

August 26, 2025

Secretary Brooke Rollins
U.S. Department of Agriculture
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Re: Request for Comment on Department of Agriculture Reorganization Plan
Secretary Memorandum SM 1078-015

Dear Secretary Rollins,

MAZON: A Jewish Response to Hunger provides these comments in response to the U.S. Department of Agriculture (USDA) Reorganization Plan as outlined in Secretary Memorandum SM 1078-015. MAZON strongly opposes this Plan due to concerns that such a reorganization will disrupt and dismantle the essential hunger-fighting programs that make up a vital part of USDA's mission.

Inspired by Jewish values and ideals, MAZON is a national advocacy organization working to end hunger among people of all faiths and backgrounds in the United States and Israel. For 40 years, MAZON has been committed to ensuring that people have access to the resources they need to be able to put food on the table. MAZON is a leading voice on anti-hunger issues, including those that have been previously overlooked or under-addressed. This mission includes protecting federal food programs for all families and individuals who rely on these programs to nourish themselves.

As an organization in its fifth decade of working to end hunger in America, MAZON knows that this proposed reorganization will impede the basic functions of USDA and the Food and Nutrition Service. The relocation of thousands of federal employees, not only from our nation's capital but also from the effective regional offices already spread throughout the country, will certainly result in an insurmountable loss of expertise and capacity. Such a vast and ill-considered transfer and reduction of staff, especially at a time when states are preparing to implement Congressionally-directed cuts and changes to longstanding, successful nutrition programs (via Public Law No: 119-21), guarantees errors will be made —

at a minimum — and risks the possibility of total program collapse. States cannot be reasonably expected to take on sweeping administrative and programmatic burdens with fewer federal resources.

The Secretary issued the July 24th Memorandum under the authority of Reorganization Plan No. 2 of 1953 and the Department of Agriculture Reorganization Act of 1994. Under the 1953 Reorganization Plan, the Secretary is required to “give appropriate advance public notice of delegations of functions” and “afford appropriate opportunity of interested persons and groups to place before the Department of Agriculture their views with respect to such proposed delegations” before assigning any “major functions or major groups of functions to major constituent organization units of the Department of Agriculture.” The 1994 Reorganization Act also requires that the Secretary provide advance public notice with “appropriate opportunity for interested parties to comment on the proposed reorganization action or delegation.”

MAZON is gravely concerned that the Reorganization Plan and associated creation of an email address to receive comments does not adequately allow for public input and stakeholder consideration, including questions and clarification of a sweeping plan to change the character and makeup of a federal agency. USDA provided only a press release and a five-page memo, and no stated mechanism for comments from the public to be made public or reviewed with any accountability. Without considerably more transparency and detail, the decisions to close some offices while opening others, encourage staff to resign, and haphazardly consolidate and otherwise interrupt agency operations are entirely arbitrary and perhaps capricious.

The deficiencies of the presentation of the Reorganization Plan to the public on July 24, 2025, have been further exacerbated by the way USDA has answered questions from Congress. On July 30, 2025, the Senate Agriculture, Nutrition and Forestry Committee held a hearing on the USDA Reorganization Proposal. At the hearing, Judge Stephen Vaden, Deputy Secretary of Agriculture, cited the principal cost savings to come from a reduction in staff, not the cost-of-living adjustments cited in the Secretary’s Memorandum. When asked a follow-up question about how the reorganization would help states reduce the error rates in the administration of the Supplemental Nutrition Assistance Program (SNAP), Judge Vaden provided no details except to promise more USDA staff in the field, an assertion contradicted by both the Reorganization Plan and his earlier testimony.

On August 13, 2025, the Senate Agriculture Committee Democrats registered their concerns regarding the Reorganization Plan in a letter to Secretary Rollins. MAZON agrees “[t]hat the Administration did not consult with Congress on a planned reorganization of this magnitude prior to its publication is unacceptable...[G]iven the Secretary’s recent comments that the plan is “95 percent baked,” we are very skeptical and deeply concerned that any feedback provided over the next month will not be seriously considered because the fundamental decisions behind this

plan are already set in stone.” The letter goes on to state that “[o]n July 25th, USDA staff informed staff from the Agriculture and Appropriations Committees of the House of Representatives and Senate that the Department had no data or analysis backing up the decisions outlined in the July 24th memo to share with members or our staff.” The bulk of the letter contains dozens of questions that illustrate the true lack of detail in the Reorganization Plan. The right and obligation to ask questions is a fundamental Jewish value. As an organization whose work is inseparable from its values, MAZON would like to echo the thoughtful questions posed in the letter, particularly those regarding the Food and Nutrition Service and the importance of its critical programs like SNAP.

Due to these large procedural concerns, the proposed reorganization will cause immense and potentially irreparable harm to the American families meant to be served by USDA. This harm will fall disproportionately on the vulnerable populations whose food security is at the heart of MAZON’s mission — including single mothers, military families, Indigenous communities, veterans, college students, the people of Puerto Rico and the territories, and members of the LGBTQ community including trans youth. Of particular concern here are the consolidation of support functions contained in, but not fully explained by, Principle 4 of the Secretary’s Memorandum. All of these ill-advised and harmful changes will be compounded by the weakening of Civil Rights and Freedom of Information Act functions throughout USDA.

Consolidation and loss of talent and expertise will be devastating for many of MAZON’s priority populations — groups that face unique barriers to feeding themselves and their families. For example, households led by a single mother face much higher food insecurity rates than the national average. The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is a lifeline for those families. According to the National WIC Association, the Reorganization Plan will “sever decades of institutional knowledge, weaken quality control, delay critical services, and create unnecessary barriers for state agencies and families who rely on WIC.”

An important piece of MAZON’s work focuses on strengthening and improving federal nutrition assistance programs in Indian Country so that Tribal communities can sustain and nurture themselves with safe, affordable, healthy, accessible, and culturally appropriate food. MAZON’s support of Native-led policy change to advance food security and food sovereignty in Indian Country is rooted in the recognition that Tribal Nations are sovereign and entitled to Tribal self-determination. MAZON’s years of partnership with Native advocates and communities inform its concern for the careless handling of Tribal Relations in the Reorganization Plan.

There are currently hundreds of Tribal liaisons working throughout USDA. Plans to get these employees to resign or consolidate them into a vague central location will result in the agency losing cultural competency and specific expertise, making preserving “statutorily required tribal relations functions” impossible. Furthermore, no Tribal Consultation was done prior to the

release of this Reorganization Plan. The requirements and procedures for Tribal Consultation are regulatory, not statutory, but that does not make them any less legally binding. It is troubling that USDA mentions only statutorily required functions, while ignoring its regulatory obligations in the written Plan and in practice.

In addition to communication and collaboration with Tribal Nations, inter-agency communication and collaboration will also necessarily be hampered by the Reorganization Plan as staff is reduced in Washington, D.C. This will negatively impact partnerships USDA has with other federal agencies, including the U.S. Department of Veterans Affairs. MAZON has worked for a decade to change the painful reality of food insecurity among veterans. A large part of that work has been educating those providing services to veterans about the various USDA food assistance programs that are available to veterans, who struggle with food insecurity and poverty in large numbers. MAZON's advocacy on this issue helped bring about a partnership between the VA's Food Security Office and USDA to improve food security, access to nutritious diets, and healthful nutrition education for veterans. There is still an immense amount of work to be done to fulfill the promise of this initiative, and MAZON is incredibly disheartened to see no detailed mention of cooperation with the VA or any other federal agency in the Reorganization Plan.

MAZON is appalled by the clear deficiencies in the Department of Agriculture Reorganization Plan and the process by which this sham of a plan is being enacted. MAZON strongly urges USDA to abandon this attack on hunger-fighting programs and the people who they are designed to help. Should USDA wish to move forward with any sort of reorganization, MAZON strongly urges the Department to do so in a way that is far more transparent and respects the law, the public, and the mission of USDA.

Sincerely,

Abby J. Leibman
President & CEO
MAZON: A Jewish Response to Hunger