



DEFENSE SECURITY COOPERATION AGENCY

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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
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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: Security Cooperation Transfer of Animals Policy, DSCA 24-55 and E-Change 639

REFERENCE: a) Defense Security Cooperation Agency [Policy Memorandum 23-18](#),
Suspension and Prohibition on Transfer of Animals Under Title 10 Building
Partnership Capacity (BPC) Authorities, February 6, 2023

This policy supersedes Defense Security Cooperation Agency Policy Memorandum 23-18 (reference (a)), and establishes Security Assistance Management Manual (SAMM) guidelines for Department of Defense (DoD) animal transfers to allies and partners. This policy applies to all temporary or permanent transfers under Title 10 security cooperation and Title 22 security assistance authorities.

Effective immediately, DoD will not review or approve any Title 10 or Title 22 Building Partner Capacity (BPC) memorandums of request (MORs) for animal transfers for any stated purpose. For Foreign Military Sales (FMS) cases, DoD will only consider Letters of Request (LORs) for working dogs.

Consistent with prior policy determinations, Foreign Military Financing (FMF) remains restricted source of funding for the care of animals (see [Table C9.T10](#)). If a partner would like

to submit a FMF Letter of Request for a working dog, the Security Cooperation Organization should initiate an early discussion of the request to use FMF funds with DSCA International Operations and Department of State, Bureau of Political and Military Affairs to confirm that the partner's funds will be provided for the on-going care and sustainment of the FMF purchased working dogs. See guidance in [Section C9.7.2.9.6. Restrictions on the Use of Foreign Military Financing](#).

Due to the highly specialized nature of working dogs, LORs that contain such requirements are subject to additional scrutiny and requirements. An LOR with working dog requirements must be supplemented by a detailed long-term care and sustainment plan outlining the Purchaser's plans to address a wide range of employment and sustainment considerations. The Implementing Agency and Program Office will review the Purchaser's long-term care and sustainment plan and evaluate that plan against the corresponding United States Military Department's current internal guidance, regulations, and standard of care for working dogs. This review of the purchaser's plan and a mandatory pre-site survey will be used to determine if case development in the Defense Security Assistance Management System is approved or if additional improvements are required. Further, working dogs will be subject to an annual health and welfare check by a designated United States Government representative until the animal's planned retirement which extends beyond the routine End Use Monitoring program requirements. Finally, this policy directs the activation and use of a new working dogs' entry in the Military Articles and Service List for tracking and reporting purposes.

This memorandum establishes guidance for case planning and development, animal health and welfare monitoring requirements, and a mandatory note in SAMM Appendix 6 for all Foreign Military Sales (FMS) LOAs that include transfer of working dogs. The policy in the attachment is incorporated into the SAMM at <https://samm.dscamilitary.com>.

If you have questions regarding this memo or for general questions about the SAMM, please contact DSCA (Office of Strategy, Plans, and Policy, Execution Policy and Analysis Directorate (SPP/EPA)) at dscanecr.spp.mbx.epa@mail.mil. Please reference the DSCA Policy Number and Memo Subject.



David Ferrari
Assistant Director
Strategy, Plans, and Policy

Attachment: Security Assistance Management Manual E-Change #639

Attachment: Security Assistance Management Manual E-Change #639

- 1) Add the following section to Chapter 4:

C4.4.19. Working dogs. A working dog is a specially trained canine bred, procured, or acquired to perform various tasks and duties in support of military operations. Training areas for working dogs include protection of military installations, resources, and personnel, explosive detection, illegal narcotic detection, search and rescue, patrol, and tracking. Only FMS Purchasers are eligible to obtain working dogs and must be willing to allow the USG to conduct an initial pre-site survey and inspection of any kennel facility prior to delivery of the animals. The IA, in consultation with the SCO and DSCA (Office of Administration, Performance Improvement and Effectiveness Directorate, Assessment, Monitoring and Evaluation Division (DSCA/ADM/PIE/AME)), will conduct the required site surveys, inspections, and annual welfare checks. For BPC programs see [Section C15.2.6.1. Prohibition on Animal Requirements.](#)

- 2) Add the following to Chapter 5:

C5.1.3.6. Letter of Requests with Working Dog Requirements. An LOR for a working dog must include a supplemental detailed long-term care and sustainment plan that enumerates the Purchaser's plans for veterinary care, facilities, training, current certifications for all human handler or the associated training plan to qualify the requisite number of human handlers, concept of operations, and schedule of planned use. The Purchaser must also outline plans for retirement at the end of the planned useful working life of the animal. LORs that include requirements for working dogs may be denied if the long-term care and sustainment plan of FMS purchaser does not adequately address the budget available for the ongoing sustainment and care of the animals. See [Figure C5.F15.](#) for a LOR Planning Checklist for Working Dog Animal Requirements.

C5.1.3.6.1. The long-term care and sustainment plan will be reviewed and evaluated by the Implementing Agency (IA) and Program Office for completeness and consistency with the corresponding United States Military Department (MILDEP)'s current internal guidance, regulations, and standard of care for working dogs. The IA and Program Office will work with the partner to update the Purchaser's long-term care and sustainment plan if any aspects of the Purchaser's plan are inconsistent with the MILDEP's guidance, regulations and standards of care for working dogs. An initial pre-site survey is required to review a proposed kennel or for the construction of a few facility (See [Table C9.T2a.](#) for guidance on the appropriate funding source). The IA will conduct the initial pre-site survey and include the DSCA (Office of Administration, Performance Improvement and Effectiveness Directorate, Assessment, Monitoring and Evaluation Division (DSCA/ADM/PIE/AME)) personnel for coordination. The IA, in coordination with the SCO will use the long-term care and sustainment plan and pre-site survey results to determine if the LOR is actionable and if the case development process should be initiated in the Defense Security Assistance Management System.

- 3) Insert and add to the following as Figure C5.F15. Renumber the remaining other figures in chapter 5.

Figure C5.F15. Requirements for Long Term Care Plan for a Letter of Request with Working Dog Animal Requirements

Requirements for Long Term Care Plan for a Letter of Request with Working Dog Animal Requirements

To ensure the ethical and humane treatment of working dogs, requires careful planning and consideration. A Foreign Military Sales (FMS) Purchaser's request for working dogs must include a detailed supplemental long-term care and sustainment plan which will be evaluated against the USG's standards of care for working dogs.

Applicable guidance will include but is not limited to:

- The current versions of Department of Defense Directive ([DoDD](#)) 5200.31E: [DoD Military Working Dog \(MWD\) Program](#) and the applicable current Military Department guidance:
 - [Marine Corps Military Working Dog Manual, Marine Corp Order \(MCO\) 5585.5](#)
 - [Office of the Chief of Naval Operations Instruction \(OPNAVINST\) 5585.2C: Department of the Navy Military Working Dog Program,](#)
 - [Department of the Air Force Instruction \(DAFI\) 31-121: Military Working Dog Program,](#)
 - Military Working Dog Program: [Army Regulation 190-12](#)).

The Purchaser's supplemental long-term care and sustainment plan must elaborate on the following minimum key planning considerations:

- Housing/kenneling facilities. Working dogs must have appropriate living conditions and housing facilities that meet their physical and psychological needs. The facilities must be clean, comfortable with adequate space, bedding, provide protection from extreme weather conditions and encourage regular exercise, socialization, and mental stimulation. The housing facilities must also maintain physical security and controlled access with substantially the same degree of security protection the United States provides. Specific requirements for storage of the canines must be agreed upon by the USG prior to delivery of the animals. The standards will at least address the following elements:
 - Continuous intrusion detection and electronic or human surveillance, day and night. Coverage provides immediate response to any attempted unauthorized intrusion. The facility will maintain the capability to render immediate attention to an animal in physical distress and seek immediate veterinary medical assistance if required. The facility will maintain continuous ability to feed, water, and care for the animals.
 - Lighting/Fencing. Doors and locking hardware should be consistent with the structural security requirements for buildings (as outlined in the Military

Department's current instructions and guidance). Keys must be readily available in case of an emergency.

- Confirmation that drug and/or explosives training aids will not be stored in the same facilities.
- New Facility construction. Designs for any new facilities will be consistent with Department of Defense approved design manuals and reviewed by the Army Corp of Engineers, Naval Facilities Engineering Systems Command or Air Force Civil Engineering Center for compliance with DoD regulations and standards.
- Controlled Access. The Purchaser shall outline procedures to establish and control a roster of all personnel who are authorized access to the animals. The access roster will be kept to a minimum number of personnel in order to complete their duties.
- Comprehensive Training Program. In addition to any requesting training, the Purchaser will outline any additional or planned training events or exercises designed to strengthen the bond between handlers and dogs and maintain the animal's specialized training skills.
- Handler training, education and certification. The Purchaser shall outline the educational requirements for the handlers to ensure they are trained in dog behavior, health, and welfare to enhance their understanding of the needs and requirements of working dogs. The Purchaser should also elaborate on plans to provide ongoing support, training, and resources to handlers so they may provide the best possible care and treatment for the working dogs in their care.
- Concept of operation and deployment considerations. The proposed concept of operations must account for appropriate transportation, acclimatization, and rest periods during deployments and provide any necessary protective equipment to mitigate the risk of injury to the working dogs during planned work or deployment.
- Schedule of planned use, rest, and recovery periods. Regular rest and recovery periods for any working dog must be accounted for in the proposed duty schedule. Adequate downtime allows for physical and mental recuperation, reducing the risk of fatigue, stress, and injuries to the animal.
- Nutritional considerations. The Purchaser will outline plans to provide access to high quality food to meet the nutritional needs of the working dogs, taking into account the level of activity based upon the concept of operations and schedules of planned used. Fresh water will be provided at all times for working dogs confined in kennels or other facilities.
- Adequate healthcare and veterinary support. The Purchaser must outline plans to provide regular veterinary care, including routine check-ups, vaccinations, and preventive treatments for parasites. The care plan must outline the established protocols for immediate medical attention and emergency veterinary care when needed as well as access to specialized veterinary services for injuries or other health conditions.
- General welfare/monitoring visits. To support and monitor the health and well-being of the working dogs, the Purchaser will confirm they will submit to at a minimum

annual monitoring health and welfare checks by a designated USG representative (e.g. the Security Cooperation Office (SCO), Implementing Agency (IA), program office personnel, or a designated alternate). The annual welfare check will be to ensure appropriate physical conditions, internal controls, and health and safety measures remain in place where the animals are store and employed. This unique monitoring requirement is separate from any of the requirements for routine End Use Monitoring (EUM) and the associated temporary duty travel costs for these annual welfare checks must be included in the case manpower travel data sheet as a direct case cost. Veterinary health care records and accountability documentation maintained by the purchaser must be retained for at least three-years and will be made available for review upon U.S. Government request.

- Retirement and post-service placement. The FMS purchaser must specify their intent and plans for post-service placement and retirement of the working dogs. The FMS purchaser must specify if they intend to apply for a change in end use and a third-party transfer from the partner government to a non-state or private entity to enable adoption (see [Section C8.7.4. Third Party Transfer Requests Government-to-Non-States or Private Entities](#)). Six months prior to planned retirement (based on the estimated animal's anticipated useful life) the Purchaser must obtain approval from the Department of State and meet U.S. Military Working Dog standards, if a third-party transfer government to non-state or private entities as outline in [Section C8.7.4.](#) to enable adoption by an international organization or an approved handler within the partner country.
- Ongoing sustainment budget. The Purchaser must confirm the amount and availability of funds for the ongoing sustainment, healthcare, training, and general welfare of the working dogs based on the estimated anticipated useful life of the animals.

By incorporating these planning considerations into a comprehensive long-term care and sustainment plan, the FMS Purchaser will outline their commitment to promoting the ethical and humane treatment of any working dogs, ensuring physical and psychological well-being throughout the service life and beyond for the animals.

- 4) Add the following section to Chapter 15 and renumber remaining subsections accordingly.

C15.2.6.1. Prohibition on Animal Requirements. Due to the limited period of performance for BPC funded programs, BPC cases cannot not adequately plan and account for the associated long-term care and sustainment concerns associated with the transfer of animals (e.g. ceremonial, working animals such as working dogs, other animals used for detection or counter maneuvers etc.). If proposals for desired capabilities include any requirements for animals the Requesting Authority must work with the Combatant Command, DSCA and Implementing Agencies to identify alternative capabilities.

- 5) Military Article and Service List (MASL) entry 88200001DD0GS is deactivated. All future cases with Working Dogs will use MASL: **882000ANMLDOG**

6) Add row CE49 to C9.T2A. as follows:

Row	Activity	Admin*	Case	Non-Standard	Frequency
Case Execution					
CE49	Annual and periodic health/safety inspections for working dogs.		X		

7) Add the following note to Appendix 6, LOA Notes:

Transfer of Working Dogs

Note Usage
FMS: Yes BPC: No Mandatory for all LOAs that include working dogs.
References
See Section C5.1.3.6. Letter of Requests with Working Dog Requirements
Note Input Responsibility
CWD
Date Range of Use
All
Note Text
<p>The Purchaser understands that working dogs are specialized defense articles that require additional controls. The Purchaser agrees to comply with all qualifications, accountability, training records for the handlers and animals, long-term budgeting for animal care and sustainment, end-use requirements, and retirement requirements associated with canines for the life of the animal. Additionally, the Purchaser agrees to allow the United States Government (USG) to perform annual and other periodic healthy/safety inspections and general welfare checks to ensure the ethical and humane treatment of the working dogs that may include on the job assessments and video or photographic documentation.</p> <ol style="list-style-type: none"> 1. <u>Site Certification.</u> Prior to the delivery of the working dogs, a physical site delivery certification/assessment will be performed by the USG to verify the animals will be placed in an adequate facility. A copy of the approved physical site certification will be kept on-site at each operational location and is reviewable at any time during welfare monitoring checks by designated USG representatives.

2. Physical Security/Access Control. The animals shall be housed in facilities that are at least substantially the same degree of security protection the United States provides. Specific requirements for storage shall be agreed upon by the USG prior to delivery of the animals. The standards will at least meet the following:
 - a. Continuous intrusion detection and electronic or human surveillance, day and night. Coverage provides immediate response to any attempted unauthorized intrusion. The facility maintains the capability to render immediate attention to an animal in physical distress and seek immediate veterinary medical assistance if required. The facility will maintain continuous ability to feed, water, and care for the animal.
 - b. Lighting/Fencing. Doors and locking hardware should be consistent with the structural security requirements for buildings used by DoD. Keys must be readily available in case of an emergency.
 - c. Drug and/or explosives training aids will not be stored in the same facilities.
 - d. New Facility construction. Designs will be consistent with DoD approved design manuals and reviewed by the Army Corp of Engineers for compliance with DoD regulations and standards.
 - e. Access. The Purchaser shall establish a roster of all personnel who have been authorized access to the animals. The access roster will be kept to a minimum number of personnel in order to complete their duties.
3. Nutrition. The Purchaser will provide quality food to meet the energy needs of the working dogs, taking into account the level of activity based upon the concept of operations and schedules of planned used. Fresh water must be provided at all times for working dogs confined in kennels or other facilities.
4. Adequate Healthcare and Veterinary Support. All animals will receive regular, routine veterinary care, to include routine check-ups, vaccinations, and preventive treatments for parasites. The Purchaser will also provide immediate medical attention and emergency veterinary care when needed as well as access to specialized veterinary services for injuries or other health conditions.
5. Retirement and post-service placement. Six months prior to planned retirement (based on the estimated animal's anticipated useful life) the Purchaser will contact the Department of State to initiate a third-party transfer government to non-state or private entities as outline in [Section C8.7.4](#), to enable adoption by an international organization or an approved handler within the partner. The Partner also agrees to notify the Implementing Agency and DSCA and provide a report of the circumstances if the canine passes away prior to the anticipated retirement date.