ASA Response to USDA Public Comment Period on Department Reorganization Plan

August 26, 2025

The American Statistical Association (ASA) appreciates the opportunity to provide comments on the U.S. Department of Agriculture's (USDA) reorganization plan, which includes the proposed relocation of the National Agricultural Statistics Service (NASS) and the Economic Research Service (ERS). As the nation's largest professional organization of statisticians, the ASA is committed to upholding the integrity and objectivity of federal statistics, and our comments are guided by the goal of ensuring NASS and ERS can continue to produce the reliable, objective data essential to America's farmers, ranchers, rural communities, and all of us who rely on a safe, healthy, and affordable food supply, as well as policymakers, industry, and the public.

Relocating the National Agricultural Statistics Service (NASS) and the Economic Research Service (ERS) is likely to result in major disruptions, including product delays and suspensions, resulting in the loss of timely, reliable data for farmers, ranchers, and policymakers. The employees of both agencies are already heavily burdened by the loss of nearly a third of their fellow employees this year, putting the agencies' products at increased risk of disruption beyond that detailed in the 2024 report, The Nation's Data at Risk. Already, we have seen a scaling back of a NASS product due to staff loss. (See https://bit.ly/FedStatMonitoring.) Given the already strained operations of these two agencies, the course that would minimize the disruption of ERS and NASS products for America's producers of food and other agricultural products would be not to move the agencies.

Relocation threatens the credibility and integrity of federal statistics

Both agencies provide critical data, research, and analysis that are routinely used by policymakers at the federal, state and local levels, by industry and trade groups, and by the public. Please see the supporting materials addendum for a short description of each of the agencies' mission, scope, and products. Notably, the agencies are two of the 13 principal statistical agencies in the Federal Government. Five principles are fundamental to statistical agencies: relevance to policy issues, credibility among data users, trust among data providers, independence from political and other undue external influence, and continual improvement and innovation.[1] Public trust in Federal statistics is essential to their value and use in informing decisions across public and private sectors; any loss of trust in the integrity of the Federal statistical system and its products can foster uncertainty about the validity of measures our nation uses to monitor and assess performance and progress.

The production of government statistics is a highly specialized process, and any action leading to a loss of skilled staff from NASS and ERS would negatively impact the timely production of data critical to the agricultural sector. The ASA has previously stated that such a move would be a "fundamental undermining of federal statistical agencies."[2]

2019 Relocation

The 2019 relocation of ERS serves as an example of the delays and disruptions that will likely result from the proposed relocation. About a quarter of ERS staff, whose positions were intricately linked to USDA data, program or policy offices or to the larger Federal statistical system, were retained in DC in 2019, reflecting the importance of those positions, as well the need for proximity to USDA data systems, processes and programs essential to perform their duties consistent with the security requirements of Federal Statistical Agencies. The rest of ERS staff were reassigned to Kansas City. This relocation of ERS (and the National Institute of Food and Agriculture (NIFA)) resulted in a significant loss of staff and a temporary but severe decline in productivity (Government Accountability Office, 2023). The abrupt timeline for the move, the fact that many staff lived in dual-career households and no help was given to place the second earner, the lack of support and time to alter care arrangements for children or elderly family members, and the availability of good alternative opportunities for these highly skilled staff, contributed to the lack of retention. (See also this 2023 Government Accountability Office (GAO) report.)

[1] National Academies of Sciences, Engineering, and Medicine. 2025. Principles and Practices for a Federal Statistical Agency: Eighth Edition. Washington, DC: The National Academies Press. https://doi.org/10.17226/27934.

[2] https://www.amstat.org/news-listing/2021/10/08/asa-decries-usda-undermining-of-federal-statistical-agency-evidence-based-policymaking

Although staffing levels eventually recovered, the new workforce was largely composed of less-experienced employees, and the agencies lost critical institutional knowledge (GAO, 2023). The 2019 move resulted in a "hollowing out" of the agencies, with approximately 75% of staff leaving. Former federal officials warned the relocation would result in a "disastrous loss of expertise."[3]

Co-location of NASS and ERS in Washington, D.C., is essential for effectiveness

Geographic location and co-location are crucial for fostering innovation through knowledge spillovers and the diffusion of tacit knowledge.[4,5] Tacit knowledge, which is difficult to articulate and codify, is best transferred through frequent, face-to-face interactions. This is why innovative clusters, like Silicon Valley, often emerge where key stakeholders are located in close proximity, facilitating informal, day-to-day interactions and trust-building essential for collaborative learning and the exchange of complex ideas.[4] While digital communication has made global collaboration possible, research indicates that geographic proximity still significantly impacts knowledge transfer and is a primary driver of innovation.[5]

Co-locating the portions of NASS and ERS currently in the Washington, D.C. metropolitan region is essential for effective statistical coordination. ERS and NASS greatly benefit from their proximity to each other, USDA partner agencies, and to the 11 other principal federal statistical agencies, as well as other federal science agencies and departments. Their research agenda is directly applicable to the food and agricultural policies debated in Congress.

Three high-profile examples of the value associated with close proximity of NASS and ERS within USDA Headquarters are the following:

- *World Agricultural Supply and Demand Estimates (WASDE)*—are market-moving, monthly supply and demand forecasts for major crop and livestock commodities for the nation and the world. NASS and ERS both work with the Office of the Chief Economist's World Agriculture Outlook Board (WAOB), in NASS's highly secure, in person, "lock-up" to compile and issue the frequent and regular market sensitive WASDE estimates. Both the WASDE Estimates and the Crop Production reports, along with five other NASS data series, are Principal Federal Economic Indicators of the United States.

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[3] https://www.amstat.org/news-listing/2021/10/08/leaders-across-five-decades-unite-to-oppose-usda-statistics-and-research-plans

[4] Delgado, M. (2020). The co-location of innovation and production in clusters. Industry and Innovation, 27(8), 842–870.

[5] Narula, R., & Santangelo, G. D. (2018). Location, collocation and innovation by multinational enterprises: a research agenda. *Journal of International Business Studies*, 49(7), 891–904.

- NASS releases six of the eight USDA Principal Federal Economic Indicators. With at least four of these indicators being produced every month, these market-moving, supply estimates and forecasts of U.S. major crop and livestock commodities provide foundational information for understanding the contribution of agriculture to the U.S. economy. These frequent and regular market-sensitive NASS statistics are compiled and issued in NASS's highly secure, in-person "lock-up."
- ERS releases its *U.S. Farm Income and Wealth Estimates and Forecasts* three times per year. The releases are based on responses to ERS's and NASS's annual Agricultural Resource Management Survey (ARMS) and information provided by NASS, Farm Service Agency (FSA), Risk Management Agency (RMA), and other sources of sector-level information. Data are coordinated with other key U.S. Department of Agriculture (USDA) data releases, including the World Agricultural Supply and Demand Estimates (WASDE). The program's data and analysis are used by USDA and its stakeholders to inform their perspective on the financial health of the U.S. agricultural economy, and are transferred to the Bureau of Economic Analysis (BEA) for incorporating into their U.S. GDP estimates, to NASS for incorporation in its Prices Paid Index, and the specialty crop cash receipts data are used to distribute AMS' specialty crop block grants.

By moving the majority of NASS and ERS staff away from the nation's capital, the agencies would be detached from the World Agriculture Outlook Board, and the highly sensitive monthly meetings held to prepare their market-moving data releases, key partners in data collection, such as the Census Bureau and Bureau of Economic Analysis, national discussions and other expert groups, and lose connection to the combined know-how and innovation that the whole of the Federal statistical system generates. Further, the distribution of NASS and ERS over multiple locations would disrupt the collaborative in-person work that is needed to move these estimates from data collection to final releases.

Severing NASS and ERS from USDA Headquarters and the rest of the federal statistical system could lead to a lack of consistency and efficiency across the federal statistical system and duplication of effort and make it harder for USDA to respond in periods of crisis. In-house expertise with deep institutional knowledge is critical for analyzing policy options and implications and quickly responding to information needs related to economic shocks.

For example, both NASS and ERS have benefited from collaborations with colleagues from other statistical agencies to develop new techniques for reducing respondent burden in surveys, for using administrative records to more efficiently collect information from respondents, and creating rapid response surveys and data collections to provide critical information about consumers, producers, and retailers during crises, like the 2022 infant formula supply chain crisis. Other examples include quick turnaround analyses of sector impacts of severe droughts,

floods and hurricanes, supply chain shocks, and trade-disruptions due to wars and extreme weather events in trading partners, research that addresses questions with immediate policy implications, e.g., Farm Bill debates, among others. This capability is based on ERS staff with in-depth knowledge of sectoral conditions and relationships with key USDA stakeholders.

Given the already strained operations of these two agencies, the course that would minimize the disruption of ERS and NASS products for America's producers of food and other agricultural products would be not to move the agencies at all. We discuss alternatives below.

Recommendations

To minimize disruption of the widely used and influential ERS and NASS products and the significant costs of standing up new locations, and to ensure the continued integrity of these vital agencies, the following steps should be taken:

- **Retain ERS and NASS HQ staff in the National Capital Region (NCR):** The least disruptive option would be to retain the South Building. If that is not possible, we recommend that NASS and ERS employees already in the Capital Region be moved to another location within the Washington, D.C., metropolitan area. This would allow the agencies to retain their expert workforce and continue to benefit from coordination with other USDA and federal agencies while achieving potential modernization or cost-effectiveness goals. It would also preserve the integrity of sensitive data through both agencies' secure data networks and infrastructures.
- **Phased relocation for positions and staff to be relocated.** In addition to staff in the NCR, both agencies have staff located in hubs across the country and remotely. Any relocations of ERS or NASS staff should be conducted over time and in phases that minimize disruption, protect the quality of critical data collections and research and that ensure the maintenance of the secure data infrastructures upon which both agencies rely. For example, moving NASS now would put the 2027 Census of Agriculture at risk. A phased relocation could also help retain staff if they have time and resources to move their families. Both agencies have seen roughly 30% reductions already in 2025; further attrition due to short notice mandated relocations would be devastating.
- **Release a full plan for public comment:** The USDA should release a full, detailed plan outlining the costs and benefits of the proposed relocation, including how to minimize disruption of products. This plan should include a comprehensive analysis of the projected staff attrition, consequences for high profile data products and analyses, and projected costs and timeframe for procuring secure office space and computing resources sufficient to meet the needs of federal statistical agencies, and for relocation. The plan should provide details on the timing, location, and co-location of each agency. Without such information, the potential costs of losses in collaboration and reduced

efficiencies in interagency coordination cannot be assessed. The plan should also be subject to a public comment period and input from Congress.

The ASA urges the USDA to prioritize the continuity of products on which farmers, ranchers, and others rely and the integrity of federal statistics for the benefit of all Americans. As former U.S. Chief Statistician Katherine Wallman noted, the actions to dismantle ERS in 2019 were "the biggest threat to a federal statistical agency in many years" and undermined the autonomy critical to its credibility and effectiveness.[6] The ASA recommends more careful planning to avoid making a significant step backward for the nation's data infrastructure.

Supporting Materials: Agency Missions, Scope, and Products

NASS's mission is to provide timely, accurate, and useful statistics in service to U.S. agriculture (https://www.nass.usda.gov/About_NASS/Mission_Statement/index.php). Key investments and functions include:

Census of Agriculture (COA): Every five years NASS conducts the COA to obtain agricultural statistics for each county, State, and the Nation. This is the leading source of statistics about the Nation's agricultural production and the only source of consistent, comparable data, at the county level.

Agricultural Estimates Program: Through conducting scientifically designed surveys of operators of farms, ranches, and agribusinesses who provide information on a confidential basis, a large share of NASS's core statistical staff is dedicated to providing these objective data essential to the public and private sectors of the agriculture industry.

Reimbursable activities. Major reimbursable programs include intradepartmental reimbursable work to support ERS (Agriculture Resource Management Survey), the Farm Service Administration (prices received by farmers and county-level cash rental rates), the Foreign Agriculture Service (assist foreign countries with agricultural statistical services), and the Risk Management Agency (county estimates of commodity production and yield).

Principal Federal Economic Indicators. NASS produces six of the eight principal economic indicators produced by USDA. These are key national data series that contribute the agricultural information needed for a comprehensive picture of the U.S. economy. If

[6] https://www.amstat.org/asa/files/pdfs/pressreleases/2018-FormerAdministrationOfficialsPressRelease.pdf

NASS releases estimates of these indicators that are a surprise to the agricultural industry, the commodity markets are shaken. Failure to produce them or concern about their quality would have negative impacts on all facets of agriculture, including farmers and ranchers, agribusinesses, and policy makers.

Human Capital. A skilled set of applied statisticians, data analysts, survey methodologists, and data scientists with experience in the fields relevant to agriculture are essential to the continued production of quality agricultural statistics.

Development of Agricultural Statistics by Integrating Multiple Sets of Relevant Data. Although surveys of farmers continue to be foundational to NASS's production of agricultural statistics, surveys alone are no longer sufficient to produce the best possible agriculture statistics. Administrative, remotely sensed and other data are required. NASS has a strong research record of evolving its estimates and Census programs to incorporate all relevant data. This effort requires close cooperation among research and production staff, which relies heavily on being co-located, and its continued success is critical for NASS to continue to be the leading source for agricultural statistics.

Engagement with the Agricultural Community. About half of NASS's staff have traditionally worked in field offices spread across the nation. Their efforts have focused on engagement at the local level. Important engagement with the agricultural community also occurs in the NCR. American Farm Bureau Federation, National Association of State Departments of Agriculture, U.S. Wheat Associates, and American Sugar Beets Growers Association are some of the agriculturally related associations located in the Washington DC area. Representatives from other associations, such as the National Corn Growers Association, the American Soybean Association, and the United States Cattlemen's Association come to DC to visit with their Congressmen and Senators and, while in DC, request to meet with NASS. These meetings are attended by NASS's leaders and are generally enriched by participation of those with experience in the specific commodity of interest.

ERS' mission is to anticipate trends and emerging issues in agriculture, food, the environment, and rural America and to conduct high-quality, objective economic research to inform and enhance public and private decision making (https://www.ers.usda.gov/about-ers). The agency provides data, market and trend analyses, and modeling for prediction and policy evaluation for public use so that all decision-makers can access the same information, models, or research results. Key investments and functions include:

Efficiency and timeliness – Maintaining a level of in-house research capacity is essential to providing timely policy input to the Secretary, other USDA agencies, Congress, and other parts of the Federal government.

Human Capital -- A skilled group of applied economists and social scientists in the fields of agricultural, resource, rural, and food economics supporting internationally recognized research programs to inform USDA decision making on economic and policy issues.

Primary statistics describing and monitoring the economic activity and well-being of producers, consumers, and rural areas – Major products include Farm Income estimates, food prices and food expenditures, analysis of the population and areas in rural America, household food security, availability of foods and food loss and waste, costs of foodborne illness, as well as measures of use of USDA's farm, nutrition assistance, and conservation programs. To produce these statistics, ERS uses surveys and administrative and other data from other USDA and Federal program agencies, maintaining confidentiality protections.

Unique modeling and data platforms—ERS builds and maintains models to analyze economic relationships in agriculture production, food consumption, international trade, and of the farm and food supply chains to name a few. The models are used by analysts to forecast market outcomes and in analysis of policy alternatives. The results of these models are made public through peer-reviewed reports and data platforms. These models serve the short and long run needs of policy makers, industry and the public and are not duplicated elsewhere in the government nor private sector. In-house modeling capability and sector-specific expertise are essential to update and improve these models to ensure the quality of the estimates and to rapidly respond to fast-moving policy debates.

Integrated programs of data development, short turn-around analyses, and longer-term research projects, and policy expertise enhances each component, and creates the foundation upon which economists can be nimble in projecting and addressing emerging policy questions.