



COALITION ON HUMAN NEEDS

2021 L Street, NW Suite 101-219 Washington, DC 20036 www.chn.org (202) 223-2532

August 26, 2025

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

Dear Secretary Rollins:

The Coalition on Human Needs submits these comments in response to the Secretary's Memorandum ([SM 1078-015](#)) on the reorganization plan for the U.S Department of Agriculture (USDA) on July 24, 2025.

The [Coalition on Human Needs](#) (CHN), an alliance of national organizations working together to promote public policies which address the needs of low-income and other vulnerable populations, strongly opposes the USDA reorganization plan as outlined last month. The Coalition's members include civil rights, religious, labor, and professional organizations, service providers and those concerned with the wellbeing of children, women, the elderly, and people with disabilities, and other organizations concerned with meeting the needs of people with low incomes. Many of our members and larger networks of local organizations and advocates care deeply about nutrition programs and other core basic needs programs, and are alarmed at the potential impact of this USDA reorganization for those who participate in programs such as SNAP, WIC, TEFAP, school and summer meals, and more. In particular, **relocating thousands of federal employees could lead to delays in critical services, reduced technical assistance for local officials and service providers, and loss of overall capacity and expertise at a fraught time for many in local communities that are facing hunger.**

The proposed plans to reduce the number of regional FNS offices from 7 to 5, and to relocate all offices over a two-year period, will severely disrupt services across all federal nutrition programs. The expected further loss of staff will jeopardize the support for local nutrition programs, including timely distribution of funds.

We know that many people in communities across the country are struggling with the high cost of living including grocery prices, and SNAP provides many of our neighbors, including children, seniors, people with disabilities, and others with lower incomes with vital food benefits to

purchase groceries from local food retailers. As you know, SNAP serves people of all ages, staves off hunger, promotes well-being, and serves people in [every state](#). SNAP provides much more than just food assistance: It is a critical support system that promotes economic well-being and better health outcomes. The program plays a vital role in addressing hunger, reducing health care costs, and improving the long-term prospects of households with low incomes, including the one in five beneficiaries who are children. SNAP has been shown to improve student performance and allows families to maintain healthy diets, which in turn leads to long-term positive health outcomes for children and adults alike. As a result of the passage of the budget package this summer, millions of Americans are forecast to lose SNAP – and millions more will see benefits reduced, making it harder to put food on the table. These deep cuts will have a ripple effect across services and hurt the broader economy, [leading to a loss of jobs in every state](#) while [harming retailers in every county](#). Food banks, pantries, and soup kitchens are reporting high demand for assistance. We all know the cost of food is high. While emergency food programs help, they only provide one meal for every nine meals that SNAP supplies. These emergency food providers will struggle to meet increased needs because of the scope of the SNAP cuts. Reducing the federal staff based in Washington DC and in regional offices that support states to administer programs will make it even harder for SNAP participants and program administrators. Instead, **we urge the USDA to expand its capacity to administer SNAP and other federal nutrition programs.**

We are also concerned that USDA reorganization plan will lead to significant disruptions in the implementation of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). WIC provides targeted nutrition support for expectant and new parents, infants, and young children. Healthy foods provided by WIC are associated with positive birth outcomes and address specific nutrition risks at key developmental stages, assuring a healthier next generation while also addressing long-term health care costs. WIC has long enjoyed bipartisan support, and the Administration has recognized WIC's benefits in its Make America's Children Healthy Again report. CHN supports efforts to strengthen and expand access to WIC, investing robustly in the program's unique position at the intersection of food security and public health to address inequities in maternal health and child nutrition, while also ensuring adequate funding to serve all eligible individuals. As you know, WIC is administered at the federal level by the USDA Food and Nutrition Service (FNS), which included about 1,800 staff across the U.S. As a result of the administration's actions to reduce staff, FNS has lost approximately 500 employees, over 25% 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. Many additional FNS staff are likely to leave USDA as a result, and this substantial loss of staff, coming on the heels of staff departures earlier this year, risks leaving FNS without the ability to conduct its most basic program functions, like

allocating federal funds. Our partners report that WIC state agencies are already experiencing challenges receiving timely and adequate federal funds, along with guidance and technical assistance to implement key policies. We echo CHN's member organization, the National WIC Association, and urge you to immediately pause this plan in order to fully consider and actively invite and take into account key stakeholder input to avoid negative impacts for the families who rely on WIC along with other nutrition programs.

Every day, millions of people across America receive critical nutrition assistance through one or more of the 15 federal nutrition assistance programs, such as SNAP, WIC, school meals, the Summer Food Service Program, the Summer Electronic Benefit Transfer Program (Summer EBT), the Child and Adult Care Food Program (CACFP), Nutrition Assistance for Puerto Rico (NAP), The Emergency Food Assistance Program (TEFAP), the Commodity Supplemental Food Program (CSFP), older adult nutrition programs, the Food Distribution on Indian Reservation Program (FDPIR), and the emergency food and shelter programs. Fully funding these programs is vital to ensure the continuum of federal nutrition programs and the charitable food system can effectively and efficiently serve those in need. USDA's planned reorganization puts all of these activities at risk.

In summary, the Coalition on Human Needs is deeply concerned that USDA's reorganization plan to relocate staff and reduce regional offices will result in significant harm to federal nutrition programs, and the low-income families, veterans, seniors, people with disabilities, and others that serve. We call on you to pause this plan immediately.

If you have any questions, please contact me at dweinstein@chn.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Weinstein", with a long, sweeping horizontal line extending to the right.

Deborah Weinstein

Executive Director,
Coalition on Human Needs