

#### The Honorable Secretary Rollins

# **U.S. Department of Agriculture**

September 25, 2025

Dear Secretary Rollins,

On behalf of <u>agInnovation</u>, representing the Land-grant University agricultural research system, we thank you for the opportunity to provide input on the proposed actions for the Department of Agriculture Reorganization, outlined in Secretary Memorandum SM 1078-015.

Since its founding, USDA—"The People's Department"—has partnered with Land-grant institutions to advance agricultural science and deliver results that directly benefit farmers, ranchers, foresters, rural communities, and all Americans. Together, in partnership with USDA, we work every day to:

- Equip farmers, ranchers, and foresters with the science and innovation necessary to be efficient, productive, and profitable;
- Strengthen biosecurity to combat animal and plant diseases;
- Manage our lands and forests sustainably; and
- Ensure a safe, abundant, and nutritious food supply for all Americans.

Building on a strong tradition of collaboration—with farmers, ranchers, foresters, stakeholders, state institutions, and federal partners—agInnovation drives locally adapted, farmer-first research and innovation.

We commend the Administration's commitment to improving effectiveness, accountability, enhanced services, reduced bureaucracy, and cost savings for all Americans. These efforts are especially commendable when the resulting savings are strategically reinvested in U.S. agriculture—bolstering research, extension services, forestry, and other essential programs. These goals align directly with our shared mission to ensure that American agriculture remains globally competitive, resilient, and a leader in feeding the world.

We also express our gratitude for the unprecedented investment in agricultural research infrastructure included in P.L. 119-21, the One Big Beautiful Bill Act (OBBA)—\$1.125 billion over nine years for Land-grant University agricultural research facilities. This historic funding will drive innovation and help ensure that U.S. farmers and ranchers remain globally competitive for generations. This investment is especially critical and timely as other leading agricultural producers—China, the European Union, India, and Brazil—are rapidly increasing their support for agricultural research.

With our shared goals in mind—and acknowledging concerns about potential disruptions from relocation—we respectfully offer the following recommendations:

### National Institute for Food and Agriculture (NIFA)

NIFA's leadership in implementing the OBBA research facilities program is essential to its success. Current staffing levels are sufficient to launch and manage this program effectively. To maximize continuity and preserve institutional knowledge and streamline processes, we recommend retaining much of the current NIFA workforce whenever possible. A phased transition should be implemented, keeping employees who cannot relocate as mentors until Kansas City staffing targets are reached. This approach safeguards program momentum, minimizes disruptions, and builds a strong, experienced NIFA workforce at hub locations in the future.

### **Agricultural Research Service (ARS):**

ARS Area Office staff play a vital role in managing cooperative agreements and MOUs with Landgrant Universities—responsibilities that from our perspective cannot be easily assumed by the Office of National Programs. We strongly recommend that the activities of area offices are retained and are in close geographic proximity to the research programs regardless of location of ARS central office. ARS scientists embedded on our campuses and administrators are indispensable Land-grant University partners in addressing the nation's most pressing food, agriculture, health, and natural resource challenges. By leveraging our shared expertise and resources we amplify the effectiveness and efficiency of the U.S. agricultural research enterprise - driving greater innovation, impact, and responsiveness to national and regional challenges and strengthening our ability to serve farmers and ranchers. Maintaining these long-standing partnerships ensures efficiency and is in the best interest of the U.S. agriculture.

## **Biotechnology Regulatory Services (BRS):**

The work of BRS within USDA's Animal and Plant Health Inspection Service (APHIS) is vital to Land-grant researchers developing agricultural innovations. Maintaining BRS staff in the National Capital Region (NCR) ensures continuity with their regulatory counterparts at FDA and EPA—essential partners in the Coordinated Framework for the Regulation of Biotechnology. For this small but strategically important office, we recommend that BRS staff remain in the NCR to maintain seamless stakeholder and interagency coordination.

#### **Broader Considerations Across USDA Agencies:**

- Safeguard and Leverage USDA Expertise: Retain the critical scientific and programmatic
  expertise of USDA staff—vital to Land-grant University partnerships across NIFA, ARS, FS,
  NRCS, AMS, and other agencies—by providing flexible options for employees regarding work
  location as needed. Preserving this expertise positions USDA to accelerate innovation and
  deliver greater value to U.S. agriculture.
- Sustain and Strengthen Program Capacity: Ensure program continuity and long-term strength by adopting a phased transition with structured mentorship. This approach not only maintains capacity during reorganization but also builds a new generation of USDA staff who are guided by experienced mentors, securing institutional knowledge for the future.
- Enhance Research Partnerships through Shared Facility Support: There is concern
  regarding the financial burden possible relocations may have on Land-grant Universities if
  support for accommodating both current and relocated USDA ARS and other federal
  scientists is not provided. Appropriately supported shared facilities strengthens hubs of

- collaboration, maximizes the impact of federal—university partnerships, and accelerates the research breakthroughs essential for keeping U.S. farmers and ranchers globally competitive, Americans healthy, and rural communities thriving.
- Proximity to Stakeholders: In our opinion the proposed locations for USDA hubs may limit
  the agency's ability to effectively meet stakeholder needs across all dimensions of
  agriculture—particularly for farmers and ranchers in the Northeast and Pacific Northwest.
  These regions are home to a wide range of specialty crops and farming and forestry systems
  that are essential to the vitality of U.S. agriculture. We respectfully encourage the agency to
  consider establishing additional hubs in these areas to expand the geographic reach and
  better serve all US agriculture.

In conclusion, we support the Administration's vision for a modern, effective, and accountable USDA. Our recommendations are intended to strengthen the Department's ability to deliver on its mission while safeguarding the capacity of its staff and minimizing unintended disruptions in partnerships and programs that serve farmers, ranchers, and all Americans.

Thank you for the opportunity to contribute to this important process. We stand ready to work to ensure that USDA's reorganization strengthens the enduring partnership between USDA and the Land-grant University system and continues to deliver unmatched value to U.S. agriculture and the public.

Respectfully,

Chandra Reddy

agInnovation Chair

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