

Formal Comments on USDA Reorganization (SM 1078-015)

Submitted by: Joseph F. Anelli, DVM, MS Executive Vice President National Association of Federal Veterinarians (NAFV) Date: August 25, 2025

Introduction

On behalf of the National Association of Federal Veterinarians (NAFV), I submit these comments in response to the Secretary of Agriculture's 2025 memorandum on reorganizing USDA (SM 1078-015). NAFV, founded in 1918 and recognized by OPM as an organization of federal managers and supervisors, represents the interests of veterinarians working across USDA, FDA, CDC, and other federal agencies. Veterinarians are mission-critical professionals within USDA, central to food safety, animal health, disease surveillance, emergency response, and zoonotic disease prevention. Without adequate numbers of trained regulatory veterinarians, trade slows or stops, livestock diseases are not effectively managed, and research into new methods of controlling diseases slows or stops, putting the U.S. at a relative trade disadvantage. Any reorganization that diminishes the role, capacity, or morale of federal veterinarians risks undermining both USDA's mission and the states' ability to fulfill their public and animal health responsibilities. We urge USDA to recognize that the nation needs more federal veterinarians, not fewer. Reducing this workforce places significant burdens on USDA programs and state veterinary services that rely on USDA leadership and technical capacity.

Comments on Key Points of the Reorganization Plan

Ensure the size of the workforce aligns with resources and priorities

The veterinary workforce should be based on the risk and needs of our stakeholders. An independent risk assessment prior to a reorganization is vital to determine what organizational structure is best for the livestock industry. The relative low cost of the federal veterinary workforce belies its outsized return on investment that keeps diseases in check, ensures the safety of the food supply, and enhances our trade opportunities. Veterinary medicine is an area of federal service that needs greater investment, not less.

While consolidation may aim to streamline operations, reducing supervisory or technical veterinary positions undermines USDA's ability to provide scientific oversight and emergency response. Veterinary expertise is not duplicative overhead—it is essential capacity. Eliminating these roles weakens disease preparedness and diminishes the government's ability to support states in managing outbreaks. Our veterinary oversight is a strength, not a liability for trade because it ensures the integrity of our livestock products to our trade partners, putting the U.S. ahead of its competitors.

The memorandum highlights growth in the workforce and salaries as justification for reorganization. For veterinarians, this framing is misleading. Federal veterinarians are underpaid relative to the private sector. Reducing their numbers or limiting their pay will worsen already critical recruitment and retention challenges, leaving gaps in food inspection, regulatory science, critical research, and animal disease programs. At APHIS alone, 20% of the workforce has already been lost under the deferred resignation program, disproportionately impacting senior and highly experienced veterinarians. These departures created a vast knowledge gap that is nearly impossible to close—particularly at the current starting salaries offered to federal employees. Data indicates the mean starting salary for private

practice veterinarians is nearly 30% higher than that for public practice veterinarians entering federal service, and even at mid-level, public sector veterinarians earn approximately 10–12% less than their private practice counterparts. Without adjustments and incentives, USDA will struggle to attract and retain the best and brightest candidates to fill critical vacancies. Incentives—whether through Title 5/42 authorities, recruitment bonuses, or retention awards—are essential to rebuild veterinary capacity. To date, the Department has not aligned voluntary reductions with mission priorities. The voluntary reductions came before an assessment of which mission areas could reasonably be reduced. As a result, USDA has already had to rehire Veterinary Medical Officers, while administrative staff has been decimated—greatly impacting the efficiency and capability of scientific staff in ARS. The Delayed Resignation Program (DRP) devastated support staff across the board. Scientists and veterinarians are now burdened with administrative tasks far better handled by administrative personnel. This is wasteful: DVMs and PhDs should be analyzing data, publishing research, and conducting field activities—not cleaning toilets, doing laundry, or feeding animals in containment. These inefficiencies diminish USDA's ability to fulfill its research and disease control missions.

Bring USDA Closer to its Customers by reallocating resources outside of the NCR:

Relocating staff to new hubs will create operational disruptions. For veterinarians engaged in regulatory science, outbreak response, and interagency coordination, proximity to federal leadership and scientific partners in Washington is vital. Forced relocations risk losing experienced veterinarians who cannot move, stripping USDA of institutional knowledge precisely when emerging threats like H5N1 require sustained expertise. On the surface, there appear to be cost savings, but the opposite is true.

The Deputy Secretary testified in his Congressional hearing that this move out of the NCR would benefit employees by bringing them to lower cost of living areas. While this is true on the surface, many employees are in dual income households. It is unlikely the proposed locations would be able to absorb or even offer career opportunities for spouses that exist in the NCR. A forced relocation would actually result in lost income for families who choose to move, negating this argument of a financial benefit from lower cost of living areas. It is also unclear if there is housing capacity. For example, housing in Fort Collins is not much less expensive than in the NCR. In fact, a Zillow search indicates that the average cost of a house in Fort Collins, CO is \$555,000 and in Salt Lake City, UT \$524,000, while it is only \$492,500 in Beltsville, MD.

Another major risk of the proposed reorganization is the loss of institutional memory. APHIS-VS was already negatively impacted by the Department of Government Efficiency's (DOGE) cuts and the DRP, leaving it without sufficient resources to manage endemic and foreign animal diseases or respond adequately to outbreaks. This puts rural economies at risk and undermines national preparedness. The personnel in the NCR are not frontline employees—they are policy makers, strategists, and leaders. Their presence in NCR is critical precisely because they must coordinate with Congress, allied agencies, industry groups, and foreign governments located there. Moving them to distant hubs will cost taxpayers millions in relocation expenses while making them less effective. Far from reducing online meetings, relocation will increase them, because policy staff will be cut off from in-person access to the very policymakers they need to engage.

Forced moves carry an unacceptably high risk of losing veterinarians with deep institutional knowledge, many of whom have career alternatives outside USDA. A more effective approach would be to cease hiring new staff into the NCR and instead realign staffing gradually through attrition and targeted rehiring. Given current staffing shortages, especially in APHIS and FSIS, further attrition would be devastating to USDA's ability to respond to HPAI, NWS, and other threats. Closure of Research Facilities (e.g., Beltsville Agricultural Research Center). Closing or consolidating USDA

research facilities undermines critical veterinary research programs that support state and federal surveillance of zoonotic diseases, food safety hazards, and animal health. These centers are incubators of collaboration between federal and state veterinarians. Their loss will directly weaken national capacity to detect and respond to outbreaks.

Eliminating management layers and Bureaucracy - Flattening of Management Structures.

While eliminating “layers” of management may seem efficient, veterinary oversight structures exist for a reason. Supervisory veterinarians provide technical guidance, ensure regulatory compliance, and serve as liaisons with state partners. Removing these roles risks eroding quality control and overburdening remaining veterinarians with unmanageable spans of responsibility.

The oversight and regulations the U.S. places on its livestock industry is a strength, not a weakness. Regulations keep our food supply safe and raises quality standards, making the U.S. a global leader in agriculture. It allows us to keep a competitive trade edge over our rivals.

Consolidate support functions

This has been done in the past and only creates gatekeepers in the combined functions and makes things less efficient. Previously USDA consolidated IT support functions and it failed spectacularly. Now employees find it difficult to get in person IT support, decreasing their efficiency while they often wait days or even weeks to remedy work-stoppage issues. Decentralization allows for flexibility and nuanced management to meet regional needs that cannot be done at a centralized service. Consolidation of support functions only makes the USDA less efficient, in direct conflict with this Administration's stated goals.

Other Comments:

“Exemptions” for Public Safety and Inspection Roles

Although the memorandum indicates exemptions for inspection and emergency response roles, the broader reorganization—through relocations, consolidations, and attrition—will nonetheless harm these critical functions. Exemptions on paper do not offset the disruption caused when experienced veterinarians leave federal service.

Many programs located in the NCR need significant investment to allow for livestock work. Relocating these programs without serious input from the scientific staff could result in the dissolution of critical research. With student debt on an unsustainable trajectory and the low government salaries, recruitment into federal service is increasingly difficult. Agency leadership often gets the chance to meet with stakeholder groups because they are in DC to meet with Congressional members and ask to meet during those visits. Agencies run the risk of losing access to the stakeholders they aim to serve if moved from the region. Moving would require stakeholders to travel to locations they may not normally visit to engage with agency leaders.

None of the locations listed are central to all commodity groups and stakeholders may never travel to those locations for other purposes, decreasing their access to agency collaboration. These interactions allow agencies to remain relevant. It is crucial. Stakeholders were not consulted to confirm that this reorganization would not impact their access to leadership. While the DC area is sometimes expensive, the positions in DC are primarily higher-level staff positions and not entry-level. Many staff are long-term residents with spouses and families entrenched in the area. Assuming greater than 50% of the staff would move is naïve. Deputy Secretary Vaden said during his Senate testimony they learned lessons from the NIFA and ERS relocations but did not state what those lessons learned were. Agencies cannot afford to lose more senior staff.

The proposed reorganization plan and USDA's discussions of it, including [Deputy Secretary Vaden's testimony](#), make frequent references to the cost of living. Here is a table with information on the [locality adjustments for salary](#), the [median income](#), and the [median home price](#).

State	County	Locality adjustment	Income	Home price
MD	Montgomery	33.94%	\$100,044	\$671,492
MD	Prince George's	33.94%	\$57,096	\$445,727
DC	District of Columbia	33.94%	\$106,816	\$775,191
VA	Alexandria City	33.94%	\$115,144	\$778,834
CO	Larimer	30.52%	\$71,359	\$595,965
IN	Marion	18.15%	\$70,999	\$269,471
MO	Cass	18.97%	\$52,006	\$330,273
MO	Clay	18.97%	\$52,329	\$317,709
MO	Jackson	18.97%	\$49,775	\$255,895
MO	Platte	18.97%	\$73,531	\$399,940
NC	Wake	22.24%	\$81,322	\$533,344
UT	Salt Lake	17.06%	\$71,787	\$599,151

The salary a USDA employee can get in each location is not the only factor we must consider. There are certainly areas in the NCR where it is difficult to buy a home, but there are locations easily within the community area that are reasonable. Median income is included because many people have a partner. If their earning potential is limited because of the locations of the new hubs, forcing USDA employees to leave the NCR will result in families living apart or people deciding their new duty station is untenable.

Cross-Cutting Concerns

- **Erosion of Veterinary Capacity:** USDA's ability to conduct animal disease eradication, zoonotic surveillance, and food inspection hinges on maintaining—not shrinking—the veterinary workforce.
- **Impact on State Programs:** States rely heavily on USDA veterinarians for technical support, training, and joint outbreak response. Reducing USDA staff directly burdens state veterinary services, which already operate with limited resources.
- **Loss of Expertise:** The 20% attrition at APHIS, largely of senior experts, has already left a serious knowledge gap. This cannot be quickly replaced at entry-level salaries.
- **Recruitment and Retention Crisis:** Without closing the pay gap between private and public practice, USDA will fail to rebuild its veterinary corps. Incentives are necessary to retain senior staff and attract top candidates.
- **Reduced Morale:** Rapid upheaval and inadequate compensation further demoralize remaining staff, compounding attrition.

Stakeholder Perspectives Incorporated

- **Field vs. Management:** Stakeholders emphasized that more federal funding should go to boots-on-the-ground veterinarians, with fewer excessive management layers. Animal Care and other units should act as true support services, not policy-making bodies that increase administrative burdens.
- **Relocation Risks:** Forced relocations from the NCR would cause major losses of skilled veterinarians, especially following the 20% APHIS attrition. NCR remains vital for trade, industry relations, embassies, and Congressional access.
- **Workforce & Pay Gaps:** USDA salaries for veterinarians lag behind private practice by 30% at entry level and 10–12% at mid-level. Deferred Resignation hollowed out veterinary and technical roles while leaving inefficiencies intact. Closing the pay gap and offering incentives is critical.
- **Program Impact:** VS field operations, FSIS food safety oversight, and ARS animal health research are severely weakened. Consolidation of IT/admin services has historically reduced efficiency.
- **Trade & International Engagement:** Relocation out of NCR undermines U.S. trade missions and veterinary leadership in negotiations, screwworm preparedness, and zoonotic disease response.
- **Research Facilities:** Closing BARC and other ARS hubs undermines parasitology and poultry research capacity. Relocation without scientific input risks dismantling critical expertise.
- **Morale & Retention:** Stakeholders stressed that this plan repeats past failed reorganizations, accelerates brain drain, and reflects poor change management practices.

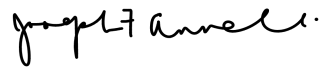
Conclusion

Veterinarians are at the very heart of USDA's mission to safeguard America's food supply, protect animal health, and respond to zoonotic threats. Any reorganization that results in fewer federal veterinarians will compromise public health, diminish USDA's capacity, and shift an unsustainable burden onto state partners. NAFV strongly urges USDA leadership to ensure that the reorganization plan: 1. Protects and strengthens the federal veterinary workforce. 2. Recognizes veterinarians as mission-critical to both USDA and state operations. 3. Provides competitive salaries and incentives to attract and retain experienced veterinarians. 4. Addresses the knowledge gaps created by the 20% attrition at APHIS and prevents further erosion of expertise. The collective voice of USDA veterinarians and stakeholders resoundingly warns that this reorganization will deepen workforce shortages, erode morale, and compromise public and animal health unless immediate steps are taken. We do not need fewer veterinarians—we urgently need more.

This reorganization, if done as proposed here, will fly in the face of the USDA priorities of:

1. Promote healthy food choices
2. Strengthen rural economies
3. Enhance trade opportunities
4. Ensure long term success of agriculture
5. Address animal disease outbreaks

Respectfully submitted,

A handwritten signature in black ink, reading "Joseph F. Anelli". The signature is written in a cursive style with a period at the end.

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