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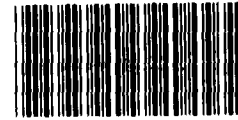
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COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

August 17, 1981

B-204179

The Honorable Doug Walgren
Chairman, Subcommittee on Science,
Research, and Technology
House Committee on Science and Technology



116169

The Honorable George E. Brown, Jr.
Chairman, Subcommittee on Department
Operations, Research, and Foreign
Agriculture
House Committee on Agriculture

Subject: [GAO Comments on the Impact of the USDA
Reorganization on Nutrition](CED-81-150)

This letter is in response to your June 24, 1981, request for our comments on the June 1981 reorganization of the U.S. Department of Agriculture (USDA) and its impact on nutrition. As requested, our comments on the reorganization address those areas that relate to USDA's nutrition responsibilities and activities.

USDA is in the process of implementing the reorganization and identifying, addressing, and resolving the management and policy problems that occur with any reorganization. Also, details of USDA's nutrition policies have not been fully formulated. As a result, our comments are based primarily on what USDA officials have told us and on the opinions of professionals from the nutrition community. Because the reorganization is just now being implemented, we are unable to reach any conclusions on the reorganization's impact on USDA's nutrition responsibilities nor on the broader impact on nutrition research, information, and education.

Any reorganization can be expected to disrupt operations in the short-run and affect the momentum in nutrition that had been established over the last few years. Whether that momentum continues under the new reorganization remains to be seen. To a large extent, that will depend on the commitment, interest, intent, and actions of the new USDA administration and the Congress. Nevertheless, we have identified several potential impacts of the reorganization. We have discussed these impacts with program officials and have incorporated their comments as appropriate.

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USDA REORGANIZATION

On June 17, 1981, the Secretary of Agriculture announced a reorganization involving several USDA agencies. The reorganization involved establishing several agencies; abolishing others; and changing the responsibilities of USDA officials in several areas, including marketing, inspection, grading, economics, consumer affairs, nutrition, environmental quality, and science and education.

Under the reorganization (see enc. I), the Secretary abolished the Science and Education Administration (SEA), including its Human Nutrition Center, and established four new program agencies: the Agricultural Research Service (ARS), the Cooperative State Research Service, the Extension Service, and the National Agricultural Library. The former Human Nutrition Center, which was created in 1979 and housed the Department's diverse efforts in nutrition research, surveillance, information, and education, was divided. Five of the Center's human nutrition research centers were transferred to the newly revived ARS, which is under the jurisdiction of the Director of Science and Education. These five centers are the Beltsville Human Nutrition Research Center in Beltsville, Maryland; the Human Nutrition Research Center on Aging at Tufts University in Boston, Massachusetts; the Human Nutrition Research Center in Grand Forks, North Dakota; the Human Nutrition Research Center at Baylor College of Medicine in Houston, Texas; and the Western Human Nutrition Research Center (formerly part of the Department of the Army's Letterman Army Institute of Research) in San Francisco, California.

The Human Nutrition Center's other two groups that were involved in information activities were transferred to a new agency, the Human Nutrition Information Service under the Assistant Secretary for Food and Consumer Services. These two groups include the Consumer Nutrition Center in Hyattsville, Maryland, which conducts the nationwide food consumption survey and maintains the nutrient data bank, among other activities, and the Human Nutrition Information and Dietary Guidance Staff. Finally, the Food and Nutrition Information Center was also transferred to the new agency as its third component. This Center provides published and audiovisual nutrition materials to nutrition educators and departments of education and USDA food assistance program administrators at the State level.

In summary, the reorganization

--separates some of USDA's nutrition information functions from its nutrition research functions and

- decentralizes its human nutrition research activities by transferring nutrition research from its former, high-level, separate-agency status to one of the component research programs of ARS.

RATIONALE FOR THE REORGANIZATION

Individuals from the Congress and the nutrition community were concerned about why the reorganization was considered necessary at this time and about how it will affect USDA's nutrition responsibilities and activities. According to the Secretary of Agriculture, USDA's restructuring was intended to

- increase the efficiency of USDA without additional cost or increase in personnel,
- focus direction of the agencies along lines of functional responsibility, and
- have a positive impact on program responsiveness.

In announcing the reorganization, the Secretary said:

"These changes are designed to improve the efficiency of the USDA because the reorganization combines some programs with comparable functions. We've put them together so they can logically result in a smoother operation."

The Secretary said that the nutrition information function, which was previously under SEA, has been changed because it is important for the Assistant Secretary for Food and Consumer Services to be responsible for that program. He said that "we've felt that the Assistant Secretary has both the obligation and is in the best position to provide the public with better nutrition information."

The Deputy Secretary of Agriculture told us that nutrition information should be the responsibility of the Assistant Secretary for Food and Consumer Services, who is also responsible for the Department's domestic food assistance programs. He said that this change would allow the Assistant Secretary to target nutrition information specifically, for example, at the 23 million food stamp users.

In abolishing SEA and decentralizing its functions, the Secretary said that he delegated greater authority to the administrators of the major science and education programs to strengthen the effectiveness of those programs and make them more efficient. The Deputy Secretary told us that he felt strongly that nutrition

research should be tied closely to food and agriculture research and that this was a reason for transferring nutrition research from its separate organizational status in SEA, to ARS, which also has responsibility for food and agricultural research. He said that, in the past, some human nutrition expertise and knowledge came from other research areas, such as animal science, including animal nutrition research. He also said that the centralized SEA was ineffective. The Deputy Director for Administrative Management of Science and Education told us that there was a general belief that SEA had become too large of a superstructure. He said that the centralized SEA organization was viewed as an impediment to program effectiveness by two USDA advisory committees representing the State agricultural experiment stations and the State extension offices.

POTENTIAL IMPACTS OF THE REORGANIZATION

With any change in administration and reorganization, there naturally is some temporary disruption in operations because of changes in leadership, responsibilities, and reporting channels. Reorganizations also involve new tasks, new behaviors, and a re-alignment of role relationships. It is natural that the people who are affected will have some concerns and fears and that speculation will arise about their jobs, activities, and the effectiveness of the reorganization.

These concerns have been expressed by individuals both inside and outside USDA and have appeared in the press. We reviewed a number of potential impacts that the current reorganization may have on USDA's role and responsibilities in nutrition research, education, and information. Some of the concerns of individuals inside and outside of USDA are:

- Will nutrition be less visible and deemphasized?
- How will nutrition issues be coordinated and integrated?
- Will nutrition information policies, programs, and strategies be adversely affected?
- Will nutrition research continue to be supported under its new decentralized setup?

Nutrition could be less visible and deemphasized

Nutrition is less visible at USDA with the abolishment of the Human Nutrition Center, which was created as a separate organization under the past administration. However, this does not necessarily mean a lack of commitment to nutrition because USDA

has not made any overall cuts in the funding of nutrition research, education, and information programs.

A concern of the nutrition community, including individuals at USDA and at the Department of Health and Human Services (HHS) is whether USDA's past emphasis and the high visibility of nutrition during the previous administration will continue. During the last administration, USDA had made nutrition a major part of its responsibilities and established a separate and distinct human nutrition research mission, including information. For example, in 1979 USDA established the Human Nutrition Center as a separate area of SEA in response to the Food and Agriculture Act of 1977 (Public Law 95-113), which directed the Secretary of Agriculture to establish research into food and human nutrition as a separate and distinct mission of the Department. This was the first time that USDA's diverse efforts in nutrition research and information were coordinated under one administration. The current reorganization splits the Center, separating nutrition research from nutrition information activities. As discussed on page 8, some of the information activities which were transferred can also be classified as research activities.

The question arises whether the recent reorganization complies with the Food and Agriculture Act of 1977. We think it does. Section 1423(a) provides, in part, that:

"The Secretary shall establish research into food and human nutrition as a separate and distinct mission of the Department of Agriculture * * *."

The act does not prescribe the manner in which the Secretary is to attain the assigned mission, nor does the act prohibit any particular action the Secretary might choose to take to attain the assigned mission. Therefore, we conclude that the act intended that the Secretary have discretion in deciding the manner in which the assigned mission is to be accomplished.

A departmentwide nutrition coordinator was established in 1978 in the Office of the Secretary to try to ensure that nutrition was integrated and coordinated across-the-board on all nutrition-related issues of all of USDA's agencies and with other Federal departments, including HHS. The present administration has decided, for the present, not to reestablish a departmentwide nutrition coordinator. However, the Deputy Secretary told us that USDA is working on departmentwide coordination mechanisms that include all of USDA's issues, including nutrition.

Although details of USDA's nutrition policies have not yet been fully formulated, the Deputy Secretary told us that the present USDA administration is producer-farmer oriented. The

Secretary has stated that USDA's major thrust will be to increase agricultural productivity, protect agriculture's natural resources, expand exports of agricultural products, and reduce Government regulations. While nutrition is not one of the major thrusts specifically mentioned, the Deputy Secretary said that USDA is "committed to active research and educational efforts in the human nutrition area and those efforts will not be manipulated by producer interests."

USDA has in general excluded basic agricultural research from the budget cuts it has made in other USDA programs. Agricultural research, including nutrition research, is one of the few areas being considered for a slight increase in funding.

In a June 18, 1981, letter to Congressman George E. Brown, Jr. the Deputy Secretary stated that "the reorganization does not diminish in any way our commitment or emphasis on human nutrition." He said that "we are not changing priorities or the commitment to excellent research and education activities in the human nutrition area."

The Deputy Assistant Secretary for Food and Consumer Services said that the

"lower level of visibility does not necessarily mean a lack of commitment because visibility can be more a factor of how controversial activities are rather than how effective they are."

He said that a better acid-test will be the level of the Department's final fiscal year 1983 budget for the nutrition area. USDA nutrition agencies requested a fiscal year 1983 budget for nutrition research, education, and information of \$45.7 million, an increase of \$11.1 million over fiscal year 1982. As of August 7, 1981, the USDA fiscal year 1983 budget had not yet been approved by the Secretary and the Office of Management and Budget.

Coordinating and integrating nutrition issues could be more difficult

We believe that coordinating and integrating nutrition issues and policies within USDA, while not impossible, may be more difficult to accomplish under the reorganization. Over the past 4 years, the Congress, the Office of Technology Assessment, the Office of Science and Technology Policy, HHS, USDA, and GAO have expressed a need for improved coordination within and among the Federal departments involved in nutrition. We contacted individuals from these organizations and some nutrition professionals and consumer groups and they have expressed concern that the

reorganization could make coordination more difficult because of the separation of nutrition functions and responsibilities and the absence of any clearly established coordination mechanisms.

The reorganization separates the nutrition information and nutrition research functions and divides them under the responsibilities of two separate high-level USDA officials instead of one official as was done under the prior administration. While the separation of functions has the advantage of putting information activities closer to the food assistance programs, it has the disadvantage of inhibiting easier access, coordination, exchange of ideas, and joint planning and integration of nutrition goals, strategies, and programs among the USDA agencies responsible for nutrition research, education, and information.

This split of the nutrition information and research functions seems to contrast with USDA's tradition of establishing a close link and tie between its agricultural research and its extension (information dissemination) functions under the same high-level USDA official. On the other hand, it is not necessary to keep information and research functions together. Some organizations separate research and information functions, such as the National Institutes of Health and the Environmental Protection Agency.

As previously stated, the departmentwide nutrition coordinator's position, which individuals inside and outside of USDA said was a useful link, is not to be reestablished. During the last few years, USDA, HHS, several other Federal agencies, and the Office of Science and Technology Policy were beginning to establish a momentum in coordinating Federal efforts in the area of nutrition. Although coordination may have been difficult, we believe there was a genuine interest and effort to establish and use coordination mechanisms. We believe part of this momentum was due to the existence of departmentwide nutrition coordinators at both USDA and HHS; the latter still has a departmentwide nutrition coordinator.

We believe that, at least temporarily, interested parties outside of USDA may have difficulty obtaining quick and comprehensive responses to departmentwide nutrition questions because of the lack of a departmentwide nutrition coordinator or at least a formally designated liaison for all nutrition matters and the absence of clearly established coordination mechanisms.

USDA will continue past efforts to provide nutrition information, but changes in policies, programs, and strategies are uncertain

The Assistant Secretary for Food and Consumer Services has said that the new Human Nutrition Information Service will continue to carry out the responsibilities of its component groups as previously done. She has stated that any change in direction of nutrition information policies will not be made until a director is appointed to the new agency.

The Deputy Secretary said that the reorganization creates for the first time a new USDA agency devoted to nutrition information and that this reflects the highlighting of nutrition information. He also said that one of the positive impacts of the reorganization is that it will make it easier to link nutrition education, information, and surveillance activities with the target audience of the food assistance programs like food stamps; child nutrition; and women, infants, and children because these activities and programs are now the responsibility of the same Assistant Secretary. We agree with the positive impact of creating a new nutrition information agency and linking it with food assistance program participants.

Not all of the Human Nutrition Information Service activities are completely information activities directed at the general public. The Deputy Assistant Secretary for Food and Consumer Services told us that the "information" of the Human Nutrition Information Service is a misnomer because a large part of the Service's activities; that is, conducting the nationwide food consumption survey and maintaining the nutrient data bank, are research-related activities and not completely information. These two activities are primarily directed at and used by other USDA agencies, other Federal agencies, researchers, nutritionists, and the food industry. He said that the Service will be working closely with ARS' five human nutrition research centers, particularly the Western Human Nutrition Research Center, because some of these centers conduct research that relates to nutritional requirements and measuring the nutritional status of individuals. This research directly supports the Service's functions.

A representative of a consumer group and a nutrition professional have pointed out their concern that (1) although the Department would shift information activities toward food program participants, it would slacken its information activities directed at the general public and (2) nutrition surveillance functions of measuring changes in people's diets and eating patterns should be the responsibility of an independent group and not the responsibility of the same official responsible for food assistance programs.

While we do not know the impact that consolidating the surveillance function and the food assistance function could have on reporting objective surveillance data, we believe that efforts to ensure objective data should be maintained. We also believe it is important to provide the necessary feedback to evaluate the effectiveness of the food assistance programs.

Another concern of some nutritionists and consumer group representatives is whether USDA will continue to promote the joint USDA-HHS Dietary Guidelines For Americans or any revision of them. Although this concern may not seem to be directly related to the reorganization, questions have been raised about whether the reorganization was an attempt to prevent any future development and/or distribution of them. We did not find any information to support this. The Deputy Secretary told us that USDA has not rescinded the dietary guidelines and that USDA will continue to distribute the remaining supply of about 280,000 copies until the supply is depleted. We were told that USDA is gradually shifting toward a policy of charging a small fee for all USDA publications and that, in the future, a nominal fee may be charged for the dietary guidelines. The guidelines are also available from the Superintendent of Documents for \$1.50. The Deputy Secretary told us that some members of the scientific community believe that the dietary guidelines were issued prematurely and without a sound basis, especially guideline number three, "Avoid Too Much Fat, Saturated Fat, and Cholesterol." He said that nutrition is an embryonic science that does not have all the definitive answers. He also said that USDA should not tell people what to eat, but that nutrition information should be provided to people to help them make their own decisions.

The dietary guidelines are supposed to be reviewed by a congressionally directed advisory group of representatives from USDA, HHS, and the National Academy of Sciences. The new group has not begun its review as of August 1981. USDA told us that any decision regarding the future of the dietary guidelines will depend on the group's evaluation of the dietary guidelines and public comments on them. Nutrition professionals from both USDA and HHS told us that USDA should try to work with and revise the dietary guidelines, if necessary, rather than to think about discarding them completely.

HHS is continuing to distribute the Dietary Guidelines. The Secretary of HHS has endorsed them and has included them as a major part of the nutrition component of HHS' Prevention Initiative, which is a new example of cooperative research planning and implementation by HHS health agencies.

Nutrition research needs special
attention under its new
decentralized setup

Under the reorganization, the nutrition research activities were decentralized and some of the nutrition information activities, such as conducting nutrition surveillance and surveys, behavioral and communications research, and food composition analysis, were transferred to the new Human Nutrition Information Service. A couple of nutrition professionals believe that part of these activities are really research, at least applied research, which should be kept together or at least closely coordinated with the nutrition research centers that were transferred to ARS.

The Deputy Director for Administrative Management of Science and Education told us that some of the functions of the Consumer Nutrition Center could be classified as methodology research as well as information. He said that the reorganization planners had considered splitting the Consumer Nutrition Center along the lines of its information and research functions but decided instead that it was more important to keep the Center intact. He said that he believes that it was important to keep together the methodological research for collecting nutrition data, collecting nutrition survey and food composition data, and interpreting such data.

As mentioned earlier, USDA believed that the centralized SEA was ineffective. The Secretary said that he delegated greater authority to the administrators of the major science and education programs to strengthen the effectiveness of these programs and make them more efficient. Before the reorganization and under SEA, human nutrition research was separate and distinct from agricultural research. Under the reorganization, five human nutrition research centers of SEA (Human Nutrition) were transferred and placed as a separate area under ARS. The five directors of the human nutrition research centers report to their appropriate ARS regional administrators for administrative matters and to the National Program Staff (Nutrition) at ARS headquarters, headed by an assistant to the deputy administrator, ARS, for program planning, priority setting, and budget formulation matters.

The Associate Administrator, ARS, told us that while nutrition research was decentralized in part, a national focus and careful attention from headquarters was also necessary because three of the five nutrition research centers were new centers in the early stages of developing and implementing their research programs. The official believed that these centers needed special attention because of their infancy and the national scope of their research programs.

The Deputy Secretary told us that he was committed to a strong and excellent nutrition research program and that USDA will continue to have a lead Federal role in nutrition. The Director of Science and Education and the Acting Administrator of ARS told us that they are committed to nutrition and support the need and importance of human nutrition research. Both officials are attempting to incorporate human nutrition into the rest of food and agricultural research but at the same time give nutrition a separate and distinct identification.

We believe that regardless of how nutrition research is organized, it needs some special attention and a national focus because nutrition is primarily a national issue and not a regional problem and also because the regional human nutrition research centers need to be monitored as some of them progress toward completion of their facilities and development and implementation of their research programs.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to provide comments on the potential impact of the June 1981 USDA reorganization on nutrition. Because you asked us to respond within 45 days and because the reorganization is only in its early implementation stages and has little operating experience, much of the information gathered is based on comments, opinions, observations, and some agency documents. New, detailed organization charts, mission statements, descriptions of responsibilities and duties were not completed at the time of our brief review. USDA officials told us that they are being prepared and should be completed shortly. Because of the reorganization's limited operating history, we largely relied on agency officials to provide the reasons for the reorganization, to respond to concerns about the reorganization's potential impacts, and to express their intent or future plans regarding nutrition.

We interviewed and obtained information from USDA officials, including the Deputy Secretary, the Director of Science and Education, the Deputy Director for Administrative Management of Science and Education, the Deputy Assistant Secretary for Food and Consumer Services, and the ARS Acting Administrator. We also obtained or reviewed the comments of individuals outside of USDA, including HHS, nutrition professional societies, such as the National Nutrition Consortium, which represents six nutrition professional societies, and consumer groups such as the Community Nutrition Institute.

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As arranged with your office, we are sending copies of this letter to the Secretary of Agriculture, the Secretary of HHS, the Office of Management and Budget, the Office of Science and Technology Policy, interested Senate and House committees, and other interested parties.

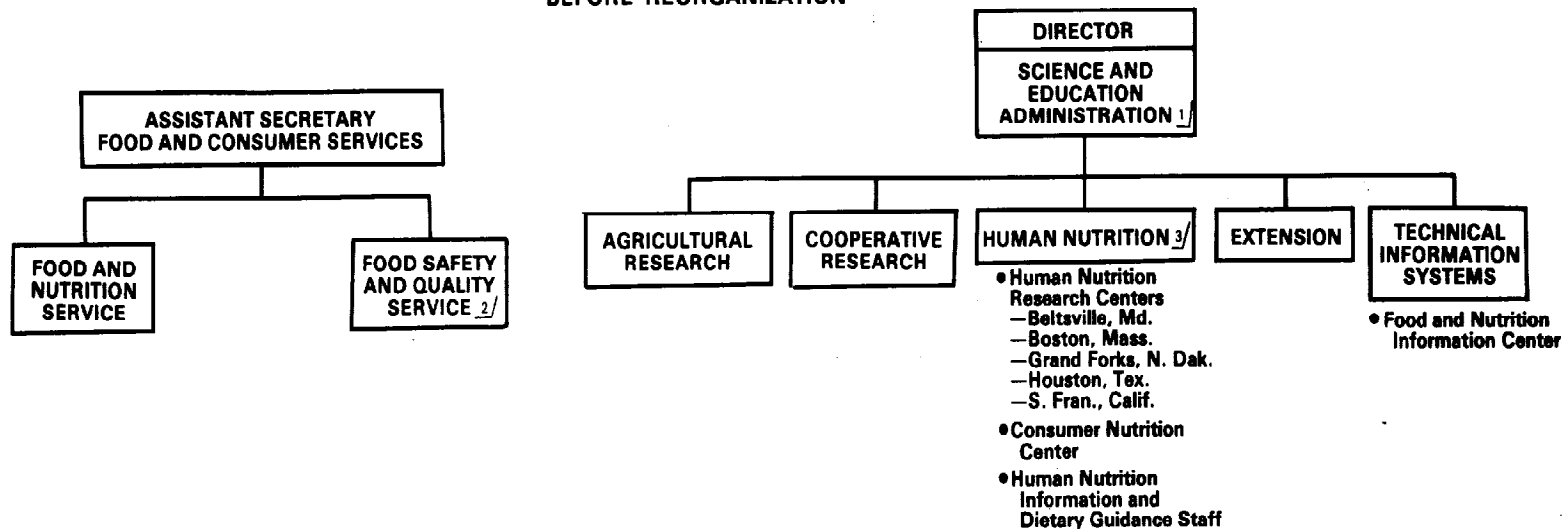
A handwritten signature in cursive script that reads "Henry Eschwege".

Henry Eschwege
Director

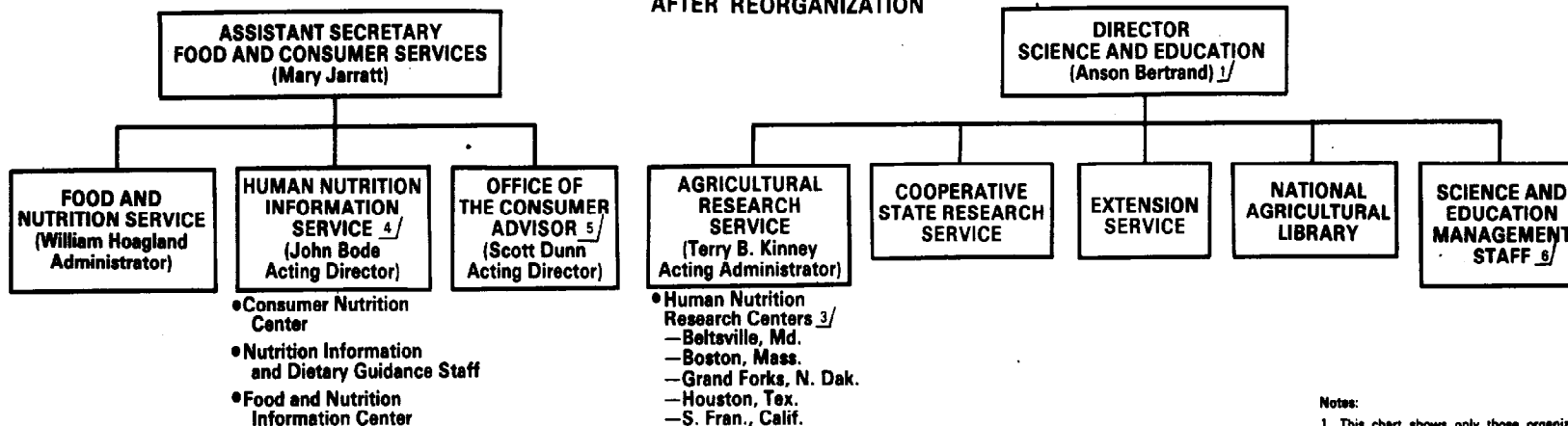
Enclosure

REORGANIZATION OF THE U.S. DEPARTMENT OF AGRICULTURE
(Effective June 17, 1981)

BEFORE REORGANIZATION



AFTER REORGANIZATION



1/ Science and Education Administration (SEA) is split into Agricultural Research Service, Cooperative State Research Service, Extension Service, National Agricultural Library, and the Science and Education Management Staff.

2/ Food Safety and Quality Service (FSQS) is renamed Food Safety and Inspection Service (FSIS) and transferred to the Assistant Secretary for Marketing and Inspection Services.

3/ SEA (Human Nutrition) is abolished. The five human nutrition research centers are transferred to ARS. The center directors will report to their appropriate ARS regional administrators for administrative matters and to the National Program Staff (Nutrition) at ARS headquarters, headed by an assistant to the deputy administrator, for program planning, priority setting, and budget formulation matters. The other three SEA nutrition groups are transferred to the Assistant Secretary for Food and Consumer Services.

4/ The new Human Nutrition Information Service (HNIS) is established from three groups transferred from the former Science and Education Administration (Human Nutrition) and the Technical Information Systems.

5/ Office of the Consumer Advisor, formerly named the Office of Consumer Affairs, is transferred from the Office of the Secretary.

6/ Science and Education Management Staff provides services for all Science and Education agencies.

Notes:

1. This chart shows only those organizational changes which directly affect the Department's nutrition activities.

2. Under the previous administration, a departmentwide nutrition coordinator position was established in the Office of the Secretary of Agriculture. That position has not been reestablished by the present administration.