



DEFENSE SECURITY COOPERATION AGENCY
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21 June 2023

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

SUBJECT: Clarification to the Requirements for Submitting a CPOHOLD Request, Defense Security Cooperation Agency (DSCA) Policy, 22-22 [SAMM E-Change 562]

Reference(s): DSCA Policy 21-66 [SAMM E-Change 545], "Revision to Letter of Offer and Acceptance (LOA) Document Processing Performance Metric," September 16, 2021.

The purpose of this policy memorandum is to provide additional guidance for Implementing Agencies submitting requests to utilize the CPOHOLD milestone in DSAMS during the foreign military sales (FMS) case development process. The CPOHOLD milestone was introduced in the reference to capture the unique scenario where circumstances are preventing a Letter of Offer and Acceptance (LOA) document from moving forward in case development. A CPOHOLD must be requested by the Implementing Agencies (IA) with appropriate justification and must be approved by the DSCA Office of Administration, Chief Performance Office Directorate (ADM/CPO).

The attached SAMM change (E-Change 562) provides updates that requires IAs to submit additional information for a CPOHOLD request and clarifies the processing time for DSCA's review.

This policy memorandum supersedes the reference and is effective immediately. If you have questions or need additional information regarding this memorandum, please contact Ms. Vu-Tuyet Nguyen, DSCA (ADM/CPO), vu-tuyet.t.nguyen.civ@mail.mil, (703) 380-9628.

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Date: 2023.06.21 14:58:04 -04'00'

Jason Marker,
Chief Performance Officer
Deputy Assistant Director,
Office of Administration

Attachment:
As stated

Security Assistance Management Manual (SAMM), E-Change 562
Clarification to the Requirements for Submitting a CPOHOLD Request

1) Replace C5.4.2.2. (and subsections) as follows:

Current Wording:

C5.4.2.2. Holds During Case Development. Recognizing that there will be times when circumstances outside our control will keep the USG from meeting the standard timeframes, case development standards (see Table C5.T6.) are set at 85 percent (vice 100 percent). In rare circumstances, there may be instances where the IA is unable to complete any further processing on an LOA document. In these cases, the IA may request that DSCA enter a CPOHOLD in DSAMS to track this time period. The request must be unique in nature (such as a Hold by a member of Congress, USD policy position, etc.) and cannot be a part of a routine or standard process (such as standard/mandatory Congressional Notification or Technology Security and Foreign Disclosure processes, etc.).

C5.4.2.2.1. CPOHOLD Criteria. A CPOHOLD milestone can only be approved and entered by DSCA/ADM/CPO. Entry of this milestone and tracking of the start and end dates will allow DSCA/ADM/CPO to determine, on a document-by-document basis, whether the captured time should be deleted from the case development performance metrics. Requests submitted for a CPOHOLD must include assertion that no further processing (parallel or sequential) is possible and include an endorsement from their organization's security cooperation policy office or other appropriate office assigned for consistent review and approval of IA CPOHOLD requests. Multiple CPOHOLDS can occur at the same time to reflect different process impediments.

C5.4.2.2.2. CPOHOLD Submission Requests. DSCA/ADM/CPO is responsible for reviewing all requests for a CPOHOLD and for making a determination to approve or disapprove. IAs must submit the requests for CPOHOLD to the DSCA CPO LOA Hold Mailbox, dscanrcpo.mbx.cpo-hold@mail.mil. The following information must be included in the request:

- 1) Case identifier,
- 2) Reason for request,
- 3) Justification for why the issue is out of DSCA and/or IA control and further processing is not possible,
- 4) Estimated timeframe when this issue/action will be resolved,
- 5) Endorsement from IA leadership, and

- 6) Point of contact who will provide updates and respond to queries for status.

C5.4.2.2.3. CPOHOLD Processing. DSCA/ADM/CPO will acknowledge receipt of the requests for CPOHOLDS within 24 business hours. DSCA/ADM/CPO will review the request and, if necessary, will reach out to the subject matter experts (SMEs) for their input, and provide a response to the IA within 5 calendar days of receipt. If the request is approved, DSCA/ADM/CPO will post the CPOHOLD start date in DSAMS, including comments and reasons for the hold, and notify the IA. If the request is denied, DSCA/ADM/CPO will provide an explanation to the submitter via e-mail. For approved CPOHOLDS, the IA will provide an update on the status of the issue to DSCA/ADM/CPO on a monthly basis until the issue has been resolved and the hold can be lifted. An e-mail from the IA to DSCA/ADM/CPO is sufficient for providing these updates. Once the issue has been resolved, the IA will notify DSCA/ADM/CPO and provide supporting documentation. DSCA/ADM/CPO will post the CPOHOLD end date in DSAMS.

Revised Wording:

C5.4.2.2. Holds During Case Development. Recognizing that there will be times when circumstances outside our control will prevent the USG from meeting the LOA development standard timeframes, DSCA established a standard (see [Table C5.T6.](#)) that are set at 85 percent of the time (vice 100 percent). In rare circumstances, there may be instances where the IA is unable to complete any further case development processing of an LOA document due to a unique constraint. In these instances, the IA may request that DSCA grant a CPOHOLD.

C5.4.2.2.1. CPOHOLD. A CPOHOLD milestone captures the period of time in DSAMS where no further case development processing (parallel or sequential) can take place, thereby excluding that time from performance metrics. These circumstances must be unique in nature (e.g., on hold by a member of Congress, Under Secretary of Defense policy position, etc.) and cannot be a part of a routine or standard process (e.g., Congressional Notification or Technology Security and Foreign Disclosure processes, etc.). A CPOHOLD can only be approved by DSCA (Office of Administration, Chief Performance Office Directorate (ADM/CPO)). Requests must include an endorsement from the IA's Security Cooperation policy office. Multiple CPOHOLDS can occur at the same time to reflect different process constraints.

C5.4.2.2.2. CPOHOLD Requests. DSCA (ADM/CPO) is responsible for reviewing all CPOHOLD requests and for making a determination to approve or disapprove. The IA is responsible for conducting all necessary research and providing all necessary information/justification to DSCA (ADM/CPO) for review and consideration. The IA Security Cooperation policy office must submit the CPOHOLD requests to the DSCA CPO LOA Hold Mailbox, dscn.ncr.cpo.mbx.cpo-hold@mail.mil. The "subject" line of the e-mail must specify the case identifier and document type/number associated with the request. The following information must be included in the request:

1. Case identifier, and document type/number,
2. Reason for request,
3. Date the issue was first identified,
4. Justification for why the issue is out of DSCA and/or IA control and further processing is not possible,
5. If the justification is related to Congressional Notification (CN), and there is an associated CN Transmittal Number, then it must be included,
6. Date that all case development processing (parallel or sequential) stopped,
7. The step in the case development process (e.g., LOAD, Review Status, etc.) when processing stopped,
8. Estimated timeframe when the issue will be resolved,
9. Endorsement from IA Security Cooperation Policy Office,
10. IA point of contact who will provide updates and respond to queries for status, and
11. Additional supporting information that may be used to determine whether or not a case warrants a CPOHOLD.

C5.4.2.2.3. CPOHOLD Processing. DSCA (ADM/CPO) will acknowledge receipt of the CPOHOLD request through e-mail within three business days. If the request does not include the required information as indicated in the above table, DSCA (ADM/CPO) will notify the IA and will not consider the request until all required information is received. Once a complete request is received, DSCA (ADM/CPO) will review and, if necessary, coordinate with pertinent subject matter experts for their input. A decision will be provided to the IA within five business days of receipt of a complete request. If the request is denied, DSCA (ADM/CPO) will provide an explanation to the submitter through e-mail.

C5.4.2.2.3.1. CPOHOLD in DSAMS. If the CPOHOLD request is approved, DSCA(ADM/CPO) will post the CPOHOLD milestone in DSAMS to start the hold time and include reasons for the hold. The CPOHOLD start date will be when all case processing stopped. When DSCA is notified that the issue has been resolved or the CPOHOLD milestone is no longer needed, DSCA (ADM/CPO) will post the CPOHOLDREM milestone to stop the hold time.

C5.4.2.2.3.2. For approved CPOHOLDS, the IA will provide an update on the status of the issue preventing case development from proceeding to DSCA (ADM/CPO) on a monthly basis until the issue has been resolved. An e-mail from the IA to the CPOHOLD mailbox is sufficient for providing these updates. Once the issue has been resolved, the IA will notify DSCA(ADM/CPO) and provide the date of resolution and supporting documentation, if available.