA to maintain staffing levels sufficient to efficiently and effectively serve the public. The proposed reorganization itself increases the need for a robust FOIA program to ensure the effectiveness of USDA operations.

Conclusion

AFSCME and AFGE urge USDA to revoke the reorganization. In the absence of such a revocation, we urge USDA to halt reorganization and call for:

1. An immediate pause on all forced relocations and Reductions-In Force (RIFs) until comprehensive employee impact assessments and cost-benefit analyses are completed and reviewed by the relevant committees in Congress, and the legally required Congressional authorization for any relocation is provided. Specifically, we request that the administration halt all forced relocations and plans for any RIFs

¹⁹ "National WIC Association Sounds Alarm on USDA Reorganization Plan, Warns of Harm to WIC and Nutrition Programs," National WIC Association, July 24, 2025, <https://www.nwica.org/press-releases/national-wic-association-sounds-alarm-on-usda-reorganization-plan-warns-of-harm-to-wic-and-nutrition-programs>.

for all of USDA, including the sub-agencies with the largest number of AFSCME- and AFGE-represented employees: the Foreign Agricultural Service, Farm Service Agency, Risk Management Agency, Farm Production and Conservation Business Center, Office of Operations, Office of Hearings and Appeals, including the National Appeals Division and Office of Administrative Law Judges, Rural Development Agency, the Economic Research Service, the National Institute of Food and Agriculture and the Food Safety and Inspection Service.

2. Providing full transparency and bargaining with employee unions under federal labor law.
3. Increasing agency investment in teleworking, flexible work arrangements and retention incentives, instead of mass relocations, to ensure the most efficient and effective possible USDA workforce.

Sincerely,

/s/ Dalia R. Thornton
Dalia R. Thornton
Director
Department of Research and
Collective Bargaining Services
American Federation of State,
County and Municipal Employees

/s/ Rushab Sanghvi
Rushab Sanghvi
General Counsel
American Federation of Government
Employees