DEFENSE SECURITY COOPERATION AGENCY
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MAR 12 2020

MEMORANDUM FOR: COMMANDERS OF THE COMBATANT COMMANDS
DEPUTY ASSISTANT SECRETARY OF THE ARMY FOR DEFENSE EXPORTS AND COOPERATION
DEPUTY ASSISTANT SECRETARY OF THE NAVY FOR INTERNATIONAL PROGRAMS
DEPUTY UNDER SECRETARY OF THE AIR FORCE FOR INTERNATIONAL AFFAIRS
DIRECTOR, DEFENSE CONTRACT MANAGEMENT AGENCY
DIRECTOR, SECURITY ASSISTANCE, DEFENSE FINANCE AND ACCOUNTING SERVICE
DIRECTOR, DEFENSE INFORMATION SYSTEMS AGENCY
DIRECTOR, DEFENSE THREAT REDUCTION AGENCY
DIRECTOR, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY
DIRECTOR, MISSILE DEFENSE AGENCY
DIRECTOR, DEFENSE LOGISTICS AGENCY
DIRECTOR, DEFENSE LOGISTICS INFORMATION SERVICE
DIRECTOR, DEFENSE LOGISTICS AGENCY DISPOSITION
DEPUTY DIRECTOR FOR INFORMATION ASSURANCE, NATIONAL SECURITY AGENCY

SUBJECT: Program Execution Requirements under 10 U.S.C § 333, DSCA Policy 20-15

REFERENCES:

(a) National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2017, Public Law 114-328
(b) Chapters 11 (Special Programs and Services) and 15 (Building Partner Capacity Programs) of the Security Assistance Manual (SAMM)
(c) Interim Clarification on 10 USC § 333, DSCA Policy 18-38
(d) Interim Clarification on Methods of Execution under 10 USC § 333, DSCA Policy 19-12
(e) 10 U.S. Code § 333. Foreign security forces: authority to build capacity

Effective immediately, this memorandum implements the attached program execution requirements for programs pursuant to Title 10, Chapter 16, Section 333 (Section 333, Train & Equip) authority. The attached program execution requirements will be included in a future comprehensive revision to Chapters 11 and 15 of the Security Assistance Management Manual (SAMM) to reflect Fiscal Year (FY) 2017 National Defense Authorization Act consolidation of multiple authorities and its impact on execution.

Security Cooperation Account Program Efficiency

As the Department of Defense (DoD) continues to implement the National Defense Strategy, DSCA must use funds efficiently to support the implementation and execution of the Security Cooperation (SC) Account (renamed as the National Defense Strategy Implementation Account in FY 2021). Beginning in FY 2020, DSCA aims to increase the obligation rate of

programs funded from the SC Account in order to mitigate future rescissions. DSCA stands ready to work with the Implementing Agencies (IAs) and other implementers to improve program execution and minimize unused funds that could be realigned to support other priorities.

Program Obligation Rates

Congress, the Office of the Secretary of Defense-Cost Assessment and Program Evaluation and the Office of the Under Secretary of Defense for Comptroller use obligation rates to evaluate program performance, determine current year rescissions, and inform future appropriations. Stakeholders measure obligation rates as a percentage of the appropriated budget for the SC Account. While DoD has until the end of the FY to obligate expiring funds, stakeholders use obligation rates at the end of the 3rd Quarter of each FY to inform next year appropriation decisions. As such, the IAs should strive to obligate 80 percent of expiring funds by June 30 of each year.

Each year, DSCA will hold two mid-year reviews to review progress on executing programs consistent with Congressional Notifications. During these reviews, DSCA and the IAs will identify the total value of funds the IAs require to execute programs by June 1, and will ask the IAs to commit to obligate at least 90 percent of those funds by September 30. During the mid-year reviews, DSCA and the IAs will identify residual and undistributed funds no longer required at the program level and facilitate reallocation of funds against other priority requirements.

Program Execution Monitoring and Milestones (PEMMs)

The attached Program Execution Monitoring and Milestones (PEMMs) document provides specific metrics DSCA will use to monitor the efficiency of funds execution and details the required milestones associated with Section 333 program execution. DSCA will review the PEMMs annually to ensure execution practices remain current.

If you have any questions concerning this guidance, please contact Ms. Caroline Chin, DSCA-SPP/SPI, caroline.s.chin.civ@mail.mil, (703) 697-9073 or Ms. Gunda Seng, DSCA-BPC/CDD, gundega.a.seng.civ@mail.mil, (703) 697-9707.

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Attachments:
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Section 333 Program Execution Monitoring and Milestones (PEMMs)

The below document establishes the required milestones for developing and executing Building Partnership Capacity (BPC) programs under the authority of 10 U.S.C § 333. It also establishes the metrics DSCA will use beginning in Fiscal Year (FY) 2020 to monitor Section 333 program performance, as required by law.

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Undistributed funds are funds originally designated for a specific program on the Congressional Notification but have not been placed on a case or sent via direct funds transfer. These funds are still available to the Department of Defense (DoD) in support of the specific notified program. If the program no longer needs the funds based on revised Pricing and Availability (P&A), the Congressional Notification program value is reduced and those funds may fund other priority requirements.

Requirements Generation

The Geographic Combatant Commands (GCCs), the Implementing Agencies (IAs), and non-traditional implementers must follow the processes set forth below when developing Section 333 programs.

Training & Equipment List (TEL) Development

The TEL is the core of the Memorandum of Request (MOR) for Section 333 programs. It is the primary document translating desired capabilities to specific acquisition requirements. The GCC must verify TEL content and submit them to DSCA within published timelines, and in accordance with the Security Assistance Management Manual (SAMM) Chapter 15. Training and equipment requirements not included in the final TEL submission from the GCC will not be

notified to Congress for Congressional approval. Section 333-funded activities may not proceed with execution prior to Congressional approval.

One TEL is required per unit. DSCA will not accept TELs that include equipment for several units. Delivery of equipment, training, services, supplies, small-scale construction and human rights training are tied to the specific unit included on the original Congressional Notification. A unit not included in the Congressional Notification may not receive any equipment, training, defense services, supplies, or small-scale construction.

Each unit receiving assistance under each Congressionally-approved Section 333 program is statutorily required to receive training on the law of armed conflict, human rights and fundamental freedoms, the rule of law, and civilian control of the military ("human rights training"). Prior to Congressional notification, the Defense Institute of International Legal Studies (DIILS) will review the proposed assistance package and determine the appropriate level of human rights training. There are three levels of human rights training – basic, intermediate, and advanced - which involve a 2-hour basic training requirement up through a 2-day-plus advanced training requirement.

For programs requiring the basic-2 hour block of human rights training, the GCC, SCO or non-traditional implementer must identify a point of contact (POC) on the TEL that will be responsible for 1) receiving the DIILS-approved basic 2-hour human rights training curriculum from DIILS, 2) delivering that basic human rights training to the recipient unit, 3) providing DIILS with the certification package upon completion of the basic human rights training, and 4) providing DIILS with a list of attendees.

Feasibility Review

DSCA/Building Partner Capacity (BPC)/Capabilities Development Division (CDD) encourages using the Feasibility Checklist on the TEL early in the process to successfully generate requirements. Security Cooperation Organizations (SCOs), GCCs, DSCA and Implementers (e.g., IAs and non-traditional IAs - Department of Justice International Criminal Investigative Training Assistance Program) should use the Feasibility Checklist located on the first tab of the TEL to review requested acquisition requirements prior to submitting the final TEL to DSCA.

The formal feasibility period is 7-14 days. During the formal feasibility period, implementers review all TELs to ensure they can procure assigned equipment, training, and services; identify any questions about equipment, services and training; and, assess feasibility of the program. It is the IA's responsibility to voice any execution concerns and provide rationale during the formal feasibility period if they cannot execute specific equipment, training, or services. DSCA may reassign an entire program or specific lines on the TEL to another implementer if the implementer or DSCA identifies issues that may inhibit the execution of a particular program.

Pricing & Availability (P&A)

Immediately following the feasibility review period, DSCA tasks the IAs to provide P&A. During this period, the IA should request additional information or clarification needed to provide pricing information. The IA's must provide P&A within 45 days of DSCA's formal request for P&A. When the IA's return P&A information to DSCA, they must identify any equipment that requires a Country Team Assessment (CTA) and Combatant Command (COCOM) Endorsement as well as any necessary disclosure requirements, and communicate this information to the DSCA Regional Portfolio Director (RPD). If the IA does not raise any concerns, DSCA will assume the IA is able to execute the program as designed. Implementers will also complete the program execution timeline tab. This information will be included in the congressional notification tables.

To include a program in a Tranche, the DSCA Strategy, Plans and Policy Directorate (SPP) Planning and Program Design (PPD), CDD, and the team lead must verify the program's supporting documentation is complete, as applicable. The program elements that require additional documentation are listed below.

1. Small Scale Construction (SSC):
    a. U.S. Army Corps of Engineers (USACE)/Naval Facilities Engineering Command (NAVFAC) Checklist
    b. Agreement from implementing office that they can execute the construction
    c. DD 1391 (only for SSC projects over $750k)
    d. Master Spend Plan (only for SSC projects over $750k)
2. Equipment requiring CTA and COCOM Endorsements
    a. CTA and COCOM Endorsement
3. Vehicles
    a. Vehicle Checklist – checklist varies depending on type of vehicle
    b. Construction equipment checklist (e.g. crane)
    c. Material handling checklists (e.g. forklift)
4. Communications Equipment
    a. Communications equipment checklist

If the proposals do not include the required supporting documentation, DSCA will not include the program in the Tranche.

<u>Case Development</u>

The IAs and non-traditional implementers must follow the processes set forth below when developing Section 333 cases.

After sending a Tranche to Congress as part of the congressional notification, CDD will send a "Case Development" email to the IAs to start case development. The email will include the final Congressional Notification Tab B, a TEL roll-up, and the associated program code for each program. Within five business days of CDD's "Case Development" email, the IAs will send the case ID to CDD, which will then enter the case ID in the Security Cooperation

Information Portal (SCIP)/Security Cooperation Management Suite (SCMS)/Tranche maintenance input screen. Within ten business days of CDD's "Case Development" email, IAs will enter the Letter of Request (LOR) receipt date into DSAMS and follow the process in SAMM Chapter 5.1.7. IAs are expected to prioritize case development for cases utilizing expiring funds.

Section 333 case development starts with CDD's "Case Development" email. Case development is measured against a 60 day standard (SAMM C5.T6.) and should achieve the "BPC Wait" milestone within that 60 day window at least 85 percent of the time. The "BPC Wait" milestone applies once BPC cases are in the Review status and signals the end of case development. If the IA determines that case development is anticipated to exceed 60 days, the IA will notify DSCA and enter a Case Development Extenuating Factor (CDEF) code into DSAMS to document the issue(s) and provide an estimated number of days to resolve the CDEF (SAMM C5.4.2.2).

The benefitting country code field is required for BPC cases and must correspond to the country code and DSCA-notified program. For transportation cases, use the program code as the benefitting country code. BPC cases also require the S1 description, which should be the benefitting country's country code followed by a dash and a short description of the articles and services being provided. This field is limited to 45 characters (DSCA Policy 16-08).

The Period of Performance (POP) must match with the funds availability based on the funding source and notified program timeline. It may utilize either Cross Fiscal Year authority (CFY) or Full Operational Capability authority (FOC) as appropriate. Further information about CFY and FOC execution can be found in DSCA Policy Memo 18-38.

CDD will review TELs to confirm all equipment, training, and services are on cases within 60 days of the tranche notification delivery to Congress. DSCA conducts a line-by-line case review matching case lines against the TEL, adding the appropriate Case ID to each line on the TEL, and noting any significant price difference from the original P&A. This information informs program reviews and future P&A reviews. CDD will monitor cases through implementation, track equipment not on cases, and review the tracker with the IAs during the Global Train and Equip (GTE) teleconferences.

Case Implementation

The IAs and non-traditional implementers must follow the processes set forth below when implementing Section 333 cases.

Once a Section 333 case reaches BPC Wait/Review status - and can proceed further in the process given funds availability – another 20 days are allocated to move it towards financial implementation. Case review should be completed by DSCA within 5 business days. Once review is completed, the case can proceed to case financial implementation, which should take no more than 15 days from receipt of the signed Letter of Offer and Acceptance (LOA).

If OUSD(C) has not released the program funds or the program is affected by Department of State (DoS) restrictions or sanctions, the DSCA Directorate of Business Operations (DBO) Country Financial Director (CFD) will hold case in BPCWait/Review status.

CDD will work with DSCA's Chief Performance Management Office (CPMO) to establish mechanisms to monitor case implementation status – tracking and annotating reasons for late implementation – and measure Section 333 case implementation timelines against the above milestones and standards.

Case Execution

The IAs and non-traditional implementers must follow the processes set forth below when executing Section 333 cases.

IAs will enter requisitions in the appropriate logistics management system within 30 days of case implementation.

Items that require basic contracting action should be obligated within six months of case implementation. Items requiring long lead contracting action are flagged and reviewed during quarterly program reviews with the IAs.

IA-managed fund transfers for training (e.g., Military Interdepartmental Purchase Request (MIPRs)) will include the following: case information, funds availability, and the Period of Performance (POP) defined in the LOA. The MIPR will also include a request to obligate the funds within three months of MIPR acceptance. United States Security Assistance Command-Washington Field Office (USASAC-WFO) tracks requirements for longer contracting actions.

Program Execution

The GCCs, IAs and non-traditional implementers must follow the processes set forth below when developing Section 333 programs.

A Section 333 program "starts" with the first obligation recorded against that program. The start date of the program dictates the length of time left to execute activities against that program.

Congressionally-mandated human rights training must be completed during program execution. This training should be scheduled directly prior to, in conjunction with, or shortly after overall program delivery. The required human rights training requirement must be provided, at a minimum, to the unit leaders and other key personnel of the recipient units.

The level of human rights training required is identified on the TEL by DIILS. DIILS will complete the human rights training for all programs requiring intermediate or advanced human rights training.

For all basic level human rights training, the POC identified on the TEL is responsible for 1) receiving the DIILS-approved basic 2-hour human rights training curriculum from DIILS, 2) delivering that basic human rights training to the recipient unit, 3) providing DIILS with the certification package upon completion of the basic human rights training, and 4) providing DIILS with a list of attendees.

Direct funding

The case process is the primary method of executing Section 333 programs. Direct funding programs is by exception only and must be approved by the DSCA CDD Division Chief via a direct funds request. Congress must approve the program, and OUSD(C) must release approved program funds before DSCA will approve any direct funds requests. Once OUSD(C) releases approved program funds to DSCA, the direct funds transfer to the recipient organization should occur within 30 days, as long as no other program holds exist. The recipient organization must accept direct funds within 10 days of issuance and obligate in the recipient organization's account within 30 days of issuance. If the recipient organization does not accept and obligate the funds within its account, DSCA will cancel the funds as non-required.

Further information about direct funds requests and execution can be found in DSCA Policy Memo 19-12.

Training

Under 22 U.S.C. §2403, military education and training is defined as formal or informal instruction of foreign students in the United States or overseas by officers or employees of the United States, contract technicians, or contractors (including instruction at civilian institutions), or by correspondence courses, technical, educational, or information publications and media of all kinds, training aid, orientation, and military advice to foreign military units and forces.

All Section 333-funded training must follow the training execution procedures required in SAMM Chapter 10. There are stringent requirements to track, monitor and report all international military students in U.S. government-sponsored training programs. All tracking, monitoring and reporting requirements will be accomplished via the Security Assistance Network – Training Management System (SC-TMS) once all training is included on a case. All Section 333-funded training should be on a case in order for training track lines and associated training pipelines to be programmed in Defense Security Assistance Management System (DSAMS) to DSAMS– Training Module (DSAMS-TM).

Once a training track exists in DSAMS-TM, it will flow to SC-TMS and allow for the SCO to enter the necessary training details. The GCC is responsible for ensuring the SCO has entered all International Military Student (IMS) training details prior to the training start date.

Transportation & Deliveries

Requests for equipment delivery to the Partner Nation (PN) must go to the respective GCC Requesting Authority and DSCA RPD for inclusion on the Transportation Forecast

schedule. The GCCs will use the USASAC-produced Transportation Forecast spreadsheet to manage the delivery of defense articles. The GCCs must ensure the SCOs are aware of incoming shipments and have the necessary documents to clear customs. The GCCs provide assistance, as appropriate, for the ground movement of articles to their final destination. Per the SAMM, the SCOs prepare the receipt and title transfer documents, and the GCCs provide support as appropriate. GCCs may request a Delivery Assistance Team (DAT) to assist with equipment delivery and transfer to partner nation. The transportation process slides available on SCIP provide additional execution details.

The GCCs should ensure SCOs see the relevant Congressional Notification tables and know which PN unit was notified and approved to receive the defense articles, training, services, supplies (including consumables), and small-scale construction associated with that program. This ensures equipment is delivered and training is provided only to a PN unit that was included in the Congressional Notification.

All material going through the Joint Consolidation Point (JCP) must be received at the JCP 30 days prior to the estimated ship date. PN training requirements must be coordinated at least six months in advance to enable synchronized equipment deliveries in support of the training event.

Any CONUS and/or OCONUS transportation costs on a line are funded by the current year Section 333 transportation case. Transportation Account Code (TAC) requests should be addressed via the following email address: usarmy.belvoir.usasac.list.gte-trans-appvl-fund-req@mail.mil. Please do not contact the JCP directly to request equipment deliveries or request for TAC codes.

Additional reference information for selecting the correct delivery transportation code (DTC) is found below:

1. For larger items shipped directly to the PN, the DTC code is 7. This includes Arms, Ammunition and Explosives (AA&E).
    a. There may be limited instances based on the transportation plan where DTC 9 (port of debarkation) is more appropriate for the PN. Please coordinate with the DSCA RPD if this is the case.
2. For smaller items going to the JCP, the DTC code is 2/7. Below the line charges only apply to DTC 2, not to both.
3. For Mexico only, the DTC code is 5. This indicates a special approval to ship items to Mexico via their freight forwarder. Please consult the DSCA RPD when developing a case for Mexico deliveries.
4. DTC 4 (shipping by the vendor) requires Financial Policy (FPA) and transportation approval prior to developing the LOA. This is a rare DTC; please consult the DSCA RPD prior to case development.

Title Transfer

Title transfer procedures are outlined in SAMM C15.5.4.4 Advance Notice of Delivery. All advance notice of delivery must include which unit will receive the materiel or service. The materiel shipment information must be attached to the notice.

Material may not be transferred to another unit without DSCA's / Congressional approval. Contact DSCA/CDD if there are issues with the Congressionally Notified recipient unit expected to receive the equipment.

The SCO will provide a copy of the signed Transfer and Receipt document to the DSCA, JCP and upload the documents into SCIP/SCMS /Documents/GT&E Documents.

Congressional Notification to Letter of Offer and Acceptance Crosswalk ("CN to LOA Crosswalk")

USASAC-WFO develops the CN to LOA crosswalk tables as soon as a tranche is notified in order to start populating the CN to LOA crosswalk with LOA information. USASAC-WFO manages the CN to LOA crosswalk for tri-service reporting of deliveries. IAs update the "Estimated Ship Date" field on the CN to LOA crosswalk in SCIP. The GCCs will review the CN to LOA crosswalk on a quarterly basis to ensure they remain current on upcoming deliveries.

Key Program Resources

Below is a list of key program documents utilized by the Section 333 execution community. All documents are accessible via within SCIP.

1. Congressional Notification TAB B (SCIP/SCMS/Documents tab)
2. TEL FY21 Final Version (SCIP/SCMS/Documents tab)
3. CN to LOA crosswalks (SCIP/SCMS/Documents tab)
4. SCMS Dashboard Report (SCIP) for the list of all LOAs under approved program.
5. Transportation Forecast Spreadsheet (SCIP/SCMS/Documents tab)
6. Title Transfer Documents (SCIP/SCMS/Documents tab)
7. SEC333 Points of Contact List (SCIP/SCMS/Documents tab)

<u>Program Monitoring</u>

The GCCs assist with program execution, must follow the processes set forth below to monitor Section 333 programs.

Teleconferences

DSCA hosts the following weekly or periodic teleconferences to synchronize the Section 333 community. GCCs, IAs and non-traditional implementers should participate to the maximum extent possible to stay abreast of program developments.

1. Transportation, Deliveries & Training – weekly Mondays at 0900
2. Global Train and Equip – bi-weekly Wednesdays at 0900
3. GCC Secure VTC – 3rd Wednesday of every month at 1200
4. Integrated Regional Teams (IRT) monthly sync SVTCs – schedule varies by GCC

Formal Program Reviews

DSCA conducts the following program reviews to synchronize and review 333 program execution:

1. Program Management Reviews – hosted by DSCA RPDs with GCC, IAs, DoS, DSCA CPD, and DSCA PPD participation.
2. GCC specific program reviews – held on ad hoc basis that varies by GCC
3. Mid-Year Program Management Review – two per year in the first half of the FY to review programs in order to capture undistributed and residual funds.
4. Section 333 Program Hotwash – annual event held in October.

<u>Reporting Requirements</u>

There are significant reporting requirements for security cooperation programs as required by statute, instructions and policy. Information on programs funded with Section 333 is included in all of the below reports. DSCA pulls relevant information from official systems of record in order to limit official requests for information to the maximum extent practical. When required, GCCs, IAs and non-traditional implementers must provide requested information as part of the report submission.

Section 333 Quarterly Report

10 U.S.C § 333 requires DSCA to submit quarterly reports to Congress about the delivery and execution status of all defense articles, training, defense services and supplies (including consumables), and small-scale construction. The report must include information on the timeliness of those deliveries compared to the delivery schedule included in the original Congressional Notification. The report must also include information about the status of funds for allocated programs, included amounts of unobligated funds, unliquidated obligations, and disbursements.

The Section 333 Quarterly Report is the official program report for Congressional committees to evaluate the efficiency and effectiveness of the Section 333 authority. Quarterly reports must be accurate and reflect any deviation from the original Congressional Notification.

Foreign Military Training Report (FMTR)

DoD and DoS are required to produce a detailed annual report of all foreign military training the United States provided in the previous fiscal year and any known estimates for the next/current fiscal year. The FMTR is mandated to include detailed information about every foreign military training activity funded by the United States. The FMTR must include all training and education funded by Section 333. This report must be delivered to Congress by January 31st each year.

Office of National Drug Control Policy (ODNCP) Report

The annual ODNCP report must include all programs funded in support of Counter-Illicit Drug Trafficking (CIDT) operations. This requires DSCA to report funding and supply a performance summary in the FY of reporting that provides a measure of performance and effectiveness for CIDT programs evaluated in that FY, regardless of which FY appropriations were applied. It also requires as an overview of the Assessment, Monitoring and Evaluation framework.

Section 386 Report

DoD must submit an annual report to Congress that details, on a country-by-country basis, a description of each DoD program that provides training, equipment, or other assistance or reimbursement during the previous FY. The report must include a description of the purpose, duration, type of training, equipment, assistance and reimbursement, how the reimbursement advances the theater security cooperation strategy, cost and expenditures, a description of the metrics used for assessing the effectiveness of the program, a description of the extent of the participation of PN forces, and the number of U.S. forces involved in providing the assistance.

Financial Reports

Financial information on programs funded with Section 333 are included the following reports:

1. Section 381(b) financial reports (quarterly)
2. ForeignAssistance.gov reports (quarterly)
3. Section 655 report (annual)
4. Other DSCA sales reports

DSCA automatically pulls these financial reports from official systems of record, and are currently unable to include direct-funded actions. Direct funding is only authorized on a by-exception basis in order to ensure all reporting requirements are met as accurately as possible.