

Make Your Voice Heard: Template Comment on USDA Reorganization

Below is a template comment prepared by the National WIC Association (NWA) in response to recently announced plans to reorganize the US Department of Agriculture. We encourage you to adapt this template to reflect your own experience with or interest in WIC. You can submit your comment by email to reorganization@usda.gov. The comment period is open through **September 30, 2025**.

Additional resources:

- USDA: [Secretary Rollins Announces USDA Reorganization, Restoring the Department's Core Mission of Supporting American Agriculture](#)
- USDA: [USDA Opens Public Comment Period on Department Reorganization Plan](#)
- NWA: [National WIC Association Sounds Alarm on USDA Reorganization Plan, Warns of Harm to WIC and Nutrition Programs](#)

September XX, 2025

Secretary Brooke Rollins
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

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

Dear Secretary Rollins,

[YOUR ORGANIZATION NAME HERE] strongly opposes the Department of Agriculture Reorganization Plan as outlined in Secretary Memorandum SM 1078-015. We are concerned that this plan will lead to significant disruptions in the implementation of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). **We urge you to immediately pause this plan in order to fully consider and take on board key stakeholder input to avoid negative impacts for the families who rely on WIC.**

[INFORMATION ABOUT YOUR ORGANIZATION AND WHY YOU CARE ABOUT WIC HERE]

As you know, WIC is administered at the federal level by the USDA Food and Nutrition Service (FNS). At the beginning of the Trump administration, FNS employed approximately 1800 employees based at eight offices representing seven regions of the country and one headquarters in northern Virginia. As a result of the administration's actions to reduce staff, including the Deferred Resignation Programs, FNS has lost approximately 500 employees, over one quarter of the agency's staff nationwide.

Under this plan, all eight FNS offices would close, with employees moving to new office locations, including a new national headquarters and five new regional offices. The five regional offices will be relocated to align with newly established USDA Hubs and Service Centers within two years. The new regional Hubs and Service Centers include: Raleigh, North Carolina; Indianapolis, Indiana; Fort Collins, Colorado; Kansas City, Missouri; Salt Lake City, Utah; St. Louis, Missouri; Lincoln, Nebraska; and Missoula, Montana.

The relocation of two USDA agencies during the first Trump administration led to about 50% of staff leaving the agencies.¹ As you have acknowledged, we can anticipate a similar level of attrition and loss of institutional knowledge as a result of these relocations. This major staff loss, coming on the heels of a loss of about one third of FNS staff, risks leaving FNS without the ability to conduct its most basic program functions, like allocating federal funds.

As a result of staff losses at FNS since the beginning of the second Trump administration, WIC state agencies are already experiencing challenges receiving timely and adequate federal funds, along with guidance and technical assistance to implement key policies. This summer, despite full federal funding being appropriated for WIC, multiple state WIC agencies experienced severe funding shortages leading them to notify staff of layoffs or plan for shutoff of WIC benefits to participants. While we understand that FNS is working to address these urgent gaps, this situation should never have occurred in the context of full federal funding.

Because WIC is a discretionary federal program that is funded to serve all eligible families, and participation can be challenging to project, FNS staff in the regional and national offices must work closely with state agencies to monitor program costs and ensure appropriate allocation of funds across states. This work requires a high degree of skill, experience, and strong relationships with state staff. As state WIC agencies are experiencing this summer, staff loss in these key roles can have devastating consequences.

Additional key responsibilities for FNS regional office staff include: setting appropriate policy to guide program operations and protect the investment in the program; providing technical assistance to state agencies; sharing innovative best practices from around the country; making site visits to state and local agencies for program monitoring and integrity; providing review and approval for technology-related projects for WIC's Management Information Systems (MIS) and Electronic Benefit Transfer (EBT) systems; and informing FNS national office activities and decisions to best meet the needs of eligible WIC families and agencies serving those families. The planned reorganization puts all of these activities at risk.

In summary, [YOUR ORGANIZATION NAME HERE] is deeply concerned that USDA's reorganization plan to relocate FNS staff and reduce regional offices will result in significant harm to the WIC program, and the low-income mothers and children we serve. WIC has long enjoyed bipartisan support as one of America's most effective public health programs—proven to prevent infant deaths, improve maternal health, ensure healthier births, and give children a stronger start in life. The Trump Administration has recognized WIC's benefits in its Make America's Children Healthy Again report. We must ensure that WIC remains fully operational for the millions of families who depend on it, and that means maintaining the integrity of the USDA. Protecting WIC means defending the USDA's capacity to serve families; we cannot dismantle the very infrastructure that keeps programs like WIC running. We call on you to pause this plan immediately.

Sincerely,

¹ Morris, S. D. (2022) AGENCY RELOCATIONS Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce. Washington, D.C.: U.S. Government Accountability Office. Available at: <https://www.gao.gov/assets/d23104709.pdf> (Accessed: 7 August 2025).