



DEFENSE SECURITY COOPERATION AGENCY

201 12TH STREET SOUTH, SUITE 101
ARLINGTON, VA 22202-5408

11 MAR 2021

MEMORANDUM FOR DIRECTOR, STRATEGY, PLANS AND POLICY, JOINT STAFF
DEPUTY UNDER SECRETARY OF THE AIR FORCE FOR
INTERNATIONAL AFFAIRS
DEPUTY ASSISTANT SECRETARY OF THE ARMY FOR
DEFENSE EXPORTS AND COOPERATION
DEPUTY ASSISTANT SECRETARY OF THE NAVY FOR
INTERNATIONAL PROGRAMS
DIRECTOR, DEFENSE CONTRACT MANAGEMENT AGENCY
DIRECTOR, DEFENSE FINANCE AND ACCOUNTING SERVICE
INDIANAPOLIS
DIRECTOR, DEFENSE INFORMATION SYSTEMS AGENCY
DIRECTOR, DEFENSE INTELLIGENCE AGENCY
DIRECTOR, DEFENSE LOGISTICS AGENCY
DIRECTOR, DEFENSE TECHNOLOGY SECURITY
ADMINISTRATION
DIRECTOR, DEFENSE THREAT REDUCTION AGENCY
DIRECTOR, MISSILE DEFENSE AGENCY
DIRECTOR, NATIONAL GEOSPATIAL-INTELLIGENCE
AGENCY
DEPUTY DIRECTOR FOR INFORMATION ASSURANCE,
NATIONAL SECURITY AGENCY

SUBJECT: Physical Security Certification of Foreign Partner Storage Facilities for Defense Articles Designated for Enhanced End-Use Monitoring, DSCA Policy 20-64 [SAMM E-Change 430]

This memorandum updates the policy contained at SAMM Section C8.4.3. and Table C8.T2. pertaining to the physical security certification of foreign partner storage facilities for defense articles designated for Enhanced End-Use Monitoring (EEUM) designated technologies and/or case-unique weapon system transfers designated for EEUM.

Physical security requirements are an integral part of the LOA development process and should be taken into consideration during the requirements definition process. The purpose of DoD conducting physical security storage facility certifications is to ensure that U.S. partner nations provide substantially the same level of physical security as what the United States would provide, as required by the Arms Export Control Act.

Physical security storage facility certifications conducted in support of the DoD Golden Sentry End-Use Monitoring Program shall be reciprocally accepted across Implementing Agencies within the Security Risk Categories identified within DoD 5100.76-M and other higher

policy guidance and directives. DSCA's Golden Sentry team will ensure standardization of physical security certification and inspection checklists across Security Risk Categories in support of our international partners.

The attached SAMM update, E-Change 430, formalizes this change. If you have any questions concerning this policy contact Mr. John Oswald, DSCA EUM Policy Lead, at 703-697-9427, or email: john.a.oswald2.civ@mail.mil. For general questions relating to the SAMM, please contact Ms. Mel Dockstader, at (703) 697-9058 or Melissa.m.dockstader.civ@mail.mil. Implementing Agencies should ensure dissemination to supporting activities. The SAMM is available at <https://www.samm.dsca.mil/>.

A handwritten signature in black ink, appearing to read "Alan Gorowitz", with a stylized flourish at the end.

Alan Gorowitz
Principal Director
Strategy, Plans and Programs

Attachment:
As stated

cc:
STATE/PM-RSAT
AFRICOM
CENTCOM
EUCOM
NORTHCOM
INDOPACOM
SOCOM
SOUTHCOM
TRANSCOM
USASAC
SATFA TRADOC
NETSAFA
AFSAC
AFSAT

ATTACHMENT

Security Assistance Management Manual (SAMM), DSCA 20-64, E-Change 430

1. Update paragraph C8.4.3. as follows:

C8.4.3. Site Surveys/Certification of Storage Facilities. With the exception of Night Vision Devices and Communications Security (COMSEC) equipment, Implementing Agencies / Military Departments (IAs / MILDEPs) are responsible for conducting physical security inspections for certifications of partner nations' storage facilities before EEUM-designated weapons systems and enhanced case-unique weapons systems are delivered or moved to a new or uncertified facility. IA / MILDEP will certify foreign countries' weapons storage facilities to standards specified in accordance with [DoD Manual 5100.76-M, "Physical Security of Sensitive Conventional Arms, Ammunition and Explosives,"](#) or by other appropriate authorities for EEUM articles not listed in [DoD Manual 5100.76-M](#). Discrepancies identified during the physical security storage facility inspections shall be corrected or compensatory measures implemented prior to shipment of any EEUM-designated items and enhanced case-unique weapons systems.

C8.4.3.1. Security Managers and Site Certification Reports. The IA / MILDEP will ensure DSCA has a current list, by weapon system, of all security inspectors/managers responsible for conducting physical security inspections and certifications. The IA / MILDEP will provide DSCA a copy of all facility certification reports within 30 calendar days of conducting the facility certification by ensuring the reports are uploaded to the site certification repository within the SCIP-EUM database.

C8.4.3.2. Facility Certification Costs. [SAMM Table C9.T2](#), (lines 16 and 85) addresses the proper source of funding to pay for foreign facility certifications. Certification of foreign sites/facilities storing equipment designated for EEUM and enhanced case-unique weapons systems shall be case-funded. FMS admin funds may be used to certify foreign facilities prior to LOA implementation; however, these costs must be reimbursed on the subsequent LOA. If a LOA is never implemented, the IA Pre-LOR funds remain the proper funding source.

C8.4.3.3. Facility Certification Reciprocity. Foreign partner facility certifications shall be conducted consistent with the appropriate Security Risk Category (SRC) of the weapon system to be stored. Excluding specified compensatory measures, facility certifications by one IA / MILDEP in one SRC are reciprocally accepted for storage of weapons systems offered by another MILDEP in the same SRC when applicable. IA / MILDEP security inspectors/managers will coordinate facility inspection visits with DSCA, SCOs, and other MILDEPs in advance to prevent the need to conduct a new facility inspection if another IA / MILDEP has already certified the same facility. The site certification repository within the SCIP-EUM database will indicate if certification by another IA / MILDEP already exists at a proposed storage location. DSCA will work with the IA / MILDEP to ensure standardized physical security inspection/certification checklists are developed for each SRC.

C8.4.3.4. Compensatory Measures. All IA / MILDEP facility certifications shall be conducted consistent with the appropriate Security Risk Category (SRC) of the weapon system to be stored and other items designated as EEUM must be protected to substantially the same level of security as afforded by the USG. The IA / MILDEP must document any areas where the foreign facilities do not meet the physical security requirements stated in [DoD Manual 5100.76-M](#), by other appropriate authorities, stipulated in the LOAs, or required by using risk management principles and will identify if any acceptable compensatory measures are in place or required. SCOs shall verify that compensatory measures remain in place during annual inspections as documented by the IA / MILDEP.

C8.4.3.5. Facility Changes. Substantial changes to certified facilities at any time that cause them to no longer meet the physical security requirements will need to be recertified. In addition, newly built foreign storage facilities will need to be certified prior to storing designated EEUM articles and enhanced case-unique weapon systems. The effort to certify and recertify storage facilities shall be case-funded. SCOs will report foreign facility discrepancies and newly-built foreign facilities storing EEUM-designated items and enhanced case-unique weapons systems to DSCA and the IA / MILDEP within 72-hours after discovery.

2. Update paragraph C8.T2. (DoD End-Use Monitoring Responsibilities) as follows:

<p>MILDEPs and Implementing Agencies (IAs)</p>	<ul style="list-style-type: none"> • Maintain a Golden Sentry primary point of contact (POC). • Assist DSCA in developing EUM policy and promulgate EUM policy within the MILDEP / IA. • Ensure that all EUM activities are captured during the budget planning, programming, and execution cycles; and that FMS Administrative funds are requested to perform EUM functions in accordance with SAMM Table C9.T2. Ensure that all EUM activities are included on a case in accordance with SAMM Table C9.T2. • In coordination with the DSCA (Directorate for Security Assistance (DSA)), identify and provide DSCA a recommended listing and decision memos of sensitive technologies and defense articles to be considered for EEUM. Provide DSCA (DSA) with supporting information for the basis for EEUM in accordance with SAMM Figure C8.F1. • Provide DSCA (DSA-AMP & WPNs) a copy of the decision memo when Enhanced case unique articles are designated as EEUM by higher policy guidance and directives. • In coordination with DSCA, develop physical security and accountability notes for inclusion on LOAs transferring defense articles designated for EEUM. • Notify SCOs and DSCA (dsc.a.eumhelpdesk@mail.mil) whenever an item is received or returned from repair facilities to update the SCIP-EUM database. • Conduct physical security inspections and certifications of partner nations' facilities storing weapons and defense systems designated for EEUM and enhanced case-unique weapons systems and ensuring the reports are uploaded to the site certification repository within the SCIP-EUM database.
--	--

Additionally:

- Ensure DSCA has a current list of all security inspectors/managers, by weapon type, responsible for conducting physical security inspections and certifications of EEUM designated items' storage facilities.
- Develop physical security inspection/certification checklist that comply with [DoD Manual 5100.76-M](#) or other instruction standards and submit them to DSCA for review to ensure standardization.
- Provide DSCA a copy of all site survey certification reports within 30 calendar days of conducting the site certification by ensuring the reports are uploaded to the site certification repository within the SCIP-EUM database.
- Ensure certification reports include authorized compensatory measures when foreign storage sites do not meet DoD physical security standards.
- Maintain personnel qualified for physical security storage facility inspection/certification procedures and requirements.
- Prior to a facility inspection visit, review the site certification repository within the SCIP-EUM database to ensure the facility needs to be certified. Additionally, coordinate visits with DSCA, SCO or other MILDEPs prior to the visit to ensure other facility inspection visits are not already scheduled.
- Coordinate with DSCA DSA and DBO regarding funding options for sites that are in but have not been certified. Ensure the cost of physical security inspections are case funded going forward.
- 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 \(AECA\)](#), and [Section 505 of the Foreign Assistance Act \(FAA\)](#).
- In coordination with DSCA (DSA) develop Golden Sentry security and accountability checklists for EEUM-designated technologies and/or case-unique specific individual transfers designated for EEUM that SCOs will use during annual inspections.
- Submit to DSCA (DSA) recommendations of defense articles that no longer require EEUM management.
- Provide a monthly delivery record with serial numbers of EEUM items to DSCA (dsc.a.eumhelpdesk@mail.mil) in advanced of shipment of EEUM-designated items for input into the SCIP-EUM database.
- Review and submit Military Articles and Services List (MASL) 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.

- | | |
|--|---|
| | <ul style="list-style-type: none">• Contribute to the improvement and monitoring of the phases of the export process that are most susceptible to diversion or retransfer:<ul style="list-style-type: none">○ Shipping○ Use○ Storage○ Disposal• Assist DSCA (DSA) 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. |
|--|---|