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31 JAN 2020

MEMORANDUM FOR DEPUTY UNDER SECRETARY OF THE AIR FORCE FOR  
INTERNATIONAL AFFAIRS  
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EXPORTS AND COOPERATION  
DEPUTY ASSISTANT SECRETARY OF THE NAVY FOR  
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DIRECTOR FOR SECURITY ASSISTANCE, DEFENSE FINANCE  
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DIRECTOR, DEFENSE THREAT REDUCTION AGENCY  
DIRECTOR, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY  
DEPUTY DIRECTOR FOR INFORMATION ASSURANCE,  
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SUBJECT: Enhanced End-Use Monitoring Procedures for Enhanced Case-Unique Articles,  
Defense Security Cooperation Agency (DSCA) Policy 19-14 [SAMM E-Change 414]

This memorandum updates Enhanced End-Use Monitoring (EEUM) procedures described in Chapter 8 of the Security Assistance Management Manual (SAMM). Currently, there is no way to identify or track EEUM defense articles considered "Case-Unique." Enhanced Case-Unique articles are items not generally treated as EEUM but are designated as EEUM for specific Foreign Military Sales (FMS) exports.

To minimize the risk of unauthorized transfer and increase accountability for identifying exports of items that have been designated to require EEUM, DSCA is implementing a new mechanism for identifying and tracking Enhanced Case-Unique defense articles using the Defense Security Assistance Management System (DSAMS). **Effective January 31, 2020, Military Articles and Service Lists (MASLs) including a Routine end use monitoring designation may be updated to reflect Enhanced monitoring designation for specific FMS exports, when appropriate. Implementing Agencies (IA) should use these "Case-Unique" version of the MASL when developing Letters of Offer and Acceptance (LO As) for which case-unique enhanced monitoring will apply.**

To ensure the IA has selected the MASL with the correct EVM designation, the DSAMS validation report will alert users when defense articles are identified on the LOA document that may have a case-unique designation. IAs should then validate they are using the correct MASL for that item, in accordance with End-Use Monitoring Responsibilities assigned in Chapter 8, Table C8.T2.

All LOAs, including basic cases, modifications, and amendments that are in development status on or after the policy effective date will follow the new policy. LOAs that are in development status prior to this date will process in DSAMS under the original policy unless returned to development status after the policy effective date.

The attached SMM update, E-Change 414, and Enhanced Case Unique Articles Process Flow Chart formalizes this change. If you have any questions concerning this policy contact, Ms. Del Woods, DSCA EUM Program Manager, at 703-697-9382, or email: [dauphine.e.woods@mail.mil](mailto:dauphine.e.woods@mail.mil)



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Attachments:

As stated

cc:

STATE/PM-RSAT

AFRICOM

CENTCOM

EUCOM

JFCOM

NORTHCOM

INDOPACOM

SOCOM

SOUTHCOM

TRANSCOM

USASAC

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USACE

MDA

DSCU

## ATTACHMENT

### Security Assistance Management Manual (SAMM), DSCA 19-14, E-Change 414

1. Revise paragraph C8.4.1 as follows:

C8.4.1. Definition. Enhanced End-Use Monitoring (EEUM), based on the principle of trust with verification, is required for defense articles or munitions controlled items designated for EEUM by the MILDEP's export policy, the inter-agency release process, or by the Department of Defense (DoD) policy as a result of consultation with Congress and/or the Department of State (DOS). EEUM requires physical security assessments of the storage facilities and serial number inventories of designated defense articles to verify compliance with the transfer conditions of the LOAs and other transfer agreements. All EEUM-designated defense articles are required to be sold on defined order lines using an EEUM-coded Military Articles and Services Listing (MASL) and are accompanied by specialized physical security and accountability notes. The defense articles listed in Security Assistance Management Manual (SAMM) Table C8.T4. below have been designated for EEUM for all FMS-eligible countries. Other defense articles may require EEUM and /or additional U.S. control measures (e.g. U.S. custody and/or electronic monitoring) on a case-by-case basis as determined in the transfer approval process.

2. Replace paragraph C8.4.2.1. with the following:

C8.4.2.1. Determining the MASL EUM code. DSCA (Directorate for Security Assistance (DSA) Assistance and Monitoring Programs (AMP)), will coordinate with DSCA (Directorate of Business Operations (DBO)) and the respective Military Department (MILDEP) to determine the item's MASL End Use Monitoring (EUM) code. The MASL EUM code of an item designated as Enhanced for all FMS exports will be coded as "E". The MASL EUM code of an item designated for Routine EUM will be coded as "R". If it is determined in the transfer approval process that an item normally handled as Routine is required to be treated as Enhanced for a specific sale, the Implementing Agency will request a Case-Unique MASL coded "E" for use of the sale.

3. Revise paragraph C8.4.2.2. as follows:

C8.4.2.2. Developing LOA physical security and accountability EEUM Note. For the defense articles listed in the SAMM Table C8.T4 as EEUM, DSCA (DSA /AMP), in coordination with the MILDEPs / Implementing Agencies (IAs) (Headquarters and Program Offices), the Defense Technology Security Administration (International Security Programs), DSCA (Strategy, Plans, and Programs Directorate (SPP)), DSCA (Directorate for Security Assistance (DSA) Assistance and Monitoring Programs (AMP) and Weapons Division (WPNS)), and DSCA Office of the General Counsel (OGC)) will lead all staffing efforts to ensure that the MILDEPs/IAs develop the physical security and accountability (EEUM) notes. MILDEPs/IAs are responsible for providing DSCA SME support in drafting security, accountability, and USG control measures included on the LOA to ensure that the parameters levied in the EEUM-designation are met for all EEUM defense articles. EEUM Notes that are coordinated and approved by DSCA (Directorate for Security Assistance (DSA) Assistance and Monitoring Programs (AMP)) for an Enhanced Case-Unique article will be used each time the same Enhanced Case-Unique article is included on a different LOA.

4. Replace paragraph C8.4.2.3. with the following:

C8.4.2.3. Publishing physical security and accountability EEUM notes for inclusion on the LOA. DSCA Standard EEUM and physical security an accountability notes (listed in Appendix 6 of the SAMM) will be included in the LOA by DSCA (Directorate for Security Assistance (DSA) Case Writing Division (CWD)). Enhanced Case-Unique EEUM notes will be included in the LOA by the IA responsible for these articles.

5. Revise paragraph C8.4.2.4. as follows:

C8.4.2.4. Developing and validating EEUM checklists. DSCA (Directorate for Security Assistance (DSA) Assistance and Monitoring Programs (AMP)) will coordinate with the respective MILDEP/IA, as required, to develop and publish in the Security Cooperation Information Portal (SCIP) EUM database the inspection checklist for the weapons system or technology designated for EEUM. The relevant Security Cooperation Office (SCO) and DSCA (Directorate for Security Assistance (DSA) Assistance and Monitoring Programs (AMP)) will validate the draft inspection checklist during EEUM checks, and will provide the MILDEP/IA recommendations for improvement when required.

6. Update SAMM Table C8.T2., Directorate for Security Assistance Responsibilities as follows:

**Table C8.T2. DoD End-Use Monitoring Responsibilities**

Organization	Responsibility
DSCA (Directorate for Security Assistance (DSA))	<ul style="list-style-type: none"> <li>• Manage DoD's Golden Sentry EUM program and provide subject matter expertise for all EUM-related issues.</li> <li>• Develop and promulgate EUM policy guidance within DoD and the interagency.</li> <li>• Draft and submit an annual report to Congress through the DOS describing the actions taken to execute the Golden Sentry program, including a detailed account of the resources and personnel associated with the monitoring program in accordance with Section 40A(c) of the Arms Export Control Act (AECA), as amended (<a href="#">22 U.S.C. 2785(c)</a>).</li> <li>• Review LOAs and other government-to-government agreements to ensure they include the appropriate EUM notes, provisos, and transfer conditions.</li> <li>• Ensure that defense technologies and weapons systems designated for EEUM controls transferred via government-to-government programs contain appropriate accountability and security notes and provisos, and work with the MILDEPs in the development of EEUM control notes and checklists to verify compliance.</li> <li>• Notify USG country teams when articles in their Area of Responsibility (AOR) are designated as Enhanced via the SCIP -EUM database interface.</li> <li>• Ensure that DSAMS has a complete and current listing of MASLs for all items that are EEUM on an annual basis.</li> </ul>

	<ul style="list-style-type: none"> <li>• Update the DSAMS listing of MASLs for EEUM items as they are designated for addition or removal.</li> <li>• Review LOAs for EEUM coded MASLs.</li> <li>• Ensure that LOAs contain the proper EUM code for Case-Unique articles.</li> <li>• Oversee the fiscal budget planning, programming, and execution of the Foreign Military Financing (FMF) Administrative funding of EUM activities.</li> <li>• Endeavor to improve monitoring of the phases of the export process that are most susceptible to diversion or retransfer: shipping, use, storage, and disposal.</li> <li>• Forward reports of possible violations of Section 40A of the AECA, as amended, and Section 505 of the Foreign Assistance Act of 1961 , as amended, (<a href="#">22 U.S.C. 2314</a>) violations to the DOS Bureau of Political-Military Affairs, Regional Security and Arms Transfer Division (DOS (PM/RSAT)).</li> <li>• Participate in USG and international meetings when EUM is an agenda item.</li> <li>• Conduct visits to the Combatant Commands (CCMDs) Headquarters and the Areas of Responsibility (AOR), SCOs, partner nations, and international organizations for: <ul style="list-style-type: none"> <li>• Compliance Assessment Visits (CAV) to assess SCOs' compliance with Golden Sentry policy and partner nations' compliance with specific physical security and accountability agreements, provisos, and other terms of sale.</li> <li>• Investigative Visits and special End-Use Monitoring checks to examine possible violations of partner obligations imposed by the transfer agreement or other applicable agreement pursuant to Section 3 of the AECA, as amended, (<a href="#">22 U.S.C. 2753</a>) and Section 505 of the FAA, as amended, (<a href="#">22 U.S.C. 2314</a>).</li> <li>• Familiarization and Assistance Visits (FA V) to assist SCOs and partner nations to develop EUM programs.</li> </ul> </li> <li>• Draft and submit CA V reports to the appropriate CCMD, SCO, other DoD organizations, and DOS to ensure EUM compliance.</li> <li>• Publish and disseminate EUM best practices and lessons-learned to the Security Cooperation (SC) community through EUM Newsletters posted in the SCIP-EUM database.</li> <li>• Incorporate EUM into workforce training programs, and support efforts by the Defense Security Cooperation University to develop computer-based and in-residence training to educate the SC community on the Golden Sentry program.</li> </ul>
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7. Update SAMM Table C8.T2., MILDEPs and Implementing Agencies (IAs) Responsibilities, as follows:

**Table C8.T2. DoD End-Use Monitoring Responsibilities**

Organization	Responsibility
MILDEPs and Implementing Agencies (IAs)	<ul style="list-style-type: none"> <li>• Maintain a Golden Sentry primary point of contact (POC).</li> <li>• Assist DSCA in developing EUM policy and promulgate EUM policy within the MILDEP.</li> <li>• Ensure that all EUM activities are captured during the budget planning, programming, and execution cycles; and that FMF Administrative and FMS Administrative funds are requested to perform EUM functions in accordance C9.T2. Ensure that all EUM activities are included on a case in accordance with C9.T2.</li> <li>• In coordination with DSCA (DSA AMP &amp; WPNs), identify and provide DSCA a recommended listing of sensitive technologies and defense articles to be considered for EEUM management or "case-unique" designation. Provide DSCA (DSA AMP &amp; WPNs) with supporting information for the basis for EEUM in accordance with C8.F1. If supporting information is from the Technology Security and Foreign Disclosure (TSFD), provide to DSCA (DSA WPNs) only.</li> <li>• In coordination with DSCA, develop physical security and accountability provisos for inclusion on LOAs transferring defense articles designated for EEUM.</li> <li>• Conduct pre-delivery site survey certifications of partner nations' facilities storing weapons and defense systems designated for EEUM and provide DSCA (DSA) and partner nation SCOs the results of all site survey certifications performed.</li> <li>• Additionally:             <ul style="list-style-type: none"> <li>• Provide DSCA (DSA-AMP &amp; WPNs) a copy of the decision memo when Enhanced Case-Unique articles are designated by respective program security offices.</li> <li>• Provide DSCA on a quarterly basis, a current list of all security managers, by weapon type, responsible for performing site survey certifications of EEUM designated items' storage facilities.</li> <li>• Develop site survey certification checklists that comply with <a href="#">DoD Manual 5100.76-M</a> standards and submit them to DSCA for review to ensure standardization.</li> <li>• Provide DSCA, at least semiannually, a current list of all facilities certified to store EEUM-designated items.</li> <li>• Provide DSCA a copy of all site survey certification reports within 30 calendar days of conducting the site certification.</li> <li>• Maintain personnel qualified on site survey certification procedures and requirements, and coordinate with DSCA and the other MILDEPs before site survey certification visits are performed.</li> </ul> </li> </ul>

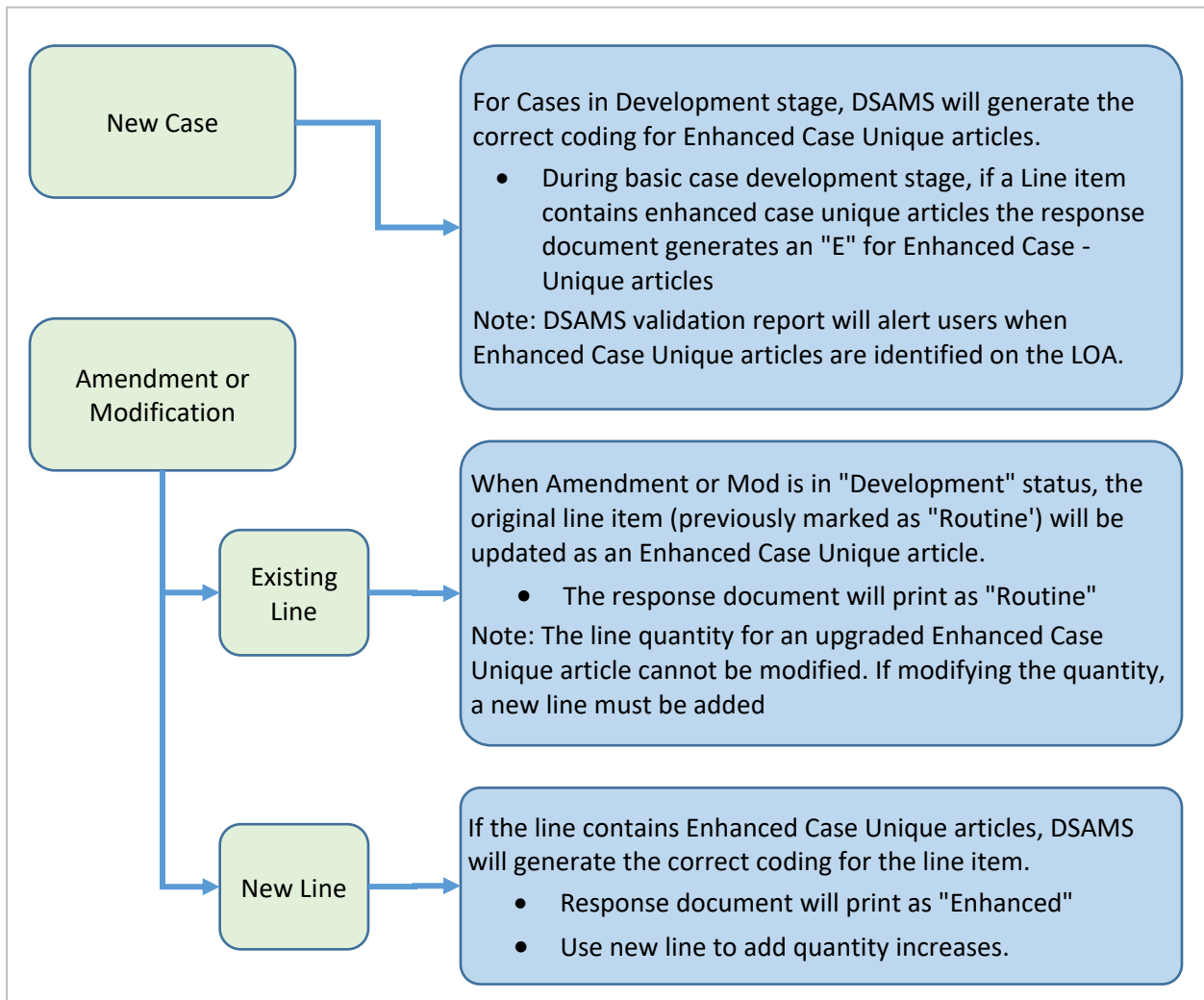
- Provide DSCA (DSA) feedback and reports based on observations during visits of any potential violations of transfer agreements or other applicable agreements pursuant to Section 3 of the Arms Export Control Act (AECA), as amended, ([22 U.S.C. 2753](#)) and Section 505 of the Foreign Assistance Act (FAA), as amended (FAA, as amended, ([22 U.S.C. 2314](#))).
- In coordination with DSCA (DSA) develop security and accountability checklists for EEUM-designated technologies and/or Case-Unique transfers designated for EEUM.
- Submit to DSCA recommendations of defense articles that no longer require EEUM management.
- Provide a monthly delivery record with serial numbers of EEUM items to DSCA ([DSCA.NCR.BPC.MBX.EEUM-REPORTS@mail.mil](mailto:DSCA.NCR.BPC.MBX.EEUM-REPORTS@mail.mil)) for input into the SCIP-EUM database.
- Notify SCOs and the EUM Help Desk in advance of the shipment of EEUM-designated items.
- Review MASL submissions for items identified for EEUM.
  - DSAMS will send alerts to the IA when a Letter of Request (LOR) contains Enhanced Case-Unique articles. The IA will verify EUM codes on LOAs in review for accuracy when an item is designated as Enhanced Case-Unique. The IA will notify/coordinate with its respective program office(s) that a partner included an Enhanced Case-Unique defense article in a LOR.
- Ensure that LOR reviewers notify their respective program offices when Enhanced Case-Unique articles are designated on an LOR.
- Ensure their respective program offices are aware of their responsibility to apply or develop physical security and accountability notes and EEUM checklists Enhanced Case-Unique articles.
- Work to improve the monitoring of the phases of the export process that are most susceptible to diversion or retransfer:
  - Shipping
  - Use
  - Storage
  - Disposal
- Assist DSCA with investigative visits regarding potential violations of obligations imposed by applicable agreements pursuant to AECA Section 3 ([22 U.S.C. 2753](#)) and FAA Section 505 ([22 U.S.C. 2314](#)).
- Support Golden Sentry goals and objectives in bilateral discussions.
- Support Golden Sentry requests for subject matter experts on EUM site visits.
- Incorporate EUM into workforce training programs.

8. General updates to Figure C8.F1. Designating Defense Articles for Enhanced End-Use Monitoring (EEUM)

- Replace every mention of "Non-Standard" with "Case-Unique."
- Add DSCA Weapons (WPNs) to the DSCA staffing in Note 1.

9. Add SAMM Table "C8.F2. Designating Enhanced Case Unique Defense Articles Process Flow" after Figure C8.F1., and renumber remaining figures:

**Figure C8.F2. Designating Enhanced Case Unique Defense Articles Process Flow**



*Only authorized personnel, (i.e. DSA AMP EUM Program Managers, DSA Weapons, and selected DSAMS users) will have access rights to the DSAMS Enhanced Case-Unique Defense articles database.*

Notes:

1. DSAMS will generate warnings to the Implementing Agencies (IA) that the LOA contains an Enhanced Case-Unique article.



2. The DSAMS Case Validation Report will alert users when Case Unique defense articles are identified on an LOA, which will require the DSAMS user to take action according to End-Use Monitoring Responsibilities assigned in Chapter 8, Table C8.T2.
3. The LOA response document will print accordingly either as "Routine" for lines previously implemented or "Enhanced" on lines being added. If a line was previously implemented as Routine and is changed to Enhanced after the original document, then it will be displayed as Enhanced on future documents. Once a line has been designated as Enhanced, the correct coding will propagate in subsequent documents as Enhanced.