June 14, 2017

Office of Budget and Program Analysis
U.S. Department of Agriculture
Jamie L. Whitten Building
Room 101-A
1400 Independence Ave., SW
Washington, DC 20250

Re: Improving Customer Service
FR Doc. 2017–10063
Regulations.gov Docket ID USDA-2017-0001

Dear Madam or Sir:

The Housing Assistance Council (HAC) appreciates the opportunity to comment on the proposed reorganization of the U.S. Department of Agriculture (USDA). A nonprofit organization, HAC has been helping local organizations build affordable homes in rural America since 1971. USDA Rural Development (RD) (and its predecessor agency) has been a steadfast partner throughout HAC’s history. HAC’s comments focus on the part of the reorganization plan related to USDA’s Rural Development mission area.

HAC views changes to rural development policies, governance structures, and funding levels through an unchanging lens: what is the impact on the most vulnerable rural people? HAC has consistently championed USDA’s rural housing and development programs because they help improve the quality of life and self-sufficiency of rural residents and their communities.

HAC agrees that increasing the attention paid to USDA’s rural development programs would be of significant benefit to rural America. Eliminating the Under Secretary for Rural Development is not, however, the way to achieve that goal. Secretary Perdue has testified before Congressional committees that he wants to give special attention to the rural development programs. The same result could be accomplished without eliminating the Under Secretary, simply by making clear the Secretary’s interest in that individual’s portfolio. Cancelling RD’s status as one of USDA’s basic mission areas – each of which is overseen by an Under Secretary – would be counterproductive.

At the same time, the Administration’s budget, instead of elevating USDA’s attention to Rural Development, would eliminate many of the Rural Development programs. Coupled with this budget, the reorganization increases the danger that Rural Development’s visibility and viability will be significantly decreased.

It is disappointing that USDA announced appointment of an Assistant to the Secretary for Rural Development two days before these comments were due – an indication that stakeholder input will not
be taken seriously. (HAC takes no position regarding the abilities of the individual hired.) An Assistant to the Secretary, hired by the Secretary without Senate confirmation, is not equal to a Senate-confirmed Under Secretary. The Administrators of USDA’s housing, business, and utilities programs, as well as the RD State Directors, will not view reporting to an Assistant to the Secretary as an increase in authority or in the status of their work.

Given the realities of the organizational chart and the budget, the potential impact on the most vulnerable rural people is of grave concern. With a deepening opioid crisis and a frayed rural social fabric in the national spotlight, the Administration should send a clear message of support to vulnerable rural people and communities. This reorganization conveys the opposite message.

Sincerely,

Moises Loza
Executive Director

ML/lrs