

## POLICY UPDATE: USDA Releases New Agricultural Research Security Policy Framework

*Lewis-Burke Associates LLC – July 16, 2025*

On July 8, the U.S. Department of Agriculture (USDA) released a new research security directive, [America First Memorandum \(SM 1078-014\) for USDA Arrangements and Research Security](#), which imposes new restrictions, compliance requirements, and eligibility conditions on domestic and international research. The memo launches a sweeping review of existing research projects with foreign entities, U.S.-based researchers. These changes have already impacted institutions of higher education—particularly those engaged in USDA-funded research, partnerships with foreign nationals, or collaborations with institutions abroad. Ultimately, USDA's research agencies, primarily the Agricultural Research Service (ARS) and National Institute of Food and Agriculture (NIFA) will be tasked with implementing the memo.

Coinciding with the release of the *America First Memorandum*, USDA also issued the *National Farm Security Action Plan*. The Action Plan frames agricultural research, land ownership, innovation, and food system resilience as national security matters, presenting a strategic framework under which the *America First Memo* squarely sits. The action plan addresses research security, which the memo expands upon, but it also covers several other Administration priorities, including foreign ownership of agricultural lands and forests, supply chain resilience, and animal health.

In addition to the intent to advance the Trump Administration's America First and Farmers First agendas, the policies outlined in the *Action Plan* are consistent with two longstanding bipartisan efforts. One focuses on securing the nation's agricultural resources. Previous efforts include the [National Security Memorandum-16 \(NSM-16\)](#), published in 2022, and [National Security Memorandum-22 \(NSM-22\)](#), published in 2024, both of which are still in effect today. NSM-16 designates the food and agriculture sector as critical infrastructure requiring protection from cyber threats and foreign manipulation; and NSM-22 mandates cross-agency safeguards to shield federally funded research from foreign interference, including disclosure of affiliations, rejection of malign talent programs, and scrutiny of foreign gifts or contracts.

Another focus of the action plan reflects the bipartisan effort to address research security and integrity. This is exemplified in the April Executive Order titled [Transparency Regarding Foreign Influence at American Universities](#) and the May Executive Order titled [Restoring Gold Standard Science](#), which called on agencies to improve and enforce their research security, merit-based review, and replicability policies.

A more detailed description of the policy directives is included below, with attention to those items that will be of most interest to the scientific and research community.

### Core Policy Directives

[America First Memorandum for USDA Arrangements and Research Security \(SM 1078-014\)](#) - This USDA memorandum establishes a rigorous framework for reviewing and justifying all research collaborations involving foreign entities, which includes foreign nationals and foreign-controlled institutions. Moving forward, all existing and proposed arrangements with foreign entities will be subject to rigorous departmental review. The memo states that USDA's agencies have 30 days from its release to conduct this review. Each project must be justified with respect to its benefit to U.S. agriculture and the necessity of foreign involvement. New projects with non-citizens or foreign entities will also require a detailed justification, including:

- a. Why U.S. citizens could not fulfill the project and how that was determined
- b. Unique expertise or resources provided by the foreign entity
- c. Assessment of any recent funding from countries of concern
- d. Explanation of national security, economic, or scientific imperatives for foreign participation

All existing foreign entity involvement must undergo this audit and justification review across all USDA agencies. New or renewed foreign engagements—including visiting scholars, subawards, and research collaborations—must be justified in writing and approved by USDA's Office of Homeland Security, Office of the Chief Scientist, and Office of General Counsel. The memo also stipulates that, effective immediately, USDA is prohibited from entering into new engagements or arrangements with governments, entities, instrumentalities, or individuals from “countries of concern” or other foreign adversaries. The memo does not list specific countries; rather, it references statute that states that these include “any country that the Secretary, in consultation with the Secretary of Defense, the Secretary of State, and the Director of National Intelligence determine to be engaged in conduct that is detrimental to the national security or foreign policy of the United States.” The term “countries of concern” has been used several times across several agencies to allow for changing national security and foreign policy needs. The memo includes a list of specific activities that are prohibited. USDA employees and funded researchers are barred from participating in malign foreign talent recruitment programs. It also enforces strict limitations on contracting, funding, or providing material benefit to foreign entities or U.S. entities under foreign control, or collaboration on publications, unless expressly approved. Acceptance of funding or in-kind donations for travel to, or participation in, events organized by countries of concern prohibited.

Enhanced research security compliance measures within the memorandum include:

1. Applicants for USDA R&D or S&T funding must annually disclose all current and pending research support, institutional appointments, and personnel (including citizenship).
2. Mandatory certification that all participants have completed research security training.
3. Entities must certify they are not party to malign foreign talent programs or utilizing forced labor and must disclose all contracts with foreign governments.

Additionally, employers must prohibit individuals with recent participation in malign foreign talent programs from working on USDA-supported projects. Employers must maintain and provide supporting documentation of compliance with all research security requirements.

### Farm Security is National Security Action Plan

This Action Plan represents the operationalization of USDA's broader policy framework, which directly links agricultural research, land ownership, supply chain security, and food system resilience to national defense priorities. This document explicitly:

1. Expands research security obligations to USDA programs. This has already been set in motion via the following actions:
  - a. Internal review and new standards for R&D-related initiatives (primarily via the earlier referenced Secretarial Memo)
  - b. Lists NIFA, REE as USDA agencies falling under the [Administration's interpretation](#) of "Federal Public Benefit" which bars illegal aliens from participation in listed programs. The primary focus of this notice was SNAP benefits, but it also includes grants and contracts from all Research, Education and Economics, the Forest Service, Natural Resource Conservation Service, and more.
  - c. Added disclosure of foreign participation in SBIR/STTR projects and proposals, [noticed in the Federal Registrar](#) on July 8 with public comment due on August 5, 2025.
2. Designates the Food and Agriculture Sector as critical infrastructure
3. Proposes restrictions on foreign land ownership in coordination with the U.S. Treasury and the Committee on Foreign Investment in the United States (CFIUS).
4. Frames foreign IP theft, technology transfer, agroterrorism, and supply chain interference as existential risks to U.S. agriculture
5. Calls on improved federal, state, and local coordination on emergent animal health concerns; continues animal health research, initiates animal health collaborations with DARPA at the Department of Defense

These changes reflect a broad, on-going federal effort to "harden the science and technology enterprise" against geopolitical threats and foreign exploitation. While USDA is among the first to fully operationalize NSM-22 within its R&D programs, similar policies are emerging across other science agencies including the Department of Energy (DOE), the National Science Foundation (NSF) and the National Institutes of Health (NIH).

### Sources and Additional Information

- The full text of the USDA America First Memorandum (SM 1078-014) can be found [here](#).

- The full text of the USDA broader strategic framework—*Farm Security is National Security*—can be found at [here](#).
- The full text of the two federal directives can be found below:
  - [NSM 16](#)
  - [NSM 22](#)
- The April Executive Order titled “Transparency Regarding Foreign Influence at American Universities” can be found [here](#).
- The May Executive Order titled “Restoring Gold Standard Science” can be found [here](#).
- The Administration’s Interpretation of what defines “Federal Public Benefit” can be found [here](#).
- The USDA notice issued on July 8 can be found [here](#).