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USDA Provides Blueprint for Dismantling a Government Research Agency

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CORRECTION: In our original post, we inaccurately stated that under the Trump administration's plan, the Economic Research Service (ERS) would move "back under" the USDA Office of the Chief Economist (OCE). That statement was based on an August 9, 2018 USDA press release describing the benefits the department claimed would result from the restructuring. More careful review of USDA organizational charts from 1961-1993 and changes made to the structure of USDA in a 1994 decision reveal that ERS was never housed under the purview of OCE. We regret the error.

For scientists, it's a significant accomplishment to get your work published in a peer-reviewed journal. The process of submitting a paper, fielding reviewer

comments, and revising the work can take months (or years!), and final publication in a respected journal lends credibility to any researcher's work.

So it was odd when the Washington Post reported last week that USDA was now requiring its researchers to label outside peer-reviewed scientific publications with the word "preliminary". But this wasn't actually news to me. And it isn't the only way the Trump administration is undermining the USDA's important research role.

Peer-reviewed ≠ preliminary

Last fall I learned about this new and unusual disclaimer as I finalized a research article for publication in *Public Health Nutrition* which I had co-written with colleagues at Tufts University and USDA's Economic Research Service (ERS). The disclaimer read as follows:

"The findings and conclusions in this preliminary publication have not been formally disseminated by the U.S. Department of Agriculture and should not be construed to represent any agency determination or policy."

This new disclaimer was very troubling to me and my colleagues because it seemed to delegitimize our scientific work even though it had undergone a rigorous scientist review. Still, when we learned about the disclaimer, we felt at the time that our only option was to include it if we wanted our work published.

Research disclaimers for government employees aren't new; I included one in another article published last summer having worked with the same USDA coauthor. ERS has used this old disclaimer language for some time. The old disclaimer essentially made clear that any opinions expressed by ERS employees in their own work were not the opinions of ERS or USDA. This old disclaimer protected USDA and the agency.

Nevertheless, each administration has its own policies and as a researcher I felt I

had no sway. We published the paper with the new disclaimer, assuming the publication of it in a well-regarded, peer-reviewed journal would speak to its finality.

Since then, a great deal has been unearthed about how USDA is sidelining science with this new "preliminary" disclaimer and by other means. The same Washington Post article reported that the "preliminary" disclaimer violates the USDA's own scientific integrity policy. Even before this disclaimer was issued, UCS's own analyses found that during the current administration some USDA scientists have had concerns about communicating their research. Just as troubling was a 2016 Washington Post report that a USDA entomologist had his research on pesticide use and its impacts suppressed.

Why the new "preliminary" disclaimer is a major red flag

What's strange to me about this new potential violation is that the USDA scientific integrity policy applies to "all USDA mission areas, agencies, and offices," but the new "preliminary" disclaimer only applies to the USDA REE mission area (which includes ERS, the Agricultural Research Service, and the National Institutes of Food and Agriculture). What is more, a brief scan of peer-reviewed research articles by USDA researchers suggests that the new disclaimer policy is being inconsistently implemented.

So why have REE and ERS researchers been singled out by this new disclaimer policy? My hypothesis (I'm a scientist, it's my job to have hypotheses) is that the Trump administration is nervous.

The Trump administration can't always control what comes out of an objective, independent research agency such as ERS. So it's doing everything it can to get ERS (and other REE) researchers aligned with the administration's political line.

One way to do that is to make it harder for scientists to publish their research or

to delegitimize it with new policies such as the "preliminary" disclaimer to which ERS and other USDA REE employees are currently subject.

But there are many ways to muzzle government scientists

Another way is to simply cut the funding for research that is out of line with the administration's policy goals. The Trump administration has done just that, proposing steep funding cuts to USDA research, especially ERS, in both fiscal years 2019 and 2020.

These cuts would eliminate huge swathes of research ERS conducts. The most recent budget proposal zeroes out research on food consumption and nutrition; invasive species; markets for environmental services; bioenergy and renewable energy; agricultural research investments; international food security; food and nutrition assistance; drought resilience; rural economics; beginning farmers and ranchers; and local/regional food markets.

What remains is bare bones. The only research the administration wants to continue, according to its official budget document, concerns farm business, household income and wealth, agricultural cost of production, and farm practice adoption.

In August 2018, the Trump administration continued its attempt to gut USDA's research capacity when Secretary Perdue unveiled a plan to reorganize and relocate ERS and NIFA. Under this plan, ERS would be resituated under the USDA Office of the Chief Economist (OCE), and both ERS and NIFA would be relocated outside of the national capital region.

As currently organized, ERS operates independently, freer from interference or the whims of high-level political appointees. ERS researchers have produced mountains of rigorous, high quality, independent research to inform the development of agriculture and food policy over the last few decades. Congress routinely calls on ERS to conduct studies of food and agriculture issues to inform policymaking or program implementation. Folks, this is how the process of government should work.

Moving ERS under OCE could give Secretary Perdue (or any future USDA Secretary, for that matter) more control over what research does and does not get done by ERS or how it's messaged to the public.

If they are out of sight, they're out of mind

The physical relocation of ERS (and NIFA) outside the capital region can be viewed as another way for Perdue to better control the messages coming from ERS research, so that it's more aligned with the political priorities of the administration, or simply to reduce the amount of research coming from the agency.

Through a game-show style bid "process", Perdue's administration has sought relocation for some, but not all ERS and NIFA staff. Politico reported that the secretary anticipated "cost savings" and thought the move would allow the agency to "provide better customer service" and it would "better attract and retain staff".

Yet it's unclear how moving some ERS employees out of DC and keeping some here is better for "customer service". According to a list published by USDA, 76 positions will remain in the capital and the remaining 253 will be moved somewhere else, which likely means the relocation will splinter ERS divisions and teams. It's anybody's guess how this could benefit USDA customer service or agriculture research.

Not only will ERS staff be split up, but they may not have the necessary data to do their work. ERS staff are currently just a stone's throw from the Census Bureau Headquarters where there is a Federal Statistical Research Data Centers (FSRDC) in Suitland, Maryland. These data centers contain several datasets ERS

researchers probably need to do their research, including data from the Economic Census, the Current Population Survey, and the American Community Survey. According to our own analyses, many of the relocation sites on the USDA "middle list" are nowhere near one of these data centers.

While it's entirely possible the relocation site will be in a city near an FSRDC, why is USDA still considering places that don't have one? Are they going to build a new data center? If so, is that really going to save USDA money (which was one of the reasons Secretary Perdue suggested the relocation in the first place)?

ERS staff may also lose critical access to data available only on-site at Bureau of Labor Statistics' (BLS) national office in Washington DC, which they likely use for their research, too. The BLS website notes that the Consumer Expenditure Survey, Consumer Price Index, Current Employment Statistics for the US and states, the Producer Price Index, and other data sets related to food purchasing and agricultural markets can only be accessed onsite at BLS in Washington. How will ERS employees be able to access these data sets at the relocation site?

Another possibility is that USDA does away with the research that requires the use of data housed at these facilities. Time will tell how data access issues are addressed as the relocation process moves forward.

Congress, economists strongly oppose ERS restructuring, but Trump administration rushing

It's telling that the primary professional association for ERS researchers, the Agricultural and Applied Economics Association (AAEA)—of which I'm a member—strongly opposes the restructuring plan. AAEA members are all over the country, including in places where ERS might be relocated. Our members do topnotch research on a variety of agricultural and food issues and understand just how vital ERS's work is to ensure that our food and agricultural systems are providing economic benefits for farmers and healthy, affordable food for

consumers. So, it's no wonder the association is opposed.

Members of Congress, both Democrats and Republicans in both the House and the Senate, have taken actions to stop the ERS/NIFA restructuring, including requesting an analysis from the USDA Office of the Inspector General (OIG) to determine if Secretary Perdue's proposal follows established procedures for relocations. The OIG report could slow or even stop the reorganization proposal but won't be complete until at least June 2019. In the meantime, Secretary Perdue has clearly signaled that he plans to ignore Congress entirely. Is this how we want a presidential administration to behave?

ERS and NIFA employees have taken matters into their own hands to push back against the relocation. They recently began the process of forming a union, as reported by Politico last week. A representative for the American Federation of Government Employees noted in the article that "morale has been destroyed at the agency." We at UCS know a thing or two about what can happen when concerned scientists band together to take action (we've been here 50 years and are still going strong).

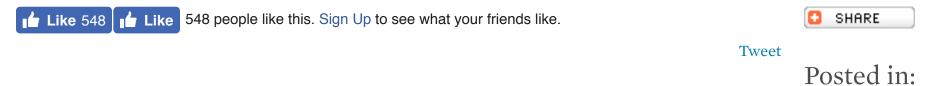
What can be done to stop this runaway train?

If carried through, this proposal would diminish the American food and farm system by harming public investment in science-based solutions at a time when farmers and ranchers need it most. It would also further deteriorate the morale of the talented staff throughout USDA. Moreover, the proposal would set a dangerous precedent for the types of actions presidential administrations can take to silence government scientists whose research happens to conflict with political agendas.

Thankfully, there's still time to stop it. And there are concrete ways to do so.

In March 2019, 108 organizations wrote to Congress asking them to stop the restructuring through the 2020 appropriations process. If Congress includes

language in the 2020 Agriculture Appropriations bill prohibiting the use of *any* funds for the reorganization, the proposal would be dead in its tracks. While many members of Congress have already expressed support for this approach, they need to hear from their constituents on this issue to compel them to act.



Food and Agriculture, Scientific Integrity

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