

**Congress of the United States**  
**Washington, DC 20515**

December 11, 2019

The Honorable Gene L. Dodaro  
Comptroller General of the United States  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Dodaro,

In August 2018, Secretary of Agriculture Sonny Perdue announced a plan to relocate two key U.S. Department of Agriculture (USDA) research agencies—the National Institute of Food and Agriculture (NIFA) and the Economic Research Service (ERS)—out of Washington D.C. NIFA funds hundreds of millions of dollars of food and agriculture research each year. A large share of these funds support our nation’s land grant institutions as they develop critical and regionally specific agricultural innovations to help boost farmers’ income and ensure a safe and abundant food supply. ERS is one of USDA’s internal science arms, producing valuable statistical analyses to inform policy and industry decisions that have real impacts on farmers, consumers, rural communities, and our natural resources. This research directly contributes to critical knowledge needed for a thriving, sustainable, and equitable food and farm system.<sup>1</sup>

We, along with dozens of stakeholders, have serious concerns that this relocation has generated significant disruptions and will continue to severely disrupt ongoing scientific research while wiping out decades of valuable experience and institutional knowledge. Moreover, the relocation has further drawn into question USDA’s commitment to fact-based science free from political interference.<sup>2</sup>

As members of the Committee on Science, Space, and Technology, we are dedicated to the protection of scientific integrity and public trust in the conduct, dissemination, and use of scientific research in the Federal government.

**Cost-Benefit Analysis**

In August 2018, USDA requested expressions of interests from potential sites for the new location of NIFA and ERS. In that announcement, USDA argued that the primary justification for the move would be cost savings due to lower employment costs and rent.<sup>3</sup> In October 2018, USDA awarded a contract for approximately \$339,000 to Ernst & Young to conduct a cost-

---

<sup>1</sup> <https://www.washingtonpost.com/science/2019/04/25/trump-administration-plans-move-usda-research-divisions-despite-concerns/>

<sup>2</sup> <https://www.politico.com/story/2019/05/22/usda-agriculture-economists-trump-policies-1340168>

<sup>3</sup> <https://www.usda.gov/media/press-releases/2019/06/13/secretary-perdue-announces-kansas-city-region-location-ers-and-nifa>

benefit analysis of the relocation.<sup>4</sup> In June 2019, Secretary Perdue announced the selection of the Kansas City Region as the next home of NIFA and ERS and released an Executive Summary of a cost-benefit analysis which describes the difference in employment costs and rent between the status quo, the Kansas City location, and three other alternate location scenarios.<sup>5</sup>

We have concerns about the information presented in this 11-page Executive Summary. The analysis claimed that, by moving to the Kansas City Region, taxpayers would save nearly \$300 million over a 15-year lease term versus the status quo in the National Capital Region. But an independent analysis conducted by the Agricultural & Applied Economics Association found that the move to Kansas City could actually *cost* taxpayers between \$83 and \$182 million dollars, mostly because of the value of research lost due to employee attrition, which it estimated at 50 to 75 percent of employees mandated to move.<sup>6</sup> USDA does not appear to have considered relocating within the National Capital Region, including to lower-cost office space already owned by USDA. The full Ernst & Young cost benefit analysis has not been made public, and the Department has refused to provide the full analysis to Congressional requestors. The National Farmers Union, which represents 200,000 family farmers, ranchers, and rural members, highlighted a lack of transparency in the metrics used for developing this proposal, and expressed its opposition to the relocation in a September 2018 letter to Secretary Perdue.<sup>7</sup>

In this context, we have the following questions:

1. What actions, if any, did USDA take to comply with legal and regulatory requirements in awarding its contract to Ernst & Young?
2. In the absence of a legal requirement, what caused USDA to publicly release an Executive Summary of a cost-benefit analysis? Did this meet standard professional or regulatory CBA guidelines?
3. What is GAO's assessment of both the Executive Summary of the cost benefit analysis and the methodology used for the complete cost benefit analysis based on GAO's Assessment Methodology for Economic Analysis (GAO-18-151SP)?

In order to expedite Congressional oversight, we ask that GAO address these questions as soon as possible and provide information to staff in the form of a correspondence or oral briefing.

### **Abandoned Science**

USDA originally intended to transition approximately 550 employees from Washington, D.C. to the selected location over a three-month period, completing all moves by September 30, 2019.<sup>8</sup> However, NIFA and ERS employees were given just one month to decide whether they would relocate. Two-thirds of the affected employees decided to give up their jobs, prompting USDA to

---

<sup>4</sup> Definitive Contract 12314419C0002

<sup>5</sup> <https://www.usda.gov/sites/default/files/documents/062819-CBA.pdf>

<sup>6</sup> <https://www.aaea.org/UserFiles/file/Report-MovingUSDAResearchersWillCostTaxpayers-AAEAReport2019june19final.docx.pdf>

<sup>7</sup> <https://1yd7z7koz052nb8r33cfxyw5-wpengine.netdna-ssl.com/wp-content/uploads/2018/09/09-18-18-Letter-to-Perdue-re-NIFA-and-ERS-1-1.pdf>

<sup>8</sup> <https://www.usda.gov/sites/default/files/documents/061319-CBA.pdf>



extend the deadline for some employees to accept the reassignment. The American Federation of Government Employees referred to this as “mission catastrophic” employee attrition.<sup>9</sup> As a result of such high attrition, USDA was forced to cut the buyout amount for employees who declined reassignment from \$25,000 to \$10,000.<sup>10</sup>

In October 2019, USDA reported that 576 positions from both research agencies would be relocated to Kansas City. Based on the latest data from USDA, about 64% of the ERS positions and 75% of NIFA positions are empty.<sup>11</sup> USDA is now delaying the publication of dozens of research reports and, in some cases, will be forced to abandon them completely.<sup>12</sup> There are also accounts of NIFA external grant funds remaining unobligated, despite research institutions being notified of their grant approvals. Gale Buchanan, USDA chief scientist under President George W. Bush, said the relocation would be detrimental to agricultural research efforts in the long run and shows a lack of recognition, appreciation, and respect for agricultural research.<sup>13</sup>

Further, the USDA Office of the Inspector General launched a new investigation in October 2019 to address alleged suppression of climate change science at USDA. In a letter to Representative Chellie Pingree, the Inspector General acknowledged reports that the relocation of NIFA and ERS was used to suppress research on controversial topics.<sup>14</sup>

USDA also claimed that the relocation was intended to increase retention of talented staff. However, it has had the opposite effect from USDA’s stated goal in that it has driven away, not retained, highly-qualified staff. It may also fray close ties between NIFA and ERS and nearby Federal research agencies like the National Science Foundation, the National Institutes of Health, and the Department of Energy. Given concerns that the delivery of vital research from these scientific agencies will be compromised, we ask that GAO address these questions in a separate review:

1. What actions, if any, did USDA take to comply with legal and regulatory requirements in planning for and conducting the relocation of NIFA and ERS?
2. How, if at all, is the relocation of NIFA and ERS likely to impact the agencies in achieving their missions in the short-term (e.g., 5 years) and in the long-term (e.g., 15 years)?
3. What, if any, legal or regulatory oversight is needed to ensure that any future agency relocation is conducted in an objective way that ensures short- and long-term agency mission continuity?

---

<sup>9</sup> <https://www.afge.org/publication/usda-economic-research-service-faces-mission-catastrophic-attrition-with-september-move/>

<sup>10</sup> <https://www.washingtonpost.com/science/2019/07/18/many-usda-workers-quit-research-agencies-move-kansas-city-brain-drain-we-all-feared/>

<sup>11</sup> <https://federalnewsnetwork.com/leasing-property-management/2019/10/usda-relocation-takes-another-key-step-with-lease-signing-for-permanent-office-space/>

<sup>12</sup> <https://www.washingtonpost.com/science/2019/10/02/usda-relocation-has-delayed-key-studies-millions-funding-employees-say/>

<sup>13</sup> <https://thehill.com/opinion/energy-environment/454094-a-sad-day-for-agriculture-unnecessarily-moving-usda-research-arm>

<sup>14</sup> <https://www.politico.com/news/2019/10/22/usda-inspector-general-launches-climate-change-investigation-054360>

Science does not have a political agenda. When science is done well, the information speaks for itself. Scientific integrity is allowing the scientists who serve this country to conduct their work unimpeded by undue outside influence. The Committee on Science, Space, and Technology aims to protect scientific research and development performed on behalf of the public, including farmers, rural communities, and everyone who eats. We will not allow science to be silenced.

Thank you for your attention to our request. Please contact Courtney Callejas in Representative Wexton's office at 202-225-5136 with any questions.

Sincerely,



JENNIFER WEXTON  
Member of Congress



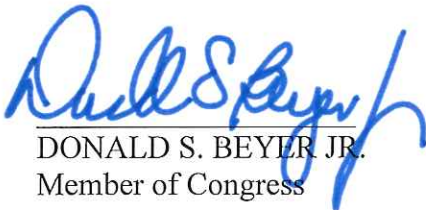
PAUL TONKO  
Member of Congress



MIKIE SHERRILL  
Member of Congress



SUZANNE BONAMICI  
Member of Congress



DONALD S. BEYLER JR.  
Member of Congress