

August 18, 2025

Secretary Brooke Rollins
Office of the Secretary
U.S. Department of Agriculture
reorganization@usda.gov



Re: Secretary Memorandum: SM 1078-015: Department of Agriculture Reorganization Plan

Dear Secretary Rollins:

On behalf of CACFP Roundtable, 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, 2025.

Formed in 1977, CACFP Roundtable is a nonprofit organization that works alongside the Child and Adult Care Food Program (CACFP) community to educate, advocate, and support the field. Our work is centered around child, family, and caregiver needs and we value the services care centers and community-based organizations offer through the CACFP. The program serves as a vital strategy for improving nutritional security and addressing food insecurity in our Head Start communities. We are deeply concerned that this proposed reorganization will dismantle a department with critical responsibilities, resulting in real consequences for the millions of children, parents, older adults, veterans, people with disabilities, and all those who depend on these nutrition programs to be food secure.

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.**

The Child and Adult Care Food Program (CACFP) is a crucial nutritional support for working families and children. Research shows that meals served in the CACFP have higher nutritional quality and contribute to the healthy growth and development of children. The CACFP keeps the price of child care down for parents and bolsters child care provider business owners' shoe-string budgets. Disruption to the reimbursements distributed to child care businesses will likely decrease participation in the CACFP, ultimately contributing to childhood obesity, businesses closing, and parents leaving the workforce because they cannot afford child care.

Additionally, reducing the number of regional offices from seven to five will further increase disruptions to services. These regional offices often provide the first line of support for state and tribal agencies administering the federal nutrition programs, especially those that are under-resourced and



rely heavily on the support for compliance and technical assistance. This consolidation will likely delay the review and approval of key waivers or program management plans. The reorganization, as stated in the SM 1078, will inhibit the understanding of local and regional problems with fewer access points to local operators. It will also create an unmanageable burden on USDA staff to ensure timely, consistent, and thorough compliance reviews. The placement of the hubs would additionally make all of the compliance reviews more costly for USDA to travel to state agencies, county departments, and other sites throughout the United States.

The CACFP is administered by state agencies who are overseen by their regional offices. In addition to technical assistance and approvals, the regional offices ensure compliance and limit the possibility of waste and fraud in the program. A smaller workforce and inadequate regional representation will work against the goals of President Trump's administration.

We urge USDA to commit to maintaining or expanding its capacity in administering the federal nutrition programs, not reducing it. 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, and impacted USDA staff.

Sincerely,

Samantha Kay-Baliden Marshall

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Director of Programs and Policy

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