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MEMORANDUM FOR DEPUTY UNDER SECRETARY OF THE AIR FORCE FOR
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AGENCY
DEPUTY DIRECTOR FOR INFORMATION ASSURANCE,
NATIONAL SECURITY AGENCY
JOINT STRIKE FIGHTER PROGRAM

SUBJECT: Clarification of DSCA Policy on Prior Year Adjustment (PYA) Requests, DSCA 20-12, Security Assistance Management Manual (SAMM) E-Change 462

REFERENCE: (a) DSCA Manual 5105.38, [SAMM Chapter 15](#)
(b) PYA Requests for Building Partner Capacity (BPC) Cases, [DSCA Policy 19-03](#)

This policy clarifies the circumstances when a change in period of performance (PoP) on a BPC case would not warrant the U.S. Military Department submitting a PYA request to DSCA. This policy also clarifies the processing time for PYA Requests.

Regarding changes to the PoP, under DSCA Policy 19-03, issued February 22, 2019, a PYA request must be submitted for “increases to BPC Letters of Offer and Acceptance (LOA) total case value (TCV), adjustments within TCV, Working Capital Fund (WCF) fact-of-life price increases, and period of performance (PoP) extensions”. There are certain situations, however, when the need for a PoP extension does not warrant a PYA request. A PYA request is not required when:

- (a) The PoP for the provision of defense articles is being extended due to delays in delivery or contract award; or
- (b) The PoP for the provision of defense services, performed by USG personnel under Economy Act, is being extended to a date that is within the period of availability of the appropriation financing the service.

- (c) The PoP for the provision of defense services, using Cross Fiscal Year (CFY) or Full Operational Capability (FOC) authority, performed by USG personnel funded by Defense Working Capital Funds or Project Orders, is being extended to a date that is within the allowable period for the applicable authority. Note: PYA requests are still required to extend PoP for contractor furnished services regardless of whether funds were distributed using the Economy Act.

When using any of the above exceptions, please include a note in the LOA Checklist indicating which exception (by reference to the SAMM chapter/paragraph number in the attached ESAMM change) is being used. This will highlight to the DSCA reviewers that you have already determined the LOA falls under PYA umbrella, and that the situation does not require a PYA request.

Regarding clarification to the processing time, DSCA Policy 19-03 states, “Within 30 days of receiving the complete PYA Request from the IA, the Country Finance Director (CFD) will inform the IA of DSCA's decision.” The 30-day window applies to PYA requests where case funds have expired but not yet cancelled. The processing time begins when the CFD receives all documents necessary to initiate internal coordination of the PYA Package within DSCA. At a minimum, the requestor must supply the PYA Request Form and draft Amendment to the LOA.

Below is the process for submitted a PYA package (where expired funding is available):

1. Submit package
2. Include Draft LOA
3. Include Supporting Documentation

For PYA requests where case funds have cancelled, or insufficient funds exist in the affected expired year, the processing time will be greater than 30 days due to the time it takes to identify a viable funding source and coordinate the funding requirements with internal/external stakeholders. The CFD will continue to make every attempt to vet PYA requests for current year funds as quickly as possible through the current PYA process.

Current-year funds are available for PYAs only if LOA funds have cancelled or if expired funds from the fiscal year of the LOA are insufficient to support the requested payment. In such instances, current-year funds may be used to: 1) generate a new current-year funded LOA, or 2) generate an Amendment against an existing current-year funded LOA. Modifications will not be accepted by the Country Financial Management (CFM) PYA Team.

Some key elements to consider when developing a current-year funded LOA to pay for a prior year request relate to the line item(s) loaded in DSAMS. The line items should reflect the Military Articles and Services List (MASL) for articles/services procured in the cancelled-year funded case. Quantities should default to ‘XX’, and periods of performance should end no later than the funds expiration date. Each line item added to the current-year funded case should link to the old case using the USE OF CURRENT YEAR FUNDS case note provided by the CFM PYA Team. The case writer can insert a place holder for said case note until the approved USE OF CURRENT YEAR FUNDS note is provided.

Below is the process for submitting a PYA package (where funds are cancelled or expired funding is not available):

1. Coordination with BPC Program Manager (PM)
2. Obtain current year funding source
3. Submit PYA package
4. Include Draft LOA
5. Include Supporting Documentation

This policy is effective immediately and supplements DSCA policy 19-03. Should you require further information, please contact Mr. Daniel Rea, DBO/FPA, daniel.rea2.civ@mail.mil, (703) 614-9955 or Ms. Alana Bates, DBO/CFM, alana.e.bates.civ@mail.mil, (703) 697-9756.



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Security Assistance Management Manual (SAMM), E-Change 462

1) Change the following section in Chapter 15:

C15.5.3.6.3. IAs are required to submit PYA requests to use expired funds for: increases to BPC LOA total case value (TCV); adjustments within TCV (i.e., increasing one Line and decreasing another); Working Capital Fund (WCF) fact-of-life price increases; and Period of Performance (PoP) extensions, where applicable. IAs will complete the PYA Request Form with all supporting documentation and submit to the DSCA CFM Prior Year Adjustment Request mailbox (dscan.cr.dbo.mbx.prior-year-requests@mail.mil).

C15.5.3.6.3.1. PYA requests for PoP extensions are not required when:

C15.5.3.6.3.1.1. The change in PoP for the provision of defense articles is being extended due to delays in delivery;

C15.5.3.6.3.1.2. The change in PoP for the provision of defense services by USG personnel, funded under the Economy Act, is being extended to a date that is within the period of availability of the appropriation that is financing the service; or

C15.5.3.6.3.1.3. The change in PoP for the provision of defense services, utilizing Cross Fiscal Year or Full Operational Capability authority by USG personnel funded by Defense Working Capital Funds or Project Orders, is being extended to a date that is within the allowable period for the applicable authority.

C15.5.3.6.4. IAs are required to submit PYA requests to use current year funds for, but not limited to: payments against a cancelled-year appropriation; payments against an expired-year appropriation where insufficient funds are available in that appropriation to support the requested payment. IAs will complete the PYA Request Form with all supporting documentation and submit to the DSCA CFM Prior Year Adjustment Request mailbox (dscan.cr.dbo.mbx.prior-year-requests@mail.mil).

C15.5.3.6.4.1. The use of a current year LOA to fund a PYA request should take into consideration the following:

C15.5.3.6.4.1.1. The line item(s) loaded in DSAMS. The line items should reflect the Military Articles and Services List (MASL) for articles/services procured in the cancelled-year funded case.

C15.5.3.6.4.1.2. Quantities should default to 'XX', and periods of performance should end no later than the funds expiration date.

C15.5.3.6.4.1.3. Each line item added to the current-year funded case should link to the old case using the USE OF CURRENT YEAR FUNDS case note provided by the CFM PYA Team. The case writer should insert a place holder for said case note until the approved USE OF CURRENT YEAR FUNDS note is provided.

C15.5.3.6.4.2. IAs must coordinate the use of an Amendment or Basic LOA with the BPC Program Manager (PM) and the Country Finance Director (CFD) to assess the feasibility of the request, taking into consideration assessorial surcharges and the current year program's budget allocation.