



Secretary Brooke L. Rollins

**UNITED STATES DEPARTMENT OF AGRICULTURE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20250**

SECRETARY'S MEMORANDUM SM 1078-014

JULY 8, 2025

**AMERICA FIRST MEMORANDUM FOR USDA ARRANGEMENTS AND RESEARCH
SECURITY**

1. PURPOSE

This Secretarial Memorandum directs the U.S. Department of Agriculture (USDA or the Department) to place America First in provisioning all USDA funds, regardless of source and in accordance with any statutory or legal requirements. Placing America First in all of USDA's work ensures the enduring strength of United States agriculture and prevents American taxpayer dollars from supporting countries of concern or other foreign adversaries who want to undermine our national security. America First policy avoids the expenditure of American taxpayer funds to help foreign competitors out-produce, out-compete, and out-innovate the United States.

Our adversaries increasingly seek to spread their influence across the globe at the expense of the United States. Foreign researchers, businesses, and governments often use resources provided by USDA for their own purposes that are not in the best interest of the United States. Foreign recipients of U.S. funding may obscure their foreign affiliations and hide their true intent to transfer American inventions, intellectual property, and knowledge to foreign adversaries. Foreign competitors benefit from USDA-funded projects, receiving loans that support overseas businesses, and grants that enable foreign competitors to undermine U.S. economic and strategic interests. Preventing this is the responsibility of every USDA employee.

Under the leadership of President Trump, it is my commitment to return USDA to its core mission to support Americans who grow and produce the food, fuel, and fiber on which the United States and the world rely. This Secretarial Memorandum directs a Department wide review of existing arrangements with foreign entities, establishes a justification process for establishing new arrangements, and enhances research security. After completing this review, the Department will institute, as appropriate, new policies to ensure USDA funding and resources support American agriculture. Every dollar will be scrutinized and stopped if determined to not be in the best interest of the nation's agricultural community which nourishes, powers, and clothes the American people.

2. DIRECTIVES

A. REVIEW OF EXISTING ARRANGEMENTS:

Within 30 days of this memorandum, all USDA Mission Areas, Agencies, and Offices shall comprehensively assess all current arrangements (including sub-arrangements) and submit a list of all arrangements and sub-arrangements with any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence (as defined in 32 CFR 117.11 and 2004.34) to the Office of Homeland Security, Office of the General Counsel, and Office of the Chief Scientist for review. Such list shall include the following information:

- Who (the foreign person or entity receiving the arrangement or sub-arrangement, or, if applicable, the foreign person or entity that owns, controls or influences the U.S. citizen or entity subject to the arrangement, with points of contact for each);
- What (brief synopsis of project and funding source (if funded));
- Why (objectives of the project and how it will benefit American agriculture);
- Where (location of the foreign person or entity, or, if applicable, the location of the foreign person or entity that owns, controls, or influences the U.S. citizen or entity subject to the arrangement);
- When (project start and end dates);
- Amount (total dollar value (if funded)); and
- Justification (why a U.S. recipient was not selected).

Within 60 days of receipt of such list, the Office of Homeland Security, Office of the General Counsel, and the Office of the Chief Scientist shall review all arrangements and make recommendations to the Secretary of Agriculture on which arrangements, if any, should be terminated due to potential risks to American agriculture.

B. JUSTIFICATION OF NEW ARRANGEMENTS:

All USDA Mission Areas, Agencies, and Staff Offices are responsible for ensuring that potential arrangements and sub-arrangements with any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence are reviewed before they are entered into and shall be executed only if the arrangement or sub-arrangement will not be inconsistent with the above-described Purpose of this Memorandum.

Effective immediately, prior to entering into an arrangement or extending letters of invitation to conduct any activities with any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence, all USDA Mission Areas, Agencies, and Staff Offices must submit the draft arrangement along with a justification to the Office of Homeland Security, the Office of General Counsel, and the Office of the Chief Scientist that answers the following questions:

- Will the arrangement provide benefits to American farmers, ranchers, foresters, or consumers? If yes, please describe.
- Is there a qualified, responsible, and responsive arrangement recipient domiciled within the United States (including the U.S. government, a U.S. non-government entity, or a U.S. citizen) (“U.S. recipient”) that can carry out the activity proposed in lieu of a foreign person or entity or a U.S. citizen or entity subject to foreign ownership, control or influence (“foreign recipient”)?
 - If yes, who are the U.S. recipient(s) and why were they not selected?
 - If no, how was it determined that (1) no U.S. recipient was qualified, responsible and responsive, and (2) the foreign recipient is qualified, responsible and responsive, and award to a foreign recipient is not inconsistent with the above-described Purpose of this Memorandum?
- What unique expertise, organizational capability, facilities, data or material resources, or access to a geographic location not generally available to potential U.S. recipients (or which would require significant effort or time to duplicate) or other resources essential to the success of the project does the foreign recipient possess that is not available from a U.S. recipient?
- Can the foreign recipient carry out the activity more effectively than a U.S. recipient? If yes, please describe.
- What economic, scientific, or national security need that cannot be fulfilled without the foreign recipient’s participation? If any, describe.
- Does the foreign recipient provide valuable education, training, or research opportunities that proportionally benefit U.S. collaborators? If yes, describe.
- Has the foreign recipient received any funding from a country of concern or other foreign adversary for the proposed activity or related area in the last five years? If yes, describe.
- Will USDA funding or other resources be provided to the foreign recipient? If so, provide a justification for why support from the foreign recipient’s local resources is not feasible, sufficient, or necessary
- If the foreign recipient is initiating this activity with USDA, what distinct advantages does their participation offer (i.e. specific unique expertise unavailable in the U.S or resources, location access, or other intangible benefits not generally available to USDA)?

Mission Areas, Agencies, and Staff Offices may only execute the arrangement with a foreign recipient upon approval of the justification by the Office of Homeland Security, the Office of the General Counsel, and the Office of the Chief Scientist. If the justification for an arrangement is denied by any of the reviewing entities, an appeal for such arrangement may be submitted by the Mission Area, Agency, or Staff Office to the Secretary of Agriculture.

If the arrangement is approved by USDA, the foreign recipient subject to the arrangement shall adhere to all controlling authority, including the above-described Purpose of this Memorandum and other applicable policies and regulations of the Office of Homeland Security, the Office of General Counsel, the Office of the Chief Scientist, and the Office of the Chief Financial Officer.

Additionally, a machine-readable copy of the signed, fully executed arrangement and the corresponding justification shall be stored in a USDA-wide centralized database, developed and maintained by the Office of the Chief Information Officer, that is accessible by any USDA employee.

C. PROHIBITIONS FOR USDA EMPLOYEES AND AFFILIATES:

Effective immediately, all USDA employees and affiliates are prohibited from:

- entering into any relationship or arrangement for conducting activities with the government of a country of concern (as defined in 15 CFR 231.102) or other foreign adversary; a foreign instrumentality (as defined in 18 USC 1839) of a country of concern or other foreign adversary; or a foreign entity of concern (as defined in 15 CFR 231.104) unless appealed to and approved by the Secretary of Agriculture;
- contracting with, entering into arrangement with, or otherwise providing material or non-material benefit through the provision of funded or unfunded work to any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence by a country of concern or other foreign adversary unless appealed to and approved by the Secretary of Agriculture;
- participating in any foreign talent recruitment programs (FTRPs), malign or otherwise;
- accepting funding or in-kind donations for travel to a country of concern or other foreign adversary;
- accepting funding or in-kind donations for travel to any destination from the government of a country of concern or other foreign adversary, a foreign instrumentality of a country of concern or other foreign adversary, or a foreign entity of concern;
- attending events organized by the government of a country of concern or other foreign adversary, a foreign instrumentality of a country of concern or other foreign adversary, or a foreign entity of concern, including events held outside a country of concern or other foreign adversary;
- attending any conferences or similar events identified as predatory, deceptive, or lacking academic rigor, regardless of the organizer or funding source;

- providing employment via contract (or any other agreement) or USDA sponsored visas to foreign nationals without prior approval from the Office of Homeland Security and an appropriate level of background investigation;
- accepting employment outside of USDA regardless of whether it is paid or unpaid (i.e. adjunct appointments) without prior approval from the Office of Homeland Security;
- knowingly allowing access to, or use of, any USDA owned, operated, or co-located Federal facility, property, non-public data, equipment, or system by a foreign entity to conduct activities without a USDA-approved arrangement in place; and
- authoring or co-authoring a scholarly publication, in their official capacity, along with a foreign national without a USDA-approved arrangement in place prior to the initial drafting or editing of any manuscript.

Failure to comply with these requirements will result in disciplinary action, which may include removal from Federal service.

D. REQUIREMENTS FOR RECIPIENTS OF CERTAIN ARRANGEMENTS:

As a term and condition of entering into an arrangement with USDA related to research and development (R&D) or science and technology (S&T), applicants must:

- complete a Common Form for Current and Pending (Other) Support and a Common Form for Biographical Sketch (OMB Control Number 3145-0279) and must agree to update such forms at any subsequent time the Department deems appropriate during the term of the award;
- certify that research security training has been completed not more than one year prior to the date of application and must recertify annually for the duration of the award;
- certify they are not party to a malign FTRP and must recertify annually for the duration of the award;
- certify that they are not contracting, entering into arrangement with, or otherwise providing material or non-material benefit through the provision of funded or unfunded work to any foreign person or entity or any U.S. citizen or entity subject to foreign ownership, control, or influence by a country of concern or other foreign adversary unless appealed to and approved by the Secretary of Agriculture;
- certify they are not party to utilizing forced labor, or partnering with universities who are party to utilizing forced labor;
- complete a disclosure (updated annually) of contracts associated with participation in programs sponsored by foreign governments, foreign instrumentalities, or foreign entities including FTRPs;

- complete a disclosure (updated annually) of the amount, type, and source of all current and pending research support received by, or expected to be received by, the applicant at the time of the disclosure and certify that the disclosure is current, accurate, and complete;
- complete a disclosure (updated annually) of all academic, professional, or institutional appointments and positions whether or not remuneration is received and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary);
- seek approval from USDA to subaward any portion of a funded arrangement, including but not limited to university students, post-doctoral fellows, visiting researchers; and
- complete a disclosure (updated annually) that includes all personnel, including the country of citizenship, who have worked or are working on projects supported by the USDA-funded R&D or S&T award.

Failure to comply with these requirements will result in the disqualification of the application. If an applicant knowingly fails to disclose information, the Department shall suspend or terminate all awards to that applicant and may take additional actions, including temporary or permanent disbarment in accordance with 2 CFR 180 and 2 CFR 417 (or any successor regulations) from receiving government funding.

E. REQUIREMENTS FOR EMPLOYING ENTITIES OF RECIPIENTS OF CERTAIN ARRANGEMENTS:

The employing entity of a recipient entering into an arrangement with USDA related to R&D or S&T must:

- prohibit applicants who either are currently or have in the past 10 years participated in malign FTRPs from working on projects supported by R&D and S&T awards;
- certify that each applicant who is employed by such entity listed on the application has completed the required research security training;
- certify that each applicant who is employed by such entity listed on the application has been made aware of requirements under this memorandum;
- provide any supporting documentation, including copies of contracts, grants, or any other agreement, specific to foreign appointments, employment with a foreign institution, participation in a FTRP, and other information reported as current and pending support for all applicants in an application; and
- review any documents required under this memorandum for compliance with USDA award terms and conditions, including guidance on conflicts of interest and conflicts of commitment.

Failure to comply with any requirement of this memorandum, or of a USDA-approved arrangement, may result in termination of the arrangement and enforcement of any applicable laws or regulations.

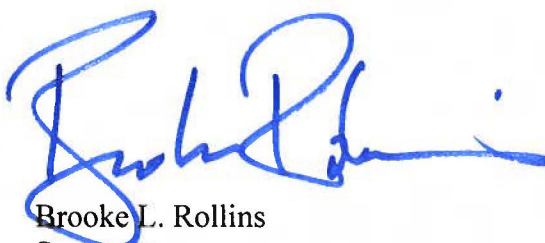
3. IMPLEMENTATION

Each Mission Area, Agency, or Office that administers arrangements shall be responsible for implementing and ensuring compliance with all aspects of this memorandum. The Office of the General Counsel, with assistance for the Office of Homeland Security and the Office of the Chief Scientist shall advise and assist all such USDA components to ensure proper implementation and compliance.

4. COMPLIANCE AND EFFECT

This memorandum is intended to secure the funding of USDA to meet the commitments of our mission to support American agriculture and outlines my expectations for action. This is not a final agency action within the meaning of such term in chapter 5 of title 5 of the United States Code. This memorandum and any resulting report or recommendations are not intended to, and do not create, any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or employees, or any other person. To the extent there is any inconsistency between the provisions of this memorandum and any Federal laws or regulations, the laws or regulations will control.

Noncompliance with this memorandum may result in suspension, limitation, or termination of USDA funding, or loss of future USDA funding opportunities and/or stop-work orders for the noncompliant parties involved.



Brooke L. Rollins
Secretary
U.S. Department of Agriculture