



**DEFENSE SECURITY COOPERATION AGENCY**  
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**20 APR 2021**

MEMORANDUM FOR 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 FOR SECURITY ASSISTANCE, DEFENSE FINANCE  
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DIRECTOR, DEFENSE INFORMATION SYSTEMS AGENCY  
DIRECTOR, DEFENSE LOGISTICS AGENCY  
DIRECTOR, DEFENSE LOGISTICS INFORMATION SERVICE  
DIRECTOR, DEFENSE REUTILIZATION AND MARKETING  
SERVICE  
DIRECTOR, DEFENSE THREAT REDUCTION AGENCY  
DIRECTOR, NATIONAL GEOSPATIAL INTELLIGENCE  
AGENCY  
DEPUTY DIRECTOR FOR INFORMATION ASSURANCE,  
NATIONAL SECURITY AGENCY  
DIRECTOR, MISSILE DEFENSE AGENCY

SUBJECT: Milestone Entry During Case Development, DSCA Policy 21-09 [SAMM E-  
Change 524]

REFERENCES:

- a) Security Assistance Management Manual (SAMM), Defense Security Cooperation Agency, C5.1.7. LOR Validation and Acknowledgement of Receipt

The prompt and accurate entry of case data is critical to ensuring accuracy and consistency in measuring and reporting case development performance. This memorandum reiterates and clarifies existing Defense Security Assistance Management System (DSAMS) milestone entry policy and guidance established in the SAMM. It also updates the SAMM to add a requirement for the Implementing Agencies (IAs) to establish internal controls and oversight mechanisms to ensure timely and accurate entry of case information. **IAs must provide a copy of their internal control and oversight document to DSCA/ADM/CPO no later than June 15, 2021.**

- a. Validation and Acknowledgement. SAMM, paragraph C5.1.7., mandates that the Letter of Request (LOR) from a potential purchaser, must be validated by the IA within 5 days of receipt. Upon validation, the IA must enter the LOR data into DSAMS as a customer request and acknowledge receipt to the purchaser. The customer request window requires entry of an

“LOR Date” as well as an “LOR Receipt Date.” **To ensure consistency of entry, the attached SAMM change provides details on what should be entered for these dates.**

Specifically, the “LOR Date” is the date on the actual request from the purchaser (e.g., dated memorandum or letter or email) or Requesting Authority (e.g. DSCA). The “LOR Receipt Date” is the actual date the LOR was received by the IA.

- b. Case Initiation. SAMM, paragraph C5.1.7.1.1., mandates that IAs should establish the case document in DSAMS within 10 days of LOR Receipt. At this time, the IA will also provide the case identifier to the purchaser (except for those cases where Congressional Notification (CN) is required.)
- c. LOR Evaluation. SAMM, paragraph C5.1.7.1.2. requires IAs to research the LOR requirements and request additional information if needed from the prospective purchaser. The SAMM states a 20-day goal for a document to move from LOR Receipt to LOR Complete. Explanatory remarks must be entered into DSAMS for any document that misses the 20-day goal. The definition of “LOR Complete” is the date when it is determined that the LOR contains sufficient information to begin drafting the document. **The attached SAMM change updates this paragraph to clarify the LOR Complete definition.**
- d. LOA Preparation Timeframe. SAMM, paragraph C5.4.2. provides standard timelines for LOA document preparation. Four different case groups are defined and the timeline standards depend on the specific type (group) of case being prepared.
- e. Congressional Notification. SAMM, paragraph C5.5.7.1.2. provides details on coordination of required CN documents and processes followed by DSCA for CN transmittal. **The attached SAMM change updates this paragraph to clarify the requirement for the IAs to enter the appropriate date for the CN transmittal milestone.**
- f. Internal Controls and Oversight. **The attached SAMM change adds paragraph C5.1.7.2.,** which mandates that all Implementing Agencies establish, publish, and enforce internal control and oversight mechanisms within their organizations to ensure all DSAMS case-related data entries are timely and accurate. The controls must include sample review of date entries (e.g., LOR Date, LOR Receipt Date, etc.) as well as adherence to standards. IA-specific guidance should also identify offices responsible for compliance and potential improvement actions (e.g., provision of training related to persistent concerns). Implementing Agencies should develop and publish their internal control and oversight document and **provide a copy to DSCA/ADM/CPO no later than 15 June 2021.**

For questions or clarification on this memo, please contact Mr. Kenneth D. Hittel, DSCA/ADM/CPO, (703) 697-9256 or [kenneth.d.hittel.civ@mail.mil](mailto:kenneth.d.hittel.civ@mail.mil).

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Attachment:  
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USASAC  
SATFA  
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AFCEE  
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CENTCOM  
NORTHCOM  
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TRANSCOM

## Milestone Entry During Case Development, SAMM E-Change 524

1. Revise paragraph C5.1.7. to the following:

C5.1.7. LOR Validation and Acknowledgement of Receipt. Within 5 days of receiving the LOR, the IA will validate the LOR to:

- Ensure that the potential purchaser is an eligible FMS recipient. See Section C4.1.2.
- Ensure that the item sought may be sold. See Section C4.4.
- Ensure that the request was received through proper channels. See Section C5.1.3.
- Determine whether any sanctions exist, that would prevent an LOA from being prepared and/or offered to the purchaser. See Section C6.6. for more information on sanctions.
- Determine whether or not a country or international organization is authorized Dependable Undertaking. The IA will notify the purchaser as soon as possible of the payment terms available for procurement items to ensure customers have maximum time to make financial arrangements. See Table C4.T2.

Once validated, the IA enters the LOR data in the Defense Security Assistance Management System (DSAMS) as a Customer Request and acknowledges receipt of the LOR to the FMS purchaser. Both the “LOR Date” – the date on the actual request from the purchaser (e.g., dated memorandum, letter or email) and the “LOR Receipt Date” – the actual date the LOR was received by the Implementing Agency should be entered into DSAMS. The standard allotted time between entry of the LOR Date and LOR Receipt Date should be no more than 5 days. A Customer Request will be created in DSAMS for each LOR received. This includes creating separate Customer Requests for multiple LOA documents that are developed based upon one LOR. Creating a separate Customer Request for each LOA document will enable DSAMS to accurately measure the LOA development processing time of each document, to include scenarios where only one of the LOA documents is restated. IAs will forward LORs to other applicable IAs when the recipient IA is not authorized to offer some or all items on the LOR. Example: Air Force (AF) receives an LOR which contains some Communications Security (COMSEC) products which must be offered on a National Security Agency (NSA) LOA, such as "S" type devices. In this instance, the AF will forward the LOR to NSA requesting case development for specific LOR item(s). NSA will provide their Case Identifier to the AF who will notify the FMS purchaser of both case identifiers and LOR details split between the IAs IAW Section C5.1.7.1.1.

2. Revise paragraph C5.1.7.1.2. to the following:

C5.1.7.1.2. LOR Evaluation. Table C5.T3. is provided to assist U.S. Embassies, SCOs, DSCA, and the DoD components to evaluate LORs. If an LOR does not meet the basic

requirements of Table C5.T3. , the DoD Component initially receiving the request notifies the originator of the deficiency and, after entering the request in DSAMS, holds any further action until all required information is received. IAs should complete their evaluation within the standard allotted time of 20 days from LOR Receipt Date established in DSAMS per Section C5.1.7. and ensure that the LOR Complete milestone is posted, accordingly, in DSAMS. LOR Complete indicates that subject matter expert(s) conducted an internal review, which assures that the LOR contains sufficient information to begin drafting the LOA. If more than 20 days pass between LOR Receipt and LOR Complete, explanatory remarks will be entered in the Customer Request window in the Request Status Comments field in DSAMS.

3. Revise paragraph C5.5.7.1.2. to the following:

C5.5.7.1.2. DSCA Prepares Notification. Upon receipt of the data, DSCA prepares the required notification documents, coordinates with the DoS, and submits the notification to Congress. DSCA assigns a Transmittal Number on each statutory notification, which identifies the year and sequential number of the transmittal (e.g. 03-30). This number must be included on the LOA and all subsequent Amendments and Modifications. When the notification is submitted to Congress, DSCA provides the Transmittal Number and a copy of the Congressional transmittal letter(s) to the IA. The IA is responsible for entering the CN transmittal date (CSTANOT) – the date the actual CN is transmitted to Congress – in DSAMS. After receipt of the Transmittal Number, the IA can provide a draft LOA to the Purchaser.

4. Add paragraph C5.1.7.2.

C5.1.7.2. Internal Controls and Oversight for Performance Milestones. DSCA requires that all Implementing Agencies establish, publish, and enforce internal control and oversight mechanisms within their organizations to ensure all DSAMS case-related data entries are timely and accurate. The controls must include sample review of date entries (e.g., LOR Date, LOR Receipt Date, etc.) as well as adherence to published standards. IA-specific guidance should also identify offices responsible for compliance and potential improvement actions (e.g., provision of training related to persistent concerns). Implementing Agencies should develop and publish their internal control and oversight documents, accordingly, and provide copies initial copies and future updates to DSCA/ADM/CPO.