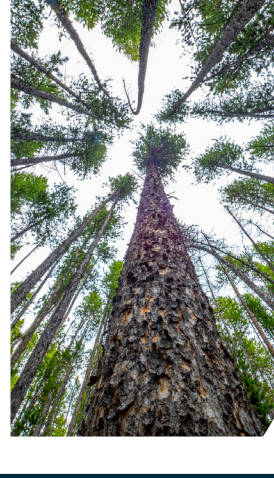




U.S. Department of Agriculture
Office of Inspector General



IMPORTANT NOTICE

This report contains sensitive information that is being withheld from public release due to concerns about the risk of circumvention of law.

Suitability of the National Bio and Agro-Defense Facility's Design

Inspection Report 50801-0002-31

We determined that the National Bio and Agro-Defense Facility was not appropriately configured and commissioned by the U.S. Department of Homeland Security to house animals for high-level biosafety and animal disease science or to receive select agent registration approval.

OBJECTIVE

Our objective was to assess whether the National Bio and Agro-Defense Facility is appropriately configured to house animals for high-level biosafety and animal disease research.

BACKGROUND

DHS constructed the \$1.25 billion biocontainment laboratory facility in Manhattan, Kansas, and reported construction completion in May 2022. The building includes multiple biocontainment and other research and diagnostic spaces and will replace DHS' Plum Island Animal Disease Center, where USDA conducted animal disease research, training, and diagnostics. NBAF will be the first facility in the United States to have large animal capacity within the highest level of biosafety containment capability. USDA received NBAF from DHS in February 2024.

REVIEWED

Our scope covered fiscal year 2025. We conducted a site visit to NBAF in September 2025, interviewed USDA staff, and reviewed documents relevant to the facility's origins, construction, commissioning, ownership transfer, and operational standup, including the 2019 Memorandum of Agreement between DHS and USDA.

WHAT OIG FOUND

The National Bio and Agro-Defense Facility (NBAF) was not set up for full operations and was not appropriately configured and commissioned by the U.S. Department of Homeland Security (DHS) to house animals for high-level biosafety and animal disease research and diagnostics or to receive select agent registration approval. DHS transferred NBAF to the U.S. Department of Agriculture (USDA) in February 2024. USDA accepted the facility without a complete commissioning report.

As a result, USDA incurred a total monetary impact of \$78.4 million as of April 2026. This included questioned costs without recovery for at least \$75.8 million that USDA incurred for remediation, commissioning, and operational costs for high biosafety laboratory spaces. The total also included \$2.6 million for funds to be put to better use for additional work in the new commissioning process not yet obligated. USDA expects additional costs may be necessary for mission transfer and NBAF full operational capability.

WHAT OIG RECOMMENDS

We recommend that USDA: (1) complete repairs and upgrades to make spaces appropriately configured to house animals for high-level biosafety and animal disease research and diagnostics; (2) complete the remaining commissioning process to enable the facility to submit for registration to use select agents; and (3) establish a timeline for achieving highest level biosafety registration.

USDA officials agreed with our finding and recommendations, but clarified that the monetary results should not be construed as the total cost of mission transfer or full operational capability, which are pending. We accepted management decision for all three recommendations.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: July 2, 2026

INSPECTION

NUMBER: 50801-0002-31

TO: Joon Park
Administrator
Agricultural Research Service

Kelly Moore
Administrator
Animal and Plant Health Inspection Service

ATTN: Brandon Levin
Acting Associate Deputy Administrator
Administrative and Financial Management
Agricultural Research Service

Carson Hawley
Deputy Administrator for
Marketing Regulatory Program Business Services
Animal and Plant Health Inspection Service

FROM: Janet Sorensen
Assistant Inspector General for Audit

SUBJECT: Suitability of the National Bio and Agro-Defense Facility's Design

This report presents the results of our inspection of the Suitability of the National Bio and Agro-Defense Facility's Design. Your written response to the official draft is included in its entirety at the end of the report. Based on your written response, we are accepting management decision for all three recommendations in the report, and no further response to this office is necessary.

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of the date of each management decision. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the courtesies and cooperation extended to us by members of your staff during our fieldwork and subsequent discussions. This report contains publicly available information and only publicly available information will be posted our website (<https://usdaoig.oversight.gov>) in the near future.

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Background and Objective

Background

The U.S. Department of Homeland Security (DHS), in coordination with the U.S. Department of Agriculture (USDA), designed the National Bio and Agro-Defense Facility (NBAF) to be USDA's highest biosafety level facility with the capacity of housing large livestock, such as cattle. DHS constructed the 574,000 square foot, \$1.25 billion biocontainment laboratory facility in Manhattan, Kansas. USDA's Agricultural Research Service (ARS) and Animal and Plant Health Inspection Service (APHIS) will transfer research, training, and diagnostic missions to NBAF and will operate the facility jointly.



Figure 1: Photograph of the View of the Main Gate and NBAF. Source: DHS Website.

NBAF will replace DHS' Plum Island Animal Disease Center, where USDA conducted animal disease research, training, and diagnostics. In addition to carrying forward Plum Island's mission, NBAF will be the first facility in the United States to have large animal capacity within the highest level of biosafety containment capability. NBAF was designed to house multiple types of research and diagnostics at multiple biosafety levels (BSLs). There are multiple BSLs based on hazard level, which range from BSL-1 (microbes and biological agents rated as "minimal" biosafety hazard) to BSL-4 (microbes and biological agents rated as "dangerous"). BSL-1 and BSL-2 require controlled access and limited protective and decontamination equipment whereas BSL-3 and BSL-4 require self-closing double doors, more robust protective and decontamination equipment, and being airtight under certain circumstances (BSL-3) or always (BSL-4). As shown in Figure 2 below, NBAF currently operates at BSL-1 and BSL-2. BSL-3 and BSL-4 operations are planned but not yet active. Figure 2 shows NBAF's current and planned BSL status.

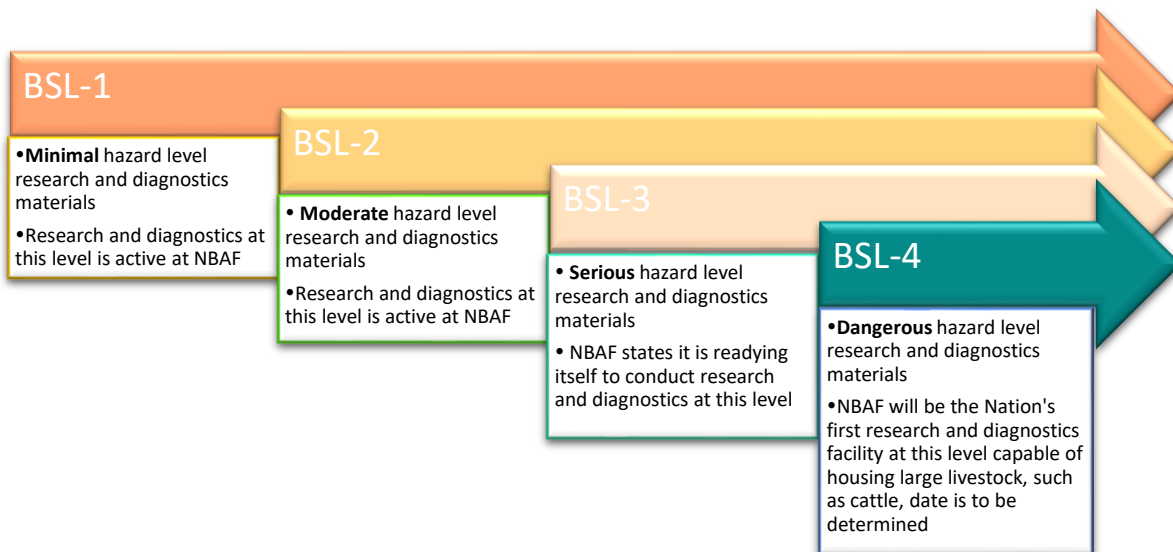


Figure 2: NBAF’s Current and Planned BSL Status.
Figure by the Office of Inspector General (OIG).

Biocontainment research and diagnostics facilities must register with the Federal Select Agent Program (FSAP).¹ As part of FSAP registration, independent Centers for Disease Control and Prevention, Division of Regulatory Science and Compliance, and APHIS, Division of Agricultural Select Agents and Toxins, reviewers visit the facility and conduct an inspection to validate the commissioning documentation and operations. NBAF is currently working to achieve FSAP registration to use select agents, see Figure 3.

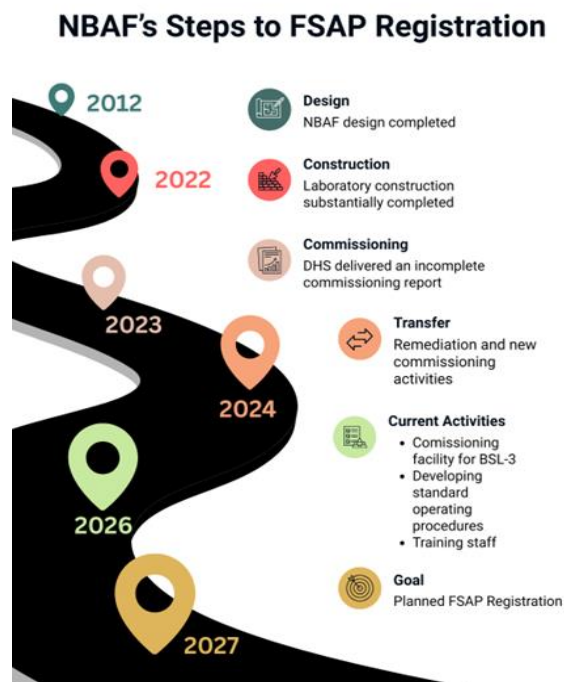
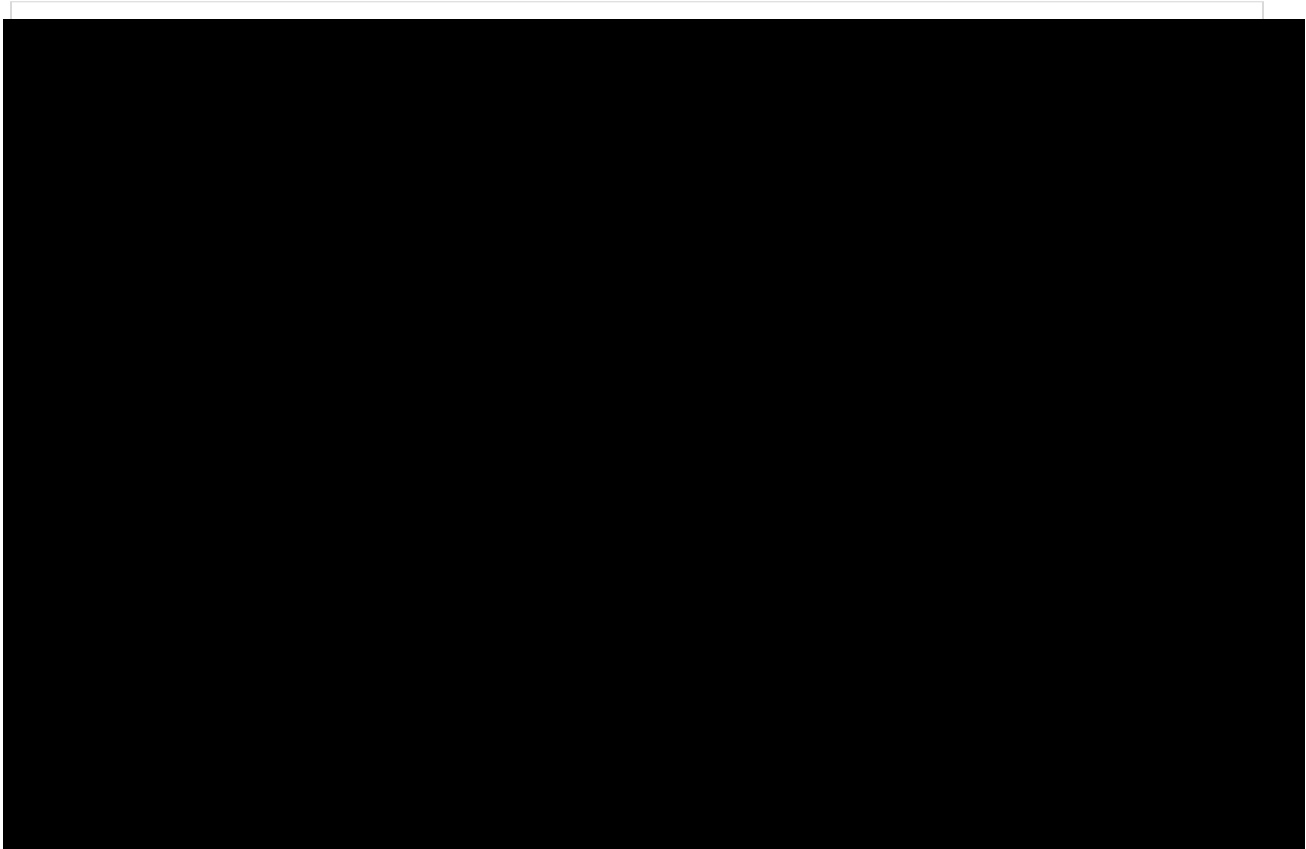


Figure 3: This Figure Shows NBAF’s Steps Towards FSAP Registration to Use Select Agents.
Figure by OIG.

¹ Specifically, entities that wish to possess, use, or transfer biological select agents and toxins must register with FSAP. FSAP regulates the possession, use, and transfer of biological select agents and toxins that have the potential to pose a severe threat to public, animal or plant health, or animal and plant products. FSAP is jointly managed by the U.S. Department of Health and Human Services’ Centers for Disease Control and Prevention and the USDA’s APHIS.

DHS reported that NBAF’s construction was completed in May 2022 and contractor commissioning was completed in December 2022. USDA formally accepted NBAF from DHS in February 2024. See Exhibits B and C for detailed timelines of completed, ongoing, and planned work to achieve full operations.



Objective

Our objective was to assess whether the National Bio and Agro-Defense Facility is appropriately configured to house animals for high-level biosafety and animal disease research.

²



Finding 1: NBAF Was Not Appropriately Configured, Which Delayed Facility Readiness

NBAF was not appropriately configured and commissioned by DHS to house animals for high-level biosafety and animal disease research and diagnostics or to receive select agent registration approval. USDA accepted the facility without a complete commissioning report. As a result, USDA incurred costs of at least \$75.8 million to remediate incomplete projects, complete a new commissioning process, and operational costs for BSL-3 and BSL-4 laboratory spaces that were not operating as intended. There are also \$2.6 million identified as funds to be put to better use for remaining work in the new commissioning process that brings OIG's identified monetary impact to \$78.4 million (see Exhibit A). USDA expects additional costs may be necessary for mission transfer and NBAF full operational capability.

A 2019 Memorandum of Agreement³ between DHS and USDA stated that DHS was responsible for completing construction of NBAF. The memorandum further stated that DHS would oversee and manage all activities required to attain initial operating capability, which was defined as the completion of facility commissioning. The memorandum did not specify whether DHS' facility commissioning was required to meet FSAP registration requirements. The memorandum specified that several transition activities were dependent on DHS completing facility commissioning, and that full operating capability was acquired after select agent registration was approved. The FSAP established that an individual or entity shall not possess, use, or transfer any select agent or toxin without a certificate of registration.^{4,5}

DHS stated in a memorandum that it had completed the commissioning process and distributed a commissioning report to USDA in July 2023, noting there were no outstanding contract deliverables or associated technical documentation to be provided to USDA. However, USDA recognized deficiencies in the facility's readiness to house animals and conduct intended research and diagnostics and, in May 2023, retained an external party to provide an independent review and validation of NBAF's commissioning criteria compliance. While the October 2023 third-party report⁶ determined the project was constructed and designed without major exceptions and the overall project design complied with typical requirements of this type of facility, commissioning tasks specified in the project requirements were not conducted. Specifically, the report identified documentation issues such as: (1) missing documentation, (2) the inability to navigate to or search certain commissioning documentation, and (3) documentation that did not clearly indicate the resolution of issues during the commissioning process. The report identified correctable findings, including 5 findings identified as failures, 117

³ Memorandum of Agreement Between the U.S. Department of Agriculture Marketing and Regulatory Programs, the U.S. Department of Agriculture Research, Education, and Economics, and the Department of Homeland Security Science and Technology Directorate, June 20, 2019.

⁴ 7 C.F.R. pt. 331, (pt. 331.7(a) and pt. 331.12), 9 C.F.R. pt. 121, (pt. 121.2, pt. 121.3, pt. 121.4, and pt. 121.7(a)), 42 C.F.R. pt. 73, (pt. 73.3, pt. 73.4, and pt. 73.7(a)), and 9 C.F.R. Subchapter A, pt. 3, Subpart F.

⁵ APHIS FSAP staff confirmed that a facility must provide documentation (commissioning report) to show all facility operational systems and mechanical systems have met their intent and that the on-site inspection verifies that everything works before the facility will receive FSAP registration approval to work with select agents.

⁶ Architectural and Engineering Review of Design, Construction, and Commissioning Documents for the National Bio and Agro Defense Facility (NBAF) Manhattan, Kansas, October 26, 2023.

identified as inconclusive, and 57 identified as missing.⁷ USDA stated that due to timing, it had limited opportunities to question the commissioning work with DHS, and DHS memoranda stated there was no opportunity for its contractor to perform work beyond items delivered.

When USDA formally accepted the facility from DHS in February 2024, USDA officials were aware that the facility needed improvements but believed taking full ownership was the most efficient way to complete the repairs and new commissioning needed for full operations. However, USDA officials said they did not know the full extent of the repairs and updates needed. In September 2024, USDA awarded a contract for stand-up project management and commissioning support to provide a commissioning report for the select agent registration application process. USDA and the commissioning contractor developed a list of known issues (see Exhibit D for categorized examples) that required resolution. USDA also identified other concerns that needed to be corrected to safely handle and conduct research on animals (see Exhibit E for categorized examples). USDA incurred \$40.5 million in obligated project remediation and new commissioning process expenses, as well as \$2.6 million in new commissioning process costs that have yet to be obligated as of April 2026 (see Exhibit A). USDA officials stated its agencies will also need to incur additional costs for mission transfer and NBAF full operational capability.

USDA officials stated they originally expected DHS to provide a facility and commissioning documentation that would meet the biosafety standards required for FSAP registration. The officials confirmed that if the commissioning report received from DHS had met these requirements, then USDA would have moved forward with pursuing FSAP registration which is needed before operations using select agents. However, this was not the case; [REDACTED]

[REDACTED] Together, the \$35.3 million in operational costs and the \$40.5 in project costs incurred total to \$75.8 million in questioned costs. This amount together with the \$2.6 million costs that are yet to be obligated and could be put to better use provide a monetary impact of at least \$78.4 million as of our fieldwork (see Exhibit A).

USDA officials agreed with our recommendations and stated they were already working toward completing necessary updates and a new commissioning process so that the facility can reach its full operating capability and house animals. See Exhibit C. Once USDA achieves FSAP registration to use select agents in a BSL-3, it will be able to transfer Plum Island Animal Disease Center's mission to NBAF.¹⁰ USDA officials stated that the requirements for achieving BSL-4 registration will be addressed in the future and will develop contracts for work that needs

⁷ This report details documentation and testing deficiencies. Exhibits D and E detail physical deficiencies.

⁹ For fiscal years 2024 through 2026 (as of February 2026), operational expenses for NBAF's laboratory mission units totaled \$65.4 million, 54 percent of which is \$35.3 million.

¹⁰ USDA stopped performing research at the Plum Island Animal Disease Center in 2025 with the critical diagnostic mission continuing. USDA will rely on a backup site, as necessary, while NBAF awaits BSL-3 registration.

to be done in a BSL-4, but did not have an official timeline. A timeline and cost estimate are important to ensure NBAF has the necessary resources at the proper time to move as efficiently as possible towards achieving BSL-4 registration and keep stakeholders informed.

Recommendation 1

Complete repairs and upgrades to make high biosafety level spaces appropriately configured to house animals for high-level biosafety and animal disease research and diagnostics to minimize questioned costs beyond the \$75.8 million and any additional costs identified by USDA.

Agency Response

USDA agreed with this recommendation and monetary result. USDA noted that the agency is already working to complete all necessary repairs and upgrades to ensure that NBAF can obtain select agent registration from the Federal Select Agent Program (FSAP), enabling the full mission transfer of the Plum Island Animal Disease Center (PIADC) USDA program.

USDA provided an estimated completion date of Spring 2027 (June 15, 2027).

OIG Position

We accept management decision for this recommendation. For Final Action, USDA needs to provide the Office of the Chief Financial Officer evidence that it completed the necessary repairs and upgrades for NBAF to be appropriately configured to house animals for high-level biosafety and animal disease research.

Recommendation 2

Complete the remaining commissioning process using the \$2.6 million identified as funds to be put to better use and any additional costs identified by USDA to enable the facility to submit for Federal Select Agent Program registration to use select agents in a BSL-3.

Agency Response

USDA agreed with this recommendation and monetary result. USDA noted that the agency is already working to complete the commissioning activities of the BSL-3 and BSL-3Ag spaces to enable the facility to submit the documentation required for Federal Select Agent Program registration.

USDA provided an estimated completion date of the end of calendar year 2026 (December 31, 2026).

OIG Position

We accept management decision for this recommendation. For Final Action, USDA needs to provide the Office of the Chief Financial Officer evidence that it completed the BSL-3 commissioning process and submitted the documentation required for Federal Select Agent Program registration.

Recommendation 3

Establish a timeline and cost estimate for achieving BSL-4 commissioning and FSAP registration to use select agents in a BSL-4.

Agency Response

USDA agreed with this recommendation and noted that the agency already has plans to establish a timeline and cost estimate for the commissioning and select agent registration of the NBAF BSL-4 laboratory. This planning effort is essential to ensuring full compliance with Federal Select Agent Program (FSAP) requirements and to verifying that all biosafety and biosecurity systems meet the highest operational standards prior to initiating BSL-4 activities.

USDA provided an estimated completion date of Summer/Fall 2026 (September 30, 2026).

OIG Position

We accept management decision for this recommendation. For Final Action, USDA needs to provide the Office of the Chief Financial Officer evidence that it established a timeline and cost estimate for the commissioning and select agent registration of the NBAF BSL-4 laboratory.

Scope and Methodology

We conducted our inspection to assess whether the NBAF was appropriately configured to house animals for high-level biosafety and animal disease research at USDA's facility in Manhattan, Kansas. The scope of our inspection covered fiscal year 2025. We conducted a site visit to NBAF in September 2025 to interview facility staff and observe the animal handling spaces within its biocontainment spaces. We conducted fieldwork from September 2025 to April 2026. We discussed the results of our inspection with APHIS and ARS officials on May 6, 2026, and included their responses, as appropriate.

We assessed the risk that the facility is not suitable or appropriately configured to house animals for high-level biosafety and animal disease research and diagnostics and whether NBAF will be capable of performing these activities in a timely manner. The inspection team developed inspection procedures to evaluate this risk alone. Because our review was limited to evaluating this specific risk, our inspection may not have disclosed all deficiencies that may have existed at the facility at the time of our inspection.

To accomplish our inspection objective, we:

- Reviewed laws, regulations, directives, policies, procedures, guidance, and notices related to requirements for housing animals for high-level biosafety and animal disease research, and diagnostics;
- Reviewed and discussed with NBAF officials, background information on the planning, development, and construction of NBAF;
- Reviewed internal and external assessments of NBAF's original readiness to conduct animal research and diagnostics at the time of the facilities' handover from DHS to USDA and assessments on the known issues that remain—currently preventing NBAF from conducting active animal research and diagnostics;
- Reviewed designs and maps showing the layout of the facility and in particular, research and diagnostic areas where animals will be moved, housed, and euthanized;
- Reviewed budgeting information relating to USDA's operating costs for NBAF;
- Interviewed leaders of the operational staff that will be responsible for animal handling and NBAF senior management; and
- Interviewed staff from APHIS' Division of Agricultural Select Agents and Toxins program to gain an understanding of the procedures that will be utilized to register NBAF to work with federal select agents.

During our inspection, we did not obtain computer-generated system data from NBAF. Assessing NBAF data accuracy was not a part of our inspection objective. Therefore, we make no representation regarding the adequacy of any agency computer system, or the information generated from it.

The inspection was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

Abbreviations

APHIS Animal and Plant Health Inspection Service
ARS Agricultural Research Service
BSL Biosafety Level
DHS U.S. Department of Homeland Security
FSAP Federal Select Agent Program
NBAF National Bio and Agro-Defense Facility
OIG Office of Inspector General
USDA U.S. Department of Agriculture

Exhibit A: Summary of Monetary Results

Exhibit A summarizes the monetary results for our inspection report by finding and recommendation number.

Finding	Recommendation	Description	Amount	Category
1	1	Operating and New Commissioning Process Costs	\$75,756,655 ¹¹	Questioned Costs – No Recovery
1	2	Remaining Costs for New Commissioning Process	\$2,600,000	Funds To Be Put to Better Use
Total			\$78,356,655¹²	

¹¹ This amount includes \$16,250,000 in project costs incurred to remediate incomplete projects, \$24,200,000 in project costs incurred to complete new commissioning, and an estimated \$35,306,655 in operational costs for the laboratories not being used as intended for research.

¹² OIG's monetary calculation is a measure of additional costs as of our fieldwork, may not include all subsequent remediation and missed research and diagnostic costs, and is not intended to convey the costs of mission transfer or NBAF full operational capability.

Exhibit B: NBAF Activities From Initial Planning to Current Status

Exhibit B presents a timeline of NBAF planning and construction activities.

Date	Event
2004	<i>Homeland Security Presidential Directive 9—Defense of United States Agriculture and Food</i> directed USDA and DHS to develop a plan to provide safe, secure, and state-of-the-art agriculture biocontainment laboratories.
2009	DHS selected Manhattan, Kansas for the future NBAF location. ¹³
2012	DHS, in coordination with USDA, completed the design of NBAF to replace Plum Island Animal Disease Center and be USDA’s highest biosafety level facility and be capable of housing large livestock, such as cattle.
2013	DHS held a groundbreaking ceremony for the NBAF central utility plant designed to support the entire NBAF campus. Construction was completed in 2015.
2015	DHS and USDA held a groundbreaking ceremony for the NBAF laboratory.
2018	In response to an Executive Order, ¹⁴ DHS and the Office of Management and Budget proposed transferring operational responsibility for NBAF from DHS to USDA.
2019	USDA and DHS signed a Memorandum of Agreement to plan and execute the systematic transfer of NBAF operational responsibility from DHS to USDA. ¹⁵
2020	USDA transmitted its NBAF Strategic Plan and Cost Estimates Report to Congress that estimated that the facility would be fully operational in fiscal year 2025. ¹⁶
December 2022	DHS informed USDA it had “substantially” completed NBAF laboratory construction. ¹⁷ DHS informed USDA there was no opportunity to have the construction contractor perform work beyond five listed scope items. DHS informed USDA all work performed to date by the contractor had been accepted by the Government.
May 2023	DHS and USDA held a ribbon-cutting ceremony to celebrate NBAF’s opening.
June 2023	BSL-1 activities began.

¹³ The Department of Homeland Security Appropriations Act of 2006 P.L. 109-90, authorized DHS to select a future NBAF site.

¹⁴ Exec. Order 13781 (Mar. 13, 2017).

¹⁵ Memorandum of Agreement Between the U.S. Department of Agriculture Marketing and Regulatory Programs, the U.S. Department of Agriculture Research, Education, and Economics, and the Department of Homeland Security Science and Technology Directorate, June 20, 2019. According to the Memorandum of Agreement, it was to be reviewed annually on or around the anniversary of its effective date. However, USDA officials stated that USDA and DHS did not review the agreement annually and allowed it to expire in 2022 because USDA and DHS held Board of Director meetings in 2020, 2021, 2024, and 2025, and Executive Steering Committee meetings that continue to be held every 2 weeks to jointly plan and execute Plum Island and NBAF transition activities.

¹⁶ The report fulfilled the directive in House Reports 116-107 (Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Bill, 2020 (June 6, 2019)) and 115-706 (Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Bill, 2019 (May 24, 2018)) and Senate Report 115-259 (Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Bill, 2019 (May 24, 2018)).

¹⁷ DHS informed USDA it had “full and unfettered access to the entirety of the NBAF campus to manage as desired, though reasonable accommodation must be made to allow the contractor to address punch list and warranty items.”

Date	Event
July 2023	DHS delivered its Commissioning Report of NBAF to USDA, stating it completed DHS’ responsibility for completing construction and commissioning of NBAF.
October 2023	USDA received its contracted third-party peer review of the DHS Commissioning Report. It determined the project was constructed and designed without major exceptions and the overall project design complies with typical requirements for this type of facility. It also provided an overview of findings and areas of concern.
February 2024	DHS officially transferred NBAF to USDA. BSL-2 activities began.
September 2024	USDA contracted for the development of a new commissioning plan.
December 2024	USDA’s contractor assembled a “Master List of Findings.” The list included 108 summary findings (the list subsequently expanded, see Exhibit D).

Graphic by OIG.

Exhibit C: Timeline of Ongoing and Planned NBAF BSL-3 Commissioning and Operational Activities to Achieve FSAP Registration

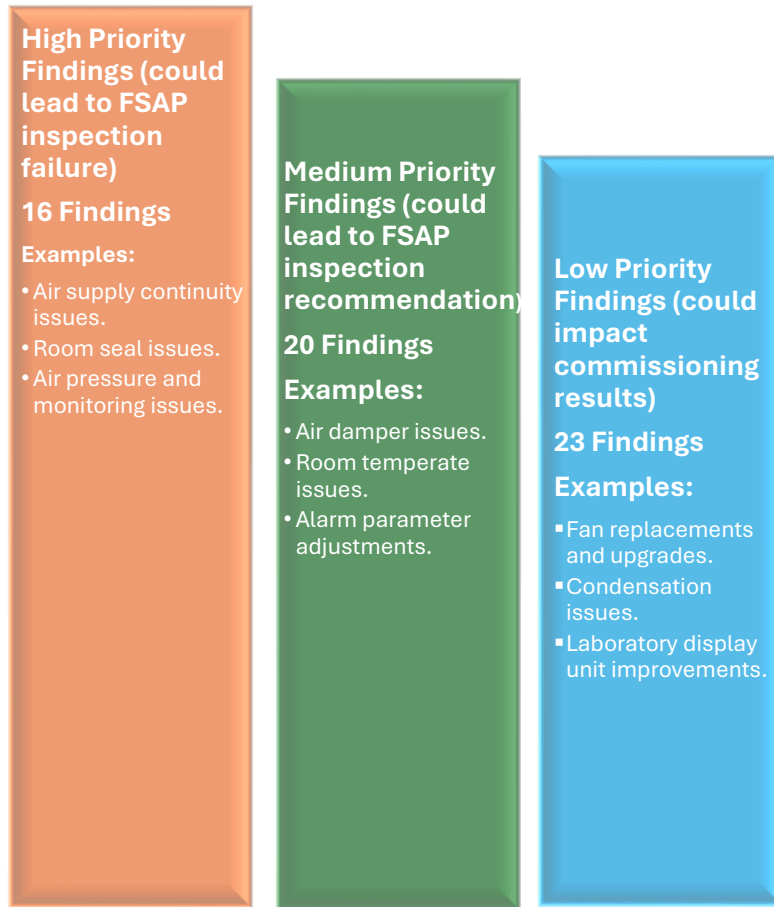
Exhibit C presents a timeline of ongoing and planned NBAF commissioning for FSAP and operational activities.

Date	Commissioning for FSAP and Operational Activities
November 2026	Estimated completion of BSL-3 commissioning report and submission to FSAP.
Spring 2027	Estimated FSAP registration for approval to use BSL-3 select agents for research and diagnostics at NBAF.
Date is to be determined	Institutional Animal Care and Use Committee approval to start housing animals at NBAF.
Date is to be determined	BSL-4 commissioning and registration.

Graphic by OIG.

Exhibit D: List of Known Issues at NBAF That Need Remedies Before BSL-3 Commissioning

A contractor assembled a master list of summary findings to be addressed before BSL-3 commissioning and noted that most of the findings apply to multiple, and in many cases hundreds, of locations in NBAF. As of our site visit to NBAF in September 2025, the list included 115 summary findings rated by priority.¹⁸

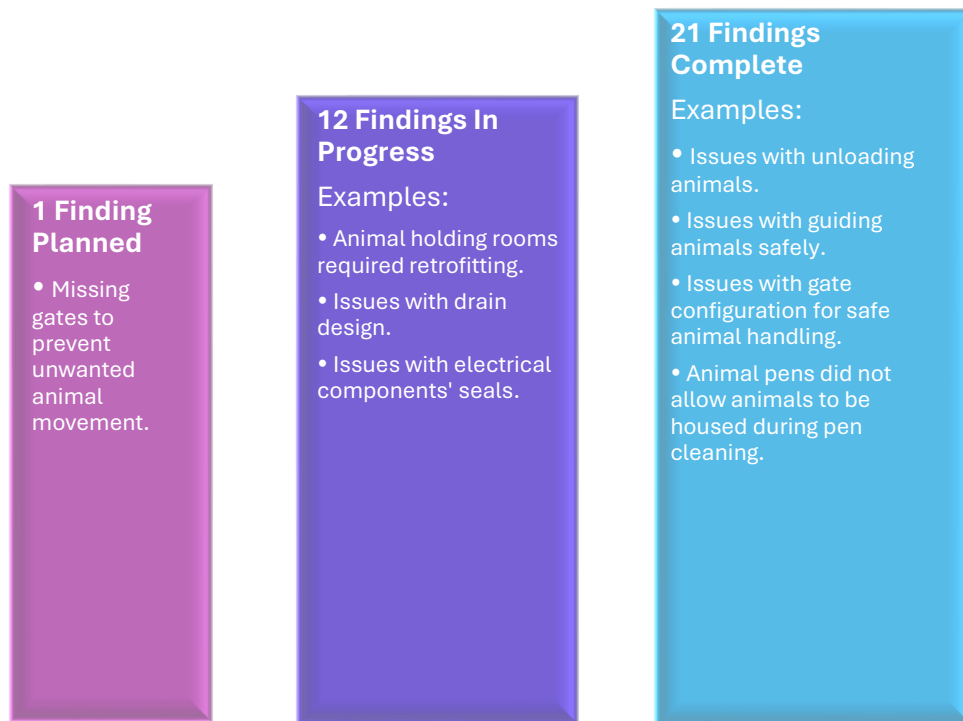


Graphic by OIG.

¹⁸ In addition to the high, medium, and low priority findings, there were 56 other findings that either did not require repair prior to commissioning or only affected BSL-4.

Exhibit E: List of Known Issues at NBAF Related to Safe Animal Handling

USDA conducted internal assessments beginning in 2020 and identified 34 separate findings that related to safe animal handling.¹⁹ A majority of these items relate to areas in the facility corridors, animal loading and unloading bays, and animal holding rooms. In these areas, the facility needs to safely guide and house multiple livestock species and quantities of animals. As of our site visit to NBAF in September 2025, USDA's progress was as follows.



Graphic by OIG.

¹⁹ For example, USDA *ARS Facilities Design Standards*, Policy & Procedure No. 242.1M-ARS (2024) Chapter 10 Animal Facilities, section 10.3.2. states that gating should be constructed with consideration for the species being housed and local environmental conditions. Chapter 9, Biohazard Containment Design, section 9.5.2 requires the biohazard containment room envelope to (1) be able to withstand animal feces, urine, and disinfectants, and (2) be washed with 180-degree Fahrenheit water containing detergents and deconning liquids under hose pressure.

**USDA's
Response to Inspection Report**



DATE: June 8, 2026

TO: Janet Sorensen
Assistant Inspector General for Audit
USDA Office of Inspector General

THROUGH: Alfonso Clavijo /s/
Director, National Bio and Agrodefense Facility
USDA, Agricultural Research Service

FROM: Jeffrey Silverstein /s/
Associate Administrator
USDA, Agricultural Research Service

SUBJECT: Response to Recommendations in OIG Engagement No. 50801-0002-31

The Agricultural Research Service (ARS) submits the following response to the recommendations in the Office of Inspector General's (OIG) engagement 50801-0002-31. Suitability of the National Bio and Agro-Defense Facility's Design

Recommendation 1: Complete repairs and upgrades to make high biosafety level spaces appropriately configured to house animals for high-level biosafety and animal disease research and diagnostics to minimize questionable cost beyond the \$75.8 million and any additional costs identified by USDA.

Agency Response:

Agree with recommendation: Yes No Agree with monetary results: Yes No N/A

The agency is already working to complete all necessary repairs and upgrades to ensure that NBAF can obtain select agent registration from the Federal Select Agent Program (FSAP), enabling the full mission transfer of the Plum Island Animal Disease Center (PIADC) USDA program.

Completion or Estimated Completion Date: Spring 2027

Recommendation 2: Complete the remaining commissioning process using the \$2.6 million identified as funds to be put to better use and any additional costs identified by USDA to enable the facility to submit for Federal Select Agent Program registration to use select agents in a BSL-3.

Agency Response:

Agree with recommendation: Yes No Agree with monetary results: Yes No N/A

The agency is already working to complete the commissioning activities of the BSL3 and BSL3Ag spaces to enable the facility to submit the documentation required for Federal Select Agent Program registration.

Completion or Estimated Completion Date: End of CY 2026

Recommendation 3: Establish a timeline and cost estimate for achieving BSL-4 commissioning and FSAP registration to use select agents in a BSL-4.

Agency Response:

Agree with recommendation: Yes No Agree with monetary results: Yes No N/A

The agency already has plans to establish a timeline and cost estimate for the commissioning and select agent registration of the NBAF BSL-4 laboratory. This planning effort is essential to ensuring full compliance with Federal Select Agent Program (FSAP) requirements and to verifying that all biosafety and biosecurity systems meet the highest operational standards prior to initiating BSL-4 activities.

Completion or Estimated Completion Date: Summer/Fall 2026

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