

June 13, 2017

Donald Bice  
Office of Budget and Program Analysis  
U.S. Department of Agriculture  
Jamie L. Whitten Building, Room 101–A  
1400 Independence Ave. SW.  
Washington, DC 20250

**RE: Comments on USDA’s Request for Information Regarding “Improving Customer Service;” Federal Register Vol. 82, No. 95, Page 22802; Submitted online via regulations.gov**

Dear Mr. Bice,

The Institute for Agriculture and Trade Policy (IATP) appreciates the opportunity to provide comments on the Department’s reorganization plan.

For the past 30 years, IATP has worked with farmers and rural communities to ensure fair and sustainable food, farm and trade systems. IATP is based in Minnesota, with an office in Washington, D.C. Through our Rural Climate Dialogues program, we work with rural communities in Minnesota to address the impacts of extreme weather by boosting community resilience and working with Minnesota state agencies to streamline program delivery to rural communities. USDA Rural Development programs and funding are instrumental for rural resilience around the country, and particularly in Minnesota, and we want to voice our support for retaining the Rural Development Mission Area at USDA.

### **1. Elimination of Rural Development Mission Area and Under Secretary**

**Recommendation:** Do not eliminate USDA’s Rural Development Mission Area and Under Secretary position.

We believe that it is important for each of the core missions of USDA to be represented by a Mission Area and Under Secretary. We therefore urge you to retain the Rural Development Mission Area and Under Secretary. We are also concerned that an Assistant to the Secretary for Rural Development has already been named, despite the fact that this comment period is still open.

As part of the USDA sub-cabinet, Under Secretaries wield significant influence and can easily communicate directly with the Secretary. Establishing a new assistant position in place of an Under Secretary will not improve the administration of Rural Development programs as claimed; in fact, it will do just the opposite. The Rural Development Mission Area and its agencies deliver a multitude of programs to rural America, and have many complex decisions to make on a daily basis. This is a job to be handled by a full-fledged Under Secretary along with his or her Deputy Under Secretaries, and their staff, not by a single assistant in the Secretary’s office. Retaining the Under Secretary and the Rural Development Mission Area gives staff greater decision making power and increases their ability to move initiatives forward.

Moreover, the new “assistant to the Secretary” would not require vetting and confirmation by the Senate, which we believe is an important step in ensuring that the individual who takes the helm of Rural Development is qualified and able to serve the needs of rural communities across all 50 states. We are concerned that Anne Hazlett has already been named as Assistant to the Secretary for Rural Development, even before this comment period is closed. This signifies that the Secretary of Agriculture and the administration do not intend to fully consider comments from the public in this important reorganization of USDA.

Retaining the Rural Development Mission Area as well as the Under Secretary will ensure adequate attention is paid to the continued administration of USDA Rural Development programs and investments, which are much needed in rural America. Nearly 85 percent of America’s persistent poverty counties are in rural areas, and rural childhood poverty rates are at their highest point since 1986. Furthermore, over 40 million Americans who live in rural communities are not involved in agriculture, and those Americans need critical help from USDA rural development just as much as the farming and agricultural communities. USDA Rural Development programs support rural communities by making investments in housing, renewable energy, essential community facilities, high-speed broadband, water systems, electric lines, small businesses, and more. Rural communities are currently seeing high levels of outmigration and experiencing higher levels of poverty than the rest of the U.S., displaying that USDA Rural Development’s attention and investments are needed now more than ever.

In Minnesota specifically, USDA Rural Development funds have supported housing repairs for low-income residents through the Housing Preservation Grant Program; rural electric infrastructure improvements through a \$14.7 million loan for Minnesota’s Wild Rice Electric Cooperative to build and improve 121 miles of electric lines and finance smart grid technologies; and essential improvements to water and wastewater infrastructure throughout Minnesota. We are concerned that the elimination of the Rural Development Mission Area will slow down this important and much-needed work.

The Trump administration’s proposed budget for fiscal year 2018 further underscores the need for USDA to pay extra attention to rural development. The budget request cuts all funding for rural business programs and much of the funding for rural housing and rural water. Adding the elimination of the Rural Development Mission Area and Under Secretary would be a big blow to rural communities, and would convey that the federal government does not care about supporting rural communities. We strongly encourage USDA not to eliminate the Rural Development Mission Area and Under Secretary position, and to fully consider the comments received during this comment period.

## **2. Creation of Farm Production and Conservation Mission Area**

**Recommendation:** In creating the Farm Production and Conservation Mission Area, we urge you to:

- Retain the unique administrative functions, services and expertise provided by NRCS;
- Limit NRCS field offices closures, if such closures are likely to result in a decrease in field support, technical assistance, and customer service for farmers and ranchers;
- Establish a Deputy Under Secretary of Conservation to coordinate conservation services across NRCS, FSA, and RMA, all three of which have conservation functions.

We are strongly supportive of improving customer service by better coordinating activities and information sharing between USDA agencies. This can improve the delivery of programs and make it easier for field staff to help farmers navigate the unique but interrelated worlds of farm programs, risk management, and conservation. We recommend that, as part of the reorganization, you create a Deputy Under Secretary to oversee this effort, which would include the NRCS portfolio as well as FSA's Conservation and Environmental Programs and RMA's work on conservation and risk management. Minnesota farmers are heavy users of conservation programs, and delivering these programs in a coordinated manner, including through NRCS field offices, is necessary for optimal program delivery.

Thank you for the opportunity to comment.

Sincerely,

Tara Ritter  
Institute for Agriculture and Trade Policy