



DEFENSE SECURITY COOPERATION AGENCY
2800 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-2800

15 JULY 2020

MEMORANDUM FOR: COMMANDERS OF THE COMBATANT COMMANDS
DEPUTY ASSISTANT SECRETARY OF THE ARMY FOR
DEFENSE EXPORTS AND COOPERATION
DEPUTY ASSISTANT SECRETARY OF THE NAVY FOR
INTERNATIONAL PROGRAMS
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DIRECTOR, DEFENSE LOGISTICS INFORMATION SERVICE
DIRECTOR, DEFENSE LOGISTICS AGENCY DISPOSITION
DEPUTY DIRECTOR FOR INFORMATION ASSURANCE,
NATIONAL SECURITY AGENCY

SUBJECT: Guidance on COVID-19-related Restriction of Movement for Title 10-Funded Building Partner Capacity (BPC) Training, DSCA Policy Memo 20-38

References: a) USD(P&R), "Guidance for Participation of International Military Students and Trainees in U.S. Department of Defense (DoD) Formal or Informal Military Education and Training at United States Government Facilities during the COVID-19 Pandemic," dated June 12, 2020.
b) DSCA Policy 20-37, "Security Assistance Management Manual (SAMM) Exception to Policy (ETP) Standardization Process," dated July 6, 2020.

In an effort to combat the spread of COVID-19, per reference (a), all International Military Student (IMS) training at U.S. government facilities should include a 14-day Restriction of Movement (ROM) at the training location prior to training start. In accordance with the guidance included in this memorandum, Title 10 (T10) BPC funding may be used to cover the costs associated with up to a 14-day ROM period as long as the total training duration is longer than the ROM period.

This memorandum provides clarifying guidance applicable to T10-funded BPC training conducted inside the United States at United States Government (USG) and contractor facilities,

training conducted outside of the United States and training conducted via distance learning. Applicable T10 BPC authorities include Section 333, Afghanistan Security Forces Fund (ASFF), Coalition Readiness Support Program (CRSP), Counter-ISIL Train and Equip Fund (CTEF), Indo-Pacific Maritime Security Initiative (MSI), and Ukraine Security Assistance Initiative (USAI).

This guidance is effective immediately until rescinded. This guidance will be re-evaluated on a quarterly basis as long as COVID-19 conditions warrant. DSCA will publish follow-on guidance for T10 BPC-funded training as necessary.

DoD Funding for ROM Associated Costs (Living Allowances)

Cost of living allowances associated with the 14-day ROM that precedes training at the training location cannot be considered as a training cost or a travel entitlement. The 14-day ROM associated costs constitute a health protection measure (not the DoD provision of health care) that benefit both the IMS and all other participants in the DoD training event. The provision of a health protection measure to a BPC IMS can be characterized as a defense service.

A BPC grant assistance program that includes an authority to provide a defense service may fund costs associated with up to a 14-day ROM prerequisite, as determined by the training provider. The provision of the defense service is necessary to facilitate DoD's BPC training objective.

The provision of lodging and meals (temporary living allowance) to an IMS during the ROM period can also be characterized as furnishing a supply. Accordingly, a BPC grant program that includes an authority to provide "supplies" may also fund costs associated with up to a 14-day ROM prerequisite, as determined by the training authority.

Whether characterized as a defense service or supply, DoD funding may only be used for ROM costs if the total duration of the training is longer than the duration of the ROM (i.e., a 14-day ROM would require a course duration of 15 or more days). Funding may not be used to cover any ROM requirements imposed by the Partner Nation (PN) for IMS returning from the U.S. to the PN upon completion of training.

Availability of Current-Year Funds for ROM Requirements

Despite the authority for T10 BPC funds to pay for ROM costs, IAs should not assume funding is available. The addition of the 14-day ROM to existing training is considered a new requirement and thus a new obligation. As such, a currently available appropriation is required to pay the ROM costs. Implementing Agencies (IAs) must adhere to the following guidance for funding a ROM requirement on a BPC Letter of Offer and Acceptance (LOA):

- ***If current-year funding is available within the implemented total case value (TCV)***, IAs are authorized to re-align available funding within the case to cover the additional cost of the ROM without additional DSCA coordination. The TCV must have enough funding available to cover the ROM living allowance costs, course costs, course travel and living allowance (TLA), medical line, and any TLA management fees. The Period of Performance (PoP) of the existing case must cover the total training duration.

- *If sufficient current-year funding is not available within the implemented TCV but DSCA determines sufficient current-year funding is available within the congressionally notified program*, DSCA will provide a Memorandum of Request to the IA directing a case amendment to cover the ROM costs. The case note should address that the amendment is adding the ROM requirement. IAs should coordinate with the DSCA Regional Portfolio Director (RPD) for Section 333 cases or the authority-specific Program Manager and Country Financial Manager (CFM) to determine sufficiency of current-year funding within the congressionally notified program to support a case amendment.
- *If funding within the notified program is insufficient to support a case amendment, or for programs and cases where the period of availability of funds has expired*, the DSCA RPD, Program, Plans and Design (PPD) regional team, and the Geographic Combatant Command will determine if another previously notified program can support the new training requirements. The determination will ensure the notified program capability, scope and recipient units are the same as the program under which the training was initially funded. A new case or an amendment to an existing case may be required to support the new training requirements under a previously notified program. If a previously notified program cannot be identified, the original program must be re-notified to Congress to include the new requirements or a new program must be developed and notified to Congress to make current year funding available.

Training in the United States at U.S. Government (USG) Facilities

For U.S.-based training with a total duration of 15 days or more, IAs should add the ROM requirement to BPC LOAs funding these training events with current-year funds consistent with the guidance above. The ROM should be added to training events occurring from the date of this issuance through September 30, 2021.

For U.S.-based training with a total duration of 14 days or less, IAs should cancel training on a rolling basis if the training program requires a 14-day ROM period before training commences. A 14-day training duration means there are at least two work weeks (10 business days) of scheduled training.

The Services are responsible for determining total training duration. For instances in which several training courses are scheduled back-to-back on the same case, the entire training program should be reviewed to determine if the aggregated training duration is a minimum of 15 days. If the entire duration of U.S.-based training, to include initial and follow-on training, is 15 days or longer, training may proceed as scheduled.

All ROM living allowance and course TLA requirements for any type of U.S.-based training must be funded on a BPC case. The BPC case must be fully funded for all requirements prior to the start of training. If an existing case does not have sufficient funding to support ROM living allowance and course TLA requirements, under no circumstances should IMS proceed to training. IMS must never report to U.S.-based training without an Invitational Travel Order (ITO) issued via the Security Cooperation–Training Management System (SC-TMS) that is valid for the duration of training. Funding issued directly to implementers via Interagency Agreements should not fund any U.S.-based training requirements.

Contractor-Provided Training in the United States

Contractor training facilities in the U.S. vary greatly by location and type of training provided. The guidance in Reference (a) does not require contractor facilities to comply with the 14-day ROM as required for training at USG facilities. Contractor facilities must still comply with all local, state and federal guidance.

Services should evaluate whether applying 14-day ROM guidance to contractor provided training in the U.S. is necessary and feasible within the existing contract. If adding the ROM requirement would result in a change of scope and cost of the contract, DSCA must be consulted prior to changes being implemented on behalf of the USG. If local, state or federal guidelines or mandates result in a requirement to change the execution of contractor-provided training, please inform the DSCA RPD or appropriate Program Manager to ensure funding is available within the program.

Training Located Outside the United States

All non-U.S.-based training must follow quarantine and testing requirements of the PN where the training will occur. As conditions vary significantly by location, non-US-based training planned for FY20 Q4 and FY21 should be coordinated with DSCA, GCC and the IA. This guidance applies to both case-funded and direct-funded non-U.S. based training.

PN ROM (e.g., quarantine and testing requirements) may vary by country, but absent an approved exception to policy in accordance with reference (b), the duration of overseas training should always be greater than the PN ROM. This guiding principal is to ensure effective and judicious use of the U.S. appropriation. Consistent with the above guidance, if DoD is funding PN travel to the training location and the BPC authority allows provision of a defense service or supplies, DoD funding to cover the cost of PN ROM at the training location is authorized as long as the training duration is longer than the PN ROM. Absent an approved exception to policy in accordance with reference (b), DoD funding will not be provided for any ROM associated costs accrued beyond the maximum ROM of 14 days.

Any scheduled non-U.S.-based training with a duration shorter than or equal to that of a PN's ROM should be cancelled through FY20 Q4. For example, if a PN has a 14-day ROM, all overseas training with a total duration of 14 days or less should be cancelled. If the entire duration of overseas training is at least 15 days, training may proceed as scheduled. For FY21, non-U.S.-based training where the training duration is less than or equal to that of a PN's ROM should be cancelled on a rolling basis until the PN ROM no longer applies or other arrangements have been made (e.g. a U.S. Embassy negotiated ROM waiver).

For non-U.S. based training with a duration longer than the PN's ROM, IAs should follow the guidance described for U.S.-based training and add the ROM requirements to the training costs for training scheduled through September 30, 2021. However, IAs should not assume funding is readily available to cover the costs of PN ROM. IAs should follow the guidance outlined in this memorandum when determining whether funding is available to cover additional TLA required due to the PN ROM. Training pipelines should be updated to reflect the new deployment dates.

PN ROM requirements may change over the coming months as local conditions warrant. In the event that the PN ROM changes, the planned overseas training must always be longer than the PN ROM for training to proceed. Funds availability must be confirmed prior to execution.

DoD schoolhouse training located outside the U.S. (e.g. International Special Training Center) should follow the direction of host nation government regarding ROM requirements.

BPC funds will not be used to cover the costs of DoD-imposed ROM requirements for U.S. forces or personnel returning to the U.S. after completing an overseas training event.

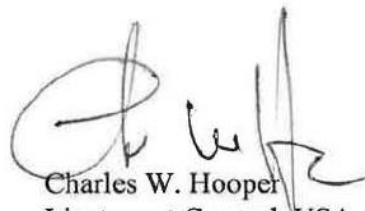
Distance Learning

In some cases, distance learning is an acceptable substitute for in-person training. Many schoolhouses have transitioned to distance learning platforms to increase flexibility for delivering content for the foreseeable future. If the training curriculum lends itself to distance learning, distance learning is an allowable substitute for planned in-person training provided that the costs of executing the training via distance learning do not exceed the planned costs of in-person execution. Funds must be available within the implemented case to cover any increased costs associated with distance learning execution, and the IA and DSCA RPD must be consulted prior to implementing changes to the delivery method that will incur additional costs (e.g. online licenses, shipping course materials, etc.) to that which was planned for in-person training. Funds will not be used in any manner outside of the scope or intent of the Congressional notification for that program (e.g. increasing internet connectivity of PN forces in order to complete the planned training via distance learning).

The 14-day quarantine period required by PNs for non-U.S. based training may also be used as a distance learning period of instruction that supplements the in-person training. Using the quarantine period to complete distance learning requirements is allowed as long as the distance learning supplements the planned instruction and is not used as a way to artificially extend the duration of deployment of the Mobile Training Team (MTT). While under COVID-19 quarantine restrictions, the total duration of in-person training must be greater than the PN quarantine requirements.

For general questions concerning this guidance, please contact Ms. Caroline Chin, caroline.s.chin.civ@mail.mil or (703) 697-9073. For questions regarding specific BPC cases, please use the following authority-specific points of contact:

- Section 333, CRSP and MSI: Ms. Elizabeth Horton, elizabeth.a.horton26.civ@mail.mil or (571) 242-0484
- ASFF: Ms. Josephine Polanco, josephine.j.polanco.civ@mail.mil or (703) 697-9377
- CTEF (Syria Programs): Mr. Jared Eros, jared.b.eros.civ@mail.mil or (703) 692-1009
- CTEF (Iraq Programs): LTC Walid Nasr, walid.r.nasr.mil@mail.mil or (703) 607-9889
- USAI: Ms. Alaina Garret, alaina.m.garrett2.civ@mail.mil or (703) 692-1282.



Charles W. Hooper
Lieutenant General, USA
Director

cc:
STATE/PM-RSAT
SOCOM
TRANSCOM
USASAC
SATFA TRADOC
NAVICP
NETSAFA
AFSAC
AFSAT
MDA
DSCU