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INSPECTOR GENERAL

U.S. Department of Defense

DECEMBER 2, 2024



(U) Follow-up Evaluation of Management Advisory: Sufficiency of Staffing at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring

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INDEPENDENCE ★ INTEGRITY ★ EXCELLENCE ★ TRANSPARENCY

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OFFICE OF INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
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ALEXANDRIA, VIRGINIA 22350-1500

December 2, 2024

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR POLICY
COMMANDER, U.S. EUROPEAN COMMAND
DIRECTOR, DEFENSE SECURITY COOPERATION AGENCY
CHIEF, OFFICE OF DEFENSE COOPERATION-UKRAINE

SUBJECT: (U) Follow-up Evaluation of Management Advisory: Sufficiency of Staffing at
Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced
End-Use Monitoring (Report No. DODIG-2025-047)

(U) This final report provides the results of the DoD Office of Inspector General's evaluation. We previously provided copies of the draft report and requested written comments from the Defense Security Cooperation Agency (DSCA) Director on the recommendation.

(U) The DSCA Director did not provide a formal response to the report. However, the DSCA provided informal management comments stating that the DSCA is not the correct organization to address the recommendation. Based on our analysis of the DSCA's comments, we revised and redirected Recommendation 1 to the Office of Defense Cooperation-Ukraine (ODC-U) Chief, who has the authority to implement the recommendation.

(U) The ODC-U Acting Chief provided formal comments on the draft report. The Acting Chief's comments, along with additional information provided by ODC-U personnel, met the intent of the recommendation. We verified that the actions were completed. Therefore, the recommendation is closed.

(U) We appreciate the cooperation and assistance received during the evaluation. If you have any questions or would like to discuss the evaluation, please contact me at [REDACTED]

FOR THE INSPECTOR GENERAL:

A handwritten signature in black ink that reads "Bryan Clark".

Bryan T. Clark
Assistant Inspector General for Evaluations
Programs, Combatant Commands, and Operations

CC:

COMMANDING GENERAL, U.S. ARMY EUROPE AND AFRICA
COMMANDER, SECURITY ASSISTANCE GROUP-UKRAINE
AUDITOR GENERAL, DEPARTMENT OF THE ARMY
AUDITOR GENERAL, DEPARTMENT OF THE NAVY
AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE

(U) Executive Summary

(U) In June 2023, the DoD Office of Inspector General issued a management advisory that found that Office of Defense Cooperation–Ukraine (ODC-U) personnel were not always present at or staffed to cover the logistics enabling nodes in Poland (LEN-P). Additionally, U.S. military personnel assigned to the LEN-P between January and June 2023 did not know which defense articles required enhanced end-use monitoring (EEUM), nor had they seen or heard of an EEUM defense article list. As a result of these issues, we found that not all EEUM-designated items were inventoried as required before being transferred to Ukraine.

(U) For this follow-up evaluation, we assessed the actions taken by the Defense Security Cooperation Agency (DSCA) to develop familiarization training materials describing EEUM and the actions taken by the ODC-U to provide that familiarization material to U.S. military personnel at the LEN-P. We determined that the DSCA developed a detailed and comprehensive EEUM familiarization presentation for personnel supporting the EEUM inventory process at the LEN-P and that the ODC-U improved on the familiarization presentation by adding photos of the EEUM items to help Soldiers easily visually identify EEUM items. We also determined that the 39th Transportation Battalion developed and implemented standard policies and procedures for military logistics personnel stationed at the LEN-P for properly managing in-transit defense articles requiring EEUM.

(U) We evaluated the ODC-U's capacity to conduct all required inventories of EEUM in Poland before onward movement to Ukraine. We found no instances when ODC-U personnel missed equipment inventories, and we determined that the ODC-U has the capacity to perform its EEUM mission in a peacetime environment. However, the ODC-U relies on a rotating and temporary cadre of individuals to conduct EEUM at the LEN-P because the ODC-U does not have dedicated EEUM-specific personnel billets for conducting EEUM inventories at the LEN-P.

(U) Additionally, validated ODC-U manpower increases have not yet been funded and completed. Therefore, the ODC-U may continue to face challenges in a wartime setting in ensuring that sufficient personnel are present to conduct all required inventories before EEUM-designated equipment is transferred to Ukraine.

(U) Finally, the ODC-U has not coordinated with the U.S. European Command (USEUCOM) to designate non-ODC-U backup personnel with the ability to conduct EEUM inventories if the primary ODC-U personnel are unavailable. As a result, if conditions arise where backup personnel are needed, a delay in getting backup personnel designated could result in the ODC-U not having the capacity to conduct 100-percent inventories of EEUM-designated defense articles before transfer to Ukraine, as the Security Assistance Management Manual requires.

(U) We recommended that the ODC-U Chief, in coordination with the Commander of the U.S. European Command, develop a plan to rapidly designate non-ODC-U personnel with the ability to conduct EEUM inventories if the primary ODC-U personnel are not unavailable. The ODC-U Acting Chief and the ODC-U EEUM subject matter expert provided evidence that they developed a plan to rapidly designate non-ODC-U personnel if it becomes necessary. These actions met the intent of the recommendation. We verified that the actions were completed. Therefore, the recommendation is closed.

(U) On February 26, 2024, the DoD Office of Inspector General announced Project No. D2024-DEV0PC-0094.000, "Follow-Up Evaluation of Enhanced End-Use Monitoring of Defense Articles Provided to Ukraine," which will further address EEUM inventory completeness.

(U) Introduction

(U) Objective

(U) The objective of this follow-up evaluation of DoD Office of Inspector General (OIG) report “Management Advisory: Sufficiency of Staffing at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring,” was to assess the actions taken by the DoD to ensure that the Office of Defense Cooperation–Ukraine (ODC-U) has sufficient capacity to effectively and efficiently conduct all required enhanced end-use monitoring (EEUM) inventories of designated defense articles before transfer into Ukraine.¹

(U) Background

(U) The Arms Export Control Act (AECA) authorizes the President to control the sale or export of defense articles and services to countries and to establish a program for monitoring the end use of defense articles provided or sold by the United States.² The AECA requires the President to establish an end-use monitoring (EUM) program that:

(U) ... provides for the end-use verification of defense articles and defense services that incorporate sensitive technology, defense articles, and defense services that are particularly vulnerable to diversion or other misuse, or defense articles or defense services whose diversion or other misuse could have significant consequences.³

(U) The DoD Uses the Golden Sentry Program to Monitor the End Use of U.S. Defense Articles

(U) The DoD implements the Golden Sentry program to monitor the end use of U.S. defense articles provided to partner nations through routine and enhanced EUM to ensure that partner nations comply with the terms and conditions found in respective transfer agreements of U.S. defense articles, or other applicable agreements. The Defense Security Cooperation Agency (DSCA) directs, administers, and provides guidance on the DoD security cooperation programs for which it is responsible to DoD components and personnel assigned to U.S. embassies worldwide.⁴ The Under Secretary of Defense for Policy delegated authority to the DSCA Director to administer the Golden Sentry program. The Golden Sentry program

¹ (U) DoD OIG Report No. DODIG-2023-090, “Management Advisory: Sufficiency of Staffing at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring,” June 28, 2023.

(U) This report contains information that has been redacted because it was identified by the Department of Defense as Controlled Unclassified Information (CUI) that is not releasable to the public. CUI is Government-created or owned unclassified information that allows for, or requires, safeguarding and dissemination controls in accordance with laws, regulations, or Government-wide policies.

(U) For this report, we define “sufficient capacity” as having enough trained and competent personnel on hand to perform the assigned duties without degradation of the mission.

² (U) Title 22, United States Code, Chapter 39, Section 2785 (22 U.S.C. § 2785), “End-Use Monitoring of Defense Articles and Defense Services.”

³ (U) 22 U.S.C. § 2785(b)(1).

⁴ (U) DoD Directive 5105.65, “Defense Security Cooperation Agency (DSCA),” October 26, 2012 (Incorporating Change 1, March 2, 2023).

(U) includes EEUM articles, which are defense articles requiring additional physical security and inventory requirements.⁵ As of April 24, 2024, the United States committed more than \$44.9 billion in security assistance to the Government of Ukraine since Russia's full-scale invasion of Ukraine in February 2022; included in that security assistance are defense articles that require EEUM.⁶

(U) The DSCA's Security Assistance Management Manual (SAMM) is the DoD-wide guidance for DoD component execution of security cooperation and assistance programs over which the DSCA has responsibility. SAMM Chapter 8, "End-Use Monitoring," describes policies and procedures for EUM and EEUM under the Golden Sentry program.

(U) According to the SAMM, monitoring the use of U.S.-origin items is a joint responsibility of the partner nations and the U.S. Government, including the Military Departments, combatant commands, and security cooperation organizations (SCOs).⁷ Chapter 8 of the SAMM requires SCOs to designate a primary U.S. Government employee to serve as the EUM point of contact and conduct EEUM in accordance with Golden Sentry checklists. As part of the Ukraine SCO, the ODC-U is responsible for oversight of the EUM program in Ukraine.

(U) Multiple DoD Entities Ensure the Safe and Secure Transfer of Defense Articles Requiring EUM and EEUM

(U) Multiple DoD organizations are responsible for ensuring the safe and secure transfer of the materiel aid, including EEUM items, flowing from the United States to Ukraine under Operation Atlantic Resolve. In Poland, defense articles arrive and depart through the LEN-P.⁸ In October 2023, the 39th Transportation Battalion (Movement Control) assumed the logistics mission for moving Ukraine materiel aid through the LEN-P. The battalion's mission is to provide transportation and movement control support to the U.S. European Command (USEUCOM) area of responsibility and provide deployable units to support overseas contingency operations.

⁵ (U) According to Chapter 8 of the Security Assistance Management Manual, this includes defense articles, technologies, munitions, and weapons systems designated by the Military Departments as containing sensitive technologies that require special accountability and security measures.

⁶ (U) U.S. Department of State, "Fact Sheet on U.S. Security Assistance to Ukraine," April 24, 2024.

⁷ (U) DSCA SAMM, Chapter 8, Section C8.2.3, "End-Use Monitoring Responsibilities."

(U) DoD Directive 5132.03, "DoD Policy and Responsibilities Relating to Security Cooperation," December 29, 2016, defines SCOs as the DoD organizations permanently located in a foreign country that are responsible for carrying out security cooperation management functions under section 515 of the Foreign Assistance Act, 22 U.S.C. § 2151, including military assistance advisory groups, military missions and groups, and offices of defense and military cooperation. SAMM Chapter 2 defines a SCO as encompassing all DoD elements, regardless of actual title, located in a foreign country to carry out security cooperation and security assistance management functions under the Foreign Assistance Act and the AECA.

⁸ (CUI) For this report, the LEN-P refers to the U.S. Government presence at [REDACTED]

(U) DoD OIG Management Advisory DODIG-2023-090 Made Three Recommendations for Improving EEUM Processes

(U) DoD OIG Report No. DoDIG-2023-090, “Management Advisory: Sufficiency of Staff at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring,” stated that ODC-U personnel were not always present or staffed to conduct initial serialized inventories of EEUM defense articles being delivered to multiple logistics hubs in Poland.⁹ In addition, the advisory noted that not all U.S. military personnel present at the logistics hubs were aware of which defense articles were designated as EEUM and required serialized inventories.

(U) In the advisory, an ODC-U official stated that the ODC-U’s availability to conduct EEUM serial number inventories at the multiple logistics locations was a resource and sustainment challenge. Specifically, ODC-U personnel stated that they were not always able to conduct an initial 100-percent inventory by serial number of all EEUM-designated articles before transfer or delivery to Ukraine because ODC-U personnel were not always present or staffed to cover the multiple logistics hubs in Poland. The advisory also noted that Ukrainian locally employed staff conduct the EEUM inventories with oversight by one of three U.S. Government ODC-U personnel. As of June 2023, the three U.S. Government personnel were geographically dispersed on temporary duty orders, with one in Germany, one in Poland, and one in Ukraine.

(U) The advisory further noted that none of the U.S. military personnel at the logistics hubs were aware of which defense articles required EEUM or had specific serial number inventory requirements. In the advisory, ODC-U personnel stated that U.S. military personnel at the logistics hubs must be able to identify and hold EEUM defense articles and inform ODC-U personnel that EEUM defense articles arrived and were available for inventory. The evaluation team recommended that ODC-U personnel immediately provide the U.S. military personnel at the logistics hubs with a list of EEUM defense articles.

(U) We determined that the U.S. military personnel assigned to the LEN-P learned from experience to contact ODC-U personnel and hold back any articles that might require EEUM inventory. We cautioned that new U.S. military personnel rotating into the LEN-P positions may not have this institutional knowledge. We concluded that the small number of ODC-U personnel to conduct inventories at numerous logistics locations, coupled with new personnel’s limited understanding and potential unfamiliarity with EEUM defense articles, could lead to EEUM defense articles being transferred to Ukraine without an initial U.S. inventory, as required by law.

⁹ (U) DoD OIG Report No. DODIG-2023-090, “Management Advisory: Sufficiency of Staff at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring,” June 28, 2023.

(U) We made two recommendations to the DSCA Director and one recommendation to the ODC-U Chief to develop and implement training on EEUM defense articles and to allow U.S. Government personnel to inventory EEUM defense articles.¹⁰

¹⁰ (U) The report recommended that the DSCA develop training materials. The DSCA developed what it termed an “overview presentation.” DSCA and ODC-U personnel told us the materials are familiarization, rather than training. For this evaluation, we refer to the presentation developed by the DSCA as a “familiarization presentation” because no formal training records requirement was associated with the presentation.

(U) Finding

(U) The DSCA and ODC-U Took Steps to Increase Personnel Familiarization with EEUM Defense Articles, but the ODC-U's Capacity to Conduct All Required EEUM Inventories Remains a Challenge

(U) The DSCA and ODC-U took actions to improve U.S. military personnel's understanding and awareness of the requirements for receiving and processing EEUM defense articles at the LEN-P. Specifically, the DSCA developed a comprehensive EEUM familiarization presentation that identifies EEUM-specific laws and criteria, procedures for accurately inventorying EEUM articles, and a list of EEUM defense articles and serial number recognition photos for the most common EEUM items arriving at the LEN-P. ODC-U personnel improved the familiarization presentation by replacing the photos of serial numbers with photos that depict the approximate dimension, configuration, and color of the EEUM items. ODC-U personnel conducted at least seven EEUM familiarization sessions with U.S. military personnel at the LEN-P between January and May 2024 using the improved slide presentation.

(U) However, the ODC-U does not have an EEUM-specific project manager billet or a dedicated U.S. Government billet for oversight of EEUM inventories in Poland. Instead, the ODC-U assigned EEUM oversight responsibility to a rotating and temporary cadre of U.S. military personnel. This occurred because the ODC-U's manning in USEUCOM's Joint Table of Distribution has not been updated since 2017 and does not currently reflect the need for a dedicated EEUM program manager to oversee the surge of EEUM defense articles transferred to Ukraine after the full-scale Russian invasion.¹¹ Although validated FY 2025 ODC-U manpower increases include an EEUM manager, the positions have not been funded or added to the ODC-U's organizational manpower structure.¹²

(U) Additionally, the ODC-U has not coordinated with USEUCOM to designate non-ODC-U backup personnel with the ability to conduct EEUM inventories if the primary ODC-U personnel are unavailable. This occurred because ODC-U officials decided not to pre-designate backup personnel. According to ODC-U officials, the high turnover rate of transitory personnel who would form the pool of potential alternate personnel would require continual redesignation of new personnel as they rotate. Additionally, the SAMM requires backup

¹¹ (U) According to Chairman of the Joint Chiefs of Staff Instruction 1001.01C, "Joint Manpower and Personnel Program," the Joint Table of Distribution is the statement of manpower requirements for an organization to accomplish its assigned missions.

¹² (U) According to the U.S. Army Manpower Analysis Agency, "validated" manpower is the minimum essential manpower requirements needed to accomplish valid mission responsibilities and is based on the validated workload and the validated backlog or projected workload. A validated workload must satisfy the following three conditions: (1) enduring, or required for more than 4 years into the future; (2) appropriate, or in accordance with the mission directive or inherent mission of work center; and (3) reasonable, or the time to produce or provide the workload is acceptable.

(U) personnel to be designated only when conditions exist that impede SCO personnel from executing their inventory responsibilities. ODC-U personnel stated that there have been no instances when SCO personnel have not completed 100 percent of required inventories.

(U) If conditions arise where backup personnel are needed, a delay in getting backup personnel designated could result in the ODC-U not having the capacity to conduct 100-percent inventories of EEUM-designated defense articles before transfer to Ukraine, as the SAMM requires.

(U) The DSCA, ODC-U, and 39th Transportation Battalion Took Actions to Address the Training Recommendations from Management Advisory DODIG-2023-090

(U) The DSCA and ODC-U took actions to improve U.S. military personnel's understanding and awareness of the specific requirements for receiving and processing EEUM defense articles at the LEN-P. Additionally, although not required, the 39th Transportation Battalion developed an EEUM standard operating procedure (SOP) and a system of records for maintaining all EEUM training documentation for the Soldiers receiving the familiarization presentation. Collectively, the actions taken by the DSCA, ODC-U, and 39th Transportation Battalion ensure that U.S. military personnel at the LEN-P are sufficiently trained in identifying and responding to EEUM requirements for inventorying defense articles arriving at the LEN-P.

(U) The DSCA Developed an EEUM Familiarization Presentation

(U) In response to the recommendations made in the advisory, in January 2024, the DSCA developed and published an EEUM familiarization presentation for U.S. military personnel assigned to the LEN-P. The presentation is composed of 10 slides of background and explanatory material—including explanations of the laws and guidance governing EEUM, a list of 17 EEUM defense articles, and a bulleted list of procedures for quickly and accurately inventorying EEUM articles—and 15 slides of serial number recognition photos for the most common EEUM items arriving at the LEN-P.

(U) The ODC-U Improved and Implemented the DSCA's Presentation

(U) To address the issue raised in the advisory of Soldiers' potentially limited understanding and unfamiliarity with EEUM defense articles, the ODC-U adapted the original DSCA presentation slides to replace photos of the serial numbers with photos of the actual EEUM items most likely to transit the LEN-P. Figure 1 compares the original DSCA slide for the Javelin missile, which shows the Javelin serial number location, and the revised slide, which depicts the approximate dimension, configuration, and color of the Javelins when they arrive. The revised slides provide improved cues for Soldiers who must visually identify EEUM articles as they arrive at one of the logistics nodes in Poland alongside the myriad other defense articles.



(U) The ODC-U conducted at least seven familiarization sessions with the 39th Transportation Battalion Soldiers after the DSCA published the slide presentation in January 2024. The ODC-U military officer responsible for providing U.S. Government oversight of EEUM inventories also provided the familiarization sessions, as shown in Figure 2. We interviewed U.S. military personnel at the LEN-P, all of whom attended the familiarization sessions, and the Soldiers stated that they were confident they could identify EEUM items by sight. They also stated that they understood the actions to take when EEUM articles arrived.



(U) The 39th Transportation Battalion Created EEUM Standard Operating Procedures and Training Records

(U) [REDACTED]

(U) In February 2024, the battalion developed and published the Task Force Stilwell SOP, which includes an EEUM SOP enclosure. The EEUM SOP defines EEUM, lists all of the EEUM defense articles, delineates roles and responsibilities for EEUM at the LEN-P, identifies the specific EEUM training requirements for Task Force Stilwell soldiers, and contains actions

(U) to take when defense articles requiring EEUM arrive at the LEN-P.¹³ The battalion began conducting pre-deployment training sessions on EEUM for all Soldiers before departure from the unit's home base in Germany beginning with the second wave of relief-in-place transitions in January and February 2024. Upon arrival at the LSA Eagle site in Poland, the officers-in-charge of the arriving units coordinated with ODC-U personnel to provide a familiarization session to all incoming military personnel.

(U) Although not required given the nature of the training, the battalion also developed a system of records for maintaining all EEUM training documentation, including the familiarization presentation sign-in records, using a computer messaging application file system. During this follow-up evaluation, the battalion transitioned its EEUM training records to an official Army training records system to better track which personnel received EEUM familiarization training and when. We observed both sets of records and observed that the Soldiers' names, units, and session dates were captured first by handwritten sign-in sheets and later by digital sign-in rosters for at least seven EEUM training sessions provided by the ODC-U.

(U) ODC-U Manning Does Not Include an EEUM-Specific Project Manager Billet or a Dedicated Billet for Oversight of EEUM Inventories in Poland

(U) Chapter 8 of the SAMM requires SCOs to designate, in writing, a primary Golden Sentry point of contact who is responsible for conducting EEUM and establishing and maintaining a baseline of all EEUM-designated defense articles. However, USEUCOM's Joint Table of Distribution for the ODC-U does not include an EEUM-specific project manager billet or a dedicated billet for oversight of EEUM inventories in Poland. Instead, USEUCOM and ODC-U rely on a rotating and temporary cadre of U.S. military officers to fill this role.

(U) Current ODC-U Manpower Does Not Include EEUM-Specific Billets

(U) ODC-U manpower is composed [REDACTED]

[REDACTED]

[REDACTED]

all with different authorities and funding sources. The current ODC-U organization chart, which was last updated [REDACTED]

[REDACTED]

[REDACTED]

¹³ (U) The 39th Transportation Battalion SOP refers to "EEUM training" rather than "familiarization"; therefore, we use "training" for battalion-specific actions.

~~(CUI)~~ The organization chart, which is based on the USEUCOM Joint Table of Distribution for the ODC-U, shows that the positions are funded by a combination of [REDACTED] funds. Each position in the chart shows the type of funding allocated to that position. However, the current Joint Table of Distribution for the ODC-U does not include [REDACTED] in Poland.

(U) The ODC-U Performs the EEUM Mission Using Rotational Personnel

(U) The ODC-U Chief fills the EEUM oversight role with temporary and rotating personnel. According to the Chief, the ODC-U performs its EEUM mission by taking personnel “out of hide,” requesting military officers on temporary duty orders, and, most recently, requesting Foreign Area Officers from the George C. Marshall European Center for Security Studies in Garmisch, Germany, to fill the capacity gap. For example, the ODC-U used an active duty military officer assigned to the U.S. Army Security Assistance Training Management Organization with further assignment to the ODC-U to provide U.S. Government oversight of EEUM in Poland from mid-May 2023 to mid-May 2024. The assigned officer transitioned out of the position at the end of May 2024, and a series of foreign area officers on 30- to 45-day temporary duty orders were scheduled to provide EEUM oversight of defense articles at the LEN-P until the ODC-U and USEUCOM can determine a more permanent solution.



(U) The ODC-U noncommissioned officer-in-charge said that the current organization chart reflects the ODC-U's actual manpower before Russia's full-scale invasion of Ukraine and that the ODC-U needs the [REDACTED] overhire personnel to accomplish all the tasks it is responsible for in a peacetime environment. The noncommissioned officer-in-charge stated that the ODC-U's responsibilities grew with the increased volume of materiel aid being moved through the LEN-P to Ukraine that requires EEUM oversight by ODC-U personnel. The noncommissioned officer-in-charge further stated that U.S. and partner nation donations of defense articles to Ukraine that require EEUM will require increased oversight and inventory responsibilities in the future because of the large number of storage facilities and EEUM items that will remain in Ukraine after the conflict ends.

(U) Projected Manpower Additions Were Validated but Not Funded

(U) According to the Defense Security Cooperation University's "Green Book," SCO staffing is determined by joint DSCA and combatant command manpower surveys.¹⁴ Combatant commands submit requests for increased security cooperation manpower to the DSCA through the Security Cooperation Manpower Validation Process, tying requests to specific program growth. The requests must be supported by an extra and independent manpower study conducted in the previous 2 years by an organization with known credible manpower analysts, such as the U.S. Army Manpower Analysis Agency (USAMAA).

(U) In November 2022, the USEUCOM Director of Manpower and Personnel requested that USAMAA conduct a manpower study of 11 SCOs in the USEUCOM area of responsibility to enable USEUCOM to request additional billets through the DSCA's 2025 Security Cooperation Manpower Validation Process.¹⁵ USAMAA conducted the requested manpower study using data collected between December 2021 and November 2022 and determined that the ODC-U requires an additional seven permanent personnel. USAMAA briefed the results of the manpower study to USEUCOM senior personnel in February 2023, noting that "the current fluid environment makes it difficult to determine which workloads will continue to be enduring versus what is surge owing to current events." USAMAA specifically recommended that USEUCOM conduct another manpower study once the conflict between Ukraine and Russia ends and SCO workloads stabilize.

(U) The DSCA published the results of the 2025 Security Cooperation Manpower Validation Process, which validated 15 mission-to-manpower requirements for USEUCOM, in August 2023. The DSCA generated a prioritized list of 35 USEUCOM billet requirements, of which the top 2 billets are for the ODC-U: 1 for an active duty military officer for Service-specific case management and 1 for a GS-12 U.S. Government EUM manager. A billet for a locally employed EEUM program assistant/interpreter is also on the list of validated positions at number 30 of 35. The USEUCOM J5 manpower analyst stated that all three billets are scheduled to be funded on or about October 1, 2024, with FY 2025 funds. Establishing and funding these billets should resolve the steady-state ODC-U manning shortfalls identified by the study.

(U) The ODC-U Has Not Designated Backup Personnel to Complete EEUM Inventories if ODC-U Personnel Are Unavailable

(U) The ODC-U has not coordinated with USEUCOM to designate non-ODC-U backup personnel with the ability to conduct EEUM inventories if the primary ODC-U personnel are unavailable.

¹⁴ (U) Defense Security Cooperation University Textbook, "Security Cooperation Management," FY 2022. The "Green Book" is the security cooperation manual published by the Defense Security Cooperation University, under the DSCA, for security cooperation manpower workforce training and education.

¹⁵ (U) The ODCs were Ukraine, Poland, Romania, Moldova, Estonia, Latvia, Lithuania, Sweden, Finland, Armenia, and Switzerland.

(U) In November 2023, the DSCA Director updated Chapter 8 of the SAMM to, among other changes, enable non-DSCA, U.S. Government personnel to perform initial serial number inventories on behalf of the SCO before defense articles enter hostile areas. The SAMM states, “Designated U.S. officials shall be appointed or endorsed, in writing, by the Combatant Command (endorsed at the SES/07 General Officer/Flag Officer level) with the concurrence of the Ambassador when conditions exist that impede the SCO from executing their inventory responsibility.”

(U) The DSCA EEUM program manager told us that the updated SAMM Chapter 8 provides the SCO with the ability to designate an official outside of the SCO to conduct the inventories through a “designation memorandum.” The program manager emphasized that, in the case of Ukraine, the designation would last only for the duration of Operation Atlantic Resolve because, once the hostilities end, the SCO would resume its normal EEUM operations cycle and conduct the inventories using SCO personnel.

(U) As of October 25, 2024, the ODC-U had not coordinated with USEUCOM to designate non-ODC-U backup personnel with the ability to conduct EEUM inventories if the primary ODC-U personnel are unavailable. However, according to ODC-U officials, not pre-designating backup personnel was a deliberate decision. ODC-U officials told us that designating backup personnel in advance would be problematic. The high turnover rate of transitory personnel who would form the pool of potential alternates would require regular re-designation of new personnel as personnel rotate. Additionally, the SAMM requires that backup personnel be designated only when conditions exist that impede the SCO from executing its inventory responsibilities.

(U) However, because it may take time for ODC-U officials to staff the required designation memorandum through the appropriate process, and given the transitory and unpredictable nature of the ODC-U’s manning, ODC-U officials’ ability to quickly designate additional personnel to conduct inventories would minimize risk to completing the necessary EEUM inventories if ODC-U personnel were unavailable. Therefore, the ODC-U, in coordination with USEUCOM, should establish a plan to rapidly designate non-ODC-U backup personnel with the ability to conduct EEUM inventories if ODC-U personnel are unavailable before shipment, movement, or delivery from a logistics enabling node in Poland into hostile areas.

(U) The DoD May Be at Risk in the Ability to Sustain Security Assistance Requirements for EEUM Equipment Provided to Ukraine

(U) The ODC-U may not have the current capacity to conduct 100-percent inventory of EEUM-designated defense articles before transfer to Ukraine, as required by the SAMM, because of the unpredictable nature of the ODC-U’s manning and the geographic distance between the logistics sites in Poland. However, projected manpower updates for the ODC-U

(U) would bring the organization to a staffing level capable of accommodating surges and adapting to the operational environment. Additional personnel, such as a designated backup person at the LEN-P, would ensure that 100 percent of EEUM defense articles are inventoried before movement to Ukraine. Without these personnel remedies, the DoD risks not meeting EEUM accountability requirements in the event of a significant surge in EEUM materiel or sudden, unexpected changes in ODC-U manpower.

(U) On February 26, 2024, the DoD OIG announced project D2024-DEV0PC-0094.000, “Follow-Up Evaluation of Enhanced End-Use Monitoring of Defense Articles Provided to Ukraine,” which will further address EEUM inventory completeness.

(U) Management Comments on the Finding and Our Response

(U) DSCA personnel provided informal comments on the draft report, stating that the DSCA is not the correct organization to address the recommendation. DSCA personnel directed our attention to the SAMM, Chapter 8, which specifically states that the combatant command is responsible for generating the designation memorandum for performing EEUM duties. DSCA personnel further noted that they were waiting for the ODC-U, a USEUCOM subordinate command, to draft the memorandum for USEUCOM’s concurrence.

(U) Our Response

(U) We reviewed the SAMM, Chapter 8, C8.5.5.1, and agree with the DSCA’s informal comments. Based on our analysis of the SAMM, we determined that the ODC-U, with USEUCOM’s endorsement, is responsible for designating U.S. officials to conduct inventories of defense articles requiring EEUM. Therefore, we modified the applicable language in the report.

(U) Recommendations, Management Comments, and Our Response

(U) Revised and Redirected Recommendation

(U) As a result of the informal management comments from DSCA personnel, we revised and redirected Recommendation 1 to the ODC-U Chief, who has the authority to implement the recommendation.

(U) Recommendation 1

(U) We recommend that the Chief of the Office of Defense Cooperation–Ukraine, in coordination with the Commander of the U.S. European Command, develop a plan to rapidly designate non–Office of Defense Cooperation personnel with the ability to conduct enhanced end-use monitoring inventories if the primary Office of Defense Cooperation–Ukraine personnel are unavailable.

(U) Office of Defense Cooperation – Ukraine Comments

(U) Although not required, the ODC-U Acting Chief provided comments on the draft report. The Acting Chief stated that the ODC-U has designated a Golden Sentry primary point of contact, ensured EUM databases were current, and ensured ODC personnel assigned EUM duties completed the EUM training. Additionally, the Acting Chief stated that procedures for conducting EUM in a hostile environment are being followed and kept current. Finally, the Acting Chief said that ODC personnel located at Logistics Enabling Node–Poland provided an EUM overview for U.S. military personnel supporting U.S. defense article accountability.

(U) In addition, we met with the ODC-U EEUM subject matter expert who provided us with additional information and documentation on the actions the ODC-U has taken related to the recommendation. The subject matter expert stated that the ODC-U implemented a plan to rapidly designate non-ODC-U backup personnel, if backup personnel are needed, to ensure EEUM inventories are conducted. These actions included completing the designation memorandum except for the names of the backup personnel, pre-coordinating the designation memo and its language with USEUCOM, and identifying the unit from which potential backup personnel would be drawn.

(U) Our Response

(U) The comments from the ODC-U Acting Chief and the actions outlined by the ODC-U EEUM subject matter expert met the intent of the recommendation. We verified that the actions were completed. Therefore, the recommendation is closed.

(U) Appendix A




(U) Scope and Methodology

(U) We conducted this evaluation from February 2024 through May 2024 in accordance with the “Quality Standards for Inspection and Evaluation,” published in December 2020 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we adequately plan the evaluation to ensure that objectives are met and that we perform the evaluation to obtain sufficient, competent, and relevant evidence to support the findings, conclusions, and recommendations. We believe that the evidence obtained was sufficient, competent, and relevant to lead a reasonable person to sustain the findings, conclusions, and recommendations.

(U) This report was reviewed by the DoD Component(s) associated with this oversight project to identify whether any of their reported information, including legacy FOUO information, should be safeguarded and marked in accordance with the DoD CUI Program. In preparing and marking this report, we considered any comments submitted by the DoD Component(s) about the CUI treatment of their information. If the DoD Component(s) failed to provide any or sufficient comments about the CUI treatment of their information, we marked the report based on our assessment of the available information.

(U) For this evaluation, we reviewed the following Federal laws and DoD and DSCA policies, instructions, directives, and guidance.

- (U) 22 U.S.C. Chapter 39, “Arms Export Control Act (AECA),” June 30, 1976, as amended
- (U) 22 U.S.C. § 2785, “End-Use Monitoring of Defense Articles and Defense Services,” as amended
- (U) DoD Directive 5105.65, “Defense Security Cooperation Agency,” October 26, 2012 (Incorporating Change 1, March 2, 2023)
- (U) DoD Directive 5132.03, “DoD Policy and Responsibilities Relating to Security Cooperation,” December 29, 2016
- (U) Chairman of the Joint Chiefs of Staff Instruction 1001.01C, “Joint Manpower and Personnel Program,” February 21, 2024
- (U) DSCA Security Assistance Management Manual, Chapter 2, “Security Cooperation Organization and Case Manager Responsibilities; Security Assistance Planning and Survey Teams,” April 30, 2012
- (U) DSCA Security Assistance Management Manual, Chapter 8, “End-Use Monitoring (EUM),” September 18, 2023

~~(CUI)~~ We observed operations at three logistics hubs in the LEN-P—

—as well as the Materiel Aid Contribution Coordination Cell and the Commander's Update Brief at LSA Eagle. We observed EEUM item serial number inventory processes and procedures at the LEN-P and three ODC-U EEUM training sessions with LEN-P logistics personnel at LSA Eagle.

(U) We conducted interviews about EEUM guidance and procedures with personnel from the DSCA, USEUCOM J5, ODC-U, 82nd Airborne Division Tactical Headquarters, and 39th Transportation Battalion, which provided context for our physical observations on site.

(U) We obtained documentation from EEUM program stakeholder organizations, including the DSCA, USEUCOM J5, ODC-U, 82nd Airborne Division Tactical Headquarters, 39th Transportation Battalion, 1st Inland Cargo Transfer Company, and 355th and 635th Movement Control Teams. This documentation covered the period of October 2023 to June 2024 and includes SOPs, photos of EEUM items, training and inventory processes, training materials and records, and organization charts and manning slides.

(U) Management Comments

(U) Office of Defense Cooperation–Ukraine



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UNITED STATES EUROPEAN COMMAND
OFFICE OF DEFENSE COOPERATION
25 LESI UKRAINKY BLVD
KYIV, UKRAINE 01133

ECJ5-ODC-UKR

26 JULY 2024

MEMORANDUM FOR Department of Defense Office of Inspector General

SUBJECT: SCO Response to close a recommendation in Report No. DODIG-2023-090 Follow-up Evaluation of Management Advisory: Sufficiency of Staffing at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring (Project No. D2024-DEV0PE-0082.000)

References: (a) (U) Arms Export Control Act (AECA) Section 3 (22 U.S.C. 2753)
(b) (U) Security Assistance Management Manual (SAMM) Chapter 8 – End Use Monitoring
(c) (U) Report No. DODIG-2023-090 Follow-up Evaluation of Management Advisory: Sufficiency of Staffing at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring (Project No. D2024-DEV0PE-0082.000)

1. (U) The purpose of this memorandum is to close a recommendation to ODC Kyiv in Report No. DODIG-2023-090 Follow-up Evaluation of Management Advisory: Sufficiency of Staffing at Logistics Hubs in Poland for Conducting Inventories of Items Requiring Enhanced End-Use Monitoring (Project No. D2024-DEV0PE-0082.000).
2. (U) ODC Kyiv designated a Golden Sentry primary POC and ensured all ODC Kyiv personnel assigned EUM duties completed the EUM online training provided through DSCA's DSCU and SCIP. To date, ODC has not been in a position to necessitate use of non-ODC staff to conduct EEUM operations or to serve as the primary program manager.
3. (U) ODC Kyiv ensured procedures for conducting EUM in a hostile environment, identified in SAMM Section C8.5.5. are being followed and kept current. This includes working with the USEUCOM to obtain a USEUCOM endorsement memorandum, drafting required EEUM Control Plans, working with the PN to receive signed CONOPS documents and ensuring the latest PN supporting documentation and disposition status is current within the SCIP-EUM database.
4. (U) ODC Kyiv personnel assigned EUM duties and located at Logistics Enabling Node – Poland (LEN-P), provided DSCA EUM overview for U.S. military personnel supporting U.S. defense article accountability operations at the transition hub in Jasionka, Poland on the following dates: 4 January 2024 and 3 July 2024.
5. (U) The points of contact for this memorandum are [REDACTED], [REDACTED], ODC Kyiv EUM Program Manager at [REDACTED], and [REDACTED], ODC Kyiv EUM Program Analyst at [REDACTED].

[REDACTED]
[REDACTED]
Acting Chief, Office of Defense Cooperation

Enclosures:

1. (CUI) EUM for non-EUM U.S. Government Personnel - 20240104

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(U) Acronyms and Abbreviations

AECA	Arms Export Control Act
DSCA	Defense Security Cooperation Agency
EEUM	Enhanced End-Use Monitoring
EUM	End-Use Monitoring
LEN-P	Logistics Enabling Node–Poland
LSA	Logistics Support Area
ODC-U	Office of Defense Cooperation–Ukraine
SAMM	Security Assistance Management Manual
SCO	Security Cooperation Organization
SOP	Standard Operating Procedure
USAMAA	U.S. Army Manpower Analysis Agency
USEUCOM	U.S. European Command

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