

28 March 2022

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: Update Security Assistance Management Manual (SAMM), Table C8.T2, "DoD End-Use Monitoring (EUM) Responsibilities." DSCA Policy 22-16 [SAMM E-Change 558]

Reference: (a) <u>DoDIG-2021-102</u>, Audit of the DoD's Management of Global Train and Equip Program Resources Provided to U.S. Africa Command Partner Nations, July 23, 2021.

Effective immediately, C8.T2, "DoD End-Use Monitoring (EUM) Responsibilities" of the SAMM is revised to include language that more accurately describes the Combatant Command (CCMD) EUM oversight responsibilities. This change is a direct result of a Department of Defense Inspector General (DoDIG) audit completed in July 2021.

This memo updates the description in the SAMM of CCMD EUM oversight responsibilities to include: 1) a requirement for the frequency by which CCMDs review routine and enhanced EUM delinquencies, 2) a responsibility to assess SCO compliance with Building Partnership Capacity (BPC) transfer documentation requirements during Compliance Assessment Visits (CAVs) or Virtual Compliance Assessment (VCAs), 3) a responsibility to ensure CAV or VCA deficiencies are corrected in a timely matter, and 4) a requirement for the CCMD to determine if it is feasible for it to provide mutual support for Enhanced EUM (EEUM) inventories of deployed equipment. If you have questions regarding this change, please contact Mr. John Oswald, DSCA/IOPS/GEX, at (703) 697-9427 or e-mail: <u>John.A.Oswald2.civ@mail.mil</u>. For general questions relating to the SAMM, please contact Ms. Mel Dockstader, DSCA/SPP/EPA at (703) 692-6657 or e-mail: <u>Melissa.M.Dockstader.civ@mail.mil</u>. The SAMM is available at <u>https://samm.dsca.mil/</u>.

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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 DISCS MARCOR IP SCETC USCG International Affairs (G-CI)

Security Assistance Management Manual (SAMM), E-Change 558

Update Security Assistance Management Manual (SAMM), Table C8.T2, "DoD End-Use Monitoring (EUM) Responsibilities."

1. Update SAMM Chapter 8 as follows:

DoDIG Recommendation	Chapter 8 Section	Current Wording	Revised Wording
2.a Update the SAMM to include language describing CCMD oversight of SCOs.	C8.T2. – EUM Responsibilities (CCMD)	Maintain a Golden Sentry primary POC.	Maintain a Golden Sentry primary POC to provide oversight and ensure SCOs are in compliance with DoD EUM program policy.
2.a In addition, add the frequency by which CCMDs should review routine and enhanced EUM.	C8.T2. – EUM Responsibilities (CCMD)	Ensure SCOs conduct Routine and Enhanced EUM in accordance with Golden Sentry EUM policy and procedures and annotate all accountability and physical security checks in the SCIP-EUM database.	Review the SCIP-EUM database quarterly to ensure SCOs are conducting and documenting routine EUM checks, and performing annual accountability and physical security checks of Enhanced EUM in accordance with Golden Sentry EUM policy and procedures.
2.b Update the SAMM to include language for assessing SCO compliance with transfer of routine and EEUM documentation requirements during Compliance Assessment Visits (CAVs).	C8.5.3. EUM CAV Guidance	The purpose of a CAV is to review and evaluate the SCO's (or equivalent organization/office) compliance with Golden Sentry EUM policy and the partner nation's compliance with specific physical security and accountability requirements, as well as other terms of sale. Activities during a CAV may include facility visits, record reviews, review of REUM and EEUM policies and procedures, and inventories of U.Sorigin defense articles. EUM CAVs are coordinated well in advance with the CCMD, SCO, and partner nation to ensure the success of the visit. To maximize resources and minimize disruptions, EUM site visits should be arranged to coincide with scheduled partner nations inventory dates whenever possible. <u>Table</u> <u>C8.T6</u> , outlines the timeline and formal requirements to ensure a well-coordinated and documented EUM CAV. Informal correspondence may occur prior to these actions. Inability to obtain proper entry	The purpose of a CAV or VCA is to review and evaluate the SCO's (or equivalent organization/ office) compliance with Golden Sentry EUM policy and procedures in accordance with <u>Table</u> <u>C8.T2.</u> by using the SCO checklist (available in the SCIP-EUM database) and the partner nation's compliance with specific physical security and accountability requirements, as well as other terms of sale. Activities during a CAV or VCA may include facility visits, record reviews, review of REUM and EEUM policies and procedures, and inventories of U.Sorigin defense articles. EUM CAVs or VCAs are coordinated in advance with the CCMD, SCO, and partner nation to ensure the success of the assessment. To maximize resources and minimize disruptions, EUM site visits should be arranged to coincide with scheduled partner nations inventory dates whenever possible. <u>Table</u> <u>C8.T6.</u> outlines the timeline and formal requirements to ensure a well-coordinated and

DoDIG Recommendation	Chapter 8 Section	Current Wording	Revised Wording
		credentials for the CAV Team from the recipient country may result in unfavorable reports within the DoS and DoD and may result in mention in the annual report to Congress.	documented EUM CAV or VCA. Informal correspondence may occur prior to these actions. Inability to obtain proper entry credentials for the CAV or VCA Team from the recipient country will result in unfavorable reports within the DoS and DoD and may result in mention in the annual report to Congress.
2.b In addition ensure identified deficiencies in SCO performance are corrected in a timely matter.	C8.T6. – EUM CAV Timeline and Requirements	Event Number 15 (add additional "Event Number 16")	Remove last bullet: "SCOs will forward a written report of actions taken to correct all findings and recommendations addressed in the CAV report to DSCA (through the CCMD) not later than 90 days after receipt of the CAV Report."
			Add: Event No. 16:
			Timeframe: "No later than 90 days after receipt of the CAV Report."
			Description: "SCOs will forward a written report of actions taken to correct all findings and recommendations addressed in the CAV report to DSCA (through the CCMD)."
2.c Determine whether it is feasible for CCMD to provide mutual support for EEUM inventories of deployed equipment.	C8.T2. – EUM Responsibilities (CCMD)	Develop and promulgate policy, Standard Operating Procedures (SOPs), and/or Compliance plans to support execution of the Golden Sentry program and send via e-mail to: <u>dsca.eumhelpdesk@mail.mil</u>	Assist DSCA in promulgating EUM policy and developing Standard Operating Procedures (SOPs) and/or Compliance plans which provides the SCO the ability to execute EUM/EEUM inventories and inspections to support execution of the Golden Sentry program. This includes host nation SCO providing mutual support by performing inventories of EEUM defense articles that are temporarily deployed within the SCOs assigned country, absent of any force protection issues which would endanger USG personnel performing EEUM inventories.