

DEFENSE SECURITY COOPERATION AGENCY

2800 DEFENSE PENTAGON WASHINGTON, D.C. 20301-2800

12 AUG 2025

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: Defense Security Cooperation Agency Memorandum 25-39, Removing Manpower Travel Data Sheet Reporting Requirement for Building Partner Capacity Cases [SAMM E-Change 754]

This memorandum removes the requirement for developing a Manpower Travel Data Sheet (MTDS) for Building Partner Capacity (BPC) Letters of Offer and Acceptance (LOAs). The MTDS is a standardized format for capturing and auditing case-funded manpower costs. For BPC LOAs, however, the costs for these types of activities are researched, validated and reported to DSCA and Congress before BPC LOA development begins, thereby making MTDS reporting on an LOA duplicative. Additionally, this memorandum updates existing guidance regarding Status of Forces Agreement (SOFA) notes for Foreign Military Sale (FMS) and BPC LOAs to require their inclusion in specific circumstances, including when a SOFA exists between the USG and a benefitting partner and there is outside Continental United States Travel.

This memorandum is effective immediately upon publication. BPC cases that have already been implemented will not be subject to MTDS validation moving forward. For cases in Write status and in Development as of the date of the signature of this memo may proceed with MTDS entries if it is determined that returning the case back to the Implementing Agency to

remove the MTDS will trigger significant delays to case implementation. BPC modifications and amendments will no longer require an MTDS.

The policy in the attachment is incorporated into the SAMM at https://samm.dsca.mil. If you have questions on this guidance, please contact the Financial Policy & Regional Execution Directorate, Financial Policy Division (FPRE/FP) at dsca.ncr.obo.list.fpre-fp@mail.mil. For questions relating to the SAMM, please contact DSCA (Office of Strategy, Plans, and Policy, Execution Policy and Analysis Directorate (SPP/EPA)), dsca.ncr.spp.mbx.epa@mail.mil.

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Brian Watford Acting Chief Operating Officer and Chief Financial Officer

Attachment: SAMM E-Change 754

Attachment: Security Assistance Management Manual (SAMM) E-Change 754

Removing MTDS Reporting Requirement for Title 10 and Title 22 BPC (Changes highlighted in RED text)

1. Update Sections C9.4.2.4. through C9.4.2.4.3. per below:

From:

- **C9.4.2.4. Foreign Military Sales and Title 10 Building Partner Capacity Manpower Reporting Requirement.** Manpower requirements listed on LOAs are generated and validated through the Manpower Travel Data Sheets (MTDS) in the Defense Security Assistance Management System (DSAMS). The MTDS is in a standardized format for capturing and auditing all case-funded military, civilian, or USG contracted full-time equivalent (FTE) manpower, travel, and personnel support costs. Do not charge military salaries to Building Partner Capacity cases. Direct military labor costs are charged to applicable military personnel appropriations. MTDS data reporting requirements helps ensures USG or U.S. contracted personnel traveling overseas on case-funded activities are protected by Status of Forces Agreements (SOFA) or other status provisions, where applicable.
- **C9.4.2.4.1. Defense Security Cooperation Agency Review.** DSCA assesses costs contained in the MTDS for reasonableness and fairness and verifies consistency with the LOA. <u>Figure C9.F2.</u> depicts the MTDS format for manpower pricing and information. The LOA is provided to the foreign partner for signature. If the foreign partner requests the MTDS, the IA may provide the MTDS with an emphasis that it is a planning document.
- **C9.4.2.4.1.1.** DSCA will return LOAs with MTDS errors to the originating IA. Examples of MTDS errors include, but are not limited to: costs determined not fair and reasonable; incomplete MTDS DSAMS submission or data entries; and/or, personnel costs that significantly deviate from Office of Personnel Management (OPM) rates.
- **C9.4.2.4.1.1.1.** Reasonable Assessment of Personnel Costs. The average Work Year (WY) costs for a line is determined when the base personnel salary costs are divided by the number of Work-Years from the MTDS. DSAMS calculates the civilian fringe benefit rate on the base personnel salary costs (Step 5) for that Grade unless specific personnel costs are known. One WY is equivalent to 2087 personnel hours per year. Verify the average WY costs against the Office of Personnel Management General Schedule Table at Salaries and Wages. Non-executive federal employees are subjected to a salary limit equivalent to the pay cap for political officials, or Level IV of the Executive Schedule pay rate. When the average WY costs exceeds the annual salary cap for non-executive federal employees, the IA must provide the agency's specific legal authority in case remarks.

- **C9.4.2.4.1.1.2. Reasonable Assessment of Travel Costs.** Any line in which the average daily travel costs which exceeds \$1K per day, per person, and per trip must include specific details in the case notes which supports these costs.
- **C9.4.2.4.2. United States Government Contracted Manpower.** For contracted manpower, IAs are required to identify position or function, LOA line-item number, duration, total manpower cost, corresponding FMS or Title 10 BPC Case-Related Manpower Functions and Funding Source row number(s), and Continental United States (CONUS) and In-Country travel. The number of work years and travel costs are not required for USG contracted manpower. See <u>Table C9.T2a.</u> for FMS Case-Related Manpower Functions and Funding Source Manpower Matrix and <u>Table C9.T2b.</u> for Title 10 BPC Case-Related Manpower Functions and Funding Source Manpower Matrix.
- **C9.4.2.4.3. Amendments and Modifications.** The MTDS is required for all lines involving case-funded manpower being revised through Amendments and Modifications, whether an increase or decrease in scope for Amendments and whether an increase or decrease in price for Modifications. Revised lines must reflect the total manpower, travel (to include identifying CONUS and In-Country), and personnel support costs, not the differences between the previous and revised amounts.

To:

- C9.4.2.4. Foreign Military Sales and Title 10 Building Partner Capacity Manpower **Reporting Requirement.** For FMS cases, mManpower requirements listed on LOAs are generated and validated through the Manpower Travel Data Sheets (MTDS) in the Defense Security Assistance Management System (DSAMS). The MTDS is in a standardized format for capturing and auditing all case-funded military, civilian, or USG contracted full-time equivalent (FTE) manpower, travel, and personnel support costs. The MTDS is not required for Title 10 and Title 22 BPC cases because the costs for these types of activities are researched, validated and reported to DSCA and Congress before BPC LOA development begins. DSCA will validate auditability of all Title 10 and Title 22 BPC case-funded military, civilian or USG contracted FTE manpower, travel and personnel support costs via the planning documents used to define the program's requirements (e.g. Training and Equipment List, Memorandum of Requests, etc.). Do not charge military salaries to BPC Building Partner Capacity cases. Direct military labor costs are charged to applicable military personnel appropriations. MTDS data reporting requirements helps ensures USG or U.S. contracted personnel traveling overseas on casefunded activities are protected by Status of Forces Agreements (SOFA) or other status provisions, where applicable.
- **C9.4.2.4.1. Defense Security Cooperation Agency Review.** DSCA assesses costs contained in the MTDS or planning documents for reasonableness and fairness and verifies consistency with the LOA. Figure C9.F2. depicts the MTDS format for manpower pricing and information. The LOA is provided to the foreign partner for signature. If the foreign partner requests the MTDS, the IA may provide the MTDS with an emphasis that it is a planning document.
- **C9.4.2.4.1.1.** DSCA will return LOAs with MTDS manpower errors to the originating IA. Examples of manpower errors include but are not limited to: costs determined not fair

and reasonable; incomplete MTDS DSAMS submission or data entries; and/or personnel costs that significantly deviate from Office of Personnel Management (OPM) rates.

C9.4.2.4.1.1.1. Reasonable Assessment of Personnel Costs. The average Work Year (WY) costs for a line is determined when the base personnel salary costs are divided by the number of WYs from the MTDS or planning document. DSAMS calculates the civilian fringe benefit rate on the base personnel salary costs (Step 5) for that Grade unless specific personnel costs are known. One WY is equivalent to 2087 personnel hours per year. Verify the average WY costs against the Office of Personnel Management General Schedule Table at Salaries and Wages. Non-executive federal employees are subjected to a salary limit equivalent to the pay cap for political officials, or Level IV of the Executive Schedule pay rate. When the average WY costs exceed the annual salary cap for non-executive federal employees, the IA must provide the agency's specific legal authority in case remarks.

C9.4.2.4.1.1.2. Reasonable Assessment of Travel Costs. Any line in which the average daily travel costs which exceeds \$1K per day, per person, and per trip must include specific details in the case notes which supports these costs.

C9.4.2.4.2. United States Government Contracted Manpower. For contracted manpower, IAs are required to identify position or function, LOA line-item number, duration, total manpower cost, corresponding FMS or T10 BPC Case-Related Manpower Functions and Funding Source row number(s), and Continental United States (CONUS) and In-Country travel. The number of work years and travel costs are not required for USG contracted manpower. See <u>Table C9.T2a.</u> for FMS Case-Related Manpower Functions and Funding Source Manpower Matrix. and <u>Table C9.T2b.</u> for T10 BPC Case-Related Manpower Functions and Funding Source Manpower Matrix.

C9.4.2.4.3. Amendments and Modifications. For FMS cases, the MTDS is required for all lines involving case-funded manpower being revised through Amendments and Modifications, whether an increase or decrease in scope for Amendments and whether an increase or decrease in price for Modifications. Revised lines must reflect the total manpower, travel (to include identifying CONUS and In-Country), and personnel support costs, not the differences between the previous and revised amounts.

2. Update Table C9.T2B. Title 10 BPC Case-Related Manpower Functions and Funding Source Matrix per below:

Row	Activity	Organization	Title 10 BPC Program Support Costs	Title 10 BPC Case Costs	Performing Activity Title 10 Costs/Non-DSCA administered Title 10 funds (RDT&E, O&M, etc.)
CD6	Develop required case development package to include:	IAs/MILDEPs	X		
	Enter MOR/TEL data into DSAMS				
	2. Manpower Travel Data Sheet (MTDS), if applicable				

2.3. LOA checklists		
3.4. Special Defense Acquisition Fund (SDAF) financial analysis worksheet (if applicable)		

3. Update Chapter 15 Legacy per below:

From:

C15-Legacy.3.2.2. IAs will use DSCA-approved costs required for each category to include on program-wide support cases, using the established Military Articles and Services List (MASLs). While direct funding will be provided for all administrative program support costs, a Manpower Travel Data Sheet (MTDS) will be required for all non-severable costs (e.g. engineering support costs) included on BPC program cases. In no circumstance shall the period of performance of USG-provided services exceed the POA of the appropriation funding such services if they are being executed under the authority of the Economy Act.

To:

C15-Legacy.3.2.2. IAs will use DSCA-approved costs required for each category to include on program-wide support cases, using the established Military Articles and Services List (MASLs). While dDirect funding will be provided for all administrative program support costs., a A Manpower Travel Data Sheet (MTDS) will is not be required for all non-severable costs (e.g. engineering support costs) included on BPC program cases as previously validated in the case planning phase. In no circumstance shall the period of performance of USG-provided services exceed the POA of the appropriation funding such services if they are being executed under the authority of the Economy Act.

4. Update Table C15-Legacy.T3. Instructions for Preparing Building Partner Capacity Cases

#	Item	Use
17	Charges on the Case	Title 22 funded cases will apply "below-the-line" surcharges for PC&H FMS Administrative Surcharge; Transportation; or other accessorial charges unless otherwise specified and provided as a separate line on the LOA.
		Title 10 funded cases will override any "below-the-line" surcharges effective 14 August 2020. PC&H, and transportation costs will all be included on separate direct charge support cases. Manpower Travel Data Sheets are not required.
		*BPC Administrative and CAS funding will be issued directly to the IA.

5. Update Chapter 15 per below:

From:

C15.3.8.1. Title 10 Building Partner Capacity Case-Related Manpower Functions and Funding Source Matrix. For Title 10 BPC, the BPC Activity Matrix (BAM) table describes Title 10 BPC case-related activities/functions and their proper source of funding. The activities/functions listed in Table C9.T2b. under the "Title 10 BPC Program Support Costs" and "Performing Activity Title 10 Costs" columns represent indirect costs funded by the DoD Title 10 appropriated funds and should not be included and/or priced as direct costs on the BPC case. The activities/functions listed in Table C9.T2b. under the "Title 10 BPC Case Costs" column represents direct costs funded by the DoD Title 10 appropriated funds made available to support Benefitting Partners and should be included as lines on the BPC case. Requests for funding clarification regarding this table and possible funding alternatives or exemptions must be coordinated with the DSCA (OBO/FPRE/FP).

To:

C15.3.8.1. Title 10 Building Partner Capacity Case-Related Manpower Functions and Funding Source Matrix. For Title 10 BPC, the BPC Activity Matrix (BAM) table describes Title 10 BPC case-related activities/functions and their proper source of funding. The activities/functions listed in Table C9.T2b. under the "Title 10 BPC Program Support Costs" and "Performing Activity Title 10 Costs" columns represent indirect costs funded by the DoD Title 10 appropriated funds and should not be included and/or priced as direct costs on the BPC case. The activities/functions listed in Table C9.T2b. under the "Title 10 BPC Case Costs" column represents direct costs funded by the DoD Title 10 appropriated funds made available to support Benefitting Partners and should be included as lines on the BPC case. Manpower information for BPC cases will be reviewed/validated as part of the case planning process; no separate MTDS sheet is required. Requests for funding clarification regarding this table and possible funding alternatives or exemptions must be coordinated with the DSCA (OBO/FPRE/FP).

6. Update Table C15.T3A. Instructions for Preparing Building Partner Capacity Materiel Cases per below:

#	Item	Use
12	Direct Charges	BPC cases include any direct charges as allowed in Chapter 15 and Chapter 15-Legacy, but do not require a Manpower Travel Data Sheet.
12 13	Indirect Charges	BPC cases will not include any indirect charges for transportation, Packing, Crating and Handling (PC&H), Contract Administration Surcharge (CAS), and BPC Administrative funds. PC&H and transportation costs will all be included on separate direct charge support cases. BPC Administrative and CAS funding will be issued directly to the IA.

13 14	Military Approval (MILAP)	Once the IA enters the MILAP milestone, the BPC case will move to Writing Status (WSTATUS). The IA will upload the LOA checklist, relevant planning documentation such as a memorandum of request (MOR), or final Training and Equipment List (TEL), and any required supporting documentation such as waivers/approvals in the CTS. This
		supporting documentation such as waivers/approvals in the CTS. This kicks off the writing process with DSCA (IOPS/GEX/CWD) prior to formal review with DSCA reviewers, the IA, and State.

7. Add the following in Appendix 8:

<u>ASFF.6.3.</u> Any Overseas travel required to close the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

<u>CRSP.6.4.</u> Any Overseas travel required to support the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

<u>CTEF.6.3.</u> Any Overseas travel required to support the program require <u>Foreign Clearance Guide</u> (USG Access Only) approval.

MSI.6.1.1. Any Overseas travel required to support the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

<u>PKO.6.2.</u> Any Overseas travel required to support the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

S321.6.2. Any Overseas travel required to support the program require Foreign Clearance Guide (USG Access Only) approval.

<u>S332.6.2.</u> Any Overseas travel required to support the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

<u>S333.6.8.1.</u> Any Overseas travel required to support the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

<u>S345.6.2.</u> Any Overseas travel required to support the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

<u>USAI.6.3.</u> Any Overseas travel required to support the program require <u>Foreign Clearance</u> <u>Guide</u> (USG Access Only) approval.

8. Update Appendix 6 LOA Note "Status of Forces Agreement (SOFA)" per below:

Foreign Military Sales	Yes
Building Partner Capacity	Yes
Note Input Responsibility	CWD
Date Range of Use	All
References	See Section <u>C5.4.7.7.</u>

Note Usage Instructions for Documents

Mandatory for Foreign Military Sales (FMS) and Building Partner Capacity (BPC) Letters of Offer and Acceptance (LOAs) when a Status of Forces Agreement (SOFA) exists between the USG and the partner and outside Continental United States travel is indicated on a case line description.

Mandatory for Amendments and Modifications when the note was not previously included on the case and the DSCA (Front Office, Office of the General Counsel (FO/OGC)) indicates a SOFA or SOFA-like agreement exists that is pertinent or unless the latest version of the note is not on the Implemented Version.

Note Text

"Per agreement between the U.S. and [Purchaser/Benefitting Partner] governments, U.S. Government military and civilian personnel present in the territory of [insert name of purchaser/Benefitting Country Partner] for the purpose of implementing this [Building Partner Capacity (BPC) Letter of Offer and Acceptance (LOA)/Letter of Offer and Acceptance (LOA)] will be entitled to all of the rights, privileges, and immunities accorded in the [cite the agreement] regarding the status of forces, dated [insert date] and any related implementing agreements."