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FY 2025 Golden Sentry End Use Monitoring Report for Congress

Introduction

In 1996, through Public Law 104-164, Congress amended Section 40A of the Arms Export Control Act (AECA) (22 U.S.C. 2785), requiring the President to establish a program that provides for the End Use Monitoring (EUM) of defense articles and defense services sold, leased, or exported under the AECA or under the Foreign Assistance Act (FAA) of 1961.

This report describes Department of War (DoW) actions taken to comply with AECA EUM requirements for defense articles and defense services transferred through the Foreign Military Sales (FMS) program, as well as actions taken to monitor transfers pursuant to grant authorities (for example, Presidential Drawdowns and Title 10 Building Partner Capacity programs). As required by Section 40A, this report is submitted under Section 634 of the Foreign Assistance Act of 1961 (22 U.S.C. 2394).

1. Actions Taken to Implement the EUM Program

As the designated DoW lead for implementing and managing the EUM program, the Director, Defense Security Cooperation Agency (DSCA), established the Golden Sentry Program in 2001 to comply with Section 40A of the AECA. Section 40A requires that the EUM program be designed to provide reasonable assurance, to the extent practicable, that the recipient is complying with the requirements imposed by the U.S. Government with respect to the use, transfer, and security of defense articles and defense services, and that such articles and services are being used for the purposes for which they were provided.

Section 40A also requires the end use verification of defense articles and defense services that incorporate sensitive technology; that are particularly vulnerable to diversion or other misuse; or that would have significant consequences if diverted or misused.

Chapter 8 of DSCA's Security Assistance Management Manual (SAMM) 5105.38-M outlines Golden Sentry policy requirements and the roles and responsibilities of the security cooperation community as it pertains to EUM during each part of the transfer process. The program levies monitoring and compliance requirements on foreign governments, U.S. military departments (MILDEPs), combatant commands (CCMDs), respective U.S. Embassy country teams, and U.S. DoW Military Groups (MILGPs) worldwide.

DSCA monitors and assesses partner nation compliance with the Golden Sentry Program through Compliance Assessment Visits (CAVs), Virtual Compliance Assessments (VCAs), Focused Verification Checks (FVCs), and Familiarization Assistance Visits (FAVs). During an assessment, DSCA confirms whether our partners are following proper end use, security, and accountability procedures and that MILGPs comply with DoW policy. CAVs and VCAs are used by DSCA as a mechanism to assess the overall effectiveness of the Golden Sentry Program and identify areas for improvement.

DoW Processes *Prior* to Any Transfer – Pre-checks and Vetting

U.S. Country Team Assessments: Partner requests for purchases of Significant Military Equipment may require the submission of a U.S. country team assessment to inform U.S. Government (USG) decision-making concerning the proposed transfer. As part of this assessment, the U.S. country team, in close coordination with the CCMD, considers the partner's intended "end use" of the defense article and conducts an evaluation to assess the partner's ability and willingness to protect U.S. technologies. The evaluation will consider the ability of the partner nation and the in-country MILGP to

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properly perform their EUM responsibilities as well as the potential regional political impacts of the purchase.

Authorized Disclosure and Technology Reviews: DoW and the Department of State (DOS) thoroughly review transfers of all technologies before offering a capability to a partner nation. Each proposed transfer is vetted by various interagency organizations and offices to ensure the transfer is consistent with U.S. foreign policy and national defense objectives.

Congressional Notifications: Finally, for FMS transfers that meet specific dollar value thresholds, a formal notification is provided to Congress before offers of transfer can be made. These notifications clearly identify the proposed recipient and the capability being proposed for transfer and provide an opportunity for congressional oversight.

DoW Processes *During* Transfer – EUM Assurances

A partner's EUM assurances for transfers of defense articles, services, or training are obtained through a Letter of Offer and Acceptance (LOA) for an FMS case or through a binding agreement for grant assistance as required by Section 505 of the Foreign Assistance Act (often referred to as a 505 Agreement) between the United States and the partner or international organization. An LOA specifies the type and quantities of items to be exported, as well as the recipient's end use, transfer, and security obligations. The conditions of the LOA or 505 Agreement obligate the partner to permit USG officials, upon request, to conduct EUM verification with respect to the use, transfer, and security of defense articles and defense services transferred and conduct physical inventories of specific types of defense articles as part of routine visits or to verify reports of unauthorized use. For exports requiring unique monitoring controls, the LOA may contain unique provisos regarding the physical security requirements, accountability, movement, and other security and protection requirements for the defense articles transferred. Signing the LOA commits the purchaser to the terms and conditions established in the LOA. DoW ensures that partners or international organizations who receive U.S.-provided defense articles or services understand their requirement to allow end use monitoring mandated by U.S. law.

DoW Processes *After* Transfer – Post-Delivery EUM and Compliance Verification

Post-delivery monitoring activities are conducted to verify the partner's continuous possession of U.S.-provided defense articles and the partner's compliance with any applicable technology control or physical security requirements. DSCA requires post-delivery monitoring by U.S. personnel assigned to MILGPs located at U.S. Embassies worldwide. Post-delivery monitoring activities vary with the level of monitoring required. Some defense articles are subject to Enhanced EUM due to the nature and sensitivity of the technology associated with the articles, while others are covered by Routine EUM procedures.

Routine EUM: MILGP personnel conduct general end use observations to verify accountability and protection of U.S.-provided defense articles and services. They are also required to report any potential misuse or unauthorized transfer. MILGP personnel typically accomplish Routine EUM checks while performing other security cooperation functions, such as during visits to the partner's installations and sites. MILGP personnel may also incorporate information obtained through interaction with other assigned U.S. Embassy personnel, or from any other readily available or opportune source of credible information into the Routine EUM process. MILGPs generally focus their Routine EUM activities on the following categories of defense articles: battle tanks, armored combat vehicles, large caliber artillery systems, military fixed-wing aircraft and helicopters, unmanned aerial systems (UAS), warships and military vessels, select missiles and missile systems, military vehicles, bombs, crew served and individual weapons, and platform-mounted night vision systems.

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Enhanced EUM: For specifically designated defense articles, the Golden Sentry Program has established a regime of physical security assessments and inventories called Enhanced EUM (EEUM). MILGP personnel conduct EEUM through planned and coordinated visits to the partner’s installations and sites. This includes conducting serial number inventories of EEUM-designated defense articles when they are first delivered in-country and annually thereafter. It also includes conducting physical security assessments of defense article storage sites or other areas where EEUM-designated items are kept.

EEUM is required for defense articles specifically designated by the MILDEP’s export policy or by the interagency release process. Other defense articles may require EEUM on a case-by-case basis as a result of the transfer approval process. All EEUM-designated defense articles are required to be transferred on defined order lines within the LOA or an implementing agreement. Additionally, EEUM-coded Military Articles and Services Listing codes are used on the LOA to further identify EEUM-designated defense articles. Specialized physical security and accountability notes and provisions included in the terms of the LOA or other transfer agreements clearly notify the proposed recipient of U.S. security requirements. EEUM-designated articles include select equipment and systems related to communications security; optics; air defense systems; missiles; countermeasures; and munitions.

Security Cooperation Information Portal (SCIP): As the in-country DoW representative, the MILGP is responsible for ensuring both Routine EUM and EEUM are accomplished and documented in SCIP. The Golden Sentry Program utilizes SCIP to maintain data on the defense articles monitored through Routine EUM and EEUM. SCIP is the repository for MILGP-conducted EEUM serial number inventories and additional data such as information regarding when EEUM items are expended in testing, training or combat, or are destroyed or lost. This data is maintained from the time an EEUM-designated defense article is received by the partner until its final disposition. SCIP allows the FMS implementing agencies, CCMDs, and MILGPs to load and view Golden Sentry data. Additionally, SCIP offers comprehensive summary details on MILGP compliance with annual inventories, allowing authorized users to input, update, modify disposition, and indicate transfers of EEUM-designated defense articles. Lastly, it permits the DOS to directly input status information related to ongoing reviews of potential violations of Section 3 of the AECA.

2. Detailed Accounting of Program Cost and Personnel

Resources: DSCA employs seven full-time civilian employees to develop EUM policy guidance, implement the Golden Sentry Program worldwide, conduct compliance assessments within each CCMD’s area of responsibility, and provide EUM training to MILGP personnel assigned to U.S. Embassies. Additionally, five contractor personnel operated, maintained, and developed necessary software applications for SCIP during the reporting period, provided helpdesk support, analytical reporting, and EUM training activity assistance. Over 540 MILGP personnel performed EUM functions in fiscal year (FY) 2025 to support the Golden Sentry Program as part of their security cooperation duties.

EUM Funding: Within DSCA Headquarters, \$2 million was spent in FY 2025 for civilian salaries, travel, training, and contractor support. Throughout the CCMDs, \$253.9K was spent in FY 2025 for travel-related costs by MILGP personnel to perform EEUM and to attend EUM training.

	ACTUAL MILGP FY 2025 TRAVEL COSTS TO
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	PERFORM EEUM & ATTEND EUM TRAINING OBLIGATIONS (\$K)
USCENTCOM	\$68.8
USEUCOM	\$102.9
USNORTHCOM	\$15.5
USINDOPACOM	\$53.6
USSOUTHCOM	\$12.3
USAFRICOM	\$0.8
TOTAL	\$253.9

Review of Transfer Agreements: During FY 2025, DSCA Golden Sentry personnel reviewed 956 LOAs and other transfer agreements to verify quantities and types of designated defense articles transferred, ensure that all LOAs specified the recipient’s commitment to provide appropriate end use and protection of the defense articles transferred, and ensure that all LOAs contained provisions for USG access for monitoring compliance.

Modernized EUM Processes for Efficiency and Oversight: DSCA implemented the following initiatives to enhance SCIP in FY 2025:

1. Streamlined Reporting and Visibility: Reporting processes were enhanced to provide a more comprehensive and holistic view of the entire EUM enterprise through the integration of component data and inventory workflows. This has significantly reduced the time MILGPs spend on preparation and cross-reference reports through increased data visibility.
2. Automated Data Entry: DSCA successfully modernized the Bulk Update Tool to process large data sets for defense articles that have been disposed of, expended, or categorized as an inventory loss. Previously, data entries for these three categories into SCIP-EUM were individually entered. Automated data entry has produced significant gains in efficiency compared to the previous time-consuming, manual-entry data entry process.
3. Improved Communication and Compliance: DSCA implemented automated notifications within the SCIP-EUM system. Key stakeholders, including DSCA EUM Program Managers, now receive immediate notifications when critical documents – such as Standard Operating Procedures and Partner Control Plans – are uploaded, which has contributed to timely awareness and improved program compliance.

MILGP Annual EEUM Checks: During FY 2025, MILGP personnel assigned to U.S. Embassies in 105 countries conducted 4,694 physical security assessments of storage sites and accountability inventories of over 293,000 transferred EEUM-designated defense articles worldwide.

Conducted CAVs in FY 2025: DSCA Golden Sentry personnel conducted Compliance Assessments in Albania, Bahrain, Ecuador, Estonia, Guatemala, Kuwait, Latvia, Lithuania, Montenegro, Panama, Peru, Poland, Qatar, Romania, Tajikistan, Turkiye, and Ukraine.

DSCA’s objectives for these CAVs were to:

1. Assess MILGP compliance with the policies and procedures of DoD’s EUM program.
2. Assess foreign partner compliance with specific physical security and accountability requirements, as well as other terms of sale.

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Ukraine-specific EUM Activities: DSCA has made process improvements and applied innovative approaches to ensure EEUM material transferred to Ukraine under FMS, Presidential Drawdown, and through the Ukraine Security Cooperation Initiative were accounted for and that U.S. technology was protected, even in a contested environment.

1. DSCA Travel to Poland: EUM subject matter experts traveled to Poland on three occasions in support of EUM efforts related to U.S. defense article for transfers to Ukraine, working with the other Department of War agencies, to include U.S. rotational forces, and U.S. Embassy Kyiv MILGP personnel. DSCA officials conducted training and assessed EEUM procedures adapted especially for defense articles transferred to Ukraine in alignment with recommendations by the Government Accountability Office.
2. Bi-weekly Synchronization meetings: DSCA EUM Program Managers conducted bi-weekly accountability synchronization meetings with U.S. Embassy Kyiv MILGP personnel, U.S. European Command, and other U.S. Government agencies to discuss EUM activities.
3. Defense Threat Reduction Agency (DTRA) Cooperation: In May 2025, DSCA and DTRA finalized a Memorandum of Agreement to support DSCA's Golden Sentry End Use Monitoring program which was utilized for Ukraine-specific EUM activities. DTRA leveraged its regional resources, thereby eliminating the need for additional funding. DSCA subject matter experts conducted EUM familiarization training and oversaw the transfer of EUM responsibilities from U.S. Embassy Kyiv MILGP personnel in Poland to DTRA personnel when U.S. Embassy Kyiv MILGP personal were officially recalled to Kyiv. This transfer of responsibility ensured the continued success of EUM operations for all EEUM-designated defense articles transferred to Ukraine.

Findings Related to Transfers of Small Arms and Light Weapons: DoD's FY 2025 EUM efforts did not yield any compliance issues or concerns related to transfers of small arms and light weapons.

EUM Activities in Hostile Security Environments: Due to ongoing hostilities in Ukraine, DoD continues to rely on the established hostile security environment accountability practices to monitor Ukraine's procedures to track in-country receipt of transferred U.S. defense articles.