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Comptroller General
of the United States

June 9, 2025

The Honorable Brooke L. Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Priority Open Recommendations: U.S. Department of Agriculture

Dear Secretary Rollins:

Congratulations on your appointment. The purpose of this letter is to call your personal attention to three areas based on GAO's past work and five open priority recommendations, which are enclosed.¹ Additionally, there are 106 other GAO open recommendations that we will continue to work with your staff to address.

We are highlighting the following areas that warrant your timely and focused attention. Specifically:

Improving Information Technology (IT) modernization. The U.S. Department of Agriculture (USDA) has faced challenges effectively managing IT modernization and reducing IT duplication and overlap in its Farm Production and Conservation (FPAC) mission area. We have highlighted the need for USDA to improve its [IT acquisitions and management](#) on our High Risk List for several years.² For example, USDA has yet to develop and publish a strategic plan and associated metrics to monitor and measure its IT portfolio in the FPAC mission area. Having a strategic plan and performance metrics would position FPAC to better measure its performance against goals, maximize efficiencies, and meet the needs of farmers, ranchers, and foresters.

Mitigating the risk of pathogens from food products and animals. Humans can contract illness-causing pathogens, such as *Salmonella* and avian influenza viruses, by consuming contaminated food products and interacting with infected animals. For example, each year, foodborne illnesses sicken one in six Americans, and thousands die, according to the Centers for Disease Control and Prevention's most recent estimates. Additionally, wild birds can transmit viruses that cause zoonotic diseases—those caused by pathogens that spread between animals and humans—such as avian influenza and West Nile virus. One of our high-risk areas—[improving federal oversight of food safety](#)—centers jointly on USDA and the U.S. Department of Health and Human Services. We have made recommendations to USDA to help

¹GAO considers a recommendation to be a priority, if when implemented, it may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

²GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, [GAO-25-107743](#) (Washington, D.C.: Feb. 25, 2025).

improve its oversight efforts. For example, outbreaks continue to occur that involve food products for which USDA has not updated or developed new standards since 2018 or earlier. We recommended that USDA should develop a prioritization plan to document which products to address and the policies needed to effectively reduce the pathogens *Salmonella* and *Campylobacter*. Developing a prioritization plan could help reduce the incidence of illness-causing pathogens like *Salmonella* and *Campylobacter* in foods.

USDA should also follow leading practices for collaboration, such as clearly defining common outcomes, in developing a national wildlife disease surveillance system. More fully following leading practices in collaboration could lead to the successful implementation of a wildlife disease surveillance system that could better support early detection of zoonotic disease outbreaks and enhance preparedness for emerging zoonotic diseases.

Improving oversight of federal assistance programs. The oversight of federal assistance programs is crucial for ensuring the effective distribution of billions of dollars in federal aid and reducing costs. However, USDA's methods for calculating the payments to the insurance companies that sell and service federal crop insurance policies allowed for large fluctuations. By reducing the fluctuations in subsidies for crop insurance, USDA could improve the quality of program delivery.

Please see Enclosure 1 for additional details about the status and actions needed to fully implement all five open priority recommendations out of the 111 total recommendations that remain open.

We also provide in Enclosure 2 additional information on USDA's recommendation implementation rate and implemented, closed, and new priority recommendations since our June 2024 letter to Secretary Vilsack. Enclosure 2 also contains USDA-specific information relevant to our audit of the consolidated financial statements of the U.S. government and relevant management challenges from our High-Risk List that apply to USDA. In response to legislation enacted in December 2022, this enclosure also includes information on any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.

Copies of this letter are being sent to the appropriate congressional committees. The letter will also be available on the GAO website at [Priority Recommendations | U.S. GAO](#). We also plan to send separate letters specifically focused on open recommendations and key issues related to financial management and information technology. These letters will be sent to your Chief Financial Officer and Chief Information Officer, respectively.

If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Mark Gaffigan, Managing Director, Natural Resources and Environment at gaffiganm@gao.gov. Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this letter. Our teams will continue to coordinate with your staff on addressing these priority recommendations and the remaining 106

open recommendations. I appreciate USDA's continued commitment and thank you for your personal attention to these important issues.

Sincerely,

//SIGNED//

Gene L. Dodaro
Comptroller General
of the United States

Enclosures – 2

cc: Lynn Moaney, Deputy Chief Financial Officer, USDA
The Honorable Gary Washington, Chief Information Officer, USDA
The Honorable Seth Meyer, Chief Economist, USDA
Yarisis Rivera-Rojas, Acting Assistant Inspector General, USDA
The Honorable Pat Swanson, Administrator, Risk Management Agency
The Honorable Brooke Appleton, Deputy Under Secretary, Farm Production and Conservation
The Honorable Denise Eblen, Administrator, Food Safety and Inspection Service
The Honorable Michael Watson, Administrator, Animal and Plant Health Inspection Service

Enclosure 1

Priority Open Recommendations to the U.S. Department of Agriculture

Improving Information Technology (IT) Modernization

IT Modernization: USDA Needs to Improve Oversight of Farm Production and Conservation Mission Area. [GAO-21-512](#). Washington, D.C.: September 23, 2021

Year Recommendations Made: 2021

Recommendations: The Secretary of Agriculture should:

- ensure that the Under Secretary for Farm Production and Conservation (FPAC) directs the Assistant Chief Information Officer to have the FPAC mission area develop a strategic plan, in alignment with departmental policies and procedures, to include performance goals and measures for maximizing efficiencies and reducing IT duplication and overlap; and
- ensure that the Under Secretary for FPAC directs the Assistant Chief Information Officer to have the FPAC mission area monitor IT program performance against efficiency goals and measures documented in its plan for maximizing efficiencies and reducing IT duplication and overlap.

Actions Needed: USDA concurred with both recommendations. For our first recommendation, USDA officials stated that FPAC planned to publish a mission area IT strategic plan that included performance goals and measures for maximizing efficiencies and reducing IT duplication and overlap. As of October 2024, USDA stated that the FPAC mission area had developed an IT strategic plan, but that it was in review and approval was expected by the end of November 2024. As of February 2025, we have not received a copy of the strategic plan.

Regarding our second recommendation, USDA stated that FPAC would develop strategic performance metrics that would align with USDA's IT strategic plan, with support from FPAC's Enterprise Architecture Repository. In August 2023, agency officials told us that they were developing metrics dependent on the FPAC IT strategic plan. However, in October 2024, the IT strategic plan was in the review and approval process. As of February 2025, USDA had yet to provide the plan or metrics.

To fully implement our recommendations, USDA needs to (1) approve an FPAC strategic plan that includes performance goals and measures for maximizing efficiencies and reducing IT duplication and overlap; and (2) begin monitoring FPAC IT program performance against the goals and measurements established in the strategic plan. Including appropriate goals and measures to reduce duplication and overlap in its IT strategic plan could provide further efficiencies and savings.

High-Risk Area: [Improving IT Acquisitions and Management](#)

Director: Vijay A. D'Souza

Contact Information: dsouzav@gao.gov

Mitigating the Risk of Pathogens from Food Products and Animals

Food Safety: USDA Should Take Additional Actions to Strengthen Oversight of Meat and Poultry. [GAO-25-107613](#). Washington, D.C.: January 22, 2025

Year Recommendation Made: 2025

Recommendation: The Administrator of the Food Safety and Inspection Service (FSIS) should develop a prioritization plan to fully document which products to address and the additional policies needed to effectively address pathogen reduction for *Salmonella* in meat and standards for *Campylobacter* in turkey parts.

Action Needed: USDA neither agreed nor disagreed with our recommendation. As of March 2025, USDA had not provided GAO with any actions taken in response to this recommendation. GAO published this report in January 2025.

To fully implement the recommendation, USDA needs to provide documentation of a prioritization plan (or set time frames) that describes when it will resume the development of new or updated standards for meat and poultry products and any additional policies related to pathogen reduction for *Salmonella* in meat and standards for *Campylobacter* in turkey parts. Developing a prioritization plan could help USDA take the necessary steps such as establishing standards and developing guidance for food facilities to prevent illness-causing pathogens from entering raw and ready-to-eat meat and poultry products.

High-Risk Area: [Improving Federal Oversight of Food Safety](#)

Director: Steve D. Morris

Contact Information: morris@gao.gov

Zoonotic Diseases: Federal Actions Needed to Improve Surveillance and Better Assess Human Health Risks Posed by Wildlife. [GAO-23-105238](#). Washington, D.C.: May 31, 2023

Year Recommendation Made: 2023

Recommendation: The Administrator of the Animal and Plant Health Inspection Service (APHIS) should more fully follow leading practices for collaboration while coordinating with the U.S. Geological Survey (USGS) to develop and implement a national wildlife disease surveillance system. This should include clearly defining common outcomes, involving relevant participants, and identifying resources and staffing.

Action Needed: USDA agreed with our recommendation. As of April 2025, USDA continues to work toward implementing the recommendation. In April 2024, USDA officials provided documentation that APHIS was coordinating with USGS through a steering committee to develop a national wildlife disease database. In addition to APHIS and USGS, the steering committee includes additional federal agencies and participants representing state and tribal interests. The committee's charter established a goal of developing a first iteration of the database by September 30, 2026.

As of November 2024, APHIS continued to make progress on implementing the recommendation, including working with the Department of Energy's Pacific Northwest National

Laboratory on incorporating the national wildlife disease database into a platform that integrates data on animal and environmental information. APHIS and the other agencies are in the process of completing data-sharing agreements, and USDA has identified a funding source for this effort through September 2026.

To fully implement this recommendation, USDA needs to identify how it will track progress toward developing and implementing a national wildlife disease surveillance system and how to fund and staff the steering committee. Following leading practices for collaboration could help APHIS and USGS close some of the gaps in our nation's ability to identify and address emerging wildlife and zoonotic diseases.

Directors: Steve D. Morris, Natural Resources and Environment; and Karen L. Howard, Science, Technology Assessment, and Analytics

Contact Information: morris@gao.gov and howardk@gao.gov

Improving Oversight of Federal Assistance Programs

Crop Insurance: Opportunities Exist to Improve Program Delivery and Reduce Costs. [GAO-17-501](#). Washington, D.C.: July 26, 2017

Year Recommendation Made: 2017

Recommendation: To reduce year-to-year fluctuations in the administrative and operating expense subsidies that companies receive at the crop, state, and county levels, the Secretary of Agriculture should direct the Administrator of the Risk Management Agency (RMA) to consider adjusting the administrative and operating expense subsidy calculation method in a way that reduces the effects of changes in premiums caused by changes in crop prices or other factors when it renegotiates the standard reinsurance agreement.

Action Needed: USDA neither agreed nor disagreed with our recommendation. As of May 2025, USDA had not taken actions to implement the recommendation. According to a USDA official, RMA will consider the recommendation after it has renegotiated its agreement with insurance companies, but the time frame for the renegotiation is not known.

To fully implement the recommendation, USDA needs to provide documentation that the department and RMA considered whether to adjust the calculation method to account for changes caused by fluctuations in crop prices and other factors. Adjusting the method would help reduce fluctuations in the subsidies that companies receive and help ensure the sustainability of the program's delivery system and services to farmers.

Director: Steve D. Morris

Contact Information: morris@gao.gov

Enclosure 2

Key Information About the Status of GAO Recommendations and Improving Agency Operations

U.S. Department of Agriculture's Recommendation Implementation Rate

In November 2024, we reported that, on a government-wide basis, 70 percent of our recommendations made 4 years ago were implemented.³ USDA's recommendation implementation rate was 81 percent. As of April 2025, USDA had 111 open recommendations.

Implemented, Closed, and New Priority Recommendations

Our June 2024 letter to Secretary Vilsack identified nine priority recommendations.⁴ Since then, five recommendations were implemented, no recommendations were closed as no longer valid, and we added one new priority recommendation.

Implemented recommendations:

- In January 2024, USDA's Farm Service Agency (FSA) implemented our 2022 recommendation to conduct additional and risk-based spot checks of payments under the Coronavirus Food Assistance Program (CFAP). Specifically, FSA conducted spot checks on 1,087 producers who self-certified claims for CFAP payments based on livestock and other commodities that FSA determined were at risk of improper payments. By doing so, FSA identified overpayments of \$3.65 million and is recovering these overpayments through its national receivables system.
- In May 2024, USDA implemented our 2023 recommendation to have the Climate Change Program Office analyze options to enhance the climate resilience for agricultural producers and integrate them, as appropriate, into USDA's future climate resilience prioritization and planning efforts. Specifically, USDA included an assessment of the options in its 2024-2027 Climate Adaptation Plan, as well as barriers or limitations to implement the options. In doing so, USDA should be better positioned to enhance the resilience of agricultural producers and reduce USDA's fiscal exposure.
- As of December 2024, USDA implemented our 2024 recommendation to analyze and report to Congress USDA's ability to meet the requirements of the Consolidated Appropriations Act, 2023. USDA submitted information on its ability to create an online submission system and public database within its expected budget that would provide reliable information about where and how much U.S. agricultural land foreign persons hold. USDA reported to Congress that it revised the FSA-153 form used to capture data, such as on leaseholds and the impacts of foreign investment. However, USDA reported it could not fully meet the requirements of the Consolidated Appropriations Act, 2023, because USDA required additional funds to complete the online filing portal and public database. In doing

³GAO, *Performance and Accountability Report: Fiscal Year 2024*, [GAO-25-900570](#) (Washington, D.C.: Nov. 15, 2024).

⁴GAO, *Priority Open Recommendations: Department of Agriculture*, [GAO-24-107307](#) (Washington, D.C.: June 6, 2024).

so, USDA improved Congress' ability to consider if additional legislative action is needed to assist USDA in better identifying foreign investments in agricultural land that may pose national security risks.

- As of January 2025, USDA implemented our 2018 recommendation to take steps to consult with respective sector partners to develop methods for determining the extent to which the National Institute of Standards and Technology's cybersecurity framework has been adopted across the food and agriculture sector. USDA sent several requests for information to partners about their adoption of the framework but received limited information because it was either not available or some partners were unwilling to share it. As a result, USDA determined that the extent of cybersecurity framework adoption is unknown, and USDA has renewed efforts with sector partners to build relationships and improve information exchange.
- In February 2025, USDA implemented our 2023 recommendation to establish specific quality assurance guidelines for Thrifty Food Plan reevaluations to ensure that methodological decisions meet key quality standards. For example, these guidelines should summarize applicable USDA and other federal quality standards and ensure that future Thrifty Food Plan reports have a transparent description of analytical choices and assumptions and an explanation of key limitations. USDA prepared a detailed quality management plan for the 2026 Thrifty Food Plan reevaluation that included specific quality assurance guidelines and controls. The plan provides templates and checklists with roles and responsibilities assigned to ensure that quality assurance procedures are followed, documented, and subject to supervisory review. To the extent that USDA's Food and Nutrition Service uses them for future reevaluations beyond 2026, these plans and templates should help ensure that methodological decisions meet quality standards.

New priority recommendation: We added one new priority recommendation for improving food safety of meat and poultry. (See Enclosure 1.)

Financial Statement Audit

As the auditor of the consolidated financial statements of the U.S. government, I have noticed that USDA received a qualified audit opinion on its fiscal years 2023 and 2024 financial statements. USDA was unable to support certain budget obligations for Supplemental Nutrition Assistance Program benefits. These limitations on the audit opinion and underlying internal control weaknesses, as well as related auditor recommendations, are important issues. I encourage you to address them.

High-Risk List

In February 2025, we issued our biennial update to our High-Risk List.⁵ This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges. One of our high-risk areas—[improving federal oversight of food safety](#)—centers jointly on USDA and the U.S. Department of Health and Human Services, the agencies with primary responsibility for food safety.

⁵GAO, *High Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, [GAO-25-107743](#) (Washington, D.C.: Feb. 25, 2022).

Another high-risk area—[improving IT acquisitions and management](#)—is shared among multiple agencies and is related to strengthening oversight and management of IT portfolios and building federal IT capacity and capabilities, among other topics. Several other government-wide, high-risk areas also have direct implications for USDA and its operations. These include [improving strategic human capital management](#) and [personnel security clearance process](#), [managing federal real property](#), and [ensuring the cybersecurity of the nation](#).

In addition to USDA's high-risk areas, we urge your continued attention to the other government-wide, high-risk issues as they relate to USDA. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget, and the leadership and staff in agencies, including within USDA. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.⁶

Congress's Role on GAO Recommendations

We also recognize the key role Congress plays in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.⁷

Congress can use various strategies to address our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on USDA's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress can follow up during the appropriations process and request periodic updates.

Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress can pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

⁶GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

⁷James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).

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