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August 26, 2025

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

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

Dear Secretary Rollins:

On behalf of Children's HealthWatch, we appreciate the opportunity to comment on the United States Department of Agriculture's (USDA) reorganization plan, as outlined in the memorandum issued on July 24, 2025¹. **We are deeply concerned this proposed reorganization will result in significant disruptions to the federal nutrition assistance programs millions of children and families across the country rely on to meet their basic needs.**

Children's HealthWatch is a non-partisan network of pediatricians, public health researchers, and child health policy experts who examine how policy decisions affect the health and well-being of young children and their families. Founded in the wake of Personal Responsibility and Work Opportunity Reconciliation Act to monitor the legislation's impact on the health of young children and their families², we seek to achieve optimal health for this population by advancing research to transform policy. We accomplish this mission by interviewing caregivers of young children in emergency departments and primary care clinics in four cities: Boston, MA; Minneapolis, MN; Little Rock, AR; and Philadelphia, PA. Since 1998, we have interviewed more than 80,000 caregivers and analyzed those data to determine the impact of policy decisions on the health and development of young children.

Since our founding, Children's HealthWatch has studied the negative health consequences of food insecurity and have advocated for policy solutions to address food insecurity at the local, state, and national levels. In our more than quarter century of work, we have published studies demonstrating the associations with child health, development, growth, and health care utilization of the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and the Child and Adult Care Food Program (CACFP), all core programs under USDA's jurisdiction³⁻⁷. In addition, we were some of the first scientists to demonstrate connections between the USDA's validated food security measure and children's health and development and mothers' mental and physical health⁸. Throughout, we have worked closely with partners at USDA, both nationally and in the Northeast Regional Office (NERO), to share findings, problem-solve, and advance policy and practice, nationally and regionally.

The largest and most successful tools we have to address food insecurity in the United States are nutrition assistance programs, including SNAP and WIC. As you know, these programs are administered by the Food and Nutrition Service (FNS). Each year, programs administered by FNS serve 1 in 4 Americans⁹, and help to reduce food insecurity,¹⁰ alleviate poverty,¹¹ and improve child and family health outcomes¹² in both the immediate and long-term. As nutrition assistance programs reach such a high proportion of our country's population, improving access, implementation, and effectiveness of these programs serve as powerful tools to improve health and wellbeing in the United States—a key priority of your administration.^{13,14}

The changes proposed in the USDA reorganization plan threaten the success of these critical programs. For example, relocating thousands of federal employees from the Washington, D.C., area and consolidating the regional offices will result in an outsized loss of expertise and capacity. Delays in critical services and gaps in oversight are more likely when experienced staff choose to resign rather than move, and when critical offices needed for technical support are dismantled. Losing staff, and the invaluable institutional knowledge that they possess, will lead to service delays and less oversight of programs that provide food and stability for families.

Additionally, reducing the number of regional offices from seven to five will further increase disruptions to services. USDA regional offices and their staff provide the first line of support for state and tribal agencies administering the federal nutrition programs, providing vital support for compliance, technical assistance, and the essential behind-the-scenes work that makes the programs actually run.¹⁵ As the relocation of two USDA agencies during the first Trump administration led to about 50% of staff leaving the agencies, we can anticipate a similar level of staff attrition should the currently proposed relocations move forward.¹⁶

The Northeast and Mid-Atlantic regions will be particularly negatively impacted. The proposed plan will close NERO and the Mid-Atlantic Regional Office (MARO), despite an abundance of farmers and farm-related industry and the largest national population centers, including Greater New York City, Greater Boston, Greater Philadelphia, and the Greater Washington DC-Maryland-Virginia area. If the goal is to move USDA closer to farmers, the loss of the NERO and MARO offices do the opposite. Every region is unique—the needs of the Northeast and Mid-Atlantic are not the same as other areas—leaving a large proportion of the country without USDA staff who understand their particular circumstances. If the goal is to decrease waste, fraud, and abuse, this change will make it harder, not easier, to identify and address programmatic needs. A lack of regional staff, alongside staff layoffs and attrition, will undermine FNS' ability to oversee, engage, and support states with secure data collection and program management, in addition to severing connections with the many community organizations who help to operationalize the programs and the new guidance that will be needed.

Further, as states begin to implement the new SNAP provisions of recent Congressional legislation, having fewer USDA staff, and none available regionally, will make it difficult to comply with the increased complexity imposed by that bill.¹⁷ Regional office staff work closely

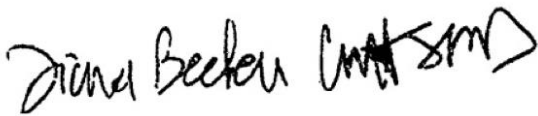
with the SNAP agencies within their specific region. These staff members are SNAP subject matter experts, possessing in-depth knowledge about the states' SNAP application and interview systems, as well as the states' local SNAP offices. This expertise is crucial to help states run SNAP efficiently and with a low error rate, while also making sure that children and families can access SNAP.

Ultimately, the proposed USDA reorganization would weaken federal nutrition assistance programs and the agency that administers them, undermining the health the well-being of millions of children and families who rely on these programs to meet their basic nutritional needs. This is all the more important in our current moment, as food prices and costs of living continue to rise, and families' budgets fall short to cover household costs.¹⁸ We urge the USDA to commit to maintaining or expanding its capacity in administering federal nutrition programs. We also urge USDA to pause the implementation of this reorganization and facilitate a transparent process that includes consultation with Congress, state agencies, national and local partners, impacted USDA staff, and program participants.

Sincerely,



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A handwritten signature in black ink that reads "Deborah A. Frank".

Deborah A. Frank, MD

Principal Investigator and Founder, Children's HealthWatch

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A handwritten signature in black ink that reads "Félice Lê-Scherban".

Félice Lê-Scherban, PhD, MPH

Principal Investigator, Children's HealthWatch

Philadelphia, PA

A handwritten signature in black ink that reads "Eduardo Ochoa Jr.". The signature is written in a cursive style.

Eduardo Ochoa Jr., MD

Principal Investigator, Children's HealthWatch

Little Rock, AR

A handwritten signature in black ink that reads "Maureen Black".

Maureen Black, PhD

Emeritus Principal Investigator, Children's HealthWatch

Baltimore, MD

Citations:

1. Rollins B. Department of Agriculture Reorganization Plan. Published online July 24, 2025. <https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf>
2. Cook JT, Frank DA, Berkowitz C, et al. Welfare Reform and the Health of Young Children: A Sentinel Survey in 6 US Cities. *Arch Pediatr Adolesc Med*. 2002;156(7):678-684. doi:10.1001/archpedi.156.7.678
3. Ettinger de Cuba S, Chilton M, Bovell-Ammon A, et al. Loss Of SNAP Is Associated With Food Insecurity And Poor Health In Working Families With Young Children. *Health Aff (Millwood)*. 2019;38(5):765-773. doi:10.1377/hlthaff.2018.05265
4. Ettinger de Cuba SA, Bovell-Ammon AR, Cook JT, et al. SNAP, Young Children's Health, and Family Food Security and Healthcare Access. *Am J Prev Med*. 2019;57(4):525-532. doi:10.1016/j.amepre.2019.04.027
5. Black MM, Cutts DB, Frank DA, et al. Special Supplemental Nutrition Program for Women, Infants, and Children Participation and Infants' Growth and Health: A Multisite Surveillance Study. *Pediatrics*. 2004;114(1):169-176. doi:10.1542/peds.114.1.169
6. Frank DA, Bruce C, Ochoa E. SNAP Is Medicine for Food Insecurity. *Pediatrics*. 2020;146(3):e2020002105. doi:10.1542/peds.2020-002105
7. Poblacion A, Ettinger de Cuba S, Black MM, et al. Food Insecurity and Weight Faltering: US Multisite Analysis of Young Children's Weight Trajectory. *J Acad Nutr Diet*. 2025;125(7):900-908.e5. doi:10.1016/j.jand.2024.12.004
8. Cook JT, Frank DA, Meyers AF, et al. Food Insecurity Is Associated with Adverse Health Outcomes among Human Infants and Toddlers. *J Nutr*. 2004;134(6):1432-1438. doi:10.1093/jn/134.6.1432
9. The U.S. Department of Agriculture. About FNS. Food and Nutrition Service. March 10, 2025. <https://www.fns.usda.gov/about-fns>
10. Ratcliffe C, McKernan SM. *How Much Does SNAP Reduce Food Insecurity?* The Urban Institute; 2010. <https://www.urban.org/research/publication/how-much-does-snap-reduce-food-insecurity>
11. Keith-Jennings B, Llobrera J, Dean S. Links of the Supplemental Nutrition Assistance Program With Food Insecurity, Poverty, and Health: Evidence and Potential. *Am J Public Health*. 2019;109(12):1636-1640. doi:10.2105/AJPH.2019.305325
12. Kaczor K, Bruce C, Ettinger de Cuba S, Frank DA. *Nourishing Futures: Strengthening Child Health Through SNAP*. Children's HealthWatch; 2023. <https://childrenshealthwatch.org/wp-content/uploads/CHW-SNAP-overview-2023-final-2.pdf>

13. The President's Make America Healthy Again Commission. *The MAHA Report: Making Our Children Healthy Again (Assessment)*. White House, Trump Administration; 2025.
14. Bleich SN, Dean S. Deliberate Actions to Weaken the Federal Nutrition Safety Net. *JAMA Health Forum*. 2025;6(7):e253766-e253766. doi:10.1001/jamahealthforum.2025.3766
15. Neisloss L. Job cuts at USDA could weaken New England food security. *GBH News*. <https://www.wgbh.org/news/national/2025-02-26/job-cuts-at-usda-in-boston-could-weaken-new-england-food-security>. February 26, 2025.
16. U.S. Government Accountability Office. *Agency Relocations: Following Leading Practices Will Better Position USDA to Mitigate the Ongoing Impacts on Its Workforce.*; 2022. <https://www.gao.gov/products/gao-23-104709>
17. Jodey C. Arrington. *One Big Beautiful Bill Act.*; 2025. <https://www.congress.gov/bill/119th-congress/house-bill/1/text>
18. U.S. Inflation Calculator. Food Inflation in the United States (1968-2025). <https://www.usinflationcalculator.com/inflation/food-inflation-in-the-united-states/>