



DEFENSE SECURITY COOPERATION AGENCY
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13 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 FOR SECURITY ASSISTANCE, DEFENSE FINANCE
AND ACCOUNTING SERVICE-INDIANAPOLIS OPERATIONS
DIRECTOR, DEFENSE LOGISTICS AGENCY
DIRECTOR, DEFENSE THREAT REDUCTION AGENCY
DIRECTOR, DEFENSE TECHNOLOGY SECURITY
ADMINISTRATION

SUBJECT: DSCA DoD Golden Sentry End-Use Monitoring (EUM) Virtual Compliance
Assessments (VCA) (DSCA 21-64) [SAMM E-Change 544]

REFERENCES:

- a) Security Assistance Management Manual (SAMM) – C8.T2. Roles and responsibilities –
Conducting Compliance Assessment Visits (CAVs)
- b) SAMM – C8.5.1. DSCA EUM Visit Guidance

Effective immediately, this memorandum incorporates E-Change 544 into the SAMM to establish policy and procedures for conducting virtual DSCA EUM compliance assessments.

The purpose of a VCA is to verify Security Cooperation Office (SCOs) compliance with DSCA Golden Sentry EUM policy and partner nations' compliance with the end-use terms and conditions of sale and other transfer agreements. VCAs are conducted similarly to CAVs, the process for which is described in references (a) and (b); however, VCAs are conducted remotely and without travel by DSCA staff. DSCA may conduct a VCA instead of a CAV when circumstances exist that impede travel, including budget constraints, heightened security risk, and other limitations that warrant a VCA in lieu of a CAV. Detailed guidance on conducting a VCA can be found in the VCA Guidance Plan within the SCIP-EUM database.

If you have questions regarding this change, please contact Mr. John Oswald, DSCA/DSA/AMP, at (703) 697-9427 or e-mail: John.A.Oswald2.civ@mail.mil. For general questions relating to the SAMM, please contact Ms. Melissa Dockstader, at (703) 692-6657 or e-mail: 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", is located below the main text.

Alan Gorowitz
Assistant Director
Strategy, Plans, and Policy

Attachment:
As stated

cc:

AFRICOM

CENTCOM

EUCOM

NORTHCOM

SOUTHCOM

INDOPACOM

TRANSCOM

SOCOM

STATE/PM-RSAT

USASAC

TRADOC SATFA

USACE

NAVSUP WSS

NETSAFA

AFSAC

AFSAT

MARCOR IP

MCSCG

USCG International Affairs

Security Assistance Management Manual (SAMM), E-Change 544

DSCA DoD Golden Sentry End-Use Monitoring (EUM) & Virtual Compliance Assessments (VCA)

1. Update SAMM Chapter 8 as follows:

Chapter 8 Section	Current Wording	Revised Wording
C8.T2 – DSCA responsibility	Compliance Assessment Visits (CAV) to assess SCOs' compliance with Golden Sentry policy and partner nations' compliance with specific physical security and accountability agreements, provisos, and other terms of sale.	Compliance Assessment Visits (CAV) or Virtual Compliance Assessment (VCA) to assess SCOs' compliance with Golden Sentry policy and partner nations' compliance with specific physical security and accountability agreements, provisos, and other terms of sale.
C8.T2 – DSCA responsibility	Draft and submit CAV reports to the appropriate CCMD, SCO, other DoD organizations, and DOS to ensure EUM compliance.	Draft and submit CAV or VCA reports to the appropriate CCMD, SCO, other DoD organizations, and DOS to ensure EUM compliance.
C8.T2 – CCMD responsibility	Support DSCA CAVs by requiring SCOs to correct CAV-identified discrepancies in SCO programs as well as ensure that SCOs oversee and monitor resolution of CAV-identified discrepancies in partner nation compliance with terms of sale.	Support DSCA CAVs or VCAs by requiring SCOs to correct CAV or VCA identified discrepancies in SCO programs as well as ensure that SCOs oversee and monitor resolution of CAV or VCA -identified discrepancies in partner nation compliance with terms of sale.
C8.T2 – SCO responsibility	Support Golden Sentry Familiarization Assistance Visits (FAVs), CAVs, and Investigative Visits as described in Tables C8.T3. and Tables C8.T4. and SAMM Section C8.6.3.	Support Golden Sentry Familiarization Assistance Visits (FAVs), Focus Verification Checks (FVCs) , CAVs, VCAs , and Investigative Visits as described in Tables C8.T3. , Tables C8.T4. , SAMM Section C8.6.3. , and VCA Guidance plan within the SCIP-EUM database.
C8.5.1. EUM Visit Guidance.	Compliance Assessment Visits (CAV)	Compliance Assessment Visits (CAV) or Virtual Compliance Assessments (VCA)

Chapter 8 Section	Current Wording	Revised Wording
<p>C8.5.2. EUM Familiarization and Assistance Visit (FAV) Guidance.</p>	<p>The purpose of an EUM FAV is to assist the partner nation, the SCO (or equivalent organization/office), and the CCMD in developing an effective EUM compliance program. It also provides an opportunity for the DSCA EUM representative to determine the requirements for conducting a potential future EUM CAV. A FAV may be prompted by a request from the partner nation, SCO, or the CCMD to validate EUM programs. A FAV can also be prompted by the introduction of specific equipment into the region/country. Table C8.T5 outlines the timeline and formal requirements for a well-coordinated and documented EUM FAV. Informal correspondence may occur prior to these actions.</p>	<p>The purpose of an EUM FAV is to assist the partner nation, the SCO (or equivalent organization/office), and the CCMD in developing an effective EUM compliance program. It also provides an opportunity for the DSCA EUM representative to determine the requirements for conducting a potential future EUM CAV or VCA. A FAV may be prompted by a request from the partner nation, SCO, or the CCMD to validate EUM programs. A FAV can also be prompted by the introduction of specific equipment into the region/country. Table C8.T5 outlines the timeline and formal requirements for a well-coordinated and documented EUM FAV. Informal correspondence may occur prior to these actions.</p>
<p>C8.5.3.1.1</p>	<p>NEW</p>	<p>C8.5.3.1.1. EUM Virtual Compliance Assessments (VCAs) Guidance.</p> <p>A VCA is conducted similar to a CAV (See Section C8.5.3.); however, conducted remotely and without travel by DSCA staff. DSCA may conduct a VCA when circumstances exist that impede travel, including budget constraints, heightened security risk, and other limitations DSCA deems a VCA necessary. The purpose of virtual CAVs remains the same as a standard CAV, which consists of reviewing and evaluating SCOs compliance with Golden Sentry EUM Policy and partner nations' compliance with specific physical security and accountability agreements, provisos, and other terms of sale. The VCA timeline and</p>

Chapter 8 Section	Current Wording	Revised Wording
		requirements are identified in Table C8.T6. and the VCA Guidance Plan found in the SCIP-EUM database.
C8.5.3.1.	Factors DSCA considers when determining countries to be scheduled for CAVs include, but are not limited to, the following:	Factors DSCA considers when determining countries to be scheduled for CAVs or VCAs include, but are not limited to, the following:
C8.5.3.2.	To assist in planning and coordination with the partner nation, a two-year CAV plan has been institutionalized through formal message notifications to the CCMDs and SCOs. The two-year plan is published at the beginning of each fiscal year, and provides a quarterly CAV schedule by CCMD and country. DSCA may, in coordination with the appropriate CCMD, perform additional out-of-cycle CAVs as necessary to execute the EUM mission.	To assist in planning and coordination with the partner nation, a two-year CAV plan has been institutionalized through formal message notifications to the CCMDs and SCOs. The two-year plan is published at the beginning of each fiscal year, and provides a quarterly CAV or VCA schedule by CCMD and country. DSCA may, in coordination with the appropriate CCMD, perform additional out-of-cycle CAVs or VCAs as necessary to execute the EUM mission.
C8.5.3.3. CAV Rating Criteria.	The CAV rating is based on the CAV team's assessment of:	The CAV or VCA rating is based on the CAV team's assessment of:
C8.5.3.3.1.	CO compliance with the policies and procedures of the Golden Sentry program SCO responsibilities stated in the SCO checklist published in the SCIP-EUM database and Table C8.T2 , including:	SCO compliance with the policies and procedures of the Golden Sentry program SCO responsibilities stated in the SCO checklist published in the SCIP-EUM database and Table C8.T2 , including:
C8.5.3.3.2.	Cooperation and coordination with U.S. officials to implement and maintain a viable EUM program that provides for Routine and EEUM, including CAVs conducted by DSCA;	Cooperation and coordination with U.S. officials to implement and maintain a viable EUM program that provides for Routine and EEUM, including CAVs or VCAs conducted by DSCA;