



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

15 OCT 2021

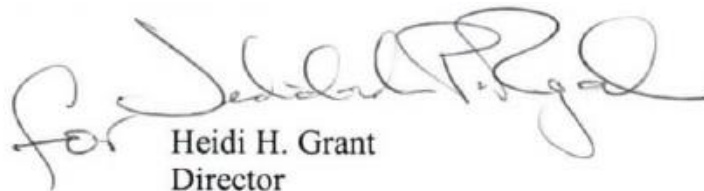
MEMORANDUM FOR DEPUTY UNDER SECRETARY OF THE AIR FORCE FOR
INTERNATIONAL AFFAIRS
DEPUTY ASSISTANT SECRETARY OF THE ARMY FOR
DEFENSE EXPORTS AND COOPERATION
DEPUTY ASSISTANT SECRETARY OF THE NAVY FOR
INTERNATIONAL PROGRAMS
DIRECTOR, DEFENSE CONTRACT MANAGEMENT AGENCY
DIRECTOR, DEFENSE INFORMATION SYSTEMS AGENCY
DIRECTOR, DEFENSE LOGISTICS AGENCY
DIRECTOR, DEFENSE THREAT REDUCTION AGENCY
DIRECTOR, MISSILE DEFENSE AGENCY
DIRECTOR, NATIONAL GEOSPATIAL-INTELLIGENCE
AGENCY
DIRECTOR FOR SECURITY ASSISTANCE, DEFENSE FINANCE
AND ACCOUNTING SERVICE – INDIANAPOLIS OPERATIONS
DIRECTOR OF CYBERSECURITY DIRECTORATE AND DEPUTY
NATIONAL MANAGER FOR NATIONAL SECURITY SYSTEMS,
NATIONAL SECURITY AGENCY

SUBJECT: International Military Student (IMS) Security Vetting Requirements Update, DSCA
Policy 21-60 [SAMM E-Change 541]

DSCA has updated Chapter 10 of the Security Assistance Management Manual (SAMM) to comply with recent statutory changes and to standardize IMS policy regarding DoD Security Vetting, Local security Screening, and Leahy Vetting. This policy memorandum applies to all DoD organizations and IMSs participating in DoD provided international training or education, and to all authorized dependents who accompany or join an IMS during the education or training activity. A copy of the update, which covers Sections C10.8.1. through C10.8.4., is attached.

This update is effective immediately. Changes to the E-SAMM will be published at <https://samm.dscamail.mil> following this memorandum's release.

Questions about this update should be addressed to Ms. Kathy Ton at 703-697-9316, khanh.t.ton.civ@mail.mil; or Mr. Clay Benton at 703-697-9309, clay.benton.civ@mail.mil.


for Heidi H. Grant
Director

Attachment:
As stated

Security Assistance Management Manual (SAMM), SAMM E-Change 541

Chapter 10.8. International Military Student (IMS) Screening Requirements Update

1) Replace C10.8.1. through C10.8.4. with the following:

C10.8. International Military Student (IMS) Screening Requirements.

C10.8.1. General. Every IMS invited to participate in DoD training, regardless of sponsoring program, funding source, or security classification of the training, must satisfactorily complete the required security, medical, and other screening described in this section before a U.S. visa or Invitational Travel Order (ITO) will be issued to the IMS. Specific screening may include Security (see Section C10.8.3.), Human Rights (Leahy vetting) (see Section C10.8.4.), and Medical Fitness (see Section C10.8.5.). In most cases, if an IMS does not meet applicable screening requirements, that person will not be authorized to participate in DoD training or education and an ITO will not be issued. Some universally applicable screening factors include:

- Age. The minimum age of an IMS who may participate in SC training is 18 unless waived by standard exception (e.g., for Service Academies).
- Course Prerequisites. SCOs must ensure IMSs meet course prerequisites noted in the T-MASL for all scheduled training.
- English Language Requirements. SCOs must conduct English Comprehension Level (ECL) screening and testing for all non-exempt IMSs. Identifying qualified candidates who do not require extensive additional English Language Training (ELT) significantly reduces training costs while increasing partner nation (PN) ability to quickly respond to training opportunities or personnel substitutions. The SCO should review any in-country ELT programs to determine and advise about how language labs are used. See Section C10.10.3. for specific ECL requirements and waiver information.

C10.8.2. Data Collection Requirements for All DoD-Provided Training and Education.

C10.8.2.1. When an IMS is nominated for U.S. sponsored training, the SCO first checks the Security Cooperation Training Management System (SC-TMS) to determine if that IMS has a previously assigned valid student control number (SCN). If the IMS has a valid SCN, the SCO must program the IMS under that SCN; if not, the SCO will program the IMS under a new SCN assigned automatically by SC-TMS.

C10.8.2.2. The SCO enters in SC-TMS all IMS information required for the programmed training. This is done for all IMSs who attend DoD-provided resident and non-resident training, both inside and outside the U.S. For courses that are distance learning only (i.e., online, with no travel required outside the IMS's home country), IMS biographical information is entered into SC-TMS even though an ITO is not issued.

C10.8.2.3. If an IMS who has been programmed against a training line (or worksheet control number (WCN)) must be removed from that WCN for any reason prior to the start of training,

and is replaced by a different IMS, the SCO must ensure all data associated with the original IMS is expunged from the WCN records in SC-TMS and elsewhere, and is replaced with the new IMS data. If an IMS is removed for any reason after beginning training, and is replaced by a different IMS in the training pipeline, the SCO must work with the IA to terminate the original WCN and to build a new SC-TMS student record associated with a new WCN.

C10.8.2.4. The purchaser or benefitting country must ensure that any IMS and family member medical, biographic, or biometric information required for the training and the training location is provided to the SCO in the time and format requested to allow review, processing, and approval by the appropriate U.S. agency.

C10.8.2.4.1. To ensure there will be sufficient time to complete screening before the start of training, the SCO should strongly encourage the purchaser or benefitting country to prompt the IMS to submit required information as soon as possible after it is requested by the SCO.

C10.8.2.4.2. If the required IMS or family member information is not provided in time to facilitate and complete appropriate reviews before the IMS is scheduled to start training, the responsible MILDEP or IA may cancel or reschedule the training. Penalty fees may be collected in accordance with the [DoD FMR, Volume 15, Chapter 7](#).

C10.8.3. Security Screening and Vetting. Regardless of sponsoring program, funding source, or security classification of the training, every IMS invited to participate in DoD training must satisfy prerequisite security screening or vetting requirements before a training-related ITO or U.S. visa will be issued, or before the IMS will be authorized to participate in overseas SC team-conducted training. This includes any local (in-country) security screening and the DoD security vetting required for U.S. based training. The goal of both local security screening and DoD security vetting is to prevent nominated personnel who have a history of objectionable, unethical, or criminal behavior from being authorized to attend U.S. sponsored training. DoD security vetting additionally determines a person's eligibility for credentialed recurring access (CRA) to DoD installations or facilities in the U.S.

C10.8.3.1. Local Security Screening.

C10.8.3.1.1. Local security screening will be conducted for both U.S. based training and overseas SC training teams, as deemed appropriate by the responsible country team, in accordance with the process developed by the embassy team and approved by the Ambassador. Local security screening is conducted, in coordination with the SCO, by in-country USG personnel (e.g., U.S. embassy Regional Security Officer or U.S. Drug Enforcement Administration (DEA) personnel) who have access to local information sources and official databases that can be searched for evidence of drug trafficking, trafficking in persons, terrorist activity or support, corruption, criminal conduct, or other U.S.-designated illegal or objectionable activities.

C10.8.3.1.2. The SCO will not accept for any U.S. sponsored training any foreign person who does not meet established local security screening standards unless a waiver is approved in writing by the Ambassador or an appropriate DoS designee.

C10.8.3.1.3. During the annual Combined Education and Training Program Plan (CETPP) review, the SCO will update the CETPP narrative describing if and how the local security screening process is incorporated into the student selection process for IMSs, including those

who participate in mobile team training. See Section C10.22.5.2. Security Screening for SCETs, MTTs, and METs for additional security screening information.

C10.8.3.1.4. DoD security vetting conducted pursuant to Section C10.8.3.2. may be considered an acceptable alternative to local security screening by the embassy team responsible for local security screening.

C10.8.3.2. DoD Security Vetting.

C10.8.3.2.1. DoD security vetting procedures satisfy the security vetting requirements established by the Office of the Under Secretary of Defense for Intelligence and Security (OUSD(I&S)). DoD security vetting does not supersede or eliminate the requirements for human rights screening (Leahy Vetting) described in Section C10.8.4. or local security screening described in Section C10.8.3.1.; however, it can be used in lieu of local security screening if desired and approved by the embassy. The visa application process is a separate process overseen by DoS, but the embassy will not issue a training-related visa to an IMS or accompanying family member (AFM) until formally notified that DoD security vetting has been completed (see Section C10.8.3.2.7.7.).

C10.8.3.2.2. OUSD(I&S) requires DoD security vetting for unexempted IMSs and their AFMs (see Section C10.8.3.2.6. for exemptions) who require CRA (i.e., unescorted physical access) for courses that last longer than 14 calendar days at a DoD training or education installation or facility in the U.S. This requirement includes Service Academy cadets/midshipmen (full-time and semester exchange) and Senior Service College students including those attending the Inter-American Defense College. The U.S. Coast Guard (USCG) will determine whether DoD security vetting is required for access to its installations.

C10.8.3.2.3. The installation-owning MILDEP may also require DoD security vetting for courses or classes scheduled to last 14 calendar days or less. Vetting requirements will be indicated in the applicable T-MASL.

C10.8.3.2.4. If DoD security vetting is required in order to obtain CRA for an IMS or family member who originally entered the U.S. for reasons that did not require DoD security vetting (e.g., to attend a civilian school or on a work permit), the responsible MILDEP or IA will work with the SCO to ensure compliance with all required DOD security vetting requirements.

C10.8.3.2.5. DoD Security Vetting Components. Pre-ITO/visa issuance DoD security vetting consists of two main components: personal information and data collection, and consent agreements.

C10.8.3.2.5.1. As part of the security vetting process, biographic and biometric data are collected. Further, if a visa is required, a [DS-160 online Nonimmigrant Visa Application](#) form is submitted for each IMS and AFM. If a visa is not required the needed data is collected using alternative forms (see Section C10.8.3.2.7.6.). Biometric enrollment required for DoD security vetting is separate from biometric enrollment conducted by embassy consular sections for visa applications.

C10.8.3.2.5.2. All IMSs and adult (a person 18 years old or older) AFMs who require CRA must sign one or more consent agreements (available on the SAN) acknowledging they were informed about, understand, and agree to comply with DoD security policies. An IMS who requires CRA must sign all three agreements listed below. An adult AFM who requires CRA must sign the

POF and PAEI agreements (#2. and #3., below). The IMS is responsible for an accompanying minor's (a person under age 18) compliance with the POF agreement (#2. below).

1. Conduct Expectations for IMS in the United States (Conduct Expectations Agreement)
2. DoD Prohibition on the Transport, Possession, Storage, or Use of Privately Owned Firearms and Non-Official Ammunition in the United States (POF Agreement)
3. Consent to Monitoring of Publicly Available Electronic Information (PAEI Agreement)

C10.8.3.2.5.3. Any IMS or AFM who refuses to provide all required biographic or biometric information, or who will not sign a required consent agreement, will not be granted CRA.

C10.8.3.2.6. DoD Security Vetting Exemptions and Exceptions.

C10.8.3.2.6.1. DoD security vetting exemptions are not required for citizens of Australia, Canada, New Zealand, and the United Kingdom who have been granted a home-country security clearance that is reciprocally accepted by the U.S. for access to classified information. This exemption does not apply to an AFM of an exempt person unless the AFM is also a citizen of one of these countries and has also been granted a clearance that is reciprocally accepted by the U.S.

C10.8.3.2.6.2. DoD security vetting is not required for any U.S. citizen, nor for an AFM who is a lawful permanent resident of the U.S.; however,

- a) The IMS must still satisfy local security screening requirements outlined in Section C10.8.3.1., as applicable.
- b) U.S. nationals, including dual nationals, must use a U.S. passport to enter and leave the U.S., and do not require a U.S. visa. The IMS's foreign government is responsible for issuing foreign government passports and requesting U.S. visas for the IMS and AFMs. Typically, non-U.S. citizens travel to U.S. based training on an A-2 visa (see the DoS website for exceptions). All IMS passports and visas must be valid for the entire duration of the IMS training period.
- c) The SCO must enter IMS information and prepare an ITO for an IMS who is a U.S. citizen the same way as would be done for non-U.S. citizens, including how the IMS will meet healthcare coverage requirements.
- d) For USG ID card issuance, the IMS (and any AFMs) must have two official forms of identification included on the DoD List of Acceptable Identity Documents, on which all names are ordered (e.g., Last, First, Middle) and spelled exactly the same.

C10.8.3.2.6.3. DoD security vetting is not required for foreign military personnel who:

- Only participate in military exercises on a DoD installation in the U.S.;
- Are escorted (continuously accompanied by a U.S. citizen who has CRA to the training installation) the entire time they are on a DoD installation or facility for training;

- Only attend contractor-provided training conducted entirely at contractor locations (not on a DoD installation or facility), under Direct Commercial Sales (DCS) or DoD contracts;
- Are present on a DoD installation or facility to serve as permanent cadre or whose participation in a DoD training activity is exclusively as a short-term guest trainer or instructor.

C10.8.3.2.6.4. DoD security vetting is not required for foreign nationals who are students at the six Senior Military Colleges (The Citadel, Norwich University, Texas A&M University, University of North Georgia, Virginia Military Institute, and Virginia Tech), nor for foreign nationals who are Reserve Officers Training Corps (ROTC) members at other U.S. institutions.

C10.8.3.2.6.5. No person is exempt from DoD security vetting solely because of age (i.e., persons under 18).

C10.8.3.2.6.6. A person is not exempt from DoD security vetting solely because travel to the U.S. is done on a diplomatic passport.

C10.8.3.2.7. DoD Security Vetting Data Collection and Reporting.

C10.8.3.2.7.1. Specific procedures used to collect DoD security vetting biographic and biometric data are published in locations appropriate to the sensitivity and security classification of the guidance.

C10.8.3.2.7.2. All required DoD security vetting data must be submitted no less than 35 days prior to the IMS report date at the first training location unless exempted per Section

C10.8.3.2.7.5. If the required information is not provided in time to facilitate and complete appropriate reviews before the IMS is scheduled to start training, the responsible MILDEP or IA may cancel or reschedule the training, and penalty fees may be collected in accordance with the [DoD FMR, Volume 15, Chapter 7](#). If a SCO foresees an exceptional situation that could result in delayed submission of required vetting information, the SCO must contact the GCC training manager to explore contingencies aimed at avoiding training cancellation.

C10.8.3.2.7.3. If an IMS or AFM does not provide required biographic or biometric information necessary for DOD vetting, or sign the consent agreements, CRA will not be granted to that person. If an IMS or AFM refuses to provide the required information or sign the consent agreements, the SCO will immediately report the refusal to the CCMD and the PN MoD POC to obtain guidance from both. If the IMS or AFM refusal will prevent an IMS from participating in the training, the responsible MILDEP or IA may cancel or reschedule the training, and penalty fees may be collected in accordance with the [DoD FMR, Volume 15, Chapter 7](#).

C10.8.3.2.7.4. Because an IMS might be denied CRA based on a security vetting alert, the SCO should establish and maintain effective open channels of communication with the purchaser or benefitting country MOD, the responsible CCMD, and IA training managers. Insofar as possible, the SCO should work with those organizations to outline a process for substituting a different IMS on short notice, or for obtaining approval to send an IMS to the U.S. before security vetting is complete. In all cases, the SCO should notify the CCMD and the MILDEP or IA as soon as possible about anything that might prevent an IMS from beginning training on the programmed start date, including IMS reluctance to provide data or sign forms, PN passport issuance delays, or technology failures.

C10.8.3.2.7.5. On a case-by-case basis, OUSD(I&S) may approve an exception to pre-travel biometric enrollment for IMSs and AFMs from countries that send to the U.S. only a small number of IMSs per year. The SCO must first request through the CCMD to OUSD(I&S) that biometric data be collected at the first training installation in the U.S. instead of prior to travel—approval is not assured. Until the required biometric data is collected, CRA will not be granted. To ensure the MILDEP and the school are able to provide an appropriate escort for the IMS before CRA is granted, the SCO must obtain written concurrence for this request from the CCMD and the MILDEP that manages the first training location prior to submitting the formal request for biometric collection in the U.S. through the CCMD to OUSD(I&S).

C10.8.3.2.7.6. If an IMS or AFM who is subject to DoD security vetting does not need to complete a [DS-160 Nonimmigrant Visa Application](#) for any reason, the SCO will use the applicable biographic data template provided in SC-TMS to collect any information required for security vetting that would have been submitted in the [DS-160](#).

C10.8.3.2.7.7. The embassy will only issue an IMS or AFM visa after the responsible DoD representative at the embassy (e.g., the SCO or SDO/DATT) formally notifies the consular section that DoD security vetting has been completed. The notification of completion of DoD security vetting to the embassy will be on DoD letterhead or sent as an official e-mail (from a .mil or state.gov account) and will include the forms and other documents submitted by the SCO in conjunction with the IMS or AFM official visa application. See DSCA's security vetting implementation guidance on SC-TMS for required content of such notifications.

C10.8.3.2.7.8. If an IMS or AFM in the U.S. need to renew a visa or other official travel document, the IMS must inform the SCO, who will notify the local U.S. embassy visa office and, as needed, seek guidance to share with the IMS to facilitate visa or other document renewal. The SCO will also work with the IMSO or IA training manager to assist the IMS and to ensure new visa numbers or other document changes are updated in all pertinent IMS or AFM records, including SC-TMS.

C10.8.3.2.7.9. Locally employed staff may help an IMS complete a form and may enter biographic data into SC-TMS, but only U.S. citizens employed by the USG or as USG contractors may conduct DoD biometric enrollment.

C10.8.3.2.8. Responsibilities Related to DoD Security Vetting.

C10.8.3.2.8.1. The Defense Counterintelligence and Security Agency (DCSA) conducts IMS and AFM security screening, provides screening results on CRA fitness, and, as appropriate, provides information to the MILDEPs that is used for adjudication and CRA fitness determination. MILDEPs make CRA fitness determination decisions and report their determinations to DSCA and DCSA. MILDEPs also provide updated information to DCSA in support of continuous assessment requirements.

C10.8.3.2.8.2. DSCA operates and maintains SC-TMS and works with the SC training community to aide and facilitate DoD security vetting data reporting and record management. See Section C10.4.2. for more information about SC-TMS.

C10.8.3.2.8.3. The course-owning MILDEP, in coordination with the training installation or facility owner, will determine or validate if a course does not require an IMS to have CRA, and will ensure the T-MASL is updated to indicate that requirement. If a course is updated to indicate that CRA is not required, the MILDEP will inform DSCA so it can adjust the 'No CRA-

Required' list (available on the SAN). To facilitate security vetting compliance, all DoD courses assigned a T-MASL are presumed to require CRA if they are not on the DSCA 'No CRA-Required' list.

C10.8.3.2.8.4. The purchaser or benefitting country ensures all required IMS and family member biographic and biometric information is provided to the SCO within the time requested to allow review, processing, and approval by the appropriate U.S. agency.

C10.8.3.2.8.5. Unexempted IMS and adult family members provide required biographic information and biometric data within the time requested to allow review, processing, and approval by the appropriate U.S. agency; this includes submission of completed [DS-160 online Nonimmigrant Visa Applications](#), if required, and the required signed consent agreements.

C10.8.3.2.8.6. The SCO works with the purchaser or benefitting country to facilitate DoD security vetting compliance and explains the requirement, purpose, and process as needed. The SCO:

- Provides or helps the IMS obtain required biographic data forms;
- Collects and enters IMS and family member biographic data in SC-TMS, and coordinates or performs in-country biometric data collection and submission;
- Confirms the IMS and AFMs have completed and submitted a [DS-160 Nonimmigrant Visa Application](#), if required;
- Ensures all data is entered and all completed forms are uploaded;
- Issues an ITO only after confirming IMS and AFM have approved vetting results, or that results have been reviewed and accepted by the MILDEP;
- Explains the consent agreements to the IMS and, if appropriate and possible, provides copies of the agreements that have been translated (and verified as accurate) into the IMS's primary language;
- Explains the IMS will be required to participate in MILDEP-provided Insider Threat training during in-processing at the first training location;
- Explains that any non-official travel that is not reflected in the ITO must be reported in advance to the IMSO if the travel is international (including Mexico, Canada, or any Caribbean country), or beyond a 250-mile radius of the school;
- Briefs the IMS and AFMs about their responsibilities while in the U.S., and the potential consequences of not adhering to the signed agreements.

C10.8.3.2.8.7. International Military Student Office (IMSO):

C10.8.3.2.8.7.1. Ensures the IMS attends MILDEP-provided Insider Threat training during in-processing (not later than the end of the first week) at the first training location.

C10.8.3.2.8.7.2. Ensures the IMS understands advance notice is required for any IMS personal travel that is not reflected in the ITO if the travel is international (including to Mexico, Canada, or any Caribbean country), or beyond a 250-mile radius of the school. Explains that all such travel will be recorded in SC-TMS by the IMSO, regardless of whether the travel is reported by

the IMS or another source (though a reasonable attempt will first be made to verify the accuracy of other source's report). Records all IMS travel described in this paragraph in SC-TMS.

C10.8.3.2.8.7.3. Ensures any issues with or changes to IMS or AFM passports, visas, or other official documents of record are reported immediately to the IA training manager and the SCO so that IMS or AFM data records in SC-TMS can be updated.

C10.8.3.2.8.7.4. Coordinates biometric collection for individuals who receive an exception under Section C10.8.3.2.7.5.

C10.8.3.2.9. DoD Security Vetting Data Privacy Management. All IMS and family member data collected by DoD in support of security vetting requirements will be collected, stored, shared, and disposed of in accordance with all applicable U.S. privacy laws and regulations. Only the data required to complete DoD security vetting will be requested, and the provided data will be retained by the USG no longer than deemed necessary or as directed by applicable policy. See the DoD Privacy Protection Statement posted in SC-TMS for details.

C10.8.4. Human Rights (HR) Screening (Leahy Vetting). Individual foreign security force members and/or whole foreign units and their commanders must be screened (Leahy Vetted) for evidence of gross violations of human rights and human trafficking violations if they are nominated for any U.S.-funded resident, non- resident, or SC team training. The SCO must initiate individual or unit Leahy vetting far enough in advance of the programmed training date to ensure completion before training starts, including DoS's vetting lead-time policy.

C10.8.4.1. Leahy vetting is not required for an IMS whose training is funded with PN funds.

C10.8.4.2. An IMS who is a U.S. Citizen (or holds dual citizenship with another country) is not required to be Leahy vetted, per DoS policy.

C10.8.4.3. The SCO should consult both the embassy's Leahy vetting guidance, and the DoS/DoD Leahy vetting requirements that are available on the Security Assistance Network (SAN) home page on the 'Training -> IMS Screening and Vetting Guidance' tab.

C10.8.4.4. Embassy personnel normally use the DoS International Vetting and Security Tracking System (INVEST) to vet foreign security forces slated for DoD-funded training, equipment, or other assistance. The SCO should become familiar with embassy policies and procedures for accessing and using INVEST.