



The National Cooperative Business Association • CLUSA International

August 27th, 2025

The Honorable Brooke L. Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Secretary Rollins,

On behalf of our hundreds of cooperative members, producers, small businesses and development centers across rural America, the National Cooperative Business Association (NCBA CLUSA) appreciates the opportunity to provide public comments on the U.S. Department of Agriculture Reorganization Plan as outlined in Secretary Memorandum: SM 1078-015.

Introduction

NCBA CLUSA is the apex association for cooperatives across all sectors of the United States economy and serves as a voice for more than 130 million people who are members of cooperatives, including credit unions. As businesses owned and controlled by the people that use them, cooperatives help build an economy that works for everyone. For over a century, cooperatives have been an integral component of the fabric of rural America by helping farmers gain access to markets, sustaining locally-owned small businesses, electrifying rural homes, providing reliable financing through the Farm Credit Institutions, and so much more.

Background

We applaud the Administration's focus on making USDA more efficient and accessible to the rural communities it serves. USDA has a long history of supporting cooperatives through research, technical assistance, financing help for newly organizing cooperatives, writing and dissemination of reports and educational materials, and maintaining statistics on cooperatives. The Rural Development Mission Area, and especially the Rural Business-Cooperative Services (RBCS) Branch, is critical to supporting farmers, communities and cooperative businesses across sectors. These services, which originally focused primarily on agriculture and credit, were supported by Congress as early as the Cooperative Marketing Act of 1926 and have been augmented by subsequent legislation.

Recommendations and Considerations for Reorganization

As a general matter, we believe that strong staffing levels are crucial for USDA to achieve its mission. We are concerned that reduced staffing levels risks USDA's ability to serve its myriad constituents. We are particularly concerned with public reports on reduced staff within the RD Mission Area and RBCS of over 40%, thus risking the agency's ability to carry out its programmatic responsibilities. As USDA considers its options for reorganization, we urge it to ensure the appropriate level of staff so it can effectively implement USDA programs and ensure access to farmers and rural citizens, no matter where they live.

We also support the Department's continued efforts to use technology more effectively, especially as it relates to ensuring data is transparent and easily accessible so that USDA and other stakeholders can ensure that tax dollars are invested in ways that make the most impact. By pairing appropriate staffing levels with strategic technology investments, USDA ensures it can meet the needs of farmers and rural citizens in the modern economy.

As it relates to supporting cooperatives and cooperative development, rural and low-capacity communities have faced significant challenges in accessing programs within USDA due to lengthy, complex application processes and cumbersome regulatory hurdles. The Rural Business-Cooperative Service and Rural Development Staff have built trusted relationships and provide the highly specialized support required for cooperative businesses to thrive. **Ensuring that USDA RD remains strong and maintains the institutional knowledge of staff experienced in cooperatives is crucial for rural prosperity.**

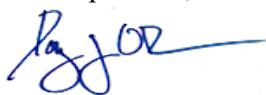
While cooperatives exist and thrive across all sectors of our nation's economy, USDA RD administers the only federal program dedicated to cooperative development, the Rural Cooperative Development and Socially Disadvantaged Groups Grants. USDA RD and RBCS staff have the expertise bolstered by a local presence to provide specialized support for the time-tested model of cooperative businesses on which other federal agencies also rely, including through initiatives like the Interagency Working Group on Cooperative Development. We applaud the Administration's efforts to make grant and financial assistance programs more efficient. **It is of utmost importance that the level of responsiveness and available services to rural communities and cooperative businesses are preserved within USDA Rural Development to ensure these efforts are successful and avoid further diminishing capacity in service of efficiency.**

The Rural Business-Cooperative Service Branch also administers the Annual Survey of Farmer Cooperatives. The Annual Survey is a vital resource in our shared goals of promoting the understanding, use, and development of the cooperative business model and continues to be deeply important to the farmer cooperatives we represent. Like other RD reporting mechanisms, the current survey process is largely done manually for both the RBCS staff and the respondents. The benefits of moving to some variation of an online, web-based system include increased efficiency of filling out the survey by the respondents, and reducing RBCS staff time in the collection, consolidation and reporting of this data. **As the Department prioritizes efficiency, we urge the administration to invest in modernizing USDA technology to enable offices to implement agency programs most efficiently, particularly technical assistance programs, in service of cooperatives and rural communities.**

Conclusion

Cooperatives and their member-owners are integral to a thriving and prosperous rural America. A strong, accessible and equipped USDA RD and Rural Business-Cooperative Service is an efficient use of taxpayer dollars that provides key support for our farmers, ranchers and the rural communities they call home. NCBA CLUSA and the cooperative community welcomes the opportunity to serve as a resource going forward. We look forward to continuing to work closely with USDA, and especially the Rural-Business Cooperative Service, to help more people seeking to use the cooperative business model to build a stronger, more prosperous nation. For questions or additional information, please contact me or Aaliyah Nedd, Director of Government Relations for NCBA CLUSA at anedd@ncba.coop.

In cooperation,



Doug O'Brien
President and CEO
NCBA CLUSA