U.S. Government Accountability Office

Department of Agriculture: Little Transparency on Whether Key Issues Were Analyzed Before Reorganization Decision

GAO-27-108734
Q&A Report to Congressional Requesters
November 5, 2026
Accessible Version

Why This Matters

The U.S. Department of Agriculture (USDA) plays a critical role in supporting our nation's agriculture, overseeing food safety, promoting rural development, and providing food and nutrition benefits, among other functions. In July 2025, USDA announced a plan to reorganize the department, including relocating thousands of staff positions. According to USDA, the purpose of the effort is to improve effectiveness and accountability, enhance services, reduce bureaucracy, and reduce costs for the American people. Separately, and over the course of 2025, USDA took steps to reduce the size of its workforce, such as offering incentives for employees to resign or retire, in response to presidential directives.

We were asked to review USDA's reorganization plan and recent workforce decreases. This report discusses available information regarding USDA's reorganization, recent changes to USDA's workforce, and leading practices that apply to planning and implementing federal agency reorganizations.

Key Takeaways

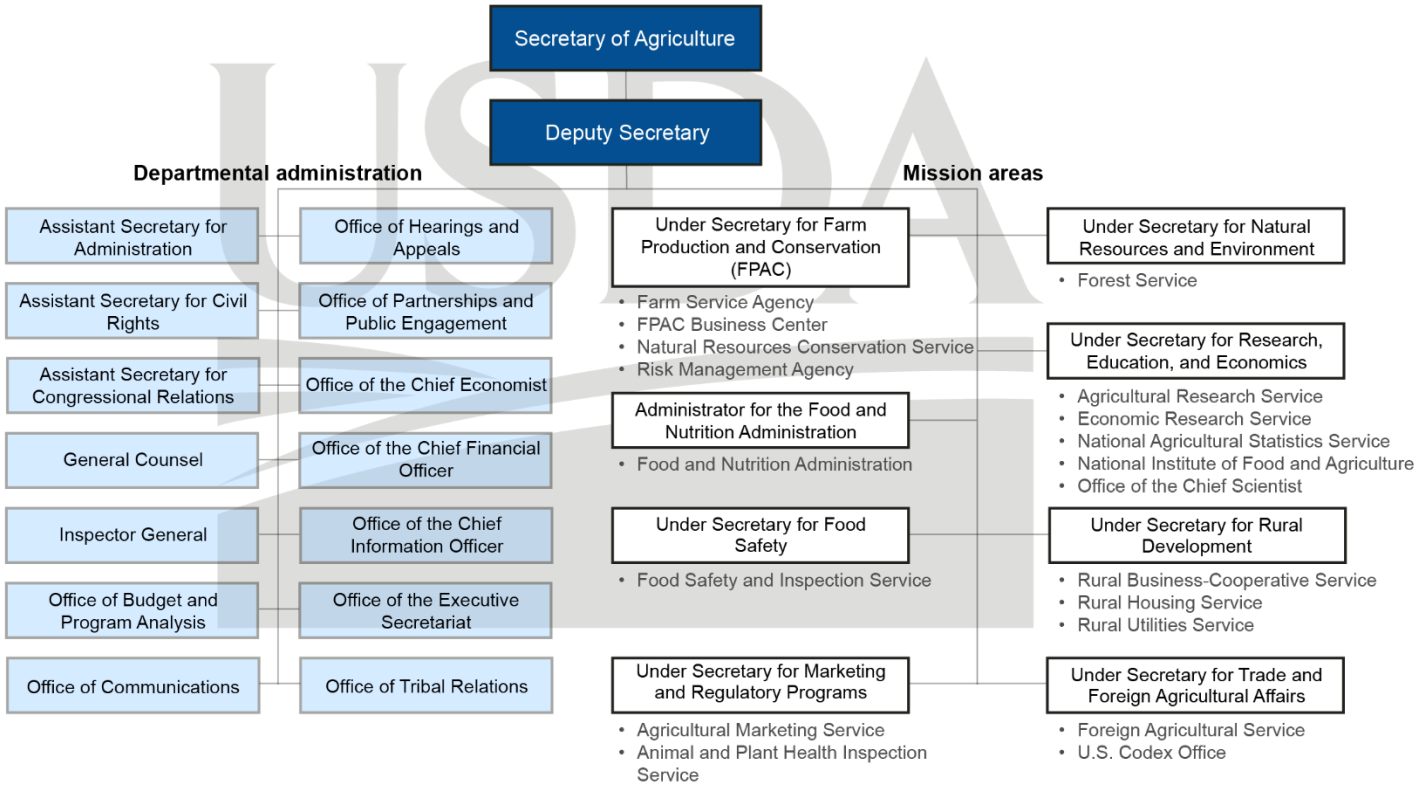
- In spring 2026, all eight USDA mission areas and several agencies announced reorganizations, including relocating staff in many instances. The department's actions are the subject of federal litigation seeking to stop USDA from implementing its reorganization plan.
- USDA's workforce decreased by 20 percent from December 2024 through March 2026, with individual agencies decreasing between 12 percent (Forest Service) and 41 percent (National Institute of Food and Agriculture).
- The extent to which USDA conducted and considered analysis to inform its July 2025 decision to reorganize the department is unknown. USDA did not respond to our requests for information about analyses USDA conducted before announcing the department's reorganization. Thus, Congress and the public do not have information on the extent to which USDA examined issues such as how the reorganization could impact service delivery, the economic effects of the reorganization, or how to safeguard taxpayers' dollars in disposing of property through the reorganization.
- Previously, when USDA relocated two agencies out of the National Capital Region in 2019, the agencies' workforces decreased by more than half. Staff experience and agency productivity also decreased following the move. Agency staff numbers and productivity generally returned to previous levels 2 years after the relocation, according to our prior work.

What is USDA's mission and how is the department organized?

USDA's mission is to provide leadership on food, agriculture, natural resources, rural development, nutrition, and related issues based on public policy, the best available science, and effective management. It carries out this mission through

its mission areas, each of which is led by an under secretary or administrator (see fig. 1).

Figure 1: U.S. Department of Agriculture (USDA) Organization Chart, as of August 2026



Source: GAO analysis of USDA information. | GAO-27-108734

Accessible Data for Figure 1: U.S. Department of Agriculture (USDA) Organization Chart, as of August 2026

Secretary
Deputy Secretary

Departmental administration

- Assistant Secretary for Administration
- Assistant Secretary for Civil Rights
- Assistant Secretary for Congressional Relations
- General Counsel
- Inspector General
- Office of Budget and Program Analysis
- Office of Communications
- Office of Hearings and Appeals
- Office of Partnerships and Public Engagement
- Office of the Chief Economist
- Office of the Chief Financial Officer
- Office of the Chief Information Officer
- Office of the Executive Secretariat
- Office of Tribal Relations

Mission areas

Under Secretary for Farm Production and Conservation (FPAC)

- Farm Service Agency
- FPAC Business Center
- Natural Resources Conservation Service
- Risk Management Agency

Administrator for the Food and Nutrition Administration

- Food and Nutrition Administration

Under Secretary for Food Safety

- Food Safety and Inspection Service

Under Secretary for Marketing and Regulatory Programs
- Agricultural Marketing Service
- Animal and Plant Health Inspection Service

Under Secretary for Natural Resources and Environment
- Forest Service

Under Secretary for Research, Education, and Economics
- Agricultural Research Service
- Economic Research Service
- National Agricultural Statistics Service
- National Institute of Food and Agriculture
- Office of the Chief Scientist

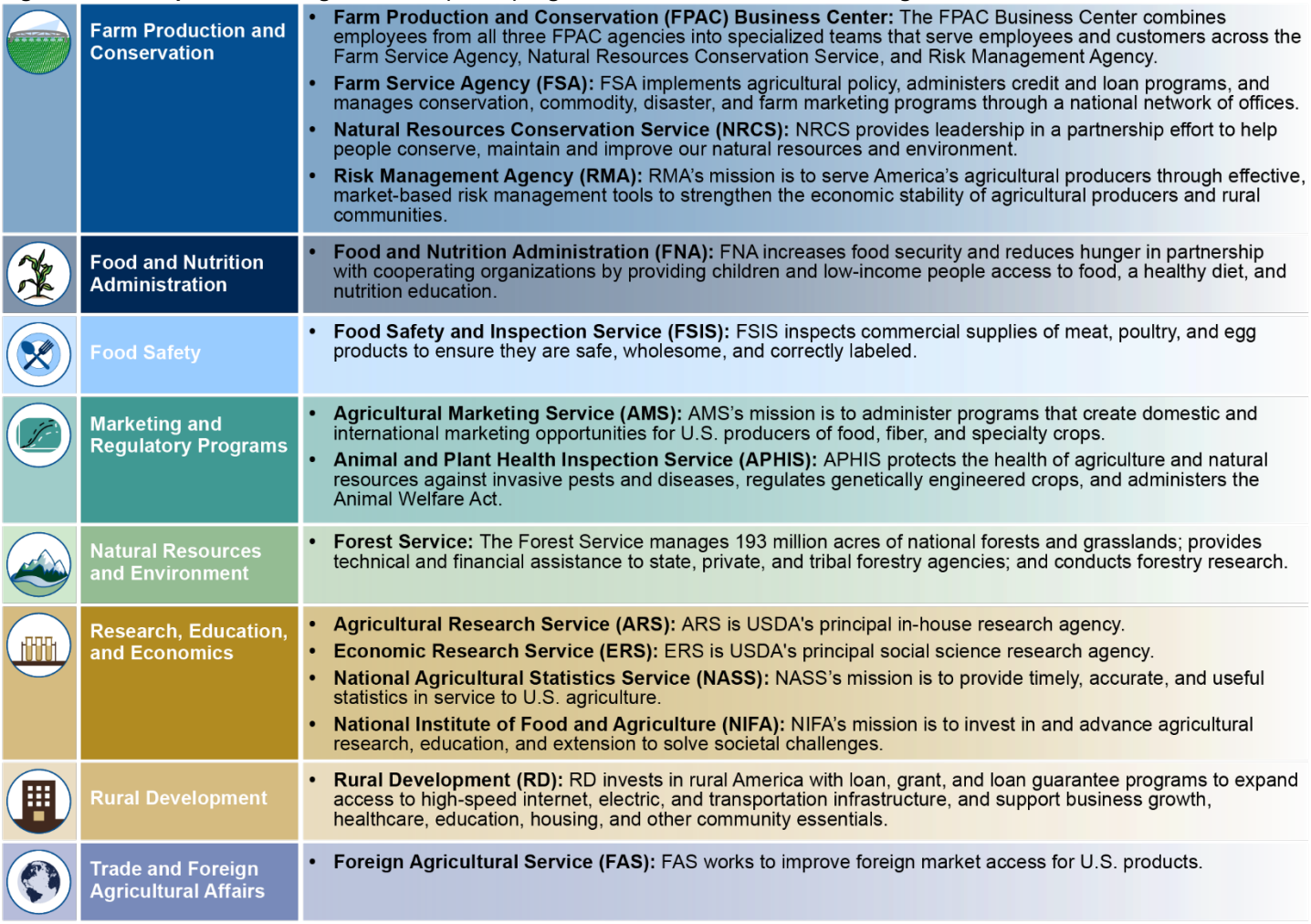
Under Secretary for Rural Development
- Rural Business-Cooperative Service
- Rural Housing Service
- Rural Utilities Service

Under Secretary for Trade and Foreign Agricultural Affairs
- Foreign Agricultural Service
- U.S. Codex Office

Source: GAO analysis of USDA information. | GAO-27-108734

Under USDA's eight mission areas, various agencies each conduct their own work to support USDA's overall mission (see fig. 2).

Figure 2: U.S. Department of Agriculture's (USDA) Eight Mission Areas and Selected Agencies



Source: GAO analysis of USDA information. | GAO-27-108734

Note: This figure only includes information on those agencies for which we are reporting workforce data, and thus does not match all of the agencies listed in USDA's organization chart.

Accessible Data for Figure 2: U.S. Department of Agriculture's (USDA) Eight Mission Areas and Selected Agencies

Farm Production and Conservation

- Farm Production and Conservation (FPAC) Business Center: The FPAC Business Center combines employees from all three FPAC agencies into specialized teams that serve employees and customers across the Farm Service Agency, Natural Resources Conservation Service, and Risk Management Agency.
- Farm Service Agency (FSA): FSA implements agricultural policy, administers credit and loan programs, and manages conservation, commodity, disaster, and farm marketing programs through a national network of offices.
- Natural Resources Conservation Service (NRCS): NRCS provides leadership in a partnership effort to help people conserve, maintain and improve our natural resources and environment.
- Risk Management Agency (RMA): RMA's mission is to serve America's agricultural producers through effective, market-based risk management tools to strengthen the economic stability of agricultural producers and rural communities.

Food and Nutrition Administration

- Food and Nutrition Administration (FNA): FNA increases food security and reduces hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthy diet, and nutrition education.

Food Safety

- Food Safety and Inspection Service (FSIS): FSIS inspects commercial supplies of meat, poultry, and egg products to ensure they are safe, wholesome, and correctly labeled.

Marketing and Regulatory Programs

- Agricultural Marketing Service (AMS): AMS's mission is to administer programs that create domestic and international marketing opportunities for U.S. producers of food, fiber, and specialty crops.
- Animal and Plant Health Inspection Service (APHIS): APHIS protects the health of agriculture and natural resources against invasive pests and diseases, regulates genetically engineered crops, and administers the Animal Welfare Act.

Natural Resources and Environment

- Forest Service: The Forest Service manages 193 million acres of national forests and grasslands; provides technical and financial assistance to state, private, and tribal forestry agencies; and conducts forestry research.

Research, Education, and Economics

- Agricultural Research Service (ARS): ARS is USDA's principal in-house research agency.
- Economic Research Service (ERS): ERS is USDA's principal social science research agency.
- National Agricultural Statistics Service (NASS): NASS's mission is to provide timely, accurate, and useful statistics in service to U.S. agriculture.
- National Institute of Food and Agriculture (NIFA): NIFA's mission is to invest in and advance agricultural research, education, and extension to solve societal challenges.

Rural Development

- Rural Development (RD): RD invests in rural America with loan, grant, and loan guarantee programs to expand access to high-speed internet, electric, and transportation infrastructure, and support business growth, healthcare, education, housing, and other community essentials.

Trade and Foreign Agricultural Affairs

- Foreign Agricultural Service (FAS): FAS works to improve foreign market access for U.S. products.

Source: GAO analysis of USDA information. | GAO-27-108734

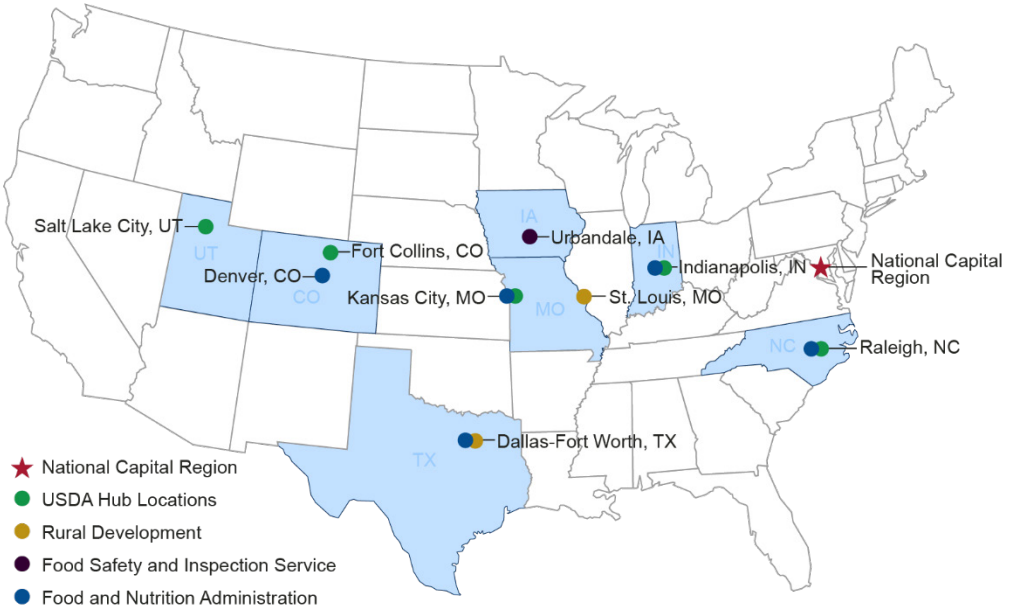
Note: This figure only includes information on those agencies for which we are reporting workforce data, and thus does not match all of the agencies listed in USDA's organization chart.

What are the key elements of USDA's reorganization plan?

On July 24, 2025, the Secretary of Agriculture announced a plan to reorganize the department via a Secretary's memorandum (see app. I).[1] USDA described four "key pillars" it said would guide the reorganization plan: (1) ensure the size of USDA's workforce aligns with financial resources and priorities,[2] (2) bring USDA closer to its customers by relocating resources outside of the National Capital Region, (3) eliminate management layers and bureaucracy, and (4) consolidate support functions. The Secretary's memorandum also included decisions about

- relocating at least 2,600 of USDA's 4,600 headquarters and National Capital Region staff to five hub locations and other cities throughout the United States, as shown in figure 3;[3]
- which facilities to retain or vacate in the National Capital Region;
- agency-specific office eliminations and regional consolidations; and
- consolidating various support functions.

Figure 3: Five Hub Locations and Other Selected Relocations from the National Capital Region Planned by the U.S. Department of Agriculture (USDA), as of June 2026



Sources: GAO analysis of USDA information; Map Resources (map). | GAO-27-108734

Accessible Dats for Figure 3: Five Hub Locations and Other Selected Relocations from the National Capital Region Planned by the U.S. Department of Agriculture (USDA), as of June 2026

USDA Hub Locations: Salt Lake City, UT; Fort Collins, CO; Kansas City, MO; Indianapolis, IN; Raleigh, NC, National Capital Region

Rural Development: St. Louis, MO; Dallas-Fort Worth, TX

Food Safety and Inspection Service: Urbandale, IA

Food and Nutrition Administration: Denver, CO; Dallas, TX; Indianapolis, IN; Kansas City, MO; Raleigh, NC.

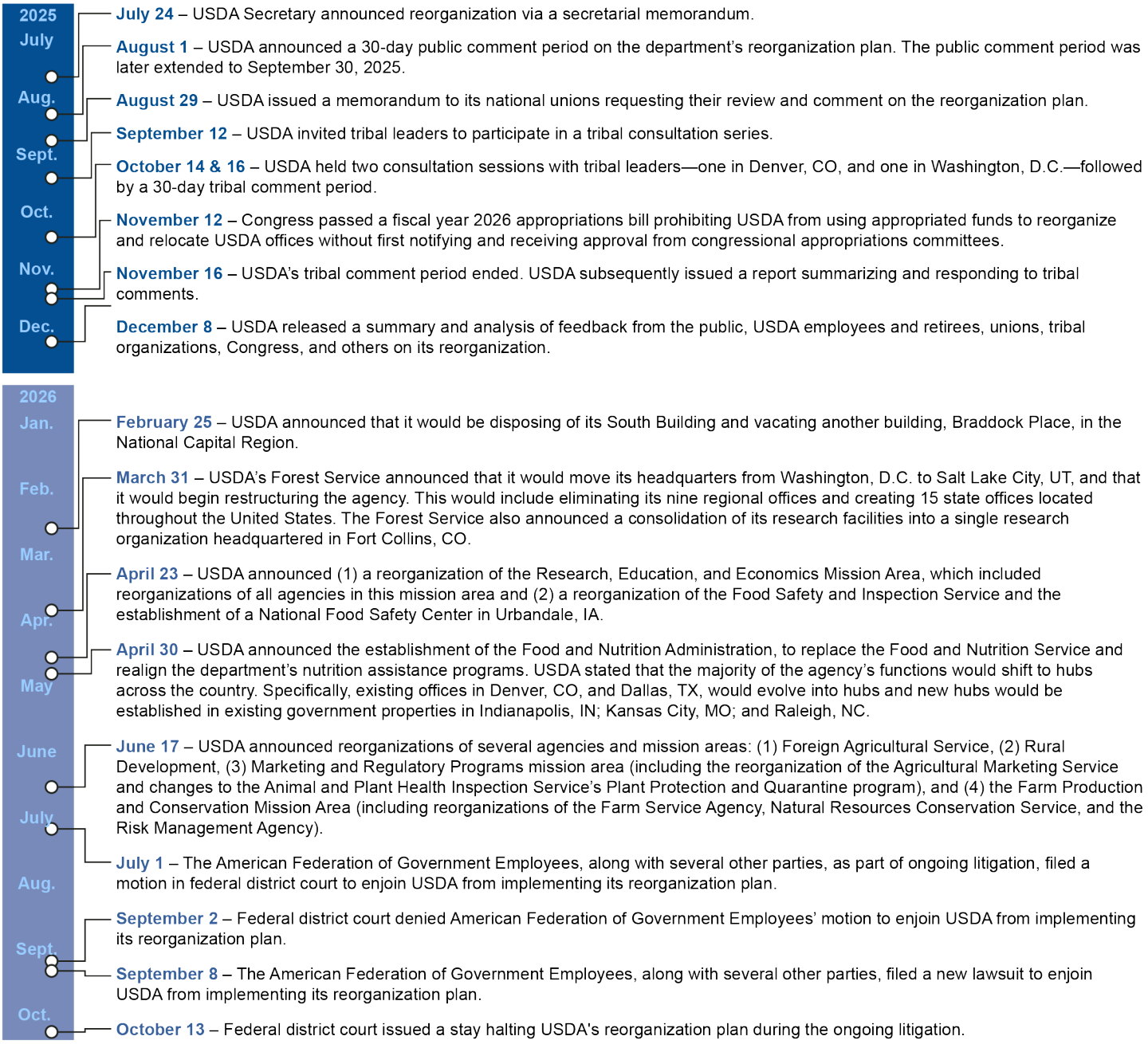
Source: GAO analysis of USDA information; Map Resources 9map). | GAO-27-108734

Following the July 2025 reorganization announcement, USDA took steps to begin implementing the reorganization, including announcing reorganizations and relocations of various mission areas and agencies. Between March and June 2026, USDA announced reorganizations of all eight of its mission areas and, as of July 2026, was in the process of implementing changes.

However, implementation of USDA's reorganization plan was contested in court and, as of October 2026, a federal judge ordered that much of the reorganization plan be halted pending legal proceedings. In July 2026, the American Federation of Government Employees, among others, as part of ongoing litigation, filed a motion in federal district court to stop USDA from implementing its reorganization plan. In September 2026, the court denied that motion. Soon after, a new suit was filed in federal court again seeking to stop the reorganization plan.[4] In October 2026, a federal district court issued an order granting a stay in response to an American Federation of Government Employees' motion. The court ordered much of USDA's reorganization plan be halted during the ongoing litigation. Shortly afterwards, USDA gave notice that it is appealing that decision to the U.S. Court of Appeals for the Ninth Circuit.

Figure 4 provides a timeline of selected key events related to USDA's reorganization.

Figure 4: Timeline of Selected Key Events Related to the Reorganization of the U.S. Department of Agriculture (USDA), July 2025–October 2026



Source: GAO analysis of USDA information. | GAO-27-108734

Accessible Data for Figure 4: Timeline of Selected Key Events Related to the Reorganization of the U.S. Department of Agriculture (USDA), July 2025–October 2026

2025:

July 24 – USDA Secretary announced reorganization via a secretarial memorandum.

August 1 – USDA announced a 30-day public comment period on the department's reorganization plan. The public comment period was later extended to September 30, 2025.

August 29 – USDA issued a memorandum to its national unions requesting their review and comment on the reorganization plan.

September 12 – USDA invited tribal leaders to participate in a tribal consultation series.

October 14 & 16 – USDA held two consultation sessions with tribal leaders—one in Denver, CO, and one in Washington, D.C.—followed by a 30-day tribal comment period.

November 12 – Congress passed a fiscal year 2026 appropriations bill prohibiting USDA from using appropriated funds to reorganize and relocate USDA offices without first notifying and receiving approval from congressional appropriations committees.

November 16 – USDA's tribal comment period ended. USDA issued a report summarizing and responding to tribal comments.

December 8 – USDA released a summary and analysis of feedback from the public, USDA employees and retirees, unions, tribal organizations, Congress, and others on its reorganization.

2026:
February 25 – USDA announced that it would be disposing of its South Building and vacating another building, Braddock Place, in the National Capital Region.

March 31 – USDA's Forest Service announced that it would move its headquarters from Washington, D.C. to Salt Lake City, UT, and that it would begin restructuring the agency. This would include eliminating its nine regional offices and creating 15 state offices located throughout the United States. The Forest Service also announced a consolidation of its research facilities into a single research organization headquartered in Fort Collins, CO.

April 23 – USDA announced (1) a reorganization of the Research, Education, and Economics Mission Area, which included reorganizations of all agencies in this mission area and (2) a reorganization of the Food Safety and Inspection Service and the establishment of a National Food Safety Center in Urbandale, IA.

April 30 – USDA announced the establishment of the Food and Nutrition Administration, to replace the Food and Nutrition Service and realign the department's nutrition assistance programs. USDA stated that the majority of the agency's functions would shift to hubs across the country. Specifically, existing offices in Denver, CO, and Dallas, TX, would evolve into hubs and new hubs would be established in existing government properties in Indianapolis, IN; Kansas City, MO; and Raleigh, NC.

June 17 – USDA announced reorganizations of several agencies and mission areas: (1) Foreign Agricultural Service, (2) Rural Development, (3) Marketing and Regulatory Programs mission area (including the reorganization of the Agricultural Marketing Service and changes to the Animal and Plant Health Inspection Service's Plant Protection and Quarantine program), and (4) the Farm Production and Conservation Mission Area (including reorganizations of the Farm Service Agency, Natural Resources Conservation Service, and the Risk Management Agency).

July 1 - The American Federation of Government Employees, along with several other parties, as part of ongoing litigation, filed a motion in federal district court to enjoin USDA from implementing its reorganization plan.

September 4 - Federal district court denied American Federation of Government Employees' motion to enjoin USDA from implementing its reorganization plan.

September 9 – The American Federation of Government Employees, along with several other parties, filed a new lawsuit to enjoin USDA from implementing its reorganization plan.

September 14 - Federal district court issued a stay temporarily halting USDA's reorganization plan during the ongoing litigation.

Source: GAO analysis of USDA information. | GAO-27-108734

How has USDA's workforce changed since December 2024?

Our analysis of federal workforce data shows that USDA's workforce decreased from about 91,000 employees in December 2024 to fewer than 73,000 employees in March 2026—a decrease of about 18,000 employees, or 20 percent. The number of employees decreased in USDA's departmental administration and all eight mission areas, with Rural Development and the Food and Nutrition Administration having the biggest decreases as a percentage of their workforces. While the relative size of these decreases varied across USDA's mission areas—from about 12 percent at the Forest Service to over 38 percent at Rural Development—four of the eight mission areas declined by more than 25 percent. In addition, staff in seven individual agencies decreased by over 30 percent. The largest decline was at the National Institute of Food and Agriculture, whose workforce decreased by about 41 percent. Table 1 shows the

change in the size of the workforce for each mission area and component agency from the end of December 2024 through late March 2026, when our data collection period ended.

Table 1: Changes in the Size of the Reported Total Workforce at U.S. Department of Agriculture (USDA) Mission Areas and Agencies

Mission area	Agency	Staff on board in December 2024	Staff on board in October 2025	Staff on board in January 2026	Staff on board in March 2026	Percentage change from December 2024 through March 2026
Departmental administration[a]	Departmental administration	4,440	3,375	3,263	3,247	–26.9
Farm Production and Conservation	Farm Production and Conservation Business Center	1,613	1,063	1,030	1,014	–37.1
	Farm Service Agency	3,374	2,594	2,604	2,684	–20.5
	Natural Resources Conservation Service	11,817	9,241	9,078	8,951	–24.3
	Risk Management Agency	415	357	351	352	–15.2
	Total	**17,219**	**13,255**	**13,063**	**13,001**	**–24.5**
Food and Nutrition Administration	Food and Nutrition Administration	1,848	1,245	1,202	1,184	–35.9
Food Safety	Food Safety and Inspection Service	8,383	7,560	7,444	7,368	–12.1
Marketing and Regulatory Programs	Agricultural Marketing Service	4,478	3,732	3,890	3,864	–13.7
	Animal and Plant Health Inspection Service	8,637	6,712	6,663	6,672	–22.8
	Total	**13,115**	**10,444**	**10,553**	**10,536**	**–19.7**
Natural Resources and Environment	Forest Service	31,665	31,065	26,260	27,909	–11.9
Research, Education, and Economics	Agricultural Research Service	7,127	5,122	4,916	4,846	–32.0
	Economic Research Service	292	208	198	196	–32.9
	National Agricultural Statistics Service	795	513	498	501	–37.0
	National Institute of Food and Agriculture	483	294	284	283	–41.4
	Total	**8,697**	**6,137**	**5,896**	**5,826**	**–33.0**
Rural Development	Rural Development	4,954	3,179	3,097	3,066	–38.1
Trade and Foreign Agricultural Affairs	Foreign Agricultural Service	726	553	543	534	–26.4

	Total USDA employees	**91,047**	**76,813**	**71,321**	**72,671**	**–20.2**

Source: GAO analysis of federal workforce data from the Office of Personnel Management. | GAO-27-108734

Note: We are reporting federal workforce data from the Office of Personnel Management. These data do not include data on nonfederal staff, including the Farm Service Agency's approximately 15,500 county employees and state and county committee members, who operate under a different personnel system, according to USDA.

[a]"Departmental administration" includes workforce data for the Offices of the Secretary of Agriculture, Budget and Program Analysis, Communications, Partnerships and Public Engagement, Chief Economist, Chief Financial Officer, Chief Information Officer, General Counsel, Inspector General, and other offices related to administration of the department. It is not one of USDA's mission areas.

How many separations and hires has USDA's workforce experienced in 2025 and 2026?

Overall, USDA had about 25,000 employee separations and about 7,000 hires from January 2025 through March 2026—decreasing from about 91,000 employees in December 2024 to fewer than 73,000 in March 2026, as noted above.[5] Table 2 provides data on the number of separations and hires at USDA's mission areas and agencies during this time period.

Table 2: Separations and Hires at U.S. Department of Agriculture Mission Areas and Agencies, January 2025–March 2026

Mission area	Agency	Separations	Hires
Departmental administration[a]	Departmental administration	1,288	211
Farm Production and Conservation	Farm Production and Conservation Business Center	454	17
	Farm Service Agency	833	294
	Natural Resources Conservation Service	2,736	213
	Risk Management Agency	56	13
	Total for Farm Production and Conservation	**4,079**	**537**
Food and Nutrition Administration	Food and Nutrition Administration	642	*
Food Safety	Food Safety and Inspection Service	1,264	303
Marketing and Regulatory Programs	Agricultural Marketing Service	860	463
	Animal and Plant Health Inspection Service	2,525	618
	Total for Marketing and Regulatory Programs	**3,385**	**1,081**
Natural Resources and Environment	Forest Service	10,253	4,832
Research, Education, and Economics	Agricultural Research Service	2,131	131
	Economic Research Service	93	*
	National Agricultural Statistics Service	285	*
	National Institute of Food and Agriculture	177	*
	Total for Research, Education, and Economics	**2,686**	**140**
Rural Development	Rural Development	1,660	78
Trade and Foreign Agricultural Affairs	Foreign Agricultural Service	191	10
	Total USDA employees	**25,448**	**7,197**

Source: GAO analysis of federal workforce data from the Office of Personnel Management. | GAO-27-108734

Note: We are reporting federal workforce data from the Office of Personnel Management. These data do not include data on nonfederal staff, including the Farm Service Agency's approximately 15,500 county employees and state and county committee members, who operate under a different personnel system, according to USDA. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk.

[a]"Departmental administration" includes workforce data for the Offices of the Secretary of Agriculture, Budget and Program Analysis, Communications, Partnerships and Public Engagement, Chief Economist, Chief Financial Officer, Chief Information Officer, General Counsel, Inspector General, and other offices related to administration of the department. It is not one of USDA's mission areas.

What were the types of separations at USDA in 2025 and 2026?

Of the over 25,000 employees who separated from USDA from January 2025 through March 2026, about half (52 percent) separated after taking a deferred resignation offer.[6] See table 3 for information on types of separations for USDA overall. In addition, appendix II provides information on types of separations for individual USDA agencies.

Table 3: Number and Percentage of U.S. Department of Agriculture Employees Who Left Agency Employment by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	7,671	30.1
Retirement	5,376	21.1
Termination Expired Appointment/Other[a]	109	0.4
All other separations[b]	17	0.1
DRP total	**13,173**	**51.8**
Separations not associated with the Deferred Resignation Program		
Employees who quit	4,437	17.4
Retirement	2,821	11.1
Termination Expired Appointment/Other[a]	3,973	15.6
All other separations[b]	1,044	4.1
Non-DRP total	**12,275**	**48.2**
Total separations	**25,448**	**100**

Source: GAO analysis of federal workforce data from the Office of Personnel Management. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. These data do not include data on nonfederal staff, including the Farm Service Agency's approximately 15,500 county employees and state and county committee members, who operate under a different personnel system, according to USDA. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency, separated due to a reduction in force, or died. Fewer than 10 employees separated from USDA due to a reduction in force from January 2025 through March 2026.

What analysis did USDA conduct and what leading practices did it follow before announcing its reorganization plans?

The extent to which USDA conducted and considered analysis before the department's reorganization announcement in July 2025 is unknown because USDA did not provide us with evidence of analysis that informed the specific decisions in its announcement. In September and December 2025 and in January, March, and April 2026, we asked for documentation of any analysis or planning that USDA conducted prior to the Secretary's July 2025 announcement of USDA's reorganization. USDA did not provide documentation of such analysis.

- In March and April 2026, USDA provided certain limited materials, including USDA documents and links to federal agency web pages.[7] This included raw, unanalyzed data on daily attendance at four of its National Capital Region buildings from May 2025 to April 2026.

- In September 2026, USDA provided us a copy of an August 2024 report on financial challenges faced by the Forest Service.

None of these materials constitute analyses that inform the specific reorganization decisions announced in July 2025. Thus, Congress and the public do not have information on the extent to which USDA used analyses to inform these decisions.

According to our prior work, which is explained in greater detail below, several leading practices can help agencies conduct appropriate analyses and help ensure sound decision-making when they reorganize and relocate staff, including practices related to agency reforms, economic analysis, management of federal real property assets, and strategic workforce planning. Because USDA did not respond to our requests for information documenting the analyses USDA conducted to inform its 2025 reorganization plan, as noted above, Congress and the public also do not have information on the extent to which USDA examined issues such as how the reorganization could impact service delivery, the economic effects of the reorganization, or how to safeguard taxpayers' dollars in disposing of property through the reorganization.

Leading Practices for Agency Reform

In 2018, we identified key questions Congress and federal agencies can use to assess the development and implementation of agency reforms.[8] For example, our prior work has found that before implementing a reorganization, agencies should consider how they are ensuring the continued delivery of services and how they plan to measure customer satisfaction with changes resulting from reorganizations. See table 4 for selected questions relevant to reorganizations and other agency reform efforts.

Table 4: Selected Categories for Key Questions to Assess Agency Reform Efforts

Categories	Selected key questions
Goals and outcomes: *What was the agency trying to achieve with its proposed reforms and who should achieve it?*	• How well have the proposed reforms indicated the likely result of the elimination, merging, or restructuring of activities with other levels of government or sectors? • To what extent has the agency established clear outcome-oriented goals and performance measures for the proposed reforms?
Process for developing reforms: *What was the process used to develop the proposed reforms and what factors were considered?*	• How, and to what extent, has the agency consulted with the Congress and other key stakeholders to develop its proposed reforms? • How, and to what extent, has the agency engaged employees and employee unions in developing the reforms to gain their ownership for the proposed changes? • How, and to what extent, has the agency involved other stakeholders and its customers in the development of the proposed reforms to ensure the reflection of their views?
Implementing the reforms: *What practices did the agency put in place to support the successful implementation of proposed reforms?*	• How has the agency ensured the continued delivery of services during reform implementation? • Has the agency developed an implementation plan with key milestones and deliverables to track implementation progress? • How is the agency planning to measure customer satisfaction with the changes resulting from its reforms?

Source: GAO-18-427. | GAO-27-108734

The extent to which USDA followed leading practices for agency reforms before announcing its reorganization is unclear because USDA did not respond to our requests for information about analyses conducted prior to its decision to reorganize.

Economic Analysis

We reported in 2018 that economic analyses may be used to propose or support an agency reorganization or other action, or to examine an action that has already been taken.[9] In this prior work, we reported that economic analysis can inform decision-makers and stakeholders about the economic effects of an agency action and associated changes, such as office relocations.[10] We identified key methodological elements to structure economic analyses,[11] including:

- **Objective and scope.** The economic analysis should explain the action examined and include a rationale and justification for the action. The analysis should generally focus on economic effects that accrue to citizens and residents of the United States, and the time horizon for the analysis should be long enough to encompass the important economic effects of the action.
- **Methodology.** The methodology for the analysis should examine the effects of the action by comparing alternatives, using one of them as a baseline.
- **Analysis of effects.** The analysis of effects should (1) monetize effects using opportunity cost and net present value to compare effects across alternatives; (2) control for inflation and use appropriate discount rates; and, (3) for nonquantifiable effects, explain how they will impact the comparison of alternatives, including equity and distributional impacts.
- **Transparency.** The analysis should describe and justify the analytical choices, assumptions, and data used.
- **Documentation.** The documentation for the analysis should be clearly written, with a plain language summary; cite all sources used; and comply with a robust quality assurance process.

The extent to which USDA conducted economic analyses before announcing its reorganization is unclear because USDA did not respond to our requests for information about analyses conducted prior to its decision to reorganize.

Real Property Assets

Since 2003, we have identified the need for better management of federal real property, including disposing of unneeded or underused buildings and improving the configuration of federal facilities.[12] For example, in 2023, we found that 17 of 24 federal agencies, including USDA, used an estimated 25 percent or less of the capacity of their headquarters buildings, on average.[13] We identified financial and other costs to maintaining unneeded federal space.

In addition, the Utilizing Space Efficiently and Improving Technologies (USE IT) Act, enacted in January 2025, requires the head of any agency, including USDA, to report occupancy data, including the actual utilization of office space and monthly utilization rates, in certain federally owned and leased spaces.[14] These occupancy data can then be used to calculate utilization rates, which indicate how much space is being used at individual locations and across agency portfolios. Beginning in 2027, the USE IT Act requires the General Services Administration, in consultation with the Office of Management and Budget, to take steps to reduce agency space if utilization rates are below 60 percent for 2 consecutive years. In commenting on a draft of this report, USDA stated that the department is taking steps to reduce underutilized office space. This includes

reducing leased space and working with the General Services Administration to occupy available space in its new hub locations. In April 2026, USDA also sent us daily attendance information for four of its National Capital Region office buildings covering May 2025 to April 2026. However, the extent to which these data were used to inform analysis of decisions in the Secretary's July 2025 memorandum announcing USDA's reorganization is unclear because what was transmitted to us was the data alone.

In our prior work, we have identified key characteristics that can help federal agencies manage their real property assets and resources effectively, such as using quality data to inventory assets and evaluating and improving asset management practices.[15] Table 5 outlines key characteristics of an effective asset management framework.

Table 5: Key Characteristics of an Effective Asset Management Framework

Key characteristic	Description
Establishing formal policies and plans	Have a clearly defined governance regime that includes a strategic asset management plan that ties to the organization's mission and strategic objectives, defines the asset management scope, and defines the roles and responsibilities for each part of the organization.
Maximizing an asset portfolio's value	Develop an asset management policy to identify the value of assets to achieve the organization's mission and strategic objectives, and invest in those assets in such a way as to derive the greatest value from them.
Maintaining leadership support	Clearly articulate leadership support for asset management and provide the necessary resources for asset management to succeed.
Using quality data	Collect, analyze, and verify accuracy of asset data, including the organization's inventory of assets and data on each asset's condition, age, maintenance cost, and criticality to the organization.
Promoting a collaborative organizational culture	Promote a culture of information sharing and enterprise-wide decision-making regarding the organization's assets.
Evaluating and improving asset management practices	Evaluate the performance of the organization's asset management system and implement necessary improvements.

Source: GAO analysis of ISO 55000 standards, asset management literature, and comments from experts, GAO-19-57. | GAO-27-108734

The extent to which the department considered leading practices for real property asset management before announcing its reorganization is unclear because USDA did not respond to our requests for information about analyses conducted prior to its decision to reorganize.

Strategic Workforce Planning

In our prior work, we have reported on the importance of strategic workforce planning and identified key principles that can enhance the effectiveness of an agency's strategic workforce planning.[16] Strategic workforce planning addresses two critical needs: (1) aligning an organization's human capital program with its current and emerging mission and programmatic goals; and (2) developing long-term strategies for acquiring, developing, and retaining staff to achieve programmatic goals.

Before implementing workforce reduction strategies, we have previously reported that it is critical for the agency to carefully consider how to strategically downsize its workforce and maintain staff resources to carry out its mission.[17] Table 6 shows selected key principles and practices for strategic workforce planning for agencies to consider.

Table 6: Selected Key Principles and Practices for Strategic Workforce Planning

Key principles	Practices to help agencies implement workforce planning
Involve top management, employees, and other stakeholders in developing, communicating, and implementing the strategic workforce plan	• Ensure top management sets the overall direction and goals of workforce planning. • Involve employees and other stakeholders in developing and implementing future workforce strategies. • Establish a communication strategy to create shared expectations, promote transparency, and report progress.
Determine the critical skills and competencies needed to achieve current and future programmatic results	• Make a fact-based determination of the critical skills and competencies needed to achieve the agency's mission and goals in a changing environment (e.g., given changes in technology, budget constraints, or agency reorganization).
Develop strategies that are tailored to address gaps in number, deployment, and alignment of human capital approaches for enabling and sustaining the contributions of all critical skills and competencies	• Develop tailored workforce planning strategies (e.g., related to hiring, training, succession planning) that can be implemented with available resources. • Consider how these strategies can be aligned to eliminate gaps and improve identified critical skills and competencies.
Monitor and evaluate the agency's progress toward its human capital goals and the contribution that human capital results have made toward achieving programmatic results	• Develop performance measures to gauge (1) progress toward reaching human capital goals and (2) contribution of human capital activities toward reaching programmatic goals. • Monitor and evaluate progress toward meeting the identified performance measures.

Source: GAO-04-39. | GAO-27-108734

The extent to which USDA conducted strategic workforce planning before announcing its reorganization is unclear because USDA did not respond to our requests for information about analyses conducted prior to its decision to reorganize.

What has prior GAO work shown about federal agency relocations?

Previous federal agency relocations preceded significant staff losses, changes in staff composition, and impacts on agencies' ability to perform their missions. In particular, we have reported on USDA's relocation of the Economic Research Service (ERS) and National Institute of Food and Agriculture (NIFA) and on the Department of the Interior's relocation of the Bureau of Land Management's (BLM) headquarters.[18] These relocations moved portions of the agencies' staff outside of the National Capital Region.

USDA's relocation of ERS and NIFA was first announced in August 2018 and had an effective date of September 30, 2019. The department's stated goals for relocating ERS and NIFA included placing USDA resources closer to the agencies' stakeholders and reducing costs. These goals reflect some of the stated goals of USDA's current reorganization. ERS and NIFA relocated to Kansas City, Missouri.

Table 7 displays key findings from our report on conditions at ERS and NIFA following their relocations. Two years after the relocations, overall staff size and productivity at the agencies had generally returned to previous levels, though changes in staff composition were more lasting.[19]

Table 7: Composition of the Workforce and Productivity Following Prior Agency Relocations, by Agency

Category	Economic Research Service	National Institute of Food and Agriculture
Proportion of staff that left the agency following the relocation	Over half	Over half
Changes in staff composition		
- Level of experience	Employees with 2 or more years of experience decreased from 84 percent to 34 percent	Employees with 2 or more years of experience decreased from 82 percent to 21 percent
- Racial and ethnic composition	Black or African American staff decreased from 22 percent of agency to 9 percent	Black or African American staff decreased from 47 percent of agency to 19 percent
Agencies' ability to perform their mission	Fewer research reports and journal articles produced	Processing times for competitive and capacity grants increased

Source: GAO-23-104709. | GAO-27-108734

Note: Two years after the relocations, ERS and NIFA had largely recovered in terms of their overall staff size and productivity, though changes in their staff composition were more lasting.

In another example, between July 2019 and August 2020, the Department of the Interior moved BLM's headquarters from Washington, D.C., to Grand Junction, CO, and relocated most of its headquarters positions to its new headquarters and other offices in 11 western states.[20] Of the 176 staff who needed to relocate as a result, 135 (77 percent) separated from their positions, either by declining their reassignments or by separating from their positions prior to receiving a reassignment.

BLM headquarters also experienced changes in staff composition around this time period. Between January 2016 and January 2021, there was a decrease in the proportion and number of experienced staff across the agency as a whole. For headquarters, the number of staff with at least 25 years of service within Interior declined by nearly 34 percent (from 171 to 113). In addition, between July 2019 and January 2021, the number of Black or African American headquarters staff decreased by more than half. Most BLM staff we spoke with said vacancies in key headquarters positions after 2016 caused delays in creating or clarifying guidance or policy.

In September 2021, the Secretary of the Interior announced plans to restore BLM's headquarters in Washington, D.C., and make the Grand Junction headquarters a western headquarters.[21] As of September 2026, BLM's headquarters was listed as Washington, D.C., and the Grand Junction office was listed as its western headquarters.

Agency Comments and Our Evaluation

We provided a draft of this report to the Department of Agriculture for review and comment. USDA provided written comments, reproduced in appendix III, as well as recent court documents, including declarations, briefings, and exhibits associated with ongoing litigation.[22] We also met with USDA officials to discuss their comments. At that meeting, USDA officials reiterated many of the arguments they have made in favor of the reorganization, including ones outlined in USDA's written comments, but did not point us to documentation of analysis or planning that informed the specific decisions in the Secretary's July 2025 announcement of USDA's reorganization. We updated some information in the report based on USDA's comments. We provided that information to USDA officials for review and they did not have any further comments. (The numbering below provides references to our notes on USDA's written comments in app. III.)

1. In its written comments, the department refers to our review as partisan, politicized, and incomplete. As discussed in more detail below, we conducted this review in an objective, independent, and nonpartisan manner and stand by the accuracy of the facts presented in our report. Notably, we do not take a position on USDA's decision to reorganize or the stated objectives of the reorganization. Rather, over the course of the review, we asked USDA to provide documentation of analysis that supported its specific reorganization decisions in order to provide Congress with information with which to conduct oversight. Despite many opportunities to do so, USDA did not provide such documentation.

2. In its comments, USDA refers to the Secretary's memorandum announcing the reorganization as a framework based on key principles that could be adjusted as needed. The Secretary's memorandum lays out four "key pillars" to guide the reorganization but, as described earlier in our report, it also includes decisions about reducing National Capital Region staff, retaining or vacating facilities, and consolidating various support functions. What analyses these decisions were based upon remains unclear. The department states that, for months prior to the issuance of the Secretary's memorandum, "administration officials, staff, and [the Secretary] deliberated the plight of the Department." Our review sought to obtain information about various types of analysis that may have informed these deliberations leading up to the decision to reorganize, including any assessments of the effects of proposed actions and alternatives.

3. The department discusses several "basic realities" that it states warrant inclusion in our report, including the Forest Service's difficult financial situation, the growth of the department's workforce under the previous administration, and the department's real estate footprint in the National Capital Region. However, the extent to which USDA conducted analysis of these issues, rather than just focusing on the conditions themselves, to inform its reorganization decisions is not clear from the documentation USDA provided.

- **Forest Service.** One of the legal filings provided by USDA with its comments is a USDA report about the Forest Service's financial difficulties. USDA sent the report to the Office of Management and Budget in August 2024. In April 2026, we met with a Forest Service official and requested documentation used to inform the Forest Service's reorganization decisions. At the time, the Forest Service official stated that several pertinent documents were being reviewed by the USDA General Counsel's office before they could be released to us. We followed up in May and July 2026 to obtain the documents, but USDA did not provide the documents. As a result, we could not determine the extent to which USDA used the August 2024 report to inform its decision to reorganize.
- **Workforce growth.** Another of the legal filings provided by USDA is a pre-decisional/deliberative draft fiscal year 2026 staffing plan for USDA, dated December 2025. The document includes summary staffing projections and a summary of employee hiring and attrition. However, USDA did not provide us with information on the extent to which staffing projections and plans informed the July 2025 decision to reorganize.
- **Real estate footprint.** In April 2026, USDA sent us daily attendance information for four of its National Capital Region office buildings, but USDA did not provide evidence of analysis it conducted using these data, such as analysis of how it would safeguard taxpayers' dollars in disposing of property through the reorganization. In response to the department's comments, we have added to our report a discussion of the requirements of the Utilizing Space Efficiently and Improving Technologies (USE IT) Act and references to prior GAO work on the

importance of utilizing federal office space. To this end, we agree with the department that efficient utilization of space is desired, but USDA did not provide evidence of analyses the department conducted to support its specific space utilization decisions. The department also stated that our report does not discuss the condition of the Beltsville Agricultural Research Center. We note that we do not discuss the condition of any particular USDA buildings or properties in our report.

4. The department also states that we "criticize the Department for not using economic analyses favored by—and created by—[GAO]." Our report outlines benefits of conducting economic analyses and some key methodological elements of such analyses that we identified in our prior work. However, we do not "contend that failure to use [our] approach before the issuance of [the Secretary's] memorandum means that efforts are unfocused in approach and result," as USDA states in its comments. Rather, we state that the extent to which USDA conducted economic analyses is unclear because the department did not respond to requests for documentation of such analyses. Transparency in economic analysis allows the public to assess the structure of an agency's analysis and, in particular, how much of an analytic result hinges on the specific choices made by the agency.[23] Because USDA has not shared information about its analysis of the benefits and costs of its decision to reorganize, if it performed such analysis, Congress and the public cannot evaluate how these factors influenced USDA's decisions and choices.

5. The department's comments mention hiring actions in fiscal year 2026 that are not reflected in the report. We included workforce data from the Office of Personnel Management through March 2026. We requested workforce data from USDA starting in September 2025. We met with an official from USDA's Office of Human Resources Management in April 2026 who stated that various staffing data would be provided to us. Later that month, the official indicated that they were reviewing the data and anticipated sending it the next day. We followed up in April and June 2026 to obtain the data, but USDA did not provide them. In response to the department's comments about the size of its workforce, we have clarified that our workforce figures do not include certain Farm Service Agency nonfederal employees.

6. The department notes that decisions have been made since the July 2025 announcement of the reorganization to decrease attrition and maximize collaboration, such as by keeping rather than vacating a facility, co-locating agencies, and expanding efforts to address fraud in domestic nutrition programs. The department also notes its engagement with Members of Congress, including through testimony, meetings, and correspondence. However, these actions and decisions do not constitute documentation of the extent to which USDA conducted analysis of issues such as how the reorganization could impact service delivery or the economic effects of the reorganization prior to its decision to reorganize.

7. Finally, the department encourages us to review materials in the public domain, including court records. To this end, USDA provided two recent legal filings that contained numerous documents and USDA assertions. We have analyzed these materials. Some of this material, such as the USDA report on the financial challenges faced by the Forest Service sent to the Office of Management and Budget in August 2024, could be interpreted as related to USDA's decision to reorganize. However, none of the material represents documentation of analysis that informed the specific decisions laid out in the Secretary's July 2025 memorandum. Starting in September 2025, we asked USDA to provide information on the analysis it conducted before announcing the department's reorganization. USDA did not follow through on multiple

opportunities to provide this information, despite our multiple requests. As a result, we stand by our finding that Congress and the public do not have information on the extent to which USDA examined issues such as how the reorganization could impact service delivery, the economic effects of the reorganization, or how to safeguard taxpayers' dollars in disposing of property through the reorganization.

How GAO Did This Study

We analyzed laws, reports, and other agency documents related to the reorganization of USDA, primarily using publicly available information. We analyzed federal workforce data from the Office of Personnel Management to assess the size of USDA's workforce and its various agencies at certain points in time ranging from December 2024 through March 2026, as well as separations and hires across these time periods. To ensure the reliability of the data, we conducted electronic testing to identify missing or redacted variables, along with values outside of expected ranges. We reviewed documentation on the federal workforce data website and spoke with Office of Personnel Management officials to clarify areas where the documentation was unclear or we had additional questions. We also compared the data to other sources of similar information. We determined these data were sufficiently reliable for our reporting purposes.

We analyzed prior GAO reports to identify leading practices related to agency reforms, economic analysis, federal real property management, and strategic workforce planning. We analyzed available information about USDA's reorganization to determine which leading practices might apply to USDA. We also analyzed prior GAO reports to describe changes following prior agency relocations. We sought to obtain information relevant to our audit objectives from USDA, and we analyzed the documentation and data the agency provided.

We conducted this performance audit from September 2025 to November 2026 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

List of Requesters

The Honorable Amy Klobuchar
Ranking Member
Committee on Agriculture, Nutrition, and Forestry
United States Senate

The Honorable Angie Craig
Ranking Member
Committee on Agriculture
House of Representatives

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of Agriculture, and other interested parties. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

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Appendix I: Secretary of Agriculture Memorandum on USDA's Reorganization Plan

THE SECRETARY OF AGRICULTURE
WASHINGTON, D.C.
20250-0100

July 24, 2025

Secretary Memorandum: SM 1078-015

Subject: Department of Agriculture Reorganization Plan

Section 1. **Purpose**: This Secretary Memorandum authorizes and directs the actions necessary to effectuate the consolidation, unification, and optimization of functions within the Department of Agriculture (USDA) to achieve improved effectiveness and accountability, enhanced services, reduced bureaucracy and cost savings for the American people. These actions constitute the USDA Department Reorganization Plan.

Section 2. **Authority**: This Memorandum is issued under the authority of Reorganization Plan No. 2 of 1953 (5 U.S.C. app.; 7 U.S.C. 2201 note) and The Department of Agriculture Reorganization Act of 1994 (Pub. L. 103-354).

Section 3. **Background**: Since its legislated establishment in 1862, USDA has been known as "The People's Department," a title reflecting its mission to serve farmers, ranchers, landowners, and rural communities, and perform critical public services that benefit all Americans. The Department is reverting to its core mission to ensure:

- American agriculture feeds all across the United States and the world.
- American farmers, ranchers, and producers compete on a world stage that is fair, just, and on terms that put America First.
- Confidence in our programs to fight disease, feed the needy, manage our land and forests, and work for all of American agriculture.
- That Make America Great Again and Make America Healthy Again exist not in opposition to one another, but as complements to a common mission for our country.

Section 4. **Key Pillars**: USDA is committed to preserving critical public safety and other public services the American public relies upon. Reductions and impacts to wildland firefighting, inspection, and farmer and rural community front-line facing positions will be minimized. The USDA Reorganization Plan will be guided by four key pillars:

Principle 1: Ensure the Size of USDA's Workforce Aligns with Financial Resources and Priorities

Over the last four years, USDA's workforce grew by approximately 8% and employees' salaries increased by 14.5%. Many of these salaries were funded by temporary funding. As part of this reorganization, USDA is not conducting a large-scale workforce reduction. To make certain USDA can afford its workforce, this reorganization is another step of the Department's process of reducing its workforce. Much of this reduction was through voluntary retirements and the Deferred Retirement Program (DRP), a completely voluntary tool. As of today, 15,364 individuals voluntarily elected deferred resignation. This re-alignment will be undertaken to mitigate adverse consequences to those agencies which rely upon temporary workforces that increase at different times of the year. Examples include Forest Service increases during the spring and summer months due to wildland firefighting, Agricultural Marketing Service increases due to agricultural product grading activities during harvest time, and field-based agricultural activities involving the Farm Production and Conservation Mission Area.

USDA has and will continue to fully leverage voluntary programs such as the Deferred Resignation Program (DRP), Voluntary Early Retirement Authority (VERA) and Voluntary Separation Incentive Payments (VSIPs). The Department will also leverage directed and voluntary reassignments to ensure the workforce is aligned with mission priorities. Focused and limited Reductions in Force will be implemented only if needed and only after approval by USDA's Deputy Secretary.

Principle 2: Bring USDA Closer to Its Customers by Relocating Resources Outside of the National Capital Region

The Department currently employs approximately 4,600 individuals that work within the National Capital Region (NCR). This Region has one of the highest costs of living in the country, with a federal salary locality rate of 33.94%. To ensure USDA is located closer to the people it serves while achieving savings to the American taxpayer, USDA will relocate much of its Agency headquarters and NCR staff from the Washington, D.C. area to five hub locations. The selection of these hub locations takes into consideration existing concentrations of USDA employees and the cost of living for USDA employees. At the conclusion of implementation, it is USDA's goal to retain no more than 2,000 employees within the NCR.

The five hub locations and current Federal locality rates are:

1) Raleigh, North Carolina (22.24%)
2) Kansas City, Missouri (18.97%)
3) Indianapolis, Indiana (18.15%)
4) Fort Collins, Colorado (30.52%)
5) Salt Lake City, Utah (17.06%)

In addition to these five hubs, USDA will maintain two additional core administrative support locations: Albuquerque, New Mexico and Minneapolis, Minnesota. These two locations have substantial concentrations of human resources staff that support the delivery of critical public safety

functions. USDA will continue to maintain critical service centers and laboratories including agency service centers in St. Louis, Missouri; Lincoln, Nebraska; and Missoula, Montana.

Regarding existing facilities within the NCR:

Whitten Building: this facility will be retained as USDA's headquarters.

Yates Building: this facility will be retained for use and USDA will fully leverage available office space for USDA mission areas and staff offices.

National Agricultural Library: retained for use, and the Department will fully leverage available office space for USDA mission areas and staff offices.

South Building: this facility will be vacated.

Braddock Place: this facility will be vacated.

Beltsville Agricultural Research Center (BARC): this facility will be vacated over multiple years to avoid disruption of critical USDA research activities.

George Washington Carver Center (GWCC): this facility will be sold or transferred upon conclusion of its use as a temporary location for USDA personnel during the re-alignment of USDA offices and personnel

Principle 3: Eliminating Management Layers and Bureaucracy
The Department will reduce or eliminate stand-alone regional offices and other similar bureaucratic management layers. To promote coordination across USDA, regional offices and other similar management layers will be co-located in the hub locations to the greatest extent possible.

- The Agriculture Research Service will eliminate its Area Offices. Residual functions will be performed by its Office of National Programs.
- The National Agricultural Statistics Service will consolidate its 12 existing regions into five USDA Hubs over a multi-year period.
- The Food and Nutrition Service will reduce its number of regions from seven to five and align locations with the USDA Hubs and Service Centers over a two-year period
- The Forest Service will phase out the nine Regional Offices over the next year and implementation activities will take into consideration the ongoing fire season. The Forest Service will maintain a reduced state office in Juneau, Alaska and an eastern service center in Athens, Georgia. The current stand-alone Research Stations will be consolidated into a single location in Fort Collins, Colorado. The Forest Service will retain the Fire Sciences Lab and Forest Products Lab – the former, vital for protection from forest fires and the latter, critical for assessing market development opportunities for timber and other forest products and related industries.
- The Natural Resources Conservation Service will align its regional structure with the five USDA hub locations.
- Animal and Plant Health Inspection Service centers will remain at current locations as they are located in USDA hub locations.

Principle 4: Consolidate Support Functions
To reduce duplication and provide consistency across USDA, support functions will be consolidated. Mission area and agency resources will be realigned to the consolidated functions.

The Department will:

- Consolidate civil rights functions into the Office of the Assistant Secretary for Civil Rights, which will deliver all statutorily required civil rights functions.
- Consolidate Freedom of Information Act and related information management functions within the Office of General Counsel.
- Consolidate Legislative Affairs functions into the Office of Congressional Relations.
- To the maximum extent practicable, consolidate communication and public affairs functions within the Office of Communication.
- Eliminate the duplication and redundancy between the Office of Budget and Program Analysis and the Office of the Chief Financial Officer and streamline budget and financial operations across USDA.
- Where possible and appropriate, complete information technology consolidation activities with services fully provided by the Office of the Chief Information Officer.
- Consolidate tribal relations functions within mission areas and ensure the Office of Tribal Relations delivers all statutorily required tribal relations functions.
- Consolidate human resources functions in the Office of the Assistant Secretary for Administration (ASA). Although human resources will be consolidated, agencies will still have focused hiring support including a dedicated team for wildland firefighting hiring.
- Consolidate contracting functions in the ASA. Although contracting resources will be consolidated, dedicated teams for commodity procurement and wildland firefighting incident support will continue to exist. The Department will transfer contracting for common goods and services to the General Services Administration during FY 2026. To eliminate redundancy, the Office of Small and Disadvantaged Business will be reduced to a single position that focuses on statutory requirements.
- Consolidate lease administration and management functions in the ASA.
- Consolidate grants and financial assistance to provide better controls and promote efficiency. This consolidation will include, where feasible, the transfer of grant making and administration functions from USDA offices and agencies that currently have limited capacity to perform such duties to other offices and agencies.
- Eliminate the redundancy in student programs in the Office of Partnerships and Public Engagement (OPPE) and the Agricultural Research Service (ARS) by realigning OPPE student programs to ARS.

Section 5. **Implementation:**

a. **Deputy Secretary.** The Deputy Secretary will lead the implementation of the USDA Reorganization Plan and may make changes or adjustments to the plan as needed.

b. **The Office of the General Counsel and the ASA.** The Office of the General Counsel and the Office of the ASA are directed to take all necessary steps to support the Deputy Secretary in implementation of the USDA Reorganization Plan

c. **The Office of the Assistant Secretary for Congressional Relations.** The Office of the Assistant Secretary for Congressional Relations is directed to work with the Office of General Counsel on all necessary Congressional notifications.

d. **Agency Heads and Department Officials**. Under Secretaries, Agency Heads, and Department Officials are directed to take all necessary actions to implement the USDA Reorganization Plan as directed by the Deputy Secretary.

Section 6. **Effect of the Memorandum**: The implementation of this Secretary Memorandum will improve the internal management of the Department. This Secretary Memorandum and any resulting actions do not confer any right or benefit (substantive or procedural) to any party. To the extent there is any inconsistency between the provisions of this Secretary Memorandum and any Federal law or regulation, the provisions of such law or regulation will control.

Section 7. **Delegation**: This Memorandum delegates to the Deputy Secretary all authorities necessary to implement the USDA Reorganization Plan.

Section 8. **Expiration Date**: This Secretary Memorandum is effective immediately and will remain in effect until the earlier of the completion of the USDA Reorganization Plan or the revocation of this memorandum.

BROOKE L. ROLLINS
Secretary of Agriculture

Accessible Text for Appendix I: Secretary of Agriculture Memorandum on USDA's Reorganization Plan

THE SECRETARY OF AGRICULTURE
WASHINGTON, D.C.
20250-0100

July 24, 2025

Secretary Memorandum: SM 1078-015

Subject: Department of Agriculture Reorganization Plan

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- American agriculture feeds all across the United States and the world.
- American farmers, ranchers, and producers compete on a world stage that is fair, just, and on terms that put America First.
- Confidence in our programs to fight disease, feed the needy, manage our land and forests, and work for all of American agriculture.
- That Make America Great Again and Make America Healthy Again exist not in opposition to one another, but as complements to a common mission for our country.

Section 4. **Key Pillars:** USDA is committed to preserving critical public safety and other public services the American public relies upon. Reductions and impacts to wildfire firefighting, inspection, and farmer and rural community front-line facing positions will be minimized. The USDA Reorganization Plan will be guided by four key pillars:

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USDA has and will continue to fully leverage voluntary programs such as the Deferred Resignation Program (DRP), Voluntary Early Retirement Authority (VERA) and Voluntary Separation Incentive Payments (VSIPs). The Department will also leverage directed and voluntary reassignments to ensure the workforce is aligned with mission priorities. Focused and limited Reductions in Force will be implemented only if needed and only after approval by USDA's Deputy Secretary.

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The five hub locations and current Federal locality rates are:

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In addition to these five hubs, USDA will maintain two additional core administrative support locations: Albuquerque, New Mexico and Minneapolis, Minnesota. These two locations have substantial concentrations of human resources staff that support the delivery of critical public safety functions. USDA will continue to maintain critical service centers and laboratories including agency service centers in St. Louis, Missouri; Lincoln, Nebraska; and Missoula, Montana.

Regarding existing facilities within the NCR:

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George Washington Carver Center (GWCC): this facility will be sold or transferred upon conclusion of its use as a temporary location for USDA personnel during the re-alignment of USDA offices and personnel.

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- Consolidate Freedom of Information Act and related information management functions within the Office of General Counsel.
- Consolidate Legislative Affairs functions into the Office of Congressional Relations.
- To the maximum extent practicable, consolidate communication and public affairs functions within the Office of Communication.

- Eliminate the duplication and redundancy between the Office of Budget and Program Analysis and the Office of the Chief Financial Officer and streamline budget and financial operations across USDA.
- Where possible and appropriate, complete information technology consolidation activities with services fully provided by the Office of the Chief Information Officer.
- Consolidate tribal relations functions within mission areas and ensure the Office of Tribal Relations delivers all statutorily required tribal relations functions.
- Consolidate human resources functions in the Office of the Assistant Secretary for Administration (ASA). Although human resources will be consolidated, agencies will still have focused hiring support including a dedicated team for wildland firefighting hiring.
- Consolidate contracting functions in the ASA. Although contracting resources will be consolidated, dedicated teams for procurement and wildland firefighting incident support will continue to exist. The Department will transfer contracting for common goods and services to the General Services Administration during FY 2026. To eliminate redundancy, the Office of Small and Disadvantaged Business will be reduced to a single position that focuses on statutory requirements.
- Consolidate lease administration and management functions in the ASA.
- Consolidate grants and financial assistance to provide better controls and promote efficiency. This consolidation will include, where feasible, the transfer of grant making and administration functions from USDA offices and agencies that currently have limited capacity to perform such duties to other offices and agencies.
- Eliminate the redundancy in student programs in the Office of Partnerships and Public Engagement (OPPE) and the Agricultural Research Service (ARS) by realigning OPPE student programs to ARS.

Section 5. **Implementation:**

a. **Deputy Secretary.**
The Deputy Secretary will lead the implementation of the USDA Reorganization Plan and may make changes or adjustments to the plan as needed.

b. **The Office of the General Counsel and the ASA.** The Office of the General Counsel and the Office of the ASA are directed to take all necessary steps to support the Deputy Secretary in implementation of the USDA Reorganization Plan.

c. **The Office of the Assistant Secretary for Congressional Relations.** The Office of the Assistant Secretary for Congressional Relations is directed to work with the Office of General Counsel on all necessary Congressional notifications.

d. **Agency Heads and Department Officials.** Under Secretaries, Agency Heads, and Department Officials are directed to take all necessary actions to implement the USDA Reorganization Plan as directed by the Deputy Secretary.

Section 6. **Effect of the Memorandum:**
The implementation of this Secretary Memorandum will improve the internal management of the Department. This Secretary Memorandum and any resulting actions do not confer any right or benefit (substantive or procedural) to any party. To the extent there is any inconsistency between the provisions of this Secretary Memorandum and any Federal law or regulation, the provisions of such law or regulation will control.

Section 7. **Delegation:**
This Memorandum delegates to the Deputy Secretary all authorities necessary to implement the USDA Reorganization Plan.

Section 8. **Expiration Date:**
This Secretary Memorandum is effective immediately and will remain in effect until the earlier of the completion of the USDA Reorganization Plan or the revocation of this memorandum.

BROOKE L. ROLLINS
Secretary of Agriculture

Appendix II: Information on Types of Separations by USDA Agency

The tables below show the number and percentage of employees who left various U.S. Department of Agriculture (USDA) agencies by type of separation from January 2025 through March 2026.

Table 8: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Administrative Offices by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	*	*
Retirement	533	41.4
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	0	0
DRP total	**889**	**69.0**
Separations not associated with the Deferred Resignation Program		
Employees who quit	115	8.9
Retirement	204	15.8
Termination Expired Appointment/Other[a]	15	1.2
All other separations[b]	65	5.0
Non-DRP total	**399**	**31.0**
Total separations	**1,288**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: The information in this table includes workforce data for the Offices of the Secretary of Agriculture, Budget and Program Analysis, Communications, Partnerships and Public Engagement, Chief Economist, Chief Financial Officer, Chief Information Officer, General Counsel, Inspector General, and other offices related to administration of the department. We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 9: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Farm Production and Conservation Business Center by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	170	37.4
Retirement	191	42.1
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**361**	**79.5**
Separations not associated with the Deferred Resignation Program		
Employees who quit	*	*
Retirement	58	12.8
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	19	4.2
Non-DRP total	**93**	**20.5**
Total separations	**454**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 10: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Farm Service Agency by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	217	26.1
Retirement	154	18.5
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**371**	**44.5**
Separations not associated with the Deferred Resignation Program		
Employees who quit	118	14.2
Retirement	88	10.6
Termination Expired Appointment/Other[a]	236	28.3
All other separations[b]	20	2.4
Non-DRP total	**462**	**55.5**
Total separations	**833**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. These data do not include data on nonfederal staff, including the Farm Service Agency's approximately 15,500 county employees and state and county committee members, who operate under a different personnel system, according to USDA. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 11: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Risk Management Agency by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	24	42.9
Retirement	16	28.6
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**40**	**71.4**
Separations not associated with the Deferred Resignation Program		
Employees who quit	*	*
Retirement	*	*
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	*	*
Non-DRP total	**16**	**28.6**
Total separations	**56**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this

with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 12: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Natural Resources Conservation Service by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	1,572	57.5
Retirement	440	16.1
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**2,012**	**73.5**
Separations not associated with the Deferred Resignation Program		
Employees who quit	386	14.1
Retirement	241	8.8
Termination Expired Appointment/Other[a]	11	0.4
All other separations[b]	86	3.1
Non-DRP total	**724**	**26.5**
Total separations	**2,736**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 13: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Food and Nutrition Administration by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	269	41.9
Retirement	*	*
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	0	0
DRP total	**483**	**75.2**
Separations not associated with the Deferred Resignation Program		
Employees who quit	59	9.2
Retirement	70	10.9
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	30	4.7
Non-DRP total	**159**	**24.8**
Total separations	**642**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 14: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	176	13.9
Retirement	331	26.2
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**507**	**40.1**
Separations not associated with the Deferred Resignation Program		
Employees who quit	263	20.8
Retirement	362	28.6
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	*	*
Non-DRP total	**757**	**59.9**
Total separations	**1,264**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency, separated due to a reduction in force, or died. Fewer than 10 employees separated from FSIS due to a reduction in force from January 2025 through March 2026.

Table 15: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Agricultural Marketing Service by Type of Separation, January 2025–March 2026

Type of Separation	Total Separations	Percentage of total Separations
Deferred Resignation Program (DRP) separations		
Employees who quit	212	24.7
Retirement	238	27.7
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**450**	**52.3**
Separations not associated with the Deferred Resignation Program		
Employees who quit	81	9.4
Retirement	91	10.6
Termination Expired Appointment/Other[a]	164	19.1
All other separations[b]	74	8.6
Non-DRP total	**410**	**47.7**
Total Separations	**860**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 16: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Animal and Plant Health Inspection Service by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	620	24.6
Retirement	662	26.2
Termination Expired Appointment/Other[a]	42	1.7
All other separations[b]	0	0
DRP total	**1,324**	**52.4**
Separations not associated with the Deferred Resignation Program		
Employees who quit	338	13.4
Retirement	232	9.2
Termination Expired Appointment/Other[a]	559	22.1
All other separations[b]	72	2.9
Non-DRP total	**1,201**	**47.6**
Total separations	**2,525**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 17: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Forest Service by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	2,490	24.3
Retirement	1,393	13.6
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**3,883**	**37.9**
Separations not associated with the Deferred Resignation Program		
Employees who quit	2,430	23.7
Retirement	1,046	10.2
Termination Expired Appointment/Other[a]	2,448	23.9
All other separations[b]	446	4.3
Non-DRP total	**6,370**	**62.1**
Total separations	**10,253**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 18: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Rural Development by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	789	47.5
Retirement	505	30.4
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**1,294**	**78.0**
Separations not associated with the Deferred Resignation Program		
Employees who quit	168	10.1
Retirement	151	9.1
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	*	*
Non-DRP total	**366**	**22.0**
Total separations	**1,660**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 19: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Agricultural Research Service by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	578	27.1
Retirement	478	22.4
Termination Expired Appointment/Other[a]	62	2.9
All other separations[b]	16	0.8
DRP total	**1,134**	**53.2**
Separations not associated with the Deferred Resignation Program		
Employees who quit	398	18.7
Retirement	171	8.0
Termination Expired Appointment/Other[a]	387	18.2
All other separations[b]	41	1.9
Non-DRP total	**997**	**46.8**
Total separations	**2,131**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 20: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's National Agricultural Statistics Service by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	93	32.6
Retirement	130	45.6
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**223**	**78.2**
Separations not associated with the Deferred Resignation Program		
Employees who quit	27	9.5
Retirement	26	9.1
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	*	*
Non-DRP total	**62**	**21.8**
Total separations	**285**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 21: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's National institute of Food and Agriculture by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	18	10.2
Retirement	*	*
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	*	*
DRP total	**33**	**18.6**
Separations not associated with the Deferred Resignation Program		
Employees who quit	*	*
Retirement	15	8.5
Termination Expired Appointment/Other[a]	113	63.8
All other separations[b]	*	*
Non-DRP total	**144**	**81.4**
Total separations	**177**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 22: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Economic Research Service by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	43	46.2
Retirement	26	28.0
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	0	0
DRP total	**69**	**74.2**
Separations not associated with the Deferred Resignation Program		
Employees who quit	*	*
Retirement	12	12.9
Termination Expired Appointment/Other[a]	0	0
All other separations[b]	*	*
Non-DRP total	**24**	**25.8**
Total separations	**93**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Table 23: Number and Percentage of Employees Who Left the U.S. Department of Agriculture's Foreign Agricultural Service by Type of Separation, January 2025–March 2026

Type of separation	Total separations	Percentage of total separations
Deferred Resignation Program (DRP) separations		
Employees who quit	*	*
Retirement	53	27.7
Termination Expired Appointment/Other[a]	*	*
All other separations[b]	0	0
DRP total	**100**	**52.4**
Separations not associated with the Deferred Resignation Program		
Employees who quit	17	8.9
Retirement	45	23.6
Termination Expired Appointment/Other[a]	16	8.4
All other separations[b]	13	6.8
Non-DRP total	**91**	**47.6**
Total separations	**191**	**100**

Source: GAO analysis of federal workforce data. | GAO-27-108734

Notes: We are reporting DRP data that have been made publicly available via the Office of Personnel Management. In instances where the number of employees in a specified group is 10 or fewer, we mark this with an asterisk. In certain cases, when only one value is 10 or fewer, we mark an additional group of employees with an asterisk to ensure privacy. Percentages may not sum due to rounding.

[a]This includes employees terminated due to the expiration of their appointment.

[b]This includes employees who transferred out of the agency or died.

Appendix III: Comments from USDA

Note: Numbered comments below refer to parts of the Agency Comments and Our Evaluation section earlier in the report.



Secretary Brooke L. Rollins

September 30, 2026

Orice W. Brown
Acting U.S. Comptroller General
U.S. Government Accountability Office
441 G St. NW
Washington, D.C. 20548

Dear Ms. Brown,

The U.S. Department of Agriculture (USDA) does not belong to Washington, D.C. Its employees do not exist to sustain Washington's bureaucracy, and its organizational chart is not a monument to federal history. The Department, upon its founding in 1862, exists to serve farmers, ranchers, States, land grant universities, families, and rural communities. Its reorganization is not an attack on the mission; it is an attempt to restore the mission to its proper center of gravity—the American people. The Government Accountability Office (GAO) may scrutinize that decision, but it does not get to define the objective through veiled partisan shenanigans meant to maintain the status quo and ignore the realities facing USDA's mission today.

The last holistic reorganization of USDA occurred in 1994. Since then, tremendous changes in American agriculture, foreign trade and food assistance, technology, community development, animal and plant health, wildfire and forest management, domestic nutrition programs, and research have transpired. Simply, the world the Department operates in today is vastly different than the world of 1994.

On July 24, 2025, I commenced the lawful reorganization of the Department via Secretary Memorandum: SM 1078-015, where I charged the Deputy Secretary with effectuating the consolidation, unification, and optimization of functions within the Department, each to improve its effectiveness, accountability, and service to the American people. It is worth mentioning Reorganization Plan No. 2 of 1953 provides the Secretary of Agriculture with broad authority to reorganize the Department, including language "*to simplify and make efficient the operation of the Department . . . to place administration of farm programs close to the State and local levels, and to adapt the administration of the programs of the Department to regional, State, and local conditions*" — all of which align with the intention of SM 1078-015. Implementing change is never easy so that it was my intention that my memorandum was a framework based on key principles that could be adjusted to meet the needs of our mission and those we serve.

I have not swayed from those principles.

For months prior, administration officials, staff, and I deliberated the plight of the Department, a situation worsened by the previous administration. Over those four years, USDA's workforce grew by eight percent and employees' salaries increased by 14.5 percent. Neither decision came with a sustainable way to pay for it. This growth occurred without any tangible increase in service to USDA's core constituencies across the agricultural sector. The Department's real estate footprint in the National Capital Region remained underutilized, plagued by decades of underfunding and costly deferred maintenance. Worse, USDA's largest agency, the United States Forest Service, was at the financial brink. The situation was so precarious that the previous USDA Secretary opined whether the Forest Service had too much land and received permission to remove 7,000 employees.

Unfortunately, these basic realities did not make it into the Government Accountability Office's proposed report. The report lays bare a politicized review of the Department's reorganization, made clear by the portrayal of events leading up to my memorandum and select events after. For example, noticeably absent is any reference to the implications of the Utilizing Space Efficiently and Improving Technologies Act (USE IT), as outlined in Section 2302 of the Thomas R. Carper Water Resources Development Act of 2024. This bipartisan legislation was premised on GAO's *own* review of federal property management. In July 2025, both the South Building and the Jamie L. Whitten building operated at only 18-23 percent occupancy, far below the utilization rate required under the USE IT Act. Congress told the executive branch to end such wastefulness. The Department is following the law by doing so.

The Government Accountability Office also found it necessary to criticize the Department for not using economic analyses favored by—and created by—itself. The Office contends that failure to use its approach before the issuance of my memorandum means that efforts are unfocused in approach and result. One does not need a special Washington-bred calculator to realize expenses and salaries cannot be paid or that it is inefficient to keep aging buildings that sit empty. Again, publicly available court records and USDA documents show the Forest Service could not afford its workforce or its facilities.

The proposed report also disregards the financial challenges that have beleaguered the Beltsville Agricultural Research Center (BARC). While at one time BARC may have been a flagship research center, decades of underfunding have taken their toll. Making the decision to move research projects so that they can flourish at other locations is about preserving research as opposed to letting it languish at a complex that is crumbling.

Frustratingly, the proposed report disregards contemporary hiring actions, which brought the Department's workforce to 93,674 strong, and how conscious decisions have been made since SM 1078-015 to decrease attrition and maximize collaboration. Examples include keeping rather than vacating the George Washington Carver Center, co-locating agencies, and expanding agency footprints on key priorities like eradicating fraud from domestic nutrition programs.

Also absent from the report is any reference to the generous and continuous engagement with Members of Congress, publicly available via the Department's own reorganization web page. The

Deputy Secretary alone has not only testified before the Senate Committee on Agriculture, Nutrition, and Forestry, but appeared in a closed-door roundtable before the House Committee on Agriculture, met with multiple Members both in Washington and in Districts across the country, and sent more than three dozen pieces of correspondence to inquiring Members and Committees. That correspondence includes an unsolicited update in July 2026 that contains a summary of announcements and notifications, bargaining activities, and lease actions.

While I have long appreciated the work of the Comptroller General to audit and evaluate use of taxpayer resources, I write with concern that GAO proposes releasing a report that fails to tell the American people and Members of Congress the unadulterated story of the Department's reorganization. I strongly encourage GAO to actually review materials in the public domain, including court records. To make the task easier, I have submitted the most recent materials as submitted to the U.S. District Court for the Northern District of California.

Sincerely,



Brooke L. Rollins
Secretary
U.S. Department of Agriculture

GAO Notes on the letter:

1. As discussed in more detail earlier in this report, we conducted this review in an objective, independent, and nonpartisan manner and stand by the accuracy of the facts presented in our report. See comment 1.

2. The Secretary's memorandum includes decisions about reducing National Capital Region staff, retaining or vacating specific facilities, and consolidating various support functions. What analyses these decisions were based upon remains unclear. See comment 2.

3. During our review, we met with USDA officials and requested data on USDA's workforce and documentation used to inform the Forest Service's reorganization. USDA did not provide this information. See comments 3 and 5.

4. We have added to our report a discussion of the requirements of the USE IT Act and references to prior GAO work on the importance of utilizing federal office space. See comment 3.

5. Transparency in economic analysis allows the public to assess the structure of an agency's analysis and, in particular, how much of an analytic result hinges on the specific choices made by the agency. See comment 4.

6. We do not discuss the conditions of any particular USDA buildings or properties in our report. See comment 3.

7. These actions and decisions do not constitute documentation of the extent to which USDA conducted analysis of issues such as how the reorganization could impact service delivery or the economic effects of the reorganization prior to its decision to reorganize. See comment 6.

8. These actions do not constitute documentation of the extent to which USDA conducted analysis to inform its decision to reorganize prior to announcing it. See comment 6.

9. We analyzed these materials, but none of them represents documentation of analysis that informed the specific decisions laid out in the Secretary's July 2025 memorandum, such as how the reorganization would impact service delivery and the economic effects of the reorganization. See comment 7.

Accessible Text for Appendix III: Comments from USDA

September 30, 2026

Orice W. Brown
Acting U.S. Comptroller General
U.S. Government Accountability Office
441 G St. NW
Washington, D.C. 20548

Dear Ms. Brown,

The U.S. Department of Agriculture (USDA) does not belong to Washington, D.C. Its employees do not exist to sustain Washington's bureaucracy, and its organizational chart is not a monument to federal history. The Department, upon founding in 1862, exists to serve farmers, ranchers, States, land grant universities, families, and rural communities. Its reorganization is not an attack on the mission; it is an attempt to restore the mission to its proper center of gravity, the American people. The Government Accountability Office (GAO) may scrutinize that decision, but it does not get to define the objective through veiled partisan shenanigans meant to maintain the status quo and ignore the realities facing USDA's mission today.

The last holistic reorganization of USDA occurred in 1994. Since then, tremendous changes in American agriculture, foreign trade and food assistance, technology, community development, animal and plant health, wildfire and forest management, domestic nutrition programs, and research have transpired. Simply, the world the Department operates in today is vastly different than the world of 1994.

On July 24, 2025, I commenced the lawful reorganization of the Department via Secretary Memorandum: SM 1078-015, where I charged the Deputy Secretary with effectuating the consolidation, unification, and optimization of functions within the Department, each to improve its effectiveness, accountability, and service to the American people. It is worth mentioning Reorganization Plan No. 2 of 1953 provides the Secretary of Agriculture with broad authority to organize the Department, including language *"to simplify and make efficient the operation of the Department… to place administration of farm programs close to the State and local levels, and to adapt the administration of the programs of the Department to regional, State, and local conditions"* all of which align with the intention of SM 1078-015. Implementing change is never easy so that it was my intention that my memorandum was a framework based on key principles that could be adjusted to meet the needs of our mission and those we serve.

I have not swayed from those principles.

For months prior, administration officials, staff, and I deliberated the plight of the Department, a situation worsened by the previous administration. Over those four years, USDA's workforce grew by eight percent and employees' salaries increased by 14.5 percent. Neither decision came with a sustainable way to pay for it. This growth occurred without any tangible increase in service to USDA's core constituencies across the agriculture sector. The Department's real estate footprint in the National Capital Region remained underutilized, plagued by decades of underfunding and costly deferred maintenance. Worse, USDA's largest agency, the United States Forest Service, was at the financial brink. The situation was so precarious that the previous USDA Secretary

opined whether the Forest Service had too much land and received permission to remove 7,000 employees

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Unfortunately, these basic realities did not make it into the Government Accountability Office's proposed report. The report lays bare a politicized review of the Department's reorganization, made clear by the portrayal of events leading up to my memorandum and select events after. For example, noticeably absent is any reference to the implementation of the Utilizing Space Efficiently and Improving Technologies Act (USE IT), as outlined in Section 2302 of the Thomas R. Carper Water Resources Development Act of 2024. This bipartisan legislation was premised on GAO's own review of federal property management. In July 2025, both the South Building and the Jamie L. Whitten building operated at only 18–23 percent occupancy, far below the utilization rate required under the USE IT Act. Congress told the executive branch to end such wastefulness. The Department is following the law by doing so.

The Government Accountability Office also found it necessary to criticize the Department for not using economic analyses favored by and created by itself. The Office contends that failure to use its approach before the issuance of my memorandum means that efforts are unfocused in approach and result. One does not need a specially Washington-bred calculator to realize expenses and salaries cannot be paid or that it is inefficient to keep aging buildings that sit empty. Again, publicly available court records and USDA documents show the Forest Service could not afford its workforce or its facilities.

The proposed report also disregards the financial challenges that have beleaguered the Beltsville Agricultural Research Center (BARC). While at one time BARC may have been a flagship research center, decades of underfunding have taken their toll. Making the decision to move research projects so that they can flourish at other locations is about preserving research as opposed to letting it languish at a complex that is crumbling.

Frustratingly, the proposed report disregards contemporary hiring actions, which brought the Department's workforce to 93,674 strong, and how conscious decisions have been made since SM 1078-015 to decrease attrition and maximize collaboration. Examples include keeping rather than vacating the George Washington Carver Center, co-locating agencies, and expanding agency footprints on key priorities like eradicating fraud from domestic nutrition programs.

Also absent from the report is any reference to the generous and continuous engagement with Members of Congress, publicly available via the Department's own reorganization web page. The Deputy Secretary alone has not only testified before the Senate Committee on Agriculture, Nutrition, and Forestry, but appeared in a closed-door roundtable before the House Committee on Agriculture, met with multiple Members both in Washington and in Districts across the country, and sent more than three dozen pieces of correspondence to inquiring Members and Committees. That correspondence includes an unsolicited update in July 2026 that contains a summary of announcements and notifications, bargaining activities, and lease actions.

While I have long appreciated the work of the Comptroller General to audit and evaluate use of taxpayer resources, I write with concern that GAO proposes releasing a report that fails to tell the American people and Members of Congress the unadulterated story of the Department's reorganization. I strongly encourage GAO to actually review materials in the public domain, including court records. To make the task easier, I have submitted the most recent materials as submitted to the U.S. District Court for the Northern District of California.

Sincerely,

Brooke L. Rollins
Secretary
U.S. Department of Agriculture

Endnotes

[1]U.S. Department of Agriculture, Secretary Memorandum: SM 1078-015, *Department of Agriculture Reorganization Plan* (Washington, D.C.: July 24, 2025).

[2]In the memorandum, the Secretary of Agriculture stated that USDA's workforce had grown by approximately 8 percent and salaries by 14.5 percent over the previous 4 years, funded in part by temporary funding. The Secretary also stated in the memorandum that the reorganization was a step in reducing USDA's workforce to make certain that the department could afford its workforce. U.S. Department of Agriculture, Secretary Memorandum: SM 1078-015, *Department of Agriculture Reorganization Plan.*

[3]USDA also laid out plans to relocate some staff from areas outside of the National Capital Region to other such areas.

[4]Am. Fed'n of Gov't Employees, et al, v. U.S. Dep't of Agric., 3:26-cv-09976 (N.D. Cal. filed Sept. 8, 2026).

[5]Separations end an individual's employment with a federal agency. They may be voluntary, such as when an employee resigns or accepts an early retirement incentive, or involuntary, such as when employment ends due to performance or conduct issues, or a reduction in force. In some instances, employees may have been rehired by USDA after being separated. However, with the data available at the time of our analysis, we were unable to determine how many of the total employees hired were rehires.

[6]In September 2026, we reported that USDA used administrative leave totaling 8,421 full-time equivalents with associated salary costs of $736,972,409 from 2023 through 2025. We also reported that our review of payroll data found that federal agencies' use of paid administrative leave increased by 435 percent from 2023 to 2025. GAO, *Federal Workforce: Deferred Resignation Program Largely Responsible for Sixfold Increase in Paid Administrative Leave Salary Costs*, GAO-26-108477 (Washington, D.C.: Sept. 15, 2026).

[7]In late March 2026, USDA provided a copy of a memorandum signed by the Deputy Secretary authorizing the Acting Principal Deputy Assistant Secretary for Administration to begin to enter into leases for office space in Kansas City. In April 2026, USDA provided weblinks to information from the White House, the Office of Personnel Management, and the Congressional Research Service; attendance extracts for USDA's four National Capital Region office buildings, showing daily attendance counts from May 2025 to April 2026; weblinks to USDA budget justifications for fiscal years 2024 through 2027, featuring information on the Agriculture Buildings and Facilities account; a report of an investigation into the condition of the buildings at the Beltsville Agricultural Research Center; a data visualization of where USDA employees were located as of June 28, 2025; a copy of an email sent to Forest Service employees after the announcement of the Forest Service's reorganization plans; and a copy of an April 2025 Agriculture Secretary's memorandum exempting certain national security and public safety positions from the broader federal civilian hiring freeze. Some of these documents establish conditions relevant for consideration as part of USDA's reorganization. Others show agency actions to implement the reorganization. None constitute analyses that inform the specific reorganization decisions announced in July 2025.

[8]GAO, *Government Reorganization: Key Questions to Assess Agency Reform Efforts*, GAO-18-427 (Washington, D.C.: June 13, 2018), and GAO, *Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce*, GAO-23-104709 (Washington, D.C.: Dec. 14, 2022).

[9]GAO, *Assessment Methodology for Economic Analysis*, GAO-18-151SP (Washington, D.C.: Apr. 10, 2018).

[10]An economic analysis may be prospective, examining an action that could be taken, or retrospective, examining the outcome of an action that has already been taken. Prospective economic analyses are predictive of a potential result and can inform the public discourse about the economic effects of the action. GAO-18-151SP.

[11]GAO-18-151SP.

[12]GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, GAO-25-107743 (Washington, D.C.: Feb. 25, 2025).

[13]We determined weekly averages based on 3 selected weeks in January, February, and March 2023. GAO, *Federal Real Property: Agencies Need New Benchmarks to Measure and Shed Underutilized Space*, GAO-24-107006 (Washington, D.C.: Oct. 26, 2023).

[14]Pub. L. No. 118-272, tit. III, § 2302, 138 Stat. 2992, 3218 (2025). The statute applies to public buildings, as defined in 40 U.S.C. § 3301(a), and to federally leased space. Pub. L. No. 118-272, § 2302(a)(8). Under the USE IT Act, federal agencies are defined as executive departments covered by the Chief Financial Officers Act of 1990. Pub. L. No. 118-272, § 2302(a)(6). In October 2026, we reported on agencies' collection and reporting of occupancy data. For more information, see GAO, *Federal Real Property: New Occupancy Data Help Agencies Shed Unneeded Office Space But Gaps Limit the Full Picture*, GAO-27-108503 (Washington, D.C.: Oct. 15, 2026).

[15]GAO, *Federal Real Property Asset Management: Agencies Could Benefit from Additional Information on Leading Practices*, GAO-19-57 (Washington, D.C.: Nov. 5, 2018). We identified these characteristics through reviews of the International Organization for Standardization (ISO) 55000 standards—an international consensus standard on asset management—studies and articles on asset management practices, and interviews with experts.

[16]GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39 (Washington, D.C.: Dec. 11, 2003).

[17]GAO-18-427.

[18]See GAO-23-104709; GAO, *Evidence-Based Policy Making: USDA's Decision to Relocate Research Agencies to Kansas City Was Not Fully Consistent with an Evidence-Based Approach*, GAO-22-104540 (Washington, D.C.: Apr. 19, 2022); GAO, *Bureau of Land Management: Agency's Reorganization Efforts Did Not Substantially Address Key Practices for Effective Reforms*,

GAO-20-397R (Washington, D.C.: Mar. 6, 2020); and GAO, *Bureau of Land Management: Better Workforce Planning and Data Would Help Mitigate the Effects of Recent Staff Vacancies*, GAO-22-104247 (Washington, D.C.: Nov. 16, 2021).

[19]GAO has not analyzed overall staff size, staff composition, or performance for ERS and NIFA since 2022.

[20]In addition to the relocation, starting in 2016, BLM changed its organizational structure by merging or transferring several of its headquarters functions. BLM's workforce also experienced some kind of hiring restriction throughout the period from January 2017 to May 2021.

[21]GAO has not analyzed overall staff size, staff composition, or performance for BLM since 2021.

[22]Am. Fed'n of Gov't Employees, et al, v. U.S. Dep't of Agric., 3:26-cv-09976 (N.D. Cal. filed Sept. 8, 2026).

[23]GAO-18-151SP.