



October 5, 2017

The Honorable Sonny Perdue
United States Department of Agriculture
Washington, DC 20510

RE: Comments on “Improving Customer Service” (Federal Register Number: 2017-19337)

Dear Secretary Perdue,

Thank you for the opportunity to provide public comments concerning the next steps toward USDA reorganization on behalf of the nation’s 3,000 conservation districts and the National Association of Conservation Districts (NACD). These comments are specifically in response to your proposal to consolidate mission support activities at the Farm Production and Conservation (FPAC) mission area level.

Based on information provided in the September 12 Federal Register notice, we understand one of the goals with respect to the new FPAC mission area—which now includes NRCS, RMA, and FSA—is to “increase operational efficiencies, but also maximize collaboration between agencies that serve similar customers.” Certainly, all three agencies housed under the FPAC mission area provide important services to the customers of rural America—our nation’s farmers, ranchers, and private forest landowners; however, each agency is unique in their mission and must continue to operate as separate, if complimentary, agencies.

The department’s conservation customers are also the conservation districts’ customers, and we are thus compelled to express our members’ strong concerns about the proposed actions. Conservation districts’ governing officials and their employees work alongside USDA officials at the customer service level across the United States. Districts are integral to the delivery of conservation programs and services and have been since 1937 when USDA helped state governments establish this local link to conservation delivery.

With regards to the proposal, first, there is lack of clarity and information regarding the proposed action. Based on what is known, we believe there is strong likelihood that these efforts toward efficiency will actually impose greater bureaucratic burdens on agency administrative functions and will ultimately discourage producers from seeking assistance and/or adversely affect the services they now receive. As mentioned in our prior comments in June, individual conservation districts are many times physically co-located with USDA field offices and all conservation districts have an assigned NRCS conservationist to facilitate producer access to USDA conservation programs. The 3,000 districts in the US have at least 7,000 employees that provide conservation services as part of the federal-state-local government conservation delivery system. Customers often don’t even distinguish whether the conservation technical assistance is coming from a federal or a local governmental conservationist.

This is done in order to create a seamless, locally-led conservation delivery system that leverages federal, state, and local resources to effectively deliver conservation assistance. Conservation districts and their governing officials contribute over \$1 billion in services to this partnership. If mission support activities were consolidated at the mission area level, there could not only be a direct effect on the day-to-day



operations of conservation districts co-located with USDA field offices, but also on the delivery of conservation assistance services to rural Americans.

Second, in response to the lack of information and clarity on this proposal, our members are expressing serious reservations about how the proposed consolidation of mission support activities will function and impact conservation delivery. Thus far, USDA announcements about the proposal have been non-specific and lacking in policy details.

Questions we seek answers to include:

- Given that most conservation districts are co-located with USDA service center agencies—in some cases as the lessee, in some cases as the lessor—how will leasing arrangements be handled going forward?
- Program administration is currently suffering across all USDA agencies because of reduced staffing. How will consolidating HR functions facilitate addressing this increasingly severe effect on the workload and customer service?
- Great strides are being made to modernize information technology and deployment of modern software platforms. How will consolidation of information technology functions enable individual agencies and their governmental partners such as conservation districts to procure and develop technology to support their unique missions?
- Current information available to stakeholders is vague and does not articulate the level of specificity needed to fully understand what is being proposed. When does the department intend to provide more specific information on the proposed reorganization to partners like conservation districts as well as stakeholders?
- What services or functions are included under the broad label of financial management?
- When and how will USDA's core conservation partners, including conservation districts, be involved in the decisions regarding reorganization that will directly affect them in the delivery of conservation customer services?
- NRCS has a unique expertise in Farm Bill conservation programs by both delivering the administrative and technical aspects of these programs. Can you assure your stakeholders that Farm Bill program administration will not be removed from NRCS's purview?
- Many districts and state associations have cooperative or contribution agreements with NRCS. Will the creation and approval process for these agreements change with this reorganization?
- How long does USDA expect it will take to shift the administrative functions out of NRCS, FSA and RMA and into the mission area?
- Does USDA expect further announcements or additional changes related to the reorganization outside of this announcement and the initial announcement in May?



Without more information and further engagement, we can only respond in our comments to “what might be.” While more questions relating to office space, information technology, human resources, and others are sure to follow, we would appreciate the opportunity to distribute the answers to these questions to our members and begin a dialogue between USDA, NACD, and your core partners: local conservation districts.

We articulated in our initial comments our belief that the department will struggle to maintain the current quality of service and coordination that producers rely on—damaging USDA’s credibility and significantly limiting conservation outcomes—without robust, sustained engagement with key partners like conservation districts. For this reason, we look forward to receiving answers to the listed questions above and will continue to strongly encourage the department to release more detailed information on its latest proposal and begin serious direct engagement with conservation districts.

Sincerely,

Brent Van Dyke
President