



August 24, 2025

RE: Comments on Memorandum: SM 1078-015

Dear Secretary Rollins:

On behalf of the [National Right to Food Community of Practice](#), we appreciate the opportunity to comment on the United States Department of Agriculture's (USDA) reorganization plan, as outlined in the memorandum issued on July 24, 2025.

The National Right to Food Community of Practice is a member-based organization with over 172 organizational members and 58 individual members in 35 states nationwide. Our Community of Practice brings together advocates, farmers, food producers, lawyers, legislators, students, and people from all walks of life working towards achieving the right to food in their respective communities and across the country. Our mission is to advance the right to food for all people across the nation, increasing food autonomy and allowing all people to access food that is adequate for themselves and their families with dignity.

As we work to achieve this vision, we understand current food assistance programs as vital to ensuring the well-being of millions of people across the country struggling to make ends meet. Building on nearly a century of learning from these programs, we must build and support systems that will allow the country to move away from charity-based food models toward supporting people and communities with the resources to nourish themselves. For this reason, we believe that it is important to maintain or improve funding and institutional capacity for food and nutrition programs, while also highlighting the importance of working towards systems that use the right to food framework to create a country where food assistance is no longer needed.

We are deeply concerned that the proposed reorganization of the USDA will dismantle a department with critical responsibilities, resulting in real consequences for the millions of children, parents, older adults, veterans, people with disabilities, and all those who depend on these nutrition programs to be food secure.

Relocating thousands of federal employees from the Washington, D.C., area and consolidating the regional offices will result in a significant loss of expertise and capacity. **Delays in critical services and gaps in oversight are more likely when experienced staff choose to resign rather than move, and when critical offices needed for technical support are dismantled.**

48 million people in the U.S. live in food insecure households. Over 50 million people are forced to supplement their food purchases with charitable food access and government nutrition programs. The moral contract between food producers and food consumers is embedded in the history of USDA programming, and the Food and Nutrition Service is a vital part of that social contract. Because we have failed to address the root causes of hunger in the U.S., families rely on food assistance programs to feed themselves. Reducing funding and administrative capacity and creativity brought by so many workers in our food and nutrition programs removes a source of food for millions of people without offering an alternative system to allow them to make up this difference. Furthermore, it will impact businesses that rely on funding from nutrition programs to continue to stock food, particularly small businesses in rural areas of our country where food access remains a critical issue. **It is extremely worrisome that the USDA is reducing its support for the Office of Small and Disadvantaged businesses to a single staff member.** Rather It is imperative to consider prioritizing increased funding for community led food systems attuned to local needs, and provide meaningful support for smaller-scale food businesses and food producers.

Additionally, reducing the number of regional offices from seven to five will further increase disruptions to services. These regional offices often provide the first line of support for state and tribal agencies administering the federal nutrition programs, especially those that are under-resourced and rely heavily on the support for compliance and technical assistance. They exist to facilitate the clarification, and therefore, efficient implementation of regulations, best practices and management at the field level. This consolidation will likely delay the review and approval of key waivers or program management plans.

We urge USDA to commit to maintaining or expanding its capacity in administering the federal nutrition programs, not reducing it. We also urge USDA to pause the implementation of this reorganization and facilitate a transparent and democratic process that includes consultation with Congress, state agencies, national and local partners, and impacted USDA staff.

Signed (at the direction of the National Right to Food Community of Practice),

A handwritten signature in black ink that reads "Alison M. Cohen". The signature is fluid and cursive, with the first name "Alison" being more prominent than the last name "Cohen".

Alison M. Cohen

Director and General Coordinator