



DEPARTMENT OF DEFENSE
Defense Contract Management Agency

IMMEDIATE POLICY CHANGE

International Requests for Contract Administration Services

Quality Assurance Directorate
OPR: DCMA-QA

DCMA-INST 313 (IPC-1)
July 7, 2015

1. **POLICY.** This Immediate Policy Change (IPC) implements changes to DCMA-INST 313, “International Requests for Contract Administration Services,” November 23, 2013.
2. **PURPOSE.** This policy is updated to clarify policy and procedures associated with International Traffic in Arms Regulations (ITAR). This IPC will be in effect until the policy is re-released in its entirety per new DoD Instruction 5025.01, “DoD Issuance Program” format standards at a future date.
3. **APPLICABILITY.** This IPC applies to all DCMA activities involved in the exchange of GQA or financial audit services with a foreign government under the terms of an International Agreement. This includes DCMA contract management offices (CMO) in the U.S. delegating to DCMA International (DCMAI) CMOs outside of the U.S.
4. **NEW GUIDANCE.**
 - a. Paragraph 1.b. is changed to read:
 - 1.b. Establishes policy statements, assigns responsibilities, and provides procedures for DCMA personnel both in and outside the U.S., when requesting a foreign government, as the **hHost nNation (HN)** to perform government quality assurance (GQA) or financial audit services on behalf of the U.S. within their country, or when DCMA, as the **host nation HN**, performs GQA or financial audits on behalf of a foreign government or international organization such as North Atlantic Treaty Organization (NATO), within the U.S.
 - b. Paragraph 1.2.4. is changed to read:
 - 1.2.4. All requests for GQA or financial audits made to another government by DCMA must be initiated by DCMAI CMOs **IAW paragraph 1.2.4.1. All requests from foreign governments or International Organizations for GQA will be processed IAW paragraph 1.2.4.2.**
 - c. Add subparagraphs 1.2.4.1. and 1.2.4.2.:
 - 1.2.4.1. Continental United States (CONUS) CMOs, administrating prime contracts, will delegate any outside the Continental United States (OCONUS) subcontract work to the**

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cognizant DCMAI CMO via the Delegation e-Tool. Delegations will be limited to work covered by existing International Agreements. The DCMAI CMO will prepare the request for GQA (RGQA) IAW paragraphs 4.6. and 4.7. of this Instruction.

1.2.4.2. When a foreign government or International Organization submits a RGQA involving a direct commercial sales contract, it will be sent to the DoDCCP. The DoDCCP is responsible to validate the work against existing International Agreements IAW paragraph 7.2.2. of this Instruction. Once validated, the DoDCCP will input the request into the ECARS e-Tool and route it to the applicable CONUS CMO. In the event that a re-delegation back to the requesting foreign nation is necessary, the CONUS CMO will send the request through ECARS. This ECARS delegation will be routed back to the DCMAI CMO responsible for work in the requesting foreign nation. In turn, the DCMAI CMO will forward this re-delegation back to the requesting HN focal point IAW existing International Agreements.

- d. Delete paragraph 1.2.9. in its entirety.
- e. Renumber paragraph 1.2.10. to **1.2.9.** and change to read:

1.2.409. With the exception of property administration *and National Aeronautics and Space Administration (NASA) delegations* in Canada, GQA and financial audit services addressed in this Instruction, DCMA personnel must not request the foreign government to perform any other contract administration services.

- f. Renumber paragraph 1.2.11. to **1.2.10.**
- g. Change paragraph 3.2. to read:

3.2. COORDINATION. All of the information addressed above must be coordinated with the DCMAI CMO prior to the delegation being sent. When requested, copies of risk assessments, surveillance plans, and other pertinent information must be provided to DCMAI CMO QA personnel. ITAR-related documents/information (*Manufacturing License Agreement (MLA)/Technical Assistance Agreement (TAA) numbers, expiration dates, and what's being protected*) must be sent with the delegation to the DCMAI CMO.

- h. Change paragraph 4.3.3.1. to read:

4.3.3.1. Each critical characteristic and/or important manufacturing process identified as CSI or ALRE CSI must be documented as an individual risk cause on the RIAC under an overarching risk statement associated with the high impact. (*See [Resource Web page for Delegation Clarification for Issuance, Rejection, and Acceptance to CMO's document.](#)*)

- i. Change paragraph 4.3.3.2. to read:

4.3.3.2. Safety of Flight (SOF) lists (or flight safety items per AQAP 2070 (reference (e))), as determined IAW DCMA-INST 308, "Safety of Flight (SOF) – QA" (Reference (r)), must be attached to the RGQA with a single risk statement and cause documented on the RIAC or

RGQA, as applicable. The purpose for attaching the list of flight safety items is to identify and communicate the risk statement and risk causes, not to impose or mandate the surveillance method or technique to the ~~host-nation~~ **HN**. DCMA may not impose, but should suggest GQA activities and techniques during discussion noted in paragraph 4.6.2. (See [Web Resource Web page](#) for *Delegation Clarification*, SOF RGQA, and RIAC template.)

j. Change paragraph 4.3.4. to read:

4.3.4. Information necessary to complete the performance factors assessment may not be readily available on the first request associated with a particular supplier. In such cases, the ~~host-nation~~ **HN** Government Quality Assurance Representative (GQAR) should be contacted for assistance in gathering information to identify risk causes. Do not send the performance factors form to ~~host-nation~~ **HN** personnel for completion. (See [Resource Web page for Delegation Clarification for Issuance, Rejection, and Acceptance to CMO's document.](#))

k. Change paragraph 4.3.4.1. to read:

4.3.4.1. During the course of the GQA surveillance, supplier performance information must be communicated with the ~~host-nation~~ **HN** personnel and records related to the supplier's performance must be maintained for future delegations. (See [Resource Web page for Delegation Clarification for Issuance, Rejection, and Acceptance to CMO's document.](#))

l. Change paragraph 4.3.4.2. to read:

4.3.4.2. The performance factor form is an excellent tool to use during occasional status meetings or other communication with the ~~host-nation~~ **HN** QA personnel when discussing supplier performance. (See [Resource Web page for Delegation Clarification for Issuance, Rejection, and Acceptance to CMO's document.](#))

m. Change paragraph 4.4.2. to read:

4.4.2. Surveillance plans must be maintained by DCMA personnel regardless of who performs the GQA surveillance (DCMA or ~~host-nation~~ **HN** personnel). ~~When a request for GQA is sent to the host-nation, the plans assist DCMAI personnel in managing the RGQA. In the event that a delegation is not a "high risk/major program" (Reference RGQA), a DCMA generated surveillance plan showing traceability to a delegation will be considered adequate documentation of a surveillance plan.~~

n. Change paragraph 4.4.6. to read:

4.4.6. Identification of all contracts or subcontracts covered by a facility-wide RGQA and the estimated contract final delivery date must be ~~a part of the GQA surveillance plan an~~ **attachment (notification letter, see [Resource Web page](#)) and maintained as part of the RGQA.** This information must be used to update the ~~host-nation~~ **HN** QA personnel of active GQA work under the current facility-wide RGQA.

o. Change paragraph 4.5.1. to read:

4.5.1. Where suppliers have multiple contracts for like or similar items utilizing similar manufacturing processes, facility-wide RGQAs are encouraged to optimize resources. Where DCMAI has an existing request, there is no need to generate additional RGQAs for similar contracts with the same supplier. ***Though ITAR related delegations are not prohibited from being placed on facility-wide delegations, they are not recommended. Any decisions for ITAR facility-wide delegations need to be considered on a case by case basis in order to ensure all ITAR delegation controls are maintained. In addition to the standard requirements for facility-wide delegations, reporting, and communicating status of the delegation would be required on a more frequent basis (i.e., as contract/MLA/TAA expiration dates are met or revised). Additional information needed to be tracked and communicated would include:***

- ***Contract number and associated final delivery date***
- ***MLA/TAA license numbers and associated expiration dates***
- ***Description of defense article, service, technical data being controlled***

p. Change paragraph 4.5.4.1. to read:

4.5.4.1. For purposes of facility-wide RGQA reporting, ***except ITAR mentioned above***, the estimated contract final delivery date shown on the DCMA facility-wide report should also be considered as the RGQA closure date. Unless the report is updated or revised otherwise, this is the date the ~~host-nation~~ ***HN*** QA personnel should cease GQA surveillance efforts and consider the request closed. A request for GQA Closure Report (GQACR) with an updated RIAC must be requested if one had not been received. If delivery dates change, DCMA QA personnel must ensure the estimated completion date is updated on the DCMA facility-wide report.

q. Change paragraph 4.6.6.2. to read:

4.6.6.2. Deviation Permits and Concessions (See Definitions). Identify whether the ~~host-nation~~ ***HN*** QA personnel are authorized to concur or nonconcur with the classification/disposition of the supplier's minor deviation permits and/or concessions. Authority for major deviation permits and/or concessions are never delegated to the ~~host-nation~~ ***HN*** QA personnel; however, indicate whether recommendations or comments are requested. Material Review Board authority for CSIs is normally withheld unless specifically delegated by the Procurement Contracting Officer (PCO)/Engineering Support Activity. ***(See [Resource Web page for Delegation Clarification for Issuance, Rejection, and Acceptance to CMO's document](#).)***

r. Change paragraph 4.6.6.5. to read:

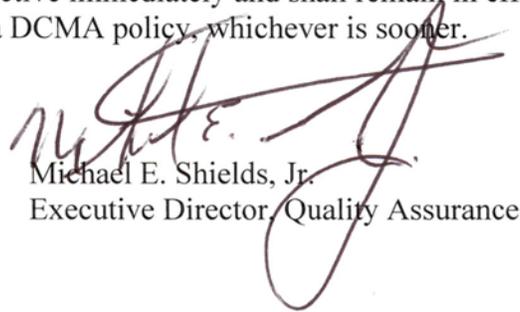
4.6.6.5. Surveillance Plans. Request copies of the ~~host-nation's~~ ***HN*** GQA surveillance plans for contracts that contain CSI, SOF, or other high-impact Risk Statements or high-likelihood Risk Causes. Plans for major programs should also be requested. DCMA QA personnel should review the ~~host-nation~~ ***HN*** GQA surveillance plan to ensure all risk causes and GQA activities

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identified on the RIAC and RGQA have been addressed on the plan. (*See [Resource Web page for Delegation Clarification for Issuance, Rejection, and Acceptance to CMO's document.](#)*)

5. RELEASABILITY – UNLIMITED. This IPC is approved for public release.

6. EFFECTIVE DATE. This IPC is effective immediately and shall remain in effect until rescinded, superseded, or incorporated in a DCMA policy, whichever is sooner.



Michael E. Shields, Jr.
Executive Director, Quality Assurance



DEPARTMENT OF DEFENSE
Defense Contract Management Agency

INSTRUCTION

International Requests for Contract Administration Services

Quality Assurance Directorate
OPR: DCMA-QA

DCMA-INST 313
November 23, 2013

NOTE: This policy is updated to meet the new Agency **policy format** requirements. Chapters 1 and 2, as well as the Appendix and Glossary, were added in accordance with the new policy format. Chapter 3 Procedures, contains substantive changes. This policy should be read in its entirety.

1. PURPOSE. This Instruction:

- a. Cancels and replaces DCMA-INST 313, “International Agreements/International Memoranda of Understanding/Host Nation Contract Management Services” (Reference (a)).
- b. Establishes policy statements, assigns responsibilities, and provides procedures for DCMA personnel both in and outside the U.S., when requesting a foreign government, as the host nation to perform government quality assurance (GQA) or financial audit services on behalf of the U.S. within their country, or when DCMA, as the host nation, performs GQA or financial audits on behalf of a foreign government or international organization such as North Atlantic Treaty Organization (NATO), within the U.S.
- c. Is established in compliance with DoD Directive 5105.64, “Defense Contract Management Agency (DCMA)” (Reference (b)), and all references listed.

2. APPLICABILITY. This Instruction applies to DCMA organizations involved in the exchange of GQA or financial audit services with a foreign government under the terms of an International Agreement. This includes DCMA contract management offices (CMO) in the U.S. delegating to DCMA International (DCMAI) CMOs outside of the U.S.

3. MANAGERS’ INTERNAL CONTROL PROGRAM. In accordance with (IAW) DCMA-INST 710, “Managers’ Internal Control Program” (Reference (c)), this Instruction is subject to evaluation and testing. The process flowchart is located at Appendix A.

4. RELEASABILITY – UNLIMITED. This Instruction is approved for public release.

5. PLAS CODE. All DCMA personnel must enter time into the Performance Labor Accounting System (PLAS) as follows:

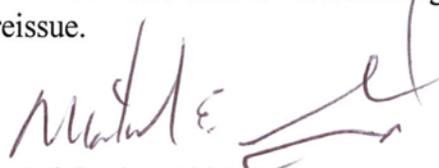
a. Process Code 008 – International Agreements/International MOU-Host Country CAS, when performing processes as defined in this Instruction.

b. When performing processes defined in other DCMA Instructions, use the PLAS process code as identified in that applicable Instruction.

c. When performing work on international requests managed by DCMA Electronic Contact Administration Request System (ECARS), report hours expended against the assigned Document Control Number (DCN).

6. POLICY RESOURCE WEB PAGE. <https://home.dcma.mil/policy/313r>

7. EFFECTIVE DATE. By order of the Director, DCMA, this Instruction is effective November 25, 2013 and all applicable activities shall be fully compliant within 60 days from this date. Exception: The reporting of delegation decisions via Metrics Studio will not be required until the performance indicator is established. Estimated time for establishing the performance indicator is 120 days from the date of this reissue.



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REFERENCES

- (a) DCMA-INST 313, "International Agreements/International Memoranda of Understanding/Host Nation Contract Management Services," June 2010 (hereby cancelled)
- (b) DoD Directive 5105.64, "Defense Contract Management Agency (DCMA)," January 10, 2013
- (c) DCMA-INST 710, "Manager's Internal Control Program," September 19, 2012
- (d) Chapter 39 of Title 22, United States Code, "Arms Export Control Act (AECA)"
- (e) Allied Quality Assurance Publication (AQAP)-2070, "NATO Mutual Government Quality Assurance Process"
- (f) NATO Standardization Agreement (STANAG) 4107, "Mutual Acceptance of Government Quality Assurance and Usage of the Allied Quality Assurance Publications (AQAP)," September 1997
- (g) Defense Federal Acquisition Regulation Supplement (DFARS) 246.406, "Foreign Governments," October 1, 2010
- (h) DoD Directive 5530.3, "International Agreements," November 21, 2003
- (i) DCMA-INST 1081, "Travel – OCONUS," May 2010
- (j) DFARS 242.002, "Interagency Agreements," November 9, 2005
- (k) DCMA-INST 501, "Policy Publications Program," October 1, 2013
- (l) Parts 120-130 of Title 22, Code of Federal Regulations (CFR), Volume I, Foreign Relations, Subchapter M, "International Traffic in Arms Regulations (ITAR)"
- (m) DFARS PGI 242.002, "Interagency Agreements," November 9, 2005
- (n) DCMA-INST 325, "Contract Technical Review – QA," May 2012
- (o) DCMA-INST 326, "Risk Assessment – QA," February 2012
- (p) DCMA-INST 309, "GCQA Surveillance Planning," February 2012
- (q) DCMA-INST 316, "Delegate Surveillance - Quality Assurance," September 2010
- (r) DCMA-INST 308, "Safety of Flight (SOF) – QA," February 15, 2013
- (s) DCMA-INST 323, "Data Collection and Analysis," May 15, 2013
- (t) DCMA-INST 1201, "Corrective Action Process," December 4, 2012
- (u) DCMA-INST 314, "Product Acceptance and Release – QA," January 17, 2013
- (v) DCMA-INST 809, "Records Management," May 2011
- (w) DCMA-INST 709, "International and Federal Business Reimbursable and Non-Reimbursable Support," September 2011
- (x) Federal Acquisition Regulation (FAR), Part 46, Subpart 46.504, "Certificate of Conformance," June 14, 2007
- (y) FAR, Part 52, Subpart 52.246-15, "Certificate of Conformance," April 1984
- (z) Chapter 12 of Title 8, United States Code, "Immigration and Nationality"
- (aa) DFARS 252.225-7048, "Export-Controlled Items," June 2013
- (ab) DFARS Procedures, Guidance, and Information (PGI), PGI 225.79, "Export-Control," June 17, 2013
- (ac) DFARS 252.225-7047, "Exports by Approved Community Members in Performance of the Contract," June 2013
- (ad) DFARS 225.79, "Export Control," June 26, 2013
- (ae) AFMC FAR Supplement 5352.227.9000, "Export-Controlled Data Restrictions (AFMC)," July 1997
- (af) ITAR Exemption Tracking No. 09-19, September 2009

CHAPTER 1

POLICY

1.1. OVERVIEW.

1.1.1. DoD has entered into international agreements with their counterparts in foreign governments for the reciprocal exchange of GQA and financial audits services. The authority for establishing these agreements is the U.S. Arms Export Control Act (AECA) (Reference (d)). (See [Resource Web page](#) for a list of nations with whom the U.S. has entered into an International Agreement.)

1.1.2. The office with primary responsibility and authority for establishing, managing, and reporting the status of these Reciprocal Defense Procurement Agreements to Congress is the Office of the Undersecretary of Defense for Acquisition, Technology and Logistics (OUSD (AT&L)), Defense Procurement and Acquisition Policy (DPAP).

1.1.3. These international agreements allow DCMA to request the foreign government to perform GQA and/or financial audit services, when supplier performance is in the foreign country, in lieu of DCMA personnel performing these services. In exchange, DCMA performs these same services on behalf of the foreign government when their supplier performance is in the U.S.

1.1.3.1. An initial basis of confidence is established during the OUSD-sponsored review of each other's GQA policies and procedures when establishing an Annex to an International Agreement between the U.S. DoD and the foreign government for the exchange of GQA services.

1.1.3.2. The teaming relationship established between DCMA and the host nation's QA organization and the mutual GQA process defined in Allied Quality Assurance Publication (AQAP)-2070, "NATO Mutual Government Quality Assurance Process (Reference (e)) and/or identified in the individual International Agreement, including any GQA administrative procedures (refer to the [Resource Web page](#) for a list of GQA administrative procedures), allows for the continued basis of confidence that the supplies or services conform to contract requirements through confidence in the cooperative contract management efforts.

1.1.4. The majority of these international agreements are with NATO nations. The overarching process for GQA, mandated for use by NATO is defined in the NATO Standardization Agreement (STANAG) 4107, "Mutual Acceptance of Government Quality Assurance and Usage of the Allied Quality Assurance Publications (AQAP)" (Reference (f)). STANAG 4107 has been ratified by the U.S. and its use is mandated by DFARS 246.406, "Foreign Governments" (Reference (g)).

1.1.5. STANAG 4107 (Reference (f)) mandates the use of AQAP-2070 (Reference (e)). Some non-NATO governments have elected to use AQAP-2070 as their national practice for performing and exchanging GQA. The use of AQAP-2070 in non-NATO nations has been

formalized in a GQA administrative/implementation procedure between the U.S. and the applicable foreign government. AQAP-2070 forms the basis of this Instruction.

1.1.6. The DCMA Government Contract Quality Assurance (GCQA) system and the AQAP-2070 (Reference (e)) GQA system mirror each other. They both require a set of interrelated GQA processes to be performed in order to establish confidence that the contractual requirements relating to quality are met by the supplier. Although similar, there are slight differences in terms, techniques, and documentation. For the sake of clarity, the term GQA will be used in lieu of GCQA throughout this Instruction.

1.1.7. The GQA procedures defined in this Instruction flow through multiple DCMA QA organizational areas of responsibilities. DCMA CMOs that are located in the U.S. delegate GQA surveillance to DCMAI CMOs who are located outside of the U.S., who may, in turn, request the other government's QA organization to perform the required GQA. Likewise, another government's QA organization may request GQA surveillance to DCMA CMOs via the DoD Central Control Point (DoDCCP). For the sake of clarity, the term DCMA CMOs refer to CMOs located in the U.S., and DCMAI CMOs refer to CMOs located outside of the U.S. (refer to the [Glossary](#) for the definitions for U.S. and outside of the U.S.).

1.2. POLICY. It is DCMA policy that:

1.2.1. DCMA personnel must not enter into discussions with personnel from foreign governments concerning the establishment of international agreements or extending the provisions of current international agreements without the expressed written authorization to do so by OUSD. (See DoD Directive 5530.3, "International Agreements" (Reference (h)).)

1.2.2. DCMA must utilize existing international agreements for the reciprocal exchange of GQA and financial audits when the performance of such services is considered necessary in the other country or when requested by a foreign government. Once the request for GQA services is accepted by the other government's QA organization, DCMA personnel must not duplicate, nor must they perform oversight of the GQA surveillance performed by the host nation. Any travel associated with delegations outside the U.S. must be IAW DCMA-INST 1081, "Travel - OCONUS" (Reference (i)).

1.2.3. Except as identified in this Instruction, the process mandated herein must take precedence over other DCMA Instructions when requesting or performing GQA or financial audits under the provisions of an existing International Agreement. Whenever a contract cannot be delegated to the host nation Ministry of Defense (HN MoD), QA personnel shall perform the GQA in accordance with the applicable QA process instructions.

1.2.4. All requests for GQA or financial audits made to another government by DCMA must be initiated by DCMAI CMOs.

1.2.5. Foreign governments and international organizations shall send their requests for contract administration services to the DoDCCP at the International and Federal Business Team, at DCMA Headquarters (HQ) IAW NATO STANAG 4107 (Reference (f)), or the applicable

International Agreement. All requests for GQA or financial audits made by another government to DCMA must only be received and processed by the DoDCCP IAW DFARS 242.002, “Interagency Agreements” (Reference (j)).

1.2.6. DCMA personnel must comply with NATO STANAG 4107 (Reference (f)), AQAP-2070 (Reference (e)), and this Instruction when asking a NATO member nation to perform GQA and when performing GQA when requested by a NATO nation or NATO organization.

1.2.6.1. Non-NATO nations may utilize the AQAP-2070 (Reference (e)) processes as their national practice for performing GQA and for sending and receiving Requests for Government Quality Assurance (RGQA) to other governments. In such cases, DCMA personnel must use the policy and procedures of this Instruction and AQAP-2070, which may have been ratified by a GQA administrative procedure with the other government.

1.2.6.2. In those cases where the AQAP-2070 (Reference (e)) process is not used, DCMA personnel must follow the request for GQA processes identified in the individual International Agreement, including any GQA administrative procedure, as applicable.

1.2.7. Requests for GQA to other governments must be based on a risk assessment performed by DCMA QA personnel IAW [Chapter 4](#).

1.2.8. Requests for financial audits must follow the applicable Annex of the International Agreement for reciprocal financial audits. (See [paragraph 4.2.4](#) for exceptions as they relate to requesting financial audit services and [Chapter 9](#) for requesting services for contracts with International Traffic in Arms Regulation (ITAR) restrictions.) The nations with whom the U.S. has entered into an agreement for financial audit services are:

- Canada
- France
- Germany
- The Netherlands
- The United Kingdom

1.2.9. DCMA personnel must follow the property administration memorandums of understanding (MOU) with Canada when requesting property administration services. (See [paragraph 4.2.4](#) for exceptions as they relate to property administration services.)

1.2.10. With the exception of property administration in Canada, GQA and financial audit services addressed in this Instruction, DCMA personnel must not request the foreign government to perform any other contract administration services.

1.2.11. Any deviation/waiver requests to this Instruction must be processed IAW DCMA-INST 501, “Policy Program Program” (Reference (k)).

CHAPTER 2

ROLES AND RESPONSIBILITIES

2.1. COMMANDER, DCMA INTERNATIONAL (DCMAI) DIRECTORATE. The Commander, DCMAI must:

2.1.1. Through the DCMAI host nation program manager, lead any effort associated with support requests under international agreements or assessments of a foreign governments QA Management System capabilities received from the Contract Policy and International Contracting (CPIC) Directorate, Defense Procurement and Acquisition Policy (DPAP), OUSD (AT&L).

2.1.1.1. Inform the DCMA Executive Director of Quality Assurance of reciprocal assessments so that Agency support can be provided, if necessary.

2.1.1.2. Inform the DPAP/CPIC Directorate of progress being made and/or anticipated delays related to support requests.

2.1.2. Notify the DPAP/CPIC, DCMA Director, and the DCMA Executive Director of Quality Assurance of any International Agreement noncompliance issues that are likely to be escalated for discussion between DoD and their foreign government counterparts.

2.2. HOST NATION PROGRAM MANAGER, DCMAI DIRECTORATE. The host nation program manager must:

2.2.1. Lead efforts associated with support requests under international agreements or assessments of a foreign government QA Management System as requested by the CPIC and DPAP, OUSD (AT&L) such as:

2.2.1.1. Liaise with the CMO Commander/Host Nation Coordinator (HNC) on international agreements and policy changes.

2.2.1.2. Coordinate reciprocal assessments with the DCMA Executive Director of Quality Assurance to determine Agency support requirements.

2.2.1.3. Ensure DPAP/CPIC Directorate is informed of all rejected delegations and the progress or delays related to support requests.

2.2.2. Provide HNCs training on NATO STANAG 4107 (Reference (f)), AQAP-2070 (Reference (e)), and CFR, Title 22, Volume I, Foreign Relations, Subchapter M, "International Traffic in Arms Regulations (ITAR)," Parts 120-130 (Reference (l)).

2.2.3. Ensure HNCs understand ITAR restrictions and requirements associated with the flow down of requirements to subcontractors. (See [Chapter 9](#).)

2.2.4. Establish and maintain performance metrics for host nation delegations and provide a monthly status to the DCMAI Commander.

2.3. DOD CENTRAL CONTROL POINT (DoDCCP). The DoDCCP must:

2.3.1. Manage RGQAs and requests for other services using the DCMA ECARS. The DoDCCP establishes ECARS delegations, tracks required process activities, and coordinates with DCMA CMOs to ensure timely acceptance and completion of all requests from other governments.

2.3.2. Escalate issues dealing with noncompliance of the provisions of International Agreements or NATO processes by either DoD personnel or foreign government personnel to the DCMA Director, DCMA Executive Director of Quality Assurance, and the Commander, DCMAI. The appropriate DCMA CMO Commander and the DCMAI host nation program manager must be made aware of the situation and circumstances.

2.3.3. Upon receipt of a request for contract administration services (CAS), follow the DFARS PGI 242.002, "Interagency Agreements" (Reference (m)).

2.4. COMMANDER, DCMAI CONTRACT MANAGEMENT OFFICE (CMO). DCMAI CMO Commanders must:

2.4.1. Ensure assigned personnel comply with this Instruction when work is performed in any geographical location falling under the purview of an International Agreement for the exchange of GQA or financial audit services.

2.4.2. Escalate to the DCMAI Commander any issues dealing with noncompliance of the provisions of international agreements by either DoD or foreign government personnel indicating whether such noncompliance appears likely to be escalated within DoD or the host nation government.

2.4.3. Ensure assigned personnel are knowledgeable of and are utilizing NATO STANAG 4107 (Reference (f)) and AQAP-2070 (Reference (e)). In addition, DCMA personnel must be knowledgeable of the requirements of the applicable international agreements and any established GQA administrative procedures.

2.4.4. Ensure assigned personnel are knowledgeable and capable of identifying contractual requirements invoking CFR, Title 22, Volume I, Foreign Relations, Subchapter M, "International Traffic in Arms Regulations (ITAR)," Parts 120-130 (Reference (l)). Ensure personnel understand ITAR restrictions and requirements associated with the flow down of requirements to subcontractors. (See [Chapter 9](#).)

2.4.5. Ensure a process is in place to periodically review and report delegation decisions being made by assigned personnel. Delegation decisions must be reported monthly via the established performance indicator metric in Metrics Studio.

2.5. HOST NATION COORDINATOR (HNC), DCMAI CMO. The HNC must:

2.5.1. Support the DCMAI CMO Commander in ensuring assigned personnel are knowledgeable of and are utilizing NATO STANAG 4107 (Reference (f)) and AQAP-2070 (Reference (e)) by providing training and follow-on guidance. In addition, DCMA personnel must be made knowledgeable of the requirements of the applicable international agreements and any established GQA administrative procedures.

2.5.2. Support the DCMAI CMO Commander in ensuring assigned personnel are knowledgeable and capable of identifying contractual requirements invoking Parts 120-130 of Title 22, Code of Federal Regulations (CFR), Volume I, Foreign Relations, Subchapter M, "International Traffic in Arms Regulations (ITAR)" (Reference (l)) by providing required training and follow-on guidance. Support the DCMAI CMO Commander in ensuring personnel understand ITAR restrictions and requirements associated with the flow down of requirements to subcontractors. (See [Chapter 9](#).)

2.5.3. Support the DCMAI CMO Commander in ensuring assigned personnel comply with this Instruction when work is performed in any geographical location falling under the purview of an International Agreement for the exchange of GQA or financial audit services. Also, IAW [paragraph 1.2.2.](#), ensure assigned personnel do not duplicate nor must they perform oversight of the GQA surveillance performed by the host nation.

2.5.4. Ensure delegation decisions and rejection management information is reported monthly via the established performance indicator metric in Metrics Studio.

2.6. COMMANDER, DCMA CMO. DCMA CMO Commanders must:

2.6.1. Ensure assigned personnel comply with this Instruction when performing GQA or financial audit services on behalf of foreign governments under the terms of applicable international agreements. DCMA CMOs must provide services only upon receipt of a request for services from the DoDCCP.

2.6.2. Ensure assigned personnel are knowledgeable of and are utilizing NATO STANAG 4107 (Reference (f)) and NATO AQAP-2070 (Reference (e)) as requested by delegations received through ECARS.

2.6.3. Ensure assigned personnel are responsive to requests received from foreign governments through the DoDCCP, and that they comply with all process suspense dates identified in this Instruction, AQAP-2070 (Reference (e)), or international agreements.

2.6.4. Ensure assigned personnel are knowledgeable and capable of identifying contractual requirements invoking Title 22 of CFR, ITAR (Reference (l)), and properly include ITAR restrictions and requirements on outgoing delegations. (See [Chapter 9](#).)

2.6.5. Escalate issues dealing with noncompliance of the provisions of international agreements or NATO processes by either DoD personnel or foreign government personnel to the

DCMA Director, DCMA Executive Director of Quality Assurance, and the Commander, DCMAI through the appropriate chain of command. The DCMAI host nation program manager must be made aware of the situation and circumstances.

2.6.6. Ensure assigned personnel delegate all contracts that require GQA surveillance to the cognizant DCMAI CMO and, IAW [paragraph 1.2.2.](#), do not duplicate nor perform oversight of risks/tasks delegated.

2.7. DCMAI CMO QA PERSONNEL. DCMAI CMO QA personnel must:

2.7.1. Comply with this Instruction when requesting GQA from foreign governments under the terms of an International Agreement and, IAW [paragraph 1.2.2.](#), must not duplicate nor perform oversight of the GQA surveillance performed by the host nation.

2.7.2. Ensure contracts not delegated to the host nation meet the exception criteria and records of these “decisions not to delegate” are maintained IAW [Chapter 4.](#)

2.7.3. Be knowledgeable of and utilize the required processes of NATO STANAG 4107 (Reference (f)), AQAP-2070 (Reference (e)), the applicable international agreements, and any established GQA administrative procedures.

2.7.4. Be knowledgeable and capable of identifying contractual requirements invoking Title 22 of CFR, ITAR (Reference (l)), and properly include ITAR restrictions and requirements on outgoing requests, when authorized to the foreign government. (See [Chapter 9.](#))

2.8. DCMA CMO QA PERSONNEL. DCMA CMO QA personnel must:

2.8.1. Comply with this Instruction when performing GQA services on behalf of another government under the terms of an International Agreement.

2.8.2. Be knowledgeable of and utilize the required processes of NATO STANAG 4107 (Reference (f)), AQAP-2070 (Reference (e)), the applicable International Agreement, and any established GQA administrative procedures, when cited on the request received from the DoDCCP.

2.8.3. Delegate all contracts that require surveillance to the cognizant DCMAI CMO and, [IAW paragraph 1.2.2.](#), must not duplicate nor perform oversight of the risks/tasks delegated. Properly include ITAR restrictions and requirements on outgoing delegations to DCMAI.

2.8.4. Be responsive to requests received from foreign governments, through the DoDCCP and comply with process suspense dates identified in this Instruction, AQAP-2070 (Reference (e)), or the applicable International Agreement.

CHAPTER 3

DELEGATION PROCEDURE - DCMA CMO TO DCMAI CMO

3.1. PROCESS STEPS.

3.1.1. The process starts with the receipt of a government contract or delegation requiring DCMA GQA.

3.1.2. Contract technical review (CTR) must be accomplished IAW DCMA-INST 325, “Contract Technical Review - QA” (Reference (n)). During the performance of CTR, special attention must be given to the identification of contractual requirements associated with ITAR restrictions, Title 22 of CFR, ITAR (Reference (l)). ITAR restrictions are a critical aspect of the CTR. See [Chapter 9](#) for detailed information concerning DCMA responsibilities related to ITAR and the ITAR Delegation Process Flowchart at [Appendix D](#).

3.1.3. Risk assessment must be performed IAW DCMA-INST 326, “Risk Assessment – QA” (Reference (o)). The risk statements and causes identified during the risk assessment process must be documented on the delegations to DCMAI. Supplier performance history must be coordinated with DCMAI CMO personnel.

3.1.4. Once a risk statement is generated and assignable risk causes (systems, processes, or product characteristics) are identified, DCMA QA personnel must determine whether the contracted products will be manufactured by the supplier or by a subcontractor and, if so, whether GQA at the subcontractor level is considered necessary based on risk. See [Chapter 9](#) for detailed information concerning DCMA responsibilities related to ITAR and see the ITAR Delegation process flowchart at [Appendix D](#).

3.1.5. Document surveillance plan IAW DCMA-INST 309, “GCQA Surveillance Planning” (Reference (p)). Where a decision has been made to delegate required GQA surveillance to another DCMA or DCMAI CMO at a subcontractor’s location, the decision must be documented on the GQA surveillance plan.

3.1.6. Delegations must be IAW DCMA-INST 316, “Delegate Surveillance - Quality Assurance” (Reference (q)), when determining the need to delegate GQA to DCMAI. Contracts with identified risks that require GQA surveillance must be delegated to the cognizant DCMAI CMO and DCMA CMO personnel must not duplicate, nor perform oversight of the GQA surveillance delegated (reference [paragraph 1.2.2.](#)).

3.1.6.1. The Delegation 1.0 eTool must be used to delegate or further subdelegate GQA functions between DCMA CMOs, regardless of the CMO’s geographic location. Once a delegation is entered into and managed by the Delegation 1.0 eTool, all further subdelegations must be issued in Delegation 1.0 eTool until its completion.

3.1.6.2. The exceptions to using the Delegation 1.0 eTool are those requests for GQA which utilize the ECARS system; e.g., International requests or National Aeronautics and Space

Administration (NASA) delegations. Once work is entered into and managed by ECARS, all further subdelegations must be issued in ECARS until its completion.

3.1.6.3. Delegation of GQA surveillance for classified programs must be processed IAW supplemental Instructions maintained by the Special Programs Directorate.

3.2. COORDINATION. All of the information addressed above must be coordinated with the DCMAI CMO prior to the delegation being sent. When requested, copies of risk assessments, surveillance plans and other pertinent information must be provided to DCMAI CMO QA personnel. ITAR-related documents/information must be sent with the delegation to the DCMAI CMO.

CHAPTER 4

REQUEST FOR GQA PROCEDURE - DCMAI TO A FOREIGN GOVERNMENT

4.1. PROCESS INPUT/OUTPUT. The process starts with the receipt of a government contract or delegation requiring GQA. The process output may be a request for GQA to the foreign government.

4.2. CTR AND EXCEPTIONS TO REQUESTING CAS.

4.2.1. Perform CTR IAW DCMA-INST 325, “Contract Technical Review - QA” (Reference (n)). CTR must be documented in a manner that complies with this Instruction and the intent of DCMA-INST 325, until such time as the CTR eTool accommodates the DCMAI requirements.

4.2.2. During the performance of CTR, special attention must be given to the identification of contractual requirements associated with the ITAR restrictions. ITAR restrictions are a critical aspect of the CTR when considering whether GQA can be requested of the foreign government. See [Chapter 9](#) for detailed information concerning DCMA responsibilities related to ITAR and see the ITAR Delegation Process Flowchart at [Appendix D](#).

4.2.3. The CTR must include a determination as to whether exceptions exist that would preclude DCMAI from requesting GQA services from the foreign government personnel under the terms of existing international agreements.

4.2.4. Common exceptions include:

4.2.4.1. ITAR Restrictions. See [Chapter 9](#) for detailed information concerning ITAR.

4.2.4.2. Navy Special Emphasis Programs. These contracts can contain a “no-foreign” access provision that prevents requesting GQA or financial audit services of the foreign government. These are contracts identified as Level 1 Sub-Safe, Navy Nuclear Propulsion Program, etc.

4.2.4.3. NASA. These international agreements are applicable to “defense” products. NASA is a non-DoD customer. With the exception of Canada, request for services for NASA contracts are not authorized.

4.2.4.4. Coast Guard. This is a non-DoD customer. With the exception of Canada, request for services for Coast Guard contracts of the host nation are not authorized.

4.2.4.5. Foreign Military Sales (FMS) Contracts. In order to avoid conflicts of interest, services for U.S. FMS contracts will not be requested of a third party (not a party to the contract) foreign government without the coordination and consent of the foreign government’s focal point prior to issuing a request for a GQA. DCMAI CMO QA personnel must identify the FMS customer so that an acceptance decision can be made. All coordination and acceptance decisions

must be documented. The third party foreign government has the right to decline the request for GQA.

4.2.4.6. No International Agreement. The exchange of GQA or financial audit services is limited to foreign governments with whom the U.S. has an agreement for the reciprocal exchange of such services.

4.2.4.7. Low Risk. GQA services for low risk contracts are not normally requested of the foreign government. However, requests may be used to establish initial risk levels or to occasionally revalidate risk decisions.

4.2.4.8. Cost Effectiveness. Where the International Agreement is a fee-for-service arrangement, DCMA personnel must consider the cost effectiveness of requesting the required GQA services from the foreign government. Where it is more cost effective for DCMAI personnel to perform the required surveillance, the information used to make such a decision must be documented on the GQA surveillance plan.

4.2.4.9. Time Constraints. Time constraints related to contract period of performance (normally <45 days). In many cases the contractually required delivery date does not allow sufficient time to plan, prepare, and process an RGQA to the foreign government's GQA focal point and sufficient time for the foreign government QA personnel to adequately develop and execute a GQA surveillance plan.

4.2.4.10. Other Exceptions. Unresolved issues warranting non-delegation to the foreign government; e.g., issues dealing with non-acceptance, resources, must be escalated through command channels to the DCMAI Commander through the host nation program manager on the DCMAI HQ staff.

4.2.5. In cases where exceptions prevent GQA from being requested of the host nation, DCMAI CMO QA personnel must perform the required GQA surveillance activities IAW the applicable QA Instructions. The CMO Host Nation Coordinator, or designated representative, must report exception codes on a monthly basis via the established performance indicator metric in Metrics Studio.

4.2.6. In the event of a request being rejected by a host nation, the CMO QA personnel must document the reason for rejection on the surveillance plan and comply with the procedures contained in [paragraph 4.8](#).

4.3. PERFORM RISK ASSESSMENT AND PREPARE RISK IDENTIFICATION, ASSESSMENT AND COMMUNICATION (RIAC) FORM.

4.3.1. Perform risk assessment IAW DCMA-INST 326, "Risk Assessment - QA" (Reference (o)), and this Instruction. The purpose of the risk assessment is to identify risk statements and the potential risk causes to the U.S. Government that can be mitigated through GQA surveillance, regardless of who performs the GQA surveillance. The use of the Risk Profile and Plan (RPP) is mandatory, with the exception of the GCQA surveillance plan portion

of the RPP form (see [Figure 1](#)) and the Data Collection and Analysis Plan form. Table 1, Risk Profile and Plan Process Activity, is provided to help the QA personnel understand the required and optional portions of the RPP.

Figure 1. Risk Profile and Plan (RPP)

Figure 1 Legend

General Information	Mandatory Use
Risk Profile Information	Mandatory Use
GCQA Surveillance Plan	Establishing and maintaining a surveillance plan is mandatory. Use of this specific form for surveillance planning is optional, but highly recommended.

4.3.2. Risk statements and risk causes identified as a result of the risk assessment must be documented on the DCMA Risk Profile portion and on the RIAC form. The RIAC is one of the forms used to request GQA services from the host nation. Risk statements and risk causes documented on the RIAC to the host nation must be traceable to the Risk Profile.

Table 1. Risk Profile and Plan Process Activity

Process Activity		Purpose of Activity	Form		Remarks
			Required	Optional	
Facility Process List		To identify supplier processes used to produce and deliver contracted supplies or services. Assists in identifying risk causes.	✓		This type of information may be readily available through discussions with the host nation.
Risk Statement Generator		Assist personnel in developing risk statements based on risk impact indicators related to contract requirements.	✓		Required to be performed and documented using the risk statement generator
Performance Factors		Assist personnel in identifying probable causes that may allow risk statements to occur. These are systems, processes, product characteristics, or other contractual activity requiring GQA surveillance.	✓		Required to be performed and documented using applicable performance factor questionnaire form. This type of information may be readily available through discussions with the host nation.
Risk Profile and Plan Form (see Figure 1)		This is a three-part form as described below.			
Risk Profile and Plan Form	General Information Portion of Form	Central repository for supplier-related information and delegation information	✓		Use of this form is mandatory.
	Risk Profile Portion of Form	Central repository for all risk statements identified by the risk statement generator and risk causes identified by the performance factors.	✓		Use of this form is mandatory.
	GCQA Surveillance Plan Portion of Form	Documents the GQA surveillance activity considered necessary to reduce the likelihood of the risk statement occurring. Documents GQA delegation activities.		✓	It is mandatory for DCMAI CMO QA personnel to establish and maintain a surveillance plan. Use of the plan portion of the form is optional but highly recommended.
Data Collection and Analysis (DC&A) Plan		Documents all information concerning DC&A.		✓	It is mandatory to have a DC&A plan. Use of this form is recommended.

4.3.2.1. The risk statement generator provides a risk impact rating for each risk impact indicator. The risk impact rating documented on the Risk Profile must be transferred to the equivalent and corresponding risk impact rating on the RIAC form. A high rating on the Risk Profile is equivalent to a 9 rating on the RIAC; a moderate rating is equivalent to a 4 rating; and a low rating is equivalent to a 1 rating. (See Figure 2, RIAC Example.)

4.3.2.2. The likelihood of the risk cause occurring, documented on the Risk Profile, must be transferred to the equivalent and corresponding risk likelihood rating on the RIAC form. A high rating on the Risk Profile is equivalent to a 9 rating on the RIAC; a moderate rating is equivalent to a 4 rating; and a low rating is equivalent to a 1 rating. (See Figure 2, RIAC Example.)

Figure 2. RIAC Example

AQAP 2070
(Edition 2)

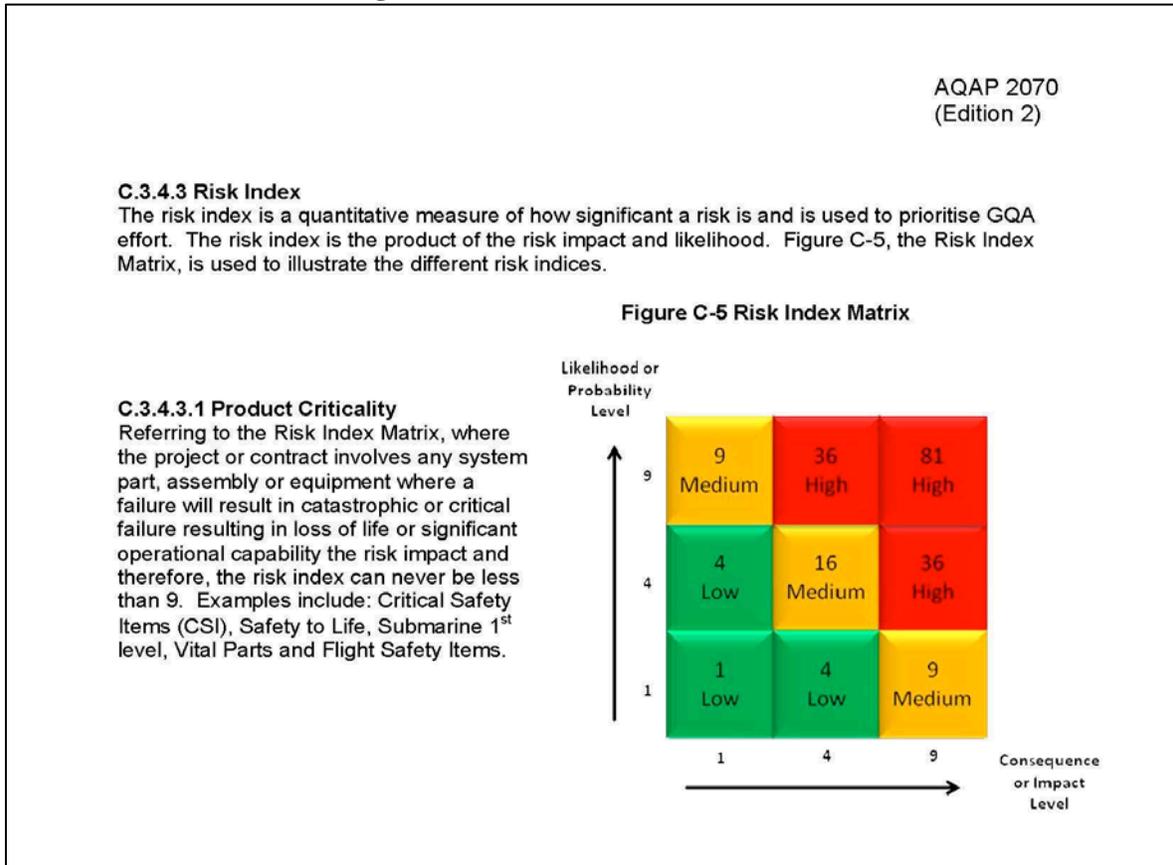
Figure C-6 Example of a Delegator Risk

	NATO Government Quality Assurance				
	Risk Identification, Assessment and Communication (RIAC) <i>Page 1 of 1</i>				
<small>Risk information is considered commercially sensitive and shall be used for GQA purposes only. Risk information shall not be shared outside of the Mutual GQA Participants, unless by prior agreement by the Acquirer, Supplier and GQAR</small>					
RGQA Number:	DAOQ n°280708	Revision Number:	0	Date:	28/07/2008
RIAC Number:	RIAC n°250708	Revision Number:	0	Date:	25/07/2008
Risk Statement: The hull integrity - Insufficient strength of the welded joints of the submarine hull.					
Risk Cause(s): Uncontrolled supply of welding wire (AQAP 2110 and ISO 7.4) There is a high turn over of staff (welders) and the company has to employ inexperienced and sometimes unqualified welders. (AQAP 2110 and ISO 9001:2000 6.2.1 and 7.5)					
Risk Assessment:	Impact: 1, 4 or 9	9	Likelihood: 1,4 or 9	9	Risk Index = I x L 81
On going GQA Risk Status:	Decreasing <input type="checkbox"/>	Stable <input type="checkbox"/>	Increasing <input type="checkbox"/>		
Delegator/Delegatee (GQAR) area for comments and recommendations: 3 customer complaints. 2 concerning incorrect specification of welding wire used and 1 concerning a non qualified welder.					
Risk Status at Closure:	No Occurrence <input type="checkbox"/>	Occurred & Controlled <input type="checkbox"/>	Occurred & Uncontrolled <input type="checkbox"/>		

4.3.2.3. The risk statement and cause(s) identified on the RIAC form are assigned a risk index number using the risk index matrix of AQAP-2070 (Reference (e)), Annex C. The risk index is calculated mathematically as Impact x Likelihood (I x L). Figure 3, Risk Index of AQAP-2070, is an excerpt from AQAP-2070 (Reference (e)). Product criticality is taken into

consideration when determining the risk impact and the risk index. Refer to the information in Figure 3, paragraph C.3.4.3.1, Product Criticality.

Figure 3. Risk Index of AQAP-2070



4.3.3. High-risk impact indicators identified on the Risk Statement Generator Form; i.e., Critical Safety Items (CSI), Air Launch and Recovery Equipment (ALRE) CSI, must have the specific details of the high impact identified on the RIAC.

4.3.3.1. Each critical characteristic and/or important manufacturing process identified as CSI or ALRE CSI must be documented as an individual risk cause on the RIAC under an overarching risk statement associated with the high impact.

4.3.3.2. Safety of Flight (SOF) lists (or flight safety items per AQAP 2070 (reference (e))), as determined IAW DCMA-INST 308, “Safety of Flight (SOF) – QA” (Reference (r)), must be attached to the RGQA with a single risk statement and cause documented on the RIAC or RGQA, as applicable. The purpose for attaching the list of flight safety items is to identify and communicate the risk statement and risk causes, not to impose or mandate the surveillance method or technique to the host nation. DCMA may not impose, but should suggest GQA activities and techniques during discussion noted in paragraph 4.6.2. (See [Web Resource Page](#) for SOF RGQA and RIAC template.)

4.3.3.3. These high-impact indicators must be reflected as a number nine (9) on the impact rating on the RIAC and the risk index matrix in Figure 3.

4.3.4. Information necessary to complete the performance factors assessment may not be readily available on the first request associated with a particular supplier. In such cases, the host nation Government Quality Assurance Representative (GQAR) should be contacted for assistance in gathering information to identify risk causes. Do not send the performance factors form to host nation personnel for completion.

4.3.4.1. During the course of the GQA surveillance, supplier performance information must be communicated with the host nation personnel and records related to the supplier's performance must be maintained for future delegations.

4.3.4.2. The performance factor form is an excellent tool to use during occasional status meetings or other communication with the host nation QA personnel when discussing supplier performance.

4.3.5. Customer mandatory requirements identified by a Quality Assurance Letter of Instruction (QALI) must be attached to the RGQA with a single risk statement "Customer Mandatory Requirement" and the risk cause(s) documented on the RIAC is the individual mandatory requirement of the QALI.

4.3.6. Risk assessments must be revised as the supplier's performance history changes or as new risk information becomes available. As a minimum, risk assessments must be reviewed on an annual basis and the risk profile and RIAC revised as necessary. The annual review due date must be documented on the GQA surveillance plan.

4.3.6.1. DCMA surveillance plans and active requests (RGQAs/RIACs) to the host nation must be revised as a result of the updated risk assessment or changes in the supplier performance.

4.3.6.2. Host Nation assistance should be requested in order to validate information used in determining the low risk rating.

4.3.7. When new contracts or delegations are received and, after the risk assessment is performed, it may be determined that the current RGQA and RIAC forms accurately reflect the applicable risk statements and causes. In such cases, a revised RGQA, and if applicable, a revised RIAC are not required to be sent to the host nation focal point. Send the new contract/subcontract to the host nation's focal point. If the contract is to be provided by the supplier, advise the host nation focal point of the contract number, the applicable RGQA/RIAC, and the applicable contractual clause that requires the supplier to provide a copy of, or access, to the contract by the Government.

4.3.8. For those nations not using the processes defined in AQAP-2070 (Reference (e)), DCMA personnel must document the results of the risk assessment on the RGQA forms and

follow the process identified in the applicable International Agreement and/or associated GQA administrative procedure.

4.4. PREPARE THE SURVEILLANCE PLAN.

4.4.1. The policy and procedures of DCMA-INST 309, “GCQA Surveillance Planning” (Reference (p)), must be used to identify and document GQA activities, methodologies, and/or techniques used to reduce the likelihood of risk causes occurring and to establish a basis of confidence that the supplies meet the quality and technical requirements of the contract.

4.4.2. Surveillance plans must be maintained by DCMA personnel regardless of who performs the GQA surveillance (DCMA or host nation personnel). When a request for GQA is sent to the host nation, the plans assist DCMAI personnel in managing the RGQA.

4.4.3. All coordination and communication between DCMAI and host nation personnel concerning CSI, SOF, low-risk surveillance strategies, etc., must be documented on the DCMA surveillance plan, including the results of the communication.

4.4.4. Contracts or subcontracts not delegated to the host nation and rationale for not requesting GQA services must be documented on the GQA surveillance plan.

4.4.5. Information concerning risk statements or risk causes not accepted or partially accepted by the host nation must be documented on the GQA surveillance plan.

4.4.6. Identification of all contracts or subcontracts covered by a facility-wide RGQA and the estimated contract final delivery date must be a part of the GQA surveillance plan. This information must be used to update the host nation QA personnel of active GQA work under the current facility-wide RGQA.

4.4.7. Data collection and analysis strategy must be identified on the GQA surveillance plan. Data collection and analysis must be performed IAW DCMA-INST 323, “Data Collection and Analysis” (Reference (s)). DCMA risk assessments, surveillance plans, and active requests (RGQAs/RIACs) must be revised as a result of data analysis.

4.5. FACILITY-WIDE RGQAs.

4.5.1. Where suppliers have multiple contracts for like or similar items utilizing similar manufacturing processes, facility-wide RGQAs are encouraged to optimize resources. Where DCMAI has an existing request, there is no need to generate additional RGQAs for similar contracts with the same supplier.

4.5.2. The facility-wide approach to requesting GQA requires only one documented Risk Profile and one Surveillance Plan to be developed covering all contracts under the purview of the facility-wide RGQA.

4.5.3. Each CMO requesting GQA on a facility-wide basis must develop a documented process for identifying, tracking, and reporting current contracts applicable to a single supplier facility-wide RGQA. As a minimum, the report must be updated and provided to the host nation QA personnel on an annual basis during the annual review of the RGQA and RIAC (if applicable), unless a shorter timeframe is agreed upon with the host nation. The frequency of reporting must be documented on the GQA surveillance plan.

4.5.4. The report must show applicable contracts and subcontracts and the estimated contract final delivery date.

4.5.4.1. For purposes of facility-wide RGQA reporting, the estimated contract final delivery date shown on the DCMA facility-wide report should also be considered as the RGQA closure date. Unless the report is updated or revised otherwise, this is the date the host nation QA personnel should cease GQA surveillance efforts and consider the request closed. A request for GQA Closure Report (GQACR) with an updated RIAC must be requested if one had not been received. If delivery dates change, DCMA QA personnel must ensure the estimated completion date is updated on the DCMA facility-wide report.

4.5.4.2. Requesting individual GQACR for contracts under the purview of a facility-wide RGQA is not practical or desirable and should not be requested. The facility-wide RGQA must request the Host Nation QA personnel to:

4.5.4.2.1. Reconcile and agree with the data provided on the facility-wide report.

4.5.4.2.2. Provide a RIAC status report indicating by contract or subcontract, when applicable, any increases or decreases in risk status. The frequency of reporting must be agreed to via the RGQA and documented in the GQA surveillance plan.

4.5.4.2.3. Provide copies of any Corrective Action Requests (CAR) by contract issued by the host nation QA personnel (see [paragraph 4.6.6.1](#), for additional information related to CARs)

4.6. PREPARE REQUEST FOR GQA (RGQA).

4.6.1. DCMAI CMO QA personnel must communicate often and work closely with their host nation counterparts in establishing a teaming relationship. This relationship must be the conduit by which information and data are exchanged regarding risks and by which confidence is reinforced in the cooperative contract management effort. Occasional joint visits to supplier facilities, by DCMAI QA personnel, when possible, should be considered to elevate the visibility of supplier performance risks and to foster the teaming relationship and communication between the two GQA organizations. These visits must not be to duplicate or oversee the GQA surveillance performed by the host nation. (Reference [paragraph 1.2.2.](#))

4.6.2. Prior to requesting GQA for SOF or CSI characteristics, DCMAI CMO QA personnel must coordinate with the host nation QA personnel to determine if a GQA surveillance strategy can be developed that will meet the intent of the DCMA SOF/CSI Instructions. For HNs, the

term “safety of flight” or critical safety items” may have different implications than in DCMA; therefore, the term “safety of flight (or SOF)” or “critical safety items (or CSI)” must be clarified with the HN using their specific term, such as “flight safety items” or “critical items” during these discussions. This will provide the HN with an understanding of the high impact risk designation. DCMAI CMO personnel should also be knowledgeable of the terms used in AQAP-2070 (Reference (e)) and/or in the individual International Agreement, including any GQA administrative procedures.

4.6.3. Only the minimum GQA surveillance necessary to mitigate the identified risk causes and to provide confidence in a supplier’s ability to provide contractual supplies or services must be requested of the Host Nation QA personnel. DCMAI CMO QA personnel must coordinate with host nation QA personnel to develop an appropriate GQA surveillance interval (quarterly, semi-annual, annual, etc.) when requesting GQA for non-complex, non-critical products, or other low risk activities. DCMA personnel must not duplicate nor perform oversight of the GQA surveillance performed by the host nation QA organization. (Reference [paragraph 1.2.2.](#))

4.6.4. When identifying the contractual QA standard on the RGQA, DCMAI CMO QA personnel must not cite an “equivalent” AQAP standard on the RGQA. Only the QA standard required by the contract will be referred on the RGQA.

4.6.5. The RGQA must be prepared IAW AQAP-2070 (Reference (e)) for all NATO nations with international agreements for exchanging GQA services and for those non-NATO nations using the Mutual GQA processes of AQAP-2070, as ratified by a GQA administrative procedure. (See the [Resource Web page](#) for a copy of the mandatory and optional forms.) For those nations not using the AQAP-2070 processes, the DCMA personnel must use the RGQA forms identified in the International Agreement and associated GQA administrative procedure. (See the [Resource Web page](#) for samples of RGQA forms used by non-NATO nations.)

4.6.6. Clearly identify the authority and responsibility of the host nation QA personnel concerning the following areas:

4.6.6.1. Corrective Action Requests. Per AQAP 2070, paragraph A.2.1. (Reference (e)), it is recognized that national practice will dictate the specific actions of the GQA participants. To comply with DCMA-INST 1201, “Corrective Action Process” (Reference (t)), RGQAs must clearly request that the host nation GQAR contact DCMA prior to issuing CARs to a subcontractor for situations where a systemic lack of prime control of subcontractors exist, such as recurring noncompliance by the subcontractor, or if the subcontractor is unwilling or unable to implement effective corrective actions. DCMA QA personnel assigned to the CMO cognizant of the prime must issue the CAR to the prime supplier. DCMAI CMO QA personnel must request copies of any CARs issued by the host nation and will be responsible for entering the CAR into the DCMA CAR eTool. DCMAI CMO QA personnel should gain an understanding of the host nation’s corrective action process to enable appropriate communications with the host nation QA personnel; i.e., using the host nation’s terminology vice DCMA’s on RGQAs or during e-mail or telephone communication.

4.6.6.2. Deviation Permits and Concessions (See [Definitions](#)). Identify whether the host nation QA personnel are authorized to concur or nonconcur with the classification/disposition of the supplier's minor deviation permits and/or concessions. Authority for major deviation permits and/or concessions are never delegated to the host nation QA personnel; however, indicate whether recommendations or comments are requested. Material Review Board authority for CSIs is normally withheld unless specifically delegated by the Procurement Contracting Officer (PCO)/Engineering Support Activity.

4.6.6.3. CSI and SOF. Request host nation QA personnel contact DCMA QA personnel (Delegator) prior to issuing subcontractor delegations related to CSI and SOF.

4.6.6.4. Subcontractor Delegations. Request host nation QA personnel contact DCMA QA personnel (Delegator) prior to issuing subcontractor delegations to another country so that DCMA can determine if reciprocal no-charge agreements exist between the U.S. DoD and the third party nation. (See [Appendix C](#).)

4.6.6.5. Surveillance Plans. Request copies of the host nation's GQA surveillance plans for contracts that contain CSI, SOF, or other high-impact Risk Statements or high-likelihood Risk Causes. Plans for major programs should also be requested. DCMA QA personnel should review the host nation GQA surveillance plan to ensure all risk causes and GQA activities identified on the RIAC and RGQA have been addressed on the plan.

4.6.6.6. Facility-Wide Delegations. Where suppliers have multiple contracts for like or similar items utilizing similar manufacturing processes, facility-wide delegations are encouraged to optimize resources.

4.6.6.7. Reporting. DCMA personnel should recognize that the host nation QA personnel's primary task is the performance of GQA; therefore, reporting requirements should be proportional to the risks related to the program, contract, or supplier performance. Reporting requirements should be kept to a minimum.

4.6.6.8. Product Release and Delegation Completion. Include any special instructions related to releasing the product from the supplier's facility and for completing the delegation.

4.6.6.9. Risk Status Reporting. The RGQA should state whether a risk status report is requested from the host nation on an ongoing basis for long-term delegations. A risk status report, such as a RIAC must always be requested at completion of GQA.

4.6.7. ITAR Restrictions. Where the contract or subcontract contains ITAR restrictions, the RGQA must be prepared and processed using the procedures in [Chapter 9](#). ITAR-specific RGQA forms must be used to request host nation GQA services when access to ITAR information is authorized. See the process flowchart for ITAR RGQAs at [Appendix D](#) and the [Resource Web page](#) for the required forms.

4.7. FORWARD RGQA TO APPLICABLE HOST NATION FOCAL POINT.

4.7.1. The RGQA and RIAC, as applicable, must be sent electronically to the host nation's focal point identified in NATO STANAG 4107 (Reference (f)), Annex A, or in the individual International Agreement. The RGQA and RIAC, as applicable, must be sent in sufficient time for the host nation QA personnel to process the request through their command channels and to adequately plan and execute the necessary GQA surveillance activities.

4.7.2. The NATO Delegation Feedback (DFB) form is used to provide information concerning the quality of the Mutual GQA process so that both the Delegator and the Delegation can use the information to improve the quality of their respective services within the Mutual GQA process. When completion of a DFB form is requested and submitted with an RGQA, the host nation QA personnel will provide feedback information to the DCMAI CMO QA personnel concerning the quality of the information provided on the RIAC and RGQA.

4.7.2.1. DCMA personnel must send a DFB form as an attachment to the RGQA.

4.7.2.2. DCMA personnel must use the information provided on the DFB form to improve the quality of the information provided on future RIAC forms and RGQAs.

4.8. MANAGING REJECTED RGQAs.

4.8.1. When RGQAs are formally rejected by the host nation, the CMO host nation Coordinator, or designated representative, must report rejected reason codes and rejection management codes on a monthly basis via the established performance indicator metric in Metrics Studio. (See the Resource Web page for rejection codes.)

4.8.2. The CMO must manage rejected delegations by identifying how the CMO will cover the workload that was rejected by the host nation. Comments must be provided that will detail whether the actions being taken will manage the workload temporarily or permanently. (See the Resource Web page for codes to be used for reporting.)

4.8.3. If applicable, the host nation Coordinator must discuss rejects with the respective host nations to determine what actions may be necessary to resolve the issue. All communications must be copied to the host nation program manager. The host nation program manager will report and discuss rejects during NATO Working Group 2 for Quality meetings.

4.9. PERFORM PRODUCT ACCEPTANCE AND RELEASE.

4.9.1. In accordance with DCMA-INST 314, "Product Acceptance and Release – QA" (Reference (u)), DCMAI CMO QA personnel must accept supplies/services offered by the supplier when there is a basis of confidence that the supplies/services conform to contract requirements.

4.9.2. GQA surveillance activities planned and implemented by the host nation QA personnel, based on the risk statements and risk causes identified by DCMAI CMO QA

personnel, as well as other delegated GQA activities, serves as the basis of confidence that the supplies or services conform to contract requirements.

4.9.3. Method(s) for accepting and releasing product from the supplier's facility must be identified during CTR and must be annotated on the RGQA to the host nation.

4.10. RECEIVE GQA CLOSURE REPORT (GQACR)/RIAC AND MAINTAIN RECORDS.

4.10.1. For NATO nations required to use the AQAP-2070 (Reference (e)) process and those non-NATO nations having elected to use the AQAP-2070, completion of the requested GQA is indicated by receipt of a GQACR from the host nation GQAR. The GQACR is to be submitted within 20 working days of completion of the RGQA.

4.10.2. As part of the closure process, the host nation GQAR must consider whether the status of the risks, as stated on the current RIAC form, has increased, decreased, or remained stable as a result of GQA surveillance activities performed in support of the RGQA.

4.10.2.1. Where risk status has changed, the GQAR should make recommendations to DCMAI QA personnel regarding future requests for GQA.

4.10.2.2. Where a risk status update at RGQA closure has been requested on the RGQA but has not been received, the DCMAI CMO QA personnel should contact the host nation GQAR and request the updated RIAC. If still not received within a reasonable timeframe, a DFB form must be processed through the host nation focal point with a written request for the updated RIAC.

4.10.2.3. Delegator satisfaction data is collected by means of the DFB form. Where the host nation has requested delegation feedback from DCMAI, the DFB form must be completed and returned to the host nation QA organization within 10 working days.

4.10.2.4. Copies of all DFB forms, either received from or sent to the host nation's QA organization, must be provided to the CMO Host Nation Coordinator who must maintain DFB records for process improvement purposes.

4.10.3. Record Retention. Records must be maintained IAW DCMA-INST 809, "Records Management" (Reference (v)), and as required by the specific process instructions. In addition, each DCMAI CMO operating under the purview of an International Agreement must maintain files that include:

- Results of CTR, including exceptions to delegations (until such time as the CTR eTool accommodates DCMAI requirements)
- Active and completed RGQA forms
- Active and completed RIAC forms
- GQACRs

- Records of communication concerning delegation of FMS contracts
- Records related to supplier performance information obtained from the host nation QA personnel regardless of media used; i.e., reports, surveillance records, telephone conversations
- DFBs

4.11. CLOSE CONTRACT DELEGATION.

4.11.1. Upon receipt of the GQACR or other notification of GQA completion, DCMAI CMO QA personnel must close the RGQA in the system used for tracking and managing RGQAs to the host nation.

4.11.2. If the RGQA was based on a subcontract delegation received from another DCMA CMO, the delegation must be closed in Delegation eTools or ECARS, as applicable. DCMAI CMO QA personnel must inform the delegating DCMA office of delegation completion and communicate any lessons learned not already identified.

CHAPTER 5

GQA PERFORMANCE – HOST NATION

5.1. PROCESS INPUT/OUTPUT. The process starts with the receipt of an RGQA from the DCMAI CMO and the output is a GQACR provided to the DCMAI Delegator.

5.2. GQA PERFORMANCE BY THE HOST NATION QA ORGANIZATION.

5.2.1. Organizations with whom DoD exchanges GQA services have agreed to comply with the processes defined in the individual International Agreement and/or in NATO STANAG 4107 (Reference (f)) and AQAP-2070 (Reference (e)).

5.2.2. As such, the host nation GQA organizations are fully expected to plan, execute, and document all GQA activities performed in support of the DCMAI RGQA per AQAP-2070 (Reference (e)), or the applicable International Agreement and GQA administrative plan. The host nation GQA organizations are expected to:

5.2.2.1. Acknowledge receipt of the RGQA within 5 working days of receipt.

5.2.2.2. Accept, partially accept or reject the RGQA within 20 working days of receipt. (See [paragraph 4.8., Managing Rejected RGQAs.](#))

5.2.2.3. Comply with all GQA tasks/activities identified on the RGQA, including reporting requirements.

5.3. GQA CLOSURE REPORT (GQACR).

5.3.1. When the host nation GQAR considers the RGQA performance complete and the delegation is considered closed, the GQAR will conduct a records review and forward a GQACR to the DCMAI delegator within 20 working days of completion IAW AQAP-2070 (Reference (e)).

5.3.2. If requested reports have not been received, contact the host nation GQAR and remind them of the report requested on the RGQA. On the second attempt for the information; process the request to the host nation's CCP and include a DFB. Communicate information relative to previous requests for the report or other information requested on the RGQA.

CHAPTER 6

REQUEST FOR GQA PROCEDURE – FOREIGN GOVERNMENT

6.1. PROCESS INPUT/OUTPUT.

6.1.1. This chapter describes the RGQA procedures that will be used when a foreign government requests DCMA to perform GQA on defense products at suppliers located within the U.S. The requests are usually made under the terms of an International Agreement for the exchange of such services. For a better understanding and clarification of requirements, the flow of information in this chapter follows the process map available at [Appendix B](#).

6.1.2. For the foreign government, the process starts with a defense contract or subcontract requiring GQA to be performed and the supplier is located within the U.S. The output of the foreign government's portion of this process is an RGQA sent to the U.S. DoDCCP for performance in the U.S. by DCMA.

6.2. AQAP-2070/INTERNATIONAL AGREEMENT/GQA ADMINISTRATIVE PROCEDURE REQUIREMENTS.

6.2.1. The following process information is provided to clarify expectations for DCMA CMO QA personnel of the foreign government's requirements as defined in AQAP-2070 (Reference (e)), the applicable International Agreement, and established GQA administrative procedures.

6.2.1.1. Risk Identification and Assessment. The request should be risk-based. An assessment should have been performed to identify risk statements and risk causes for inclusion on the RIAC form which accompanies the RGQA. There are exceptions allowed for situations where risk information is unavailable to the Delegator. (See AQAP-2070, paragraph 6.2. (Reference (e).) For non-NATO nations not using the AQAP process, the use of the RIAC or the form used to document the risks associated with the contract may be defined in the International Agreement and/or GQA administrative procedure.

6.2.1.2. RGQA Information. The RGQA should provide sufficient information for DCMA QA personnel to perform the requested GQA. The RGQA should include any reporting requirements; i.e., status reports, copy of GQA surveillance plans, CARs. Information relative to product release, subcontract delegations, deviation permits and concessions, etc. should also be included. (See AQAP-2070, Section 7 (Reference (e).) For non-NATO nations the use of the RGQA may be defined in the International Agreement and/or GQA administrative procedures.

6.2.2. The RGQA must be sent to the U.S. DoDCCP at DCMA HQ (DCMA-FBR). DCMA CMOs must contact the DODCCP when RGQAs are received directly from the foreign government prior to expending any effort on the request.

CHAPTER 7

REQUEST FOR CAS PROCEDURE – RECEIPT OF FOREIGN GOVERNMENT REQUEST BY DODCCP

7.1. PROCESS INPUT/OUTPUT. The process starts with the receipt of a request for CAS from a foreign government. The output of this process is a request for services, via ECARS, and closure of the ECARS request when the services are complete.

7.2. DETERMINE IF LABOR RATES APPLY AND ENTER REQUEST INTO ECARS.

7.2.1. The policy and procedures of DCMA-INST 709, “International and Federal Business Reimbursable and Non-Reimbursable Support” (Reference (w)), must be used for processing and managing requests for CAS.

7.2.2. The DoDCCP must:

7.2.2.1. Determine whether the request is from a friendly foreign government or international agency with whom the U.S. is a participant to an International Agreement for the exchange of CAS or if the request is covered by a cooperative program agreement.

7.2.2.2. Determine whether the requested services are authorized by and within the scope of an applicable International Agreement.

7.2.2.3. Determine whether the requested services are to be provided on a reimbursable or non-reimbursable basis consistent with defense security assistance arrangements.

7.2.3. The DoDCCP must enter all requests from foreign governments or organizations into ECARS for processing, managing, distributing, cost accounting, tracking, and communicating between DCMA CMOs and DoDCCP.

7.3. ACKNOWLEDGE REQUEST.

7.3.1. The DoDCCP must acknowledge receipt of the request back to the foreign government or organization within 5 working days of receiving the request. This action assures the international customer is aware that DCMA has received the request and is processing it to the applicable DCMA CMO for surveillance planning and acceptance. The customer knows that an acceptance decision is forthcoming.

7.3.2. The DCMA CMO must make their decision regarding acceptance within 20 working days of receipt of the request by the DoDCCP. The required Response to RGQA (RGQAR) form, updated RIAC, if applicable, and other forms used with the request to indicate acceptance/rejection must be completed by the CMO, uploaded into ECARS, and forwarded to the DoDCCP who must notify the customer of DCMA’s acceptance decision. The DoDCCP must track Agency compliance with required suspense dates and initiate improvement measures.

7.4. TRANSMIT REQUEST TO DCMA CMO VIA ECARS. The DoDCCP must:

7.4.1. Coordinate with and electronically forward the request to the appropriate DCMA CMO via ECARS.

7.4.2. Distribute all acquisition documents and related materials to the CMO.

7.4.3. Request cost estimates from the CMO and ensure accurate reporting of hours.

7.4.4. Ensure CMO requests are accepted and the international customer notified within 20 working days.

7.4.5. Coordinate with the CMO and provide the international customer with the reason requests are not accepted or are only partially accepted.

7.4.6. Assist CMO and the international customer to resolve misunderstandings, misinterpretations or problems in a timely manner, to avoid any necessary escalation.

7.5. CLOSURE OF REQUEST.

7.5.1. The DCMA CMO must close out the ECARS delegation in PLAS and complete the necessary GQACR, including updated RIAC forms, and other forms used with the request to indicate completion of the request, then forward the forms via ECARS to the DoDCCP.

7.5.2. The DoDCCP must:

7.5.2.1. Ensure all required forms have been received from the DCMA CMO and forward the closure forms to the international customer ensuring Agency compliance with the 20 working day suspense date.

7.5.2.2. Ensure requests are properly closed in ECARS.

CHAPTER 8

REQUEST FOR CAS PROCEDURE - RECEIPT AND PERFORMANCE OF REQUEST BY DCMA CMO

8.1. PROCESS INPUT/OUTPUT.

8.1.1. The process starts with the receipt of a request for GQA via ECARS from the DoDCCP. The outputs are a GQACR and updated RIAC, or completed RGQA provided to the foreign government and closure of the ECARS international requests in PLAS.

8.1.2. The GQA activities identified below must be performed IAW the referenced DCMA Instructions and, where applicable, in conjunction with AQAP-2070 (Reference (e)), or the International Agreement and associated GQA administrative procedure.

8.1.3. While performing GQA on behalf of a foreign government, DCMA CMO QA personnel must perform the GQA responsibilities and process activities of the “Delegatee” – the appropriate national authority of a supplying country performing GQA after acceptance of the RGQA. In this role, the U.S. is considered the host nation and DCMA the appropriate national authority.

8.1.4. Direct communication between DCMA QA personnel and the QA personnel of the foreign government requesting GQA surveillance is highly encouraged. This communication can help clarify ambiguous RGQA requirements and will foster a working relationship with our allies and international customers. It assures the foreign government that their acquisitions are being provided the expected visibility and GQA surveillance efforts that we expect when they perform GQA on behalf of DCMA. Where a more formal communication is required, coordinate with the DCMA country managers assigned to the DoDCCP.

8.1.5. Early coordination of requests by the foreign government with DCMA personnel is encouraged but must be followed up with a formal request of services through the DoDCCP. DCMA personnel must coordinate with the DoDCCP prior to providing any information requested by the foreign government without having received a formal request for services through ECARS. DCMA CMO QA personnel must provide the DoDCCP, via ECARS, the estimated hours expected to be expended in support of the international delegation.

8.2. RESPONSE TO GQA REQUEST (RGQAR).

8.2.1. RGQA and Contract Review. In addition to DCMA-INST 325, “Contract Technical Review – QA” (Reference (n)), the RGQA, contract, and all associated documentation received with the RGQA must be reviewed IAW Sections 9 and 10 of AQAP-2070 (Reference (e)) to ensure DCMA CMO QA personnel are knowledgeable of the requirements of the contract as related to the requested GQA. The results of the review must be used to assist in planning the appropriate GQA activities. If clarifications are required, e-mail or telephone the Delegator to obtain the necessary information to resolve issues.

8.2.2. Risk Review. DCMA personnel must review the risks identified on the RIAC form and RGQA. The risk information (risk statements, causes, ratings, etc.) should be compared to DCMA's current supplier risk assessment and, where additional risks are evident that would require GQA surveillance, the RIAC must be updated and returned to the Delegator with the RGQAR. For non-NATO nations not using the AQAP-2070 process, the RGQA must be updated and returned to the Delegator.

8.2.2.1. Where a DCMA risk assessment is not available, the risk information provided on the RIAC and RGQA (risk statements, causes, ratings, etc.) should be compared to DCMA's risk impact indicators and supplier performance factors to determine if additional risks are present and, if so, to update the RIAC or RGQA, as necessary.

8.2.2.2. It is not necessary for the Delegator and Delegatee to agree on the risk identification or assessment ratings; however, recommendations and comments should be provided to the Delegator based on DCMA's experience working with the supplier.

8.2.3. Delegation Acceptance Decision.

8.2.3.1. Requests for GQA must normally be accepted by DCMA. DCMA CMO personnel must coordinate with the DoDCCP and the Delegator prior to rejecting the RGQA.

8.2.3.2. DCMA CMO personnel must accept, partially accept, or reject the request within 20 working days of receipt of the request by the DoDCCP. DCMA CMO QA personnel must complete the RGQAR form and, if necessary, update the risk information on the RIAC or RGQA form. The completed forms must be uploaded into ECARS and sent to the DoDCCP. The DoDCCP must notify the customer of the Agency's decision.

8.2.3.3. Where a request for GQA can be only partially accepted, DCMA CMO personnel must contact the DoDCCP and explain the reasons for not fully accepting the request. An alternative approach that might satisfy the intent of the original request must be provided in writing to the Delegator using the RGQAR form. The DoDCCP must notify the Delegator.

8.2.3.4. Performance on the partially-accepted portions of the delegation request must begin immediately and must not be held up pending acknowledgement by the Delegator. Once accepted, the GQA must not be terminated without the coordination and concurrence of the Delegator.

8.2.3.5. Notify the supplier that DCMA will be performing GQA surveillance on behalf of the foreign government.

8.3. GQA SURVEILLANCE PLANNING.

8.3.1. DCMA-INST 309, “GCQA Surveillance Planning” (Reference (p)), and Section 11 of AQAP-2070 (Reference (e)), must be used in determining the GQA surveillance activities, methods, and techniques considered necessary to mitigate the identified risks. Unless otherwise specified on the RGQA, the GQA activities identified below must be planned and performed without the need for specific tasking in the RGQA:

- Documenting nonconformity and CARs to Suppliers
- Providing risk status reports and copies of CARs to Delegator
- Documenting results of GQA surveillance activities so they are traceable to RGQA
- Analyzing GQA data and adjusting GQA surveillance plan and risk information
- Consideration of subcontract delegations
- Updating RIAC risk status/RGQA and reporting to Delegator
- Reviewing supplier Quality Management System documentation as part of process reviews
- Verifying supplier’s investigations of customer complaints
- Deviation permits and concessions authority (material review)

8.3.2. GQA surveillance plans must be used to plan, document, and execute the surveillance necessary to satisfy the RGQA. The DCMA-planned GQA surveillance activities must be traceable to the risks activities identified/requested on the RGQA, and if applicable, RIAC. It is permissible for the DCMA CMO QA personnel to use the GQA plan provided at Annex B of AQAP-2070 (Reference (e)).

8.3.3. The planned GQA surveillance activities may be added to current DCMA surveillance plans or a separate surveillance plan may be generated. In either case, traceability to the RGQA must be maintained. Copies of DCMA surveillance plans must be provided to the Delegator when requested.

8.4. PERFORM GQA SURVEILLANCE.

8.4.1. GQA must be performed IAW the applicable DCMA Instructions and Sections 12 and 13 of AQAP-2070 (Reference (e)).

8.4.2. During the course of GQA surveillance, certain GQA activities must be performed with or without specific tasking on the RGQA. These support activities, identified in paragraph 8.3.1., must be performed IAW the applicable DCMA Instructions, unless otherwise specified on the RGQA.

8.5. GQA CLOSURE REPORT (GQACR).

8.5.1. For AQAP-2070 (Reference (e)) based RGQAs, notification of completion is through a GQACR. DCMA CMO QA personnel must complete the GQACR and upload the completed form into ECARS. The form must be transmitted to the DoDCCP via ECARS within 15 working days of completion of the RGQA.

8.5.2. As part of the closure process, DCMA CMO QA personnel must consider whether the status of the risks, as stated on the current RIAC form, has increased, decreased, or remained stable as a result of GQA surveillance. This information must be provided on the RIAC form or RGQA form for non-NATO nations and uploaded into ECARS. Recommendations concerning future delegations should also be provided. The RIAC form(s) must be transmitted to the DoDCCP via ECARS with the RGQA noted in paragraph 8.5.1.

8.5.3. Delegator/Delegatee satisfaction data and process improvement recommendations are collected by means of the DFB form. DCMA CMO QA personnel should submit a DFB form with the closure report to receive feedback concerning the Delegator's satisfaction with DCMA QA services provided on their request. Where the Delegator has requested delegation feedback from DCMA personnel, the DFB form must be completed and transmitted to the DoDCCP via ECARS within 10 working days.

8.5.4. Copies of all DFB forms, either received from or sent to the other government's QA organization, must be provided via ECARS to the DoDCCP who must maintain record files for process improvement purposes.

8.5.5. Certificate of Conformity. It must be understood that the use of a Certificate of Conformance in the DoD acquisition system has a very different result on GQA surveillance activities than a Certificate of Conformity used within foreign governments' procedures.

8.5.5.1. Within the U.S. acquisition system the criteria for using a certificate of conformance are found in FAR, Part 46, Subpart 46.504, "Certificate of Conformance" (Reference (x)), and must be authorized by contract, with the inclusion of the contractual clause of FAR, Part 52, Subpart 52.246-15, "Certificate of Conformance" (Reference (y)). Once authorized in writing by the cognizant CMO, the certificate is used "in lieu of source inspection" (GQA surveillance).

8.5.5.2. Within most foreign governments, the certificate of conformity is required to be submitted by the supplier on almost every shipment of every acquisition. The certificate is an affirmation by the supplier, certifying that the products identified on the certificate conform in all respects to the contract requirements. This form is used similar to a shipping document and, in many countries; payment to the supplier is not made until receipt of the certificate of conformity.

8.5.5.3. When a Certificate of Conformity is a contractual requirement for the supplier and when requested by the foreign government via the RGQA, DCMA CMO QA personnel must sign the certificate of conformity as an affirmation that GQA surveillance was performed IAW the agreed to RGQA.

8.5.5.4. AQAP-2070 (Reference (e)) includes an example of a certificate of conformity at Annex B. The example shown is a two-part form. Part I is the Supplier Certificate of Conformity and Part II is the GQAR's Statement of GQA.

8.5.6. Record Retention. Records must be maintained IAW DCMA-INST 809, "Records Management" (Reference (v)), and as required by the specific process Instructions. In addition, each DCMA CMO operating under the purview of an International Agreement must establish and maintain files that include:

- Active and completed RGQA forms
- Active and completed RIAC forms
- GQA Closure Reports
- DFBs
- GQA Surveillance Records for all activities performed on behalf of another government GQA organization

8.6. CLOSE RGQA IN PLAS/ECARS.

8.6.1. Prior to closing the request, DCMA personnel must accurately report all hours expended on international delegations, on both fee-for-service work and no-cost work. The hours expended must be reported in PLAS, in whole hour increments, using the assigned DCN. This PLAS information is used to recoup DCMA costs associated with international delegations.

8.6.2. After all hours expended are reported and upon issuance of the GQACR and other necessary forms, the DCMA CMO QA personnel must close the RGQA by DCN in PLAS. PLAS will automatically close the request in ECARS. During the course of the RGQA, all required forms must be completed and updated into ECARS for archiving by the DoDCCP.

CHAPTER 9

INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (ITAR)

9.1. ITAR OVERVIEW – RELATED TO INTERNATIONAL REQUESTS FOR CAS.

9.1.1. The ITAR is a set of U.S. Government regulations that control the export and import of defense articles and services, including related technical data identified on the United States Munitions List (USML) and parts 120-130 of Title 22 of CFR, ITAR (Reference (1)). These regulations implement the provisions of the AECA (Reference (d)), and are described in Reference (1). The Department of State (DoS), Directorate of Defense Trade Controls (DDTC), interprets and enforces ITAR, including the issuance of licenses and agreements. Its goal is to safeguard U.S. national security and further U.S. foreign policy objectives.

9.1.2. For practical purposes, ITAR regulations dictate that technical data, information, and material pertaining to defense-related technologies (for items listed on the USML) may only be shared with U.S. persons unless authorization from the DoS is received or a special exemption is used. (See [paragraph 9.1.5.9](#), for definition of a U.S. person.) U.S. persons, both supplier and Government personnel, can face heavy fines, imprisonment, or both, if they have, without proper authorization or exemption, provided foreign persons with access to ITAR-protected defense articles, services, or technical data. (See [paragraph 9.1.5.4](#), for definition of a foreign person.)

9.1.3. The DoD has entered into international agreements with their counterparts in foreign governments for the reciprocal exchange of GQA and financial audit services. These agreements allow DCMA to request GQA and/or financial audit services from the foreign government when supplier performance is in the foreign country, in lieu of DCMA personnel performing these services.

9.1.4. Occasionally, DCMAI CMOs receive contracts or subcontracts where access to the supplies and associated technical data is restricted to U.S. personnel by ITAR. Most of these international agreements do not adequately address the required access authorization when ITAR restrictions are imposed. As a result, DCMAI CMO QA cannot request GQA or financial audit services from the foreign government without using other methods of authorization that will allow the foreign government personnel access to the defense articles, services, and technical data, when necessary, in the performance of GQA on the behalf of the U.S.

9.1.5. Where ITAR restrictions are contractually imposed, the suppliers are responsible for the protection of ITAR defense articles, services, and technical data from unauthorized export and must secure access authorization for their foreign subcontractors through the DoS, DDTC. The following ITAR-specific terms are defined within this chapter to better understand the ITAR requirements related to International requests for CAS procedures. Reference for these definitions is part 121 of Title 22 of CFR, “Purpose and Definitions” (Reference (1)).

9.1.5.1. Defense Article. Any item or technical data designated by the USML at part 121 of Title 22 of CFR (Reference (1)). This term includes technical data recorded or stored in any physical form, models, mockups or other items that reveal technical data directly relating to

items designated in the USML. It does not include basic marketing information on function or purpose or general system descriptions.

9.1.5.2. Defense Service. The furnishing of assistance (including training) to foreign persons, whether in the U.S. or abroad in the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing or use of defense articles; or the furnishing to foreign persons of any technical data controlled under the ITAR, whether in the U.S. or abroad.

9.1.5.3. Export. Sending or taking a defense article out of the U.S. in any manner, as well as disclosing (including oral or visual disclosure) or transferring any defense article to an embassy, agency, or subdivision of a foreign government; or technical data to a foreign person, whether in the U.S. or abroad.

9.1.5.4. Foreign Person. Any natural person who is not a lawful permanent resident or who is not a protected individual or refugee under the U.S Asylum Program. It also means any foreign corporation, business association, partnership, trust, society or any other entity or group that is not incorporated or organized to do business in the U.S., as well as international organizations, foreign governments and any agency or subdivision of foreign governments (e.g., diplomatic missions). A U.S. person working for a foreign entity is considered a foreign person.

9.1.5.5. License. A document bearing the word “license” issued by the Director, DDTC or his authorized designee which permits the export or import (permanent or temporary) of a specific defense article or defense service controlled by the ITAR.

9.1.5.6. Manufacturing License Agreement (MLA). An agreement whereby a U.S. person grants a foreign person an authorization to manufacture defense articles abroad and which involves or contemplates the export of technical data or defense articles or the performance of a defense service or the use by the foreign person of technical data or defense articles previously exported by the U.S. person.

9.1.5.7. Technical Assistance Agreement (TAA). An agreement for the performance of a defense service(s) or the disclosure of technical data, as opposed to an agreement granting a right or license to manufacture defense articles. Assembly of defense articles is included, provided production rights or manufacturing know-how is not conveyed.

9.1.5.8. Technical Data. Information that is required for the design development, production, manufacture, assembly, operation, repair, testing, maintenance or modification of defense articles. This includes information in the form of blueprints, drawings, photographs, plans, instructions and documentation. This does not include information concerning general scientific, mathematical or engineering principles commonly taught in schools, colleges and universities or information in the public domain. It also does not include basic marketing information on function or purpose or general system descriptions of defense articles.

9.1.5.9. U.S Person. A U.S. citizen, or individual who is lawfully admitted for permanent residence; is granted the status of an alien lawfully admitted for temporary residence;

is admitted as a refugee; or is granted asylum under Chapter 12 of Title 8, United States Code, “Immigration and Nationality” (Reference (z)). It also means any corporation, business association, partnership, society, trust, or any other entity, organization or group that is incorporated to do business in the U.S. It also includes any governmental (federal, state, or local) entity.

9.1.6. Prime Supplier’s Responsibility. The USML, part 121 of Title 22 of CFR (Reference (l)), designates categories of items that are defense articles or defense services. In many cases, suppliers subcontract the manufacture and/or assembly of items or parts of items identified on the USML to subcontractors located in foreign countries. Subcontracting usually involves the export of technical data that is required for contract performance and/or product acceptance. Prime suppliers must secure authorization from the DDTC for the export of defense articles and services. Depending on the circumstances, the authorization could be in the form of:

- Temporary/Permanent Export Licenses (Form DSP-5, Form DSP-73, etc.)
- MLAs
- TAAs

9.1.6.1. All of the above authorizations should specifically identify the specific articles or services protected; the country where the defense articles, services or technical data will be used; the companies or organizations authorized access; and the associated technical data.

9.1.6.2. DFARS 252.225-7048, “Export-Controlled Items” (Reference (aa)), is a contractual requirement which states that the supplier is responsible for complying with all applicable laws and regulations regarding export-controlled items, and that the supplier must include the substance of this clause in all subcontracts.

9.1.6.3. Pursuant to DFARS/PGI 225.79, “Export-Control” (Reference (ab)), DCMA personnel should not answer any questions a supplier may ask regarding compliance with the ITAR, or questions regarding the DoS requirement for suppliers to register IAW the ITAR. DCMA personnel must direct the supplier to paragraphs (b) and (c), respectively, of DFARS 252.225-7048 (Reference (aa)), and may inform the supplier to consult with the DoS.

9.2. SAFEGUARDING CONTROLLED UNCLASSIFIED INFORMATION (CUI).

9.2.1. Suppliers are responsible for compliance with the ITAR restrictions. Neither DCMA personnel nor foreign government personnel are responsible for performing oversight or surveillance of a supplier’s compliance with export control requirements.

9.2.2. All DCMA personnel have a responsibility to safeguard U.S. export-controlled items that they may come in contact with during the performance of their official duties. DCMA personnel are reminded that export of ITAR-protected defense articles, services, and technical data can occur in the U.S. as well as in foreign countries.

9.2.2.1. CUI is information of such sensitivity as to warrant placing a degree of control over its use and dissemination.

9.2.2.1.1. CUI includes any U.S. origin unclassified information to which access or distribution limitations have been applied IAW U.S. national laws, policies, and regulations. It also includes any unclassified foreign information provided to the U.S. that is exempt from public disclosure under the providing nation's laws, regulations, and policies.

9.2.2.1.2. CUI may include technical data pertaining to defense articles and services that are subject to U.S. export controls IAW AECA (Reference (d)), as implemented by the ITAR.

9.2.2.1.3. Unclassified ITAR-controlled defense articles and defense service products also require protection from unauthorized access or transfer into the public domain.

9.2.2.2. The CUI protection standards described below have been developed based on the CUI security standards contained in these international agreements with partner nations.

9.2.2.2.1. Limit access to CUI, defense articles, and defense service products to only those personnel with the authorized "need to know" IAW any pertinent International Agreement and DCMA-generated delegation documents.

9.2.2.2.2. Do not share CUI, defense articles, or defense service products with a Third-Party Nation or entity without the prior written consent of DCMA or other DCMA-designated U.S. organization.

9.2.2.2.3. Handle as CUI any unclassified documents, defense articles, or defense service products received without markings or distribution caveats until clarification on the potential requirement for CUI controls is obtained in writing from the supplier.

9.2.2.2.4. Protect as CUI any supplier-provided proprietary information or intellectual property that is marked with restrictive legend or other statement that restricts dissemination or access.

9.2.2.2.5. Store CUI in a controlled container (e.g., office file cabinet, security container, etc.) or in a secure office area (e.g., locked office or container) to prevent inadvertent loss/dissemination.

9.2.2.2.6. Do not remove CUI from the workplace to review at home.

9.2.2.2.7. Do not read/review/discuss CUI while in-transit on public transportation or in other public areas.

9.2.2.3. Reporting.

9.2.2.3.1. Any loss or compromise of CUI, defense articles, or defense service products must be reported to DCMA in writing as soon as practicable, but no later than 5 business days after the discovery of the loss or compromise.

9.2.2.3.2. The DCMA contact for reporting is the Commander of the DCMA organization that issued the request to perform GQA or financial audit services associated with the CUI.

9.2.2.3.3. DCMA Commanders should contact their CMO legal counsel in conjunction with the Contract Integrity Center and provide the DCMAI host nation program manager with the appropriate details so that the issue can be communicated to OUSD.

9.3. ITAR-RELATED REQUEST PROCEDURE - DCMA CMO.

9.3.1. Contract Technical Review. The importance of this process cannot be over emphasized considering its impact to the International Request for CAS process. The DCMA CTR must include a determination as to the applicability of ITAR restrictions or other export-controls to the contract or subcontract/purchase order being reviewed.

9.3.2. The inclusion of DFARS clause 252.225-7048 (Reference (aa)), is required for all contracts and does not imply ITAR restrictions exist.

9.3.3. DFARS 252.225-7047, “Exports by Approved Community Members in Performance of the Contract” (Reference (ac)). There are Defense Trade Cooperation (DTC) Treaties that permit the export of certain U.S. defense articles, technical data, and defense services without U.S. export licenses or other written authorization under the ITAR, into and within the Approved Community, as long as the exports are in support of purposes specified in the DTC Treaties. If this clause is cited in the contract, DCMA CMO QA personnel must review DFARS 252.225-7047 and DFARS 225.79, “Export Control” (Reference (ad)) in its entirety to determine its applicability to the contract/subcontract. Specific defense articles that are not U.S. DoD Treaty-eligible will be identified as such in those contract line items that are otherwise U.S. DoD Treaty-eligible. (See [Glossary](#) for definitions of DTC and Approved Community.)

9.3.4. The CTR must include a review of the applicable export license, MLA, or TAA. Some contracts contain export-control language without referencing a specific DFARS clause. Examples of ITAR restrictions identified on contract/subcontract are as follows:

9.3.4.1. Inclusion of a military service specific clause, such as AFMC FAR Supplement 5352.227.9000, “Export-Controlled Data Restrictions (AFMC)” (Reference (ae)).

9.3.4.2. Inclusion of specific export-control language or ITAR restrictions, such as technical data provided to the seller in support of the contract and seller’s performance of the contract is authorized by the applicable U.S. State Department authorization number.

9.3.5. Coordination with the Supplier. The CMO should discuss the contractual ITAR restrictions with the supplier and the applicability of ITAR to subcontractors both in the U.S. and

outside of the U.S. It is highly recommended that a process be established for identifying subcontractors and subcontracts whose defense articles, services, or technical data is protected by export-controls.

9.3.5.1. The process should include a listing of contracts and associated subcontracts imposing ITAR restrictions, with reference to the export license, MLA, or TAA.

9.3.5.2. Export license restrictions, access authorizations, and agreements must be flowed down to the applicable subcontractors through the applicable subcontracts. Also, as stated in paragraph (e) of DFARS 252.225-7048 (Reference (aa)), “The Contractor shall include the substance of this clause, including this paragraph (e), in all subcontracts.”

9.3.6. Delegation Preparation. DCMA CMO QA personnel must determine if GQA is required at the foreign supplier’s location based on the risk assessment and the GQA determination made in [Chapter 3](#).

9.3.7. If GQA surveillance or financial audits are to be delegated to a DCMAI CMO, copies of all applicable sections of export licenses, MLA, or TAA relative to the subcontract/purchase order must be provided with the delegation, if available. As a minimum, the referenced DFARS clauses or the contract page numbers that contain the ITAR language, license and agreement numbers, expiration dates, and other relevant information must be provided on the delegation.

9.3.8. The delegation must be coordinated with the DCMAI CMO cognizant of the subcontractor in advance of the delegation for coordination purposes and to determine whether assistance is required to obtain access for host nation QA personnel to the export-controlled items.

9.3.9. The DCMA CMO will work with the supplier (DoS export license holder) to amend or modify the export license, access authorizations, or agreements, or to obtain a sub-license. If necessary, the CMO may contact the PCO to solicit an ITAR exemption through the appropriate military channels in order to obtain export-controlled access for the host nation during the performance of the GQA. The decision to amend a license, agreement, or to pursue an exemption rests with the supplier and will depend on the circumstances associated with the export controls. Consult with the DCMAI host nation program manager.

9.3.10. As part of their GQA Surveillance Planning effort, DCMA CMO QA personnel must schedule and perform process reviews of the supplier’s processes for flowing contract requirements to their subcontractors.

9.4. ITAR-RELATED REQUEST PROCEDURE - DCMAI CMO.

9.4.1. Contract Technical Review. CTR must include a determination as to the applicability of ITAR restrictions or other export-controls to the contract or subcontract/purchase order being reviewed.

9.4.2. The CTR must include a review of the applicable export license, MLA, or TAA to identify specific defense article or defense service restrictions, technical data, and information restrictions, and access authorizations. If this information is not available with the contract, subcontract, or delegation, the DCMAI personnel must contact the Delegator and request the information.

9.4.2.1. DCMAI personnel must not proceed with requesting GQA or financial audit services from the host nation until the information is reviewed and clearly understood.

9.4.2.2. All restrictions and authorizations must be documented on the surveillance plan or must be clearly traceable from the surveillance plan.

9.4.3. The inclusion of DFARS 252.225-7048 (Reference (aa)) is required for all contracts and does not imply ITAR restrictions exist.

9.4.4. DFARS 252.225-7047 (Reference (ac)). There are Defense Trade Cooperation (DTC) Treaties that permit the export of certain U.S. defense articles, technical data, and defense services, without U.S. export licenses or other written authorization under the ITAR, into and within the Approved Community, as long as the exports are in support of purposes specified in the DTC Treaties. If this clause is cited in the contract, DCMAI CMO QA personnel must review DFARS 252.225-7047 (Reference (ac)) and DFARS 225.79 (Reference (ad)) in their entirety to determine their applicability to the contract/subcontract. Specific defense articles that are not U.S. DoD Treaty-eligible will be identified as such in those contract line items that are otherwise U.S. DoD Treaty-eligible. (See [Glossary](#) for definitions of DTC and Approved Community.)

9.4.5. Some contracts contain export-control language without referencing a specific DFARS clause. Examples of ITAR restrictions identified on contract/subcontract are as follows:

9.4.5.1. Inclusion of a military service specific clause, such as AFMC FAR Supplement 5352.227.9000 (Reference ae)).

9.4.5.2. Inclusion of specific export-control language or ITAR restrictions, such as technical data provided to the seller in support of this contract and seller's performance of this contract is authorized by the applicable DoS authorization number.

9.4.6. Host Nation Access Authorization. DCMAI CMO QA personnel must determine if the GQA or financial audit services should be requested from the host nation personnel. If exceptions apply, as discussed in Chapter 4, [paragraph 4.2.4.](#), DCMAI personnel must plan and perform the required activities.

9.4.7. DCMAI personnel must determine whether the host nation personnel are authorized access to the ITAR export-controlled defense articles or technical data. Methods of access authorization include:

9.4.7.1. International Agreements. The method of granting access to the host nation personnel is through the security arrangement clauses of the individual international agreements. This provides an umbrella-type access authorization for ITAR or CUI. As new agreements arise or current agreements are modified, this type access authorization may be included in the agreement.

9.4.7.2. Exchange of Letters (EoL). Where the security provisions of a current International Agreement do not contain the access authorization to ITAR or CUI, the agreements must be clarified through an EoL. The EoL is an administrative procedure that outlines the required aspects for access and protection requirements for U.S. origin export-controlled information. The EoL must be agreed to by both governments prior to any access to U.S. origin export-controlled information by the foreign government. Questions concerning process initiation, coordination, and approval should be directed to the DCMAI host nation program manager.

9.4.7.3. Amendment of Export License, MLA, or TAA. DCMAI personnel must contact the PCO or the DCMA CMO Delegator and request the license or agreements be revised to provide access to the host nation personnel. See the above information at [paragraph 9.3.7](#).

9.4.7.4. No portion of GQA surveillance or financial audit services will be requested or performed by the host nation personnel until access is authorized by one of the methods described above. If implementation of GQA surveillance or financial audit services is time sensitive, the surveillance or audits must be planned and executed by DCMAI personnel.

9.4.8. Request Preparation. After all the applicable export-protected information is received, including the access authorization for the host nation personnel, the request can be coordinated with the host nation and the RGQA, RIAC, or financial audit request can be completed. Early coordination is permissible; however, host nation personnel are not authorized to act on behalf of the DoD/DCMA until access authorization is received and the request is accepted by the host nation.

9.4.9. RGQA or Request for Government Contract Audit Services (RGCAS) forms modified for ITAR requirements must be used to request GQA surveillance or financial audit services (see [Resource Web page](#) for template forms). The RGQA, RGQAR and the RGCAS forms have been modified for ITAR requests. A request “valid to” date has been included in the form so that unless the RGQA or RGCAS is revised, the delegation will expire on that date and all support from the host nation will cease regardless of the estimated contract final delivery date. This will assist in providing a more active role in managing the delegation and a higher degree of organizational management visibility.

9.4.10. Specific export-controlled defense articles, services, and technical data must be identified on the ITAR RGQA within the product description (reference ITAR Exemption Tracking No. 09-19 (Reference (af))). The ITAR RGQA/RGCAS must be signed by the Requestor’s Team Leader and reviewed by the Host Nation Coordinator, if one is assigned to the DCMAI CMO. The RGQA/RGCAS must be forwarded to the host nation’s focal point.

9.4.11. Copies of the export license, MLAs, or TAAs must not be provided to the host nation organization due to proprietary information disclosure. The supplier must be notified that the contract is being delegated to the host nation GQA/Audit organization.

9.4.12. Visibility. Each DCMAI CMO requesting GQA Surveillance or financial audit services of ITAR-protected defense articles and technical data must develop a process for managing and tracking ITAR delegations and providing the appropriate level of management visibility.

9.4.13. RGQA/RGCAS Closure.

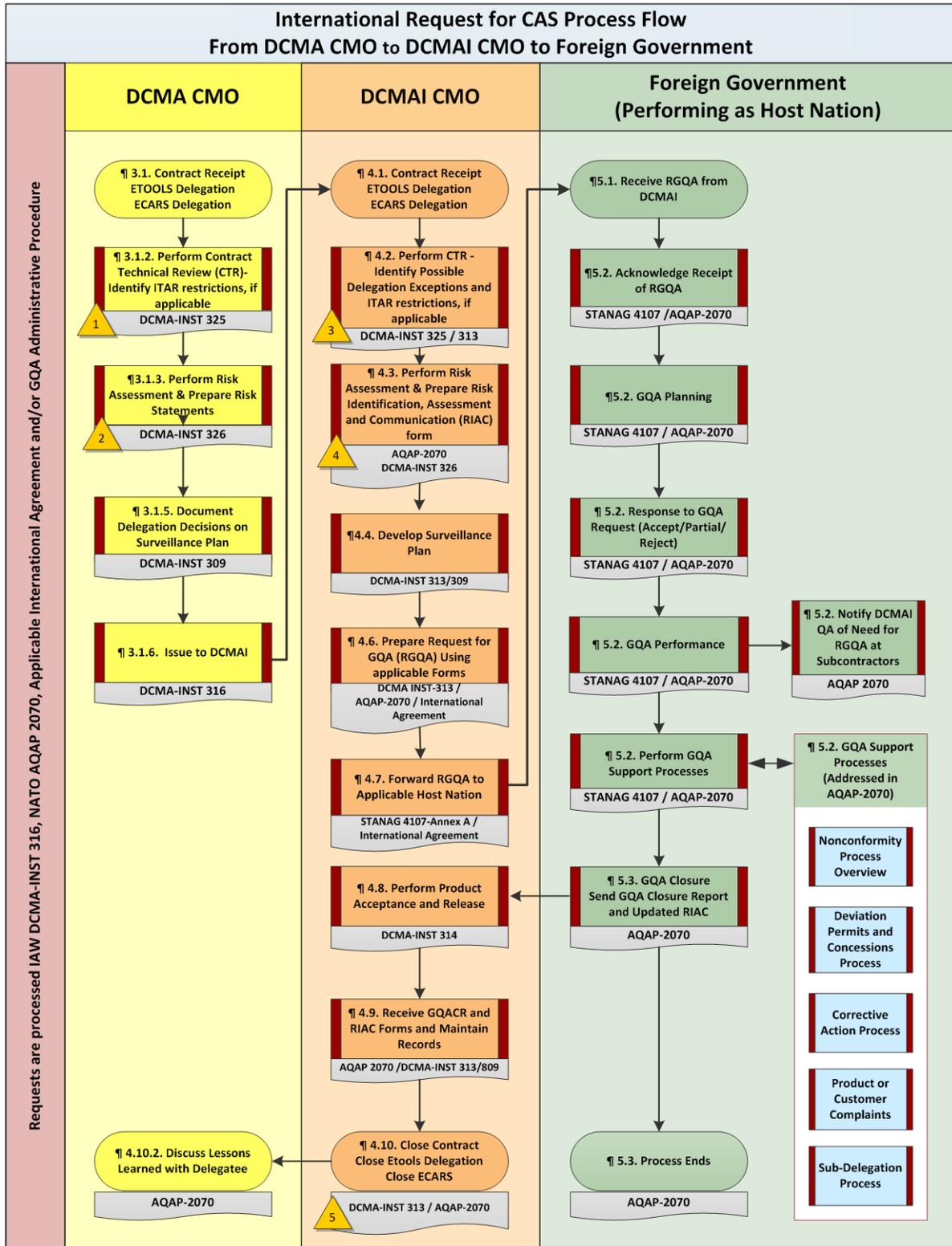
9.4.13.1. A request “valid to” date has been included on the ITAR modified RGQA/RGCAS form so that unless the RGQA/RGCAS is revised, the delegation will expire on that date and all support from the host nation will cease regardless of the estimated contract final delivery date.

9.4.13.2. The DCMAI CMO must forward a letter notifying the supplier that the request to the host nation has been terminated and they must not be provided access to ITAR-restricted defense articles and technical data/information.

9.4.13.3. If GQACR and RIAC, RGQA or audit reports have not been received, contact the host nation focal point and remind them of the AQAP-2070 (Reference (e)) or the International Agreement/GQA administrative procedure requirement for requested forms. On the second attempt for the information, process the request to the host nation’s CCP and include a DFB, as applicable.

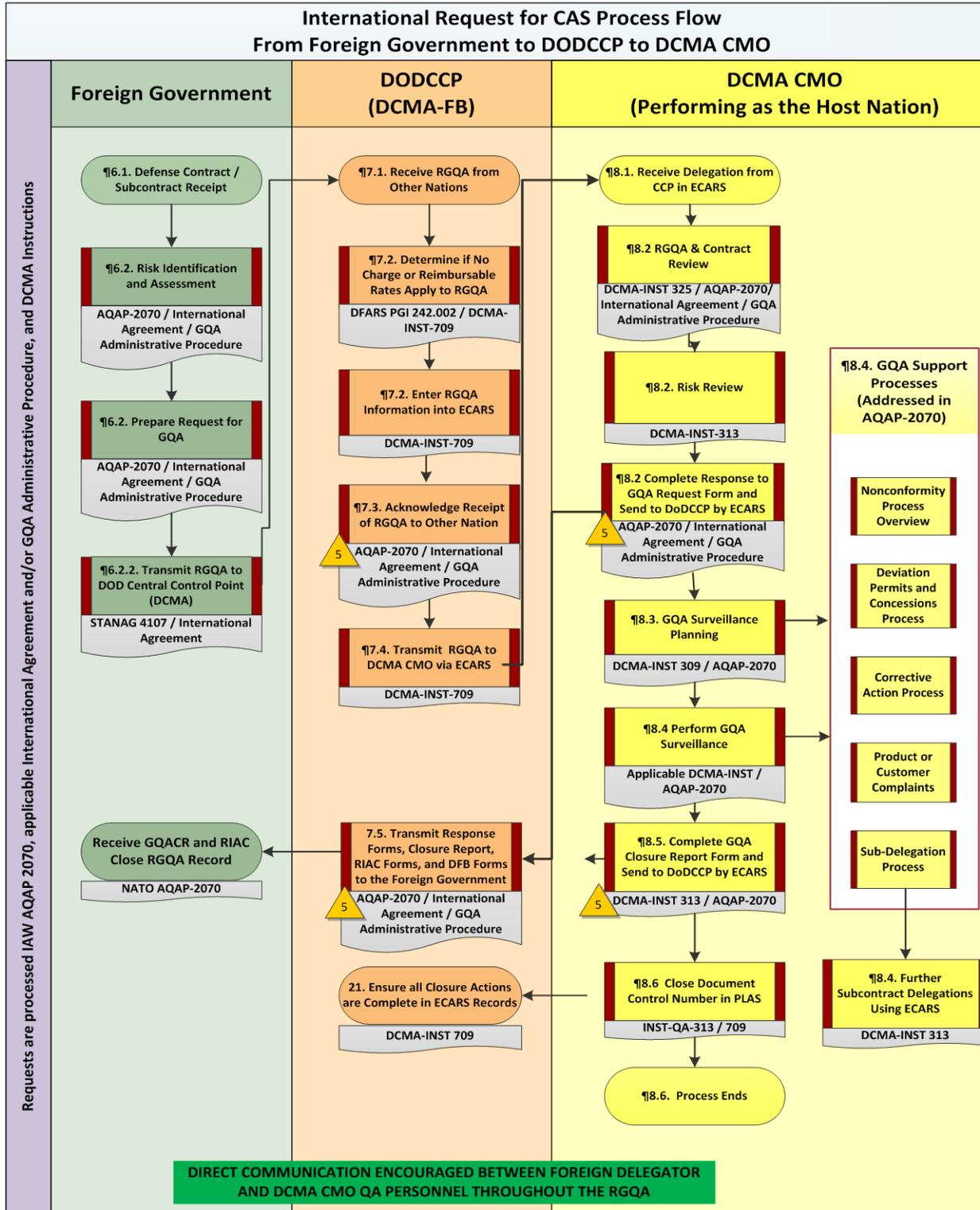
9.4.13.4. Upon receipt of the GQACR or other notification of GQA, or financial audit services completion, DCMAI CMO QA personnel must close the RGQA/RGCAS in the system they use for tracking and managing RGQAs to the host nation.

APPENDIX A



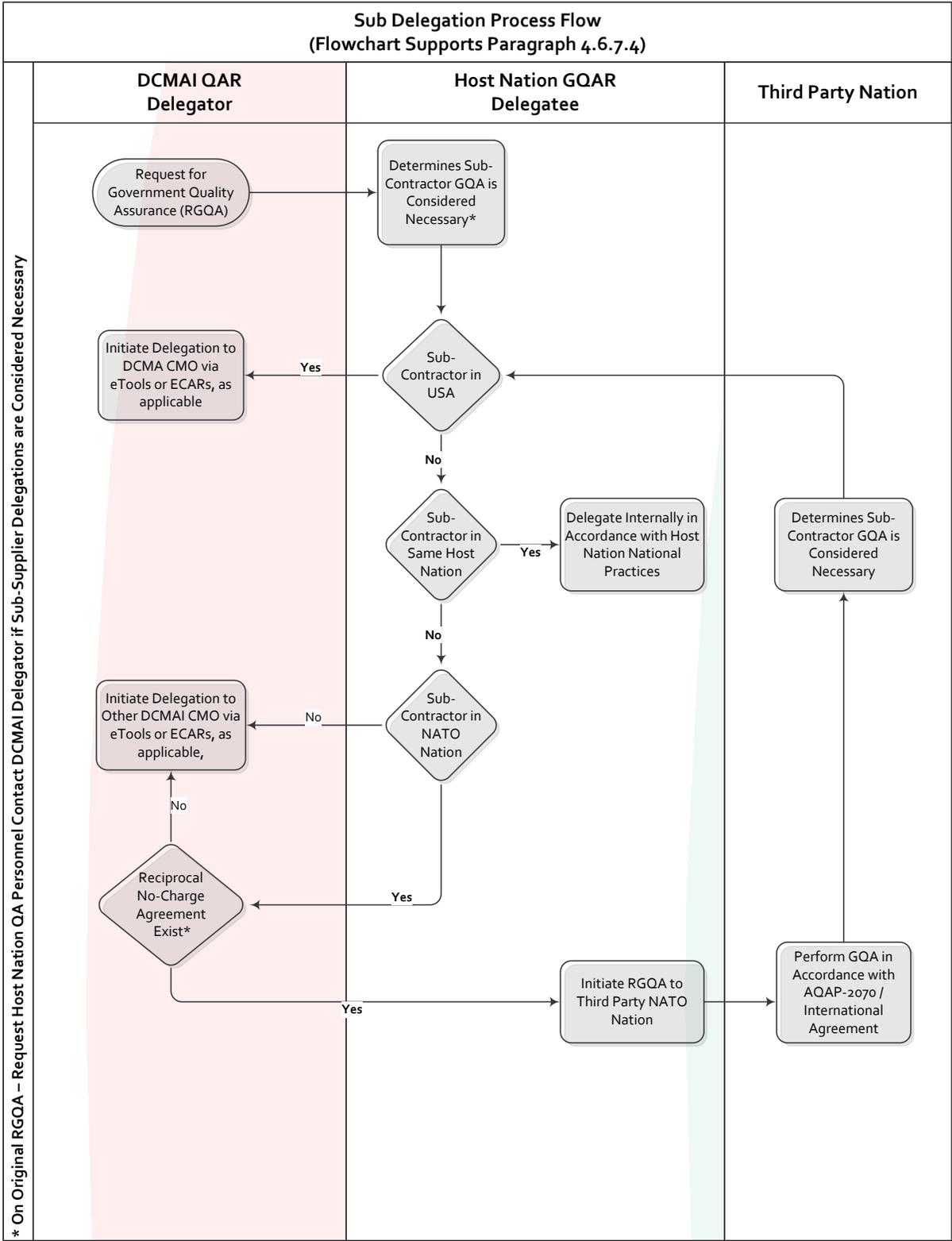
APPENDIX B

**International Request for CAS Process Flow
From Foreign Government to DODCCP to DCMA CMO**



APPENDIX C

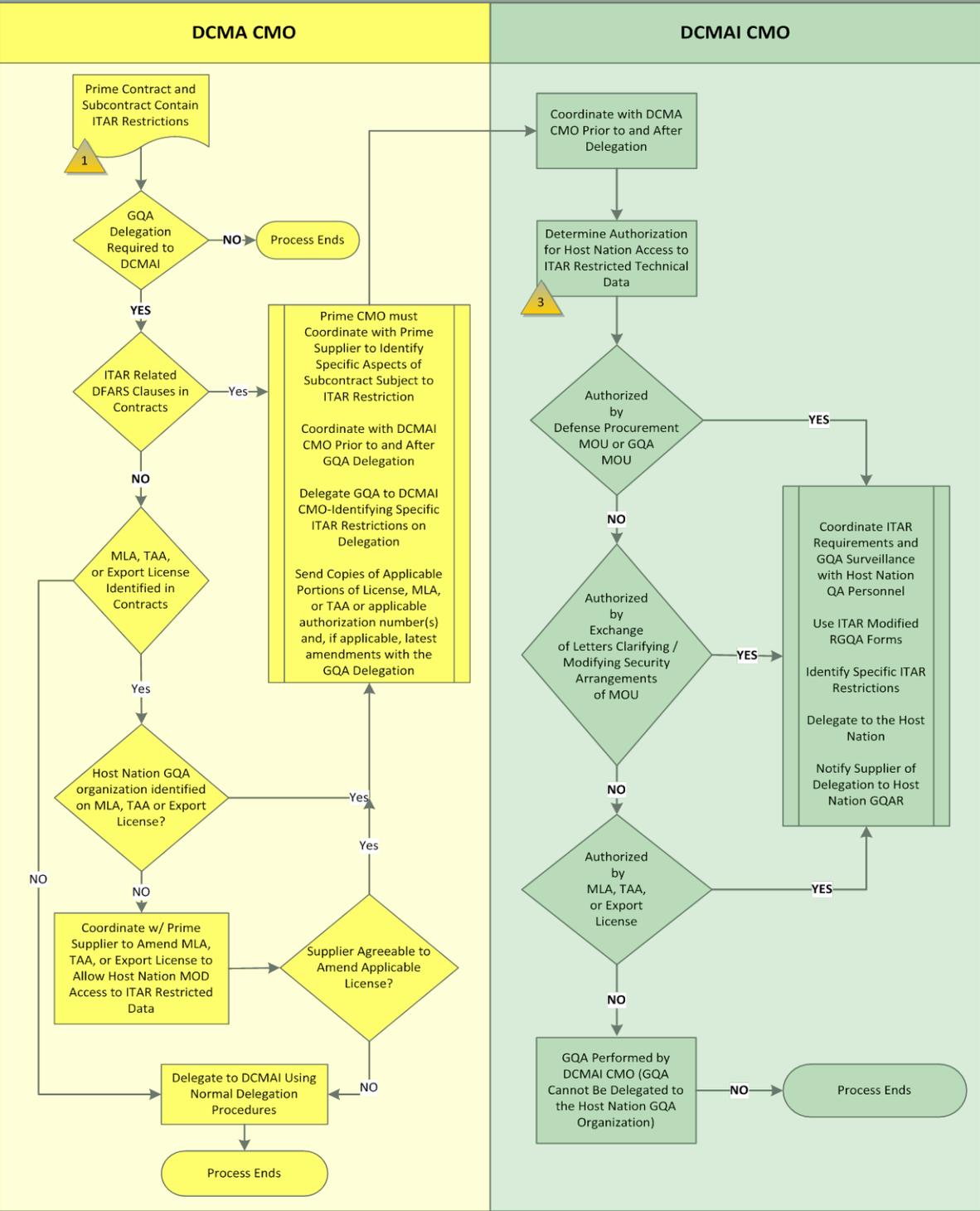
**Sub Delegation Process Flow
 (Flowchart Supports Paragraph 4.6.7.4)**



APPENDIX D

International Request for CAS Process Flow - International Traffic in Arms Regulations (ITAR)
 (Flowchart supports Chapter 9)

Note: DFARS clause 252.225-7048, "Export-Controlled Items" is required on all contracts and does not imply ITAR restrictions exist.



APPENDIX E

MANAGERS' INTERNAL CONTROL PROGRAM KEY CONTROLS (KC)

KC	Area	Risk	Possible Controls
1	DCMA CMO - Perform CTR	<ul style="list-style-type: none"> • ITAR restrictions not identified on subcontract delegations • ITAR restrictions not coordinated with DCMAI CMO • ITAR restrictions not coordinated with supplier 	<ul style="list-style-type: none"> • Comprehensive CTR to identify and document ITAR restrictions • Complete continuous learning international (CLI 007) Technology Transfer and Export Control, or equivalent CBT • Comprehensive FLS Reviews
2	DCMA/CMO – Perform risk assessment and prepare risk statement	<ul style="list-style-type: none"> • DCMAI CMO receives delegations without knowledge of risk impact • Risks not captured • Delegations not risk based 	<ul style="list-style-type: none"> • Clearly documented Risk Profile • Complete QUAL 101 • Comprehensive FLS Reviews
3	DCMAI CMO - Identify possible exceptions to delegating to the foreign government	<ul style="list-style-type: none"> • Delegating contracts to other governments with ITAR restrictions or when other exceptions exist • Noncompliance with DFARS requirements to delegate where agreements exist 	<ul style="list-style-type: none"> • Complete continuous learning international (CLI 007) Technology Transfer and Export Control, or equivalent CBT • Process established to review delegation decisions (Metric Studio) • Comprehensive FLS Reviews
4	DCMAI CMO – Perform risk assessment and prepare RIAC	<ul style="list-style-type: none"> • Risk statements and causes are not identified IAW AQAP-2070 • Delegations not risk-based • Delegations rejected 	<ul style="list-style-type: none"> • Complete AQAP-2070 CBT • Complete QUAL 101 • Comprehensive FLS Reviews
5	DCMA CMO/ DoDCCP/ DCMAI CMO	<ul style="list-style-type: none"> • Noncompliance with suspense dates defined in international agreements, STANAG 4107, AQAP-2070 and/or GQA administrative procedures 	<ul style="list-style-type: none"> • Complete AQAP-2070 CBT • Complete QUAL 101 • Comprehensive FLS Reviews

GLOSSARY

DEFINITIONS

Communities:

Approved Community. U.S. Government, U.S. entities that are registered and eligible exporters, and certain government and industry facilities in Australia or the United Kingdom that are approved and listed by the U.S. Government.

Australia Community Member. An Australian government authority or nongovernmental entity or facility on the Australia Community list accessible at <http://pmddtc.state.gov/treaties/index.html>

United Kingdom Community Member. A United Kingdom government authority or nongovernmental entity or facility on the United Kingdom Community list accessible at <http://pmddtc.state.gov>.

United States Community. 1) Departments and agencies of the U.S. Government, including their personnel, with, as appropriate, security accreditation and a need-to-know; and 2) Nongovernmental U.S. entities registered with the Department of State and eligible to export defense articles under U.S. law and regulation, including their employees, with, as appropriate, security accreditation and a need-to-know.

Concession (See Deviation Permit). Permission to use or release a product that does not conform to specified contract requirements. NOTE: A concession is generally limited to the delivery of a product that has nonconforming characteristics within specified limits for an agreed time or quantity of that product. (Source: ISO 9000)

DCMA CMOs. As used in this Instruction, refers to CMOs located in the U.S.

DCMAI CMOs. As used in this Instruction, refers to CMOs located outside of the U.S.

Defense Trade Cooperation (DTC) Treaty. 1) The Treaty Between the Government of the United States of America and the government of the United Kingdom of Great Britain and Northern Ireland concerning Defense Trade Cooperation signed at Washington and London on June 21 and 26, 2007; or 2) The Treaty Between the Government of the United States of America and the Government of Australia Concerning Defense Trade Cooperation, signed at Sydney on September 5, 2007.

Delegatee. The appropriate national authority of a supplying nation performing GQA after acceptance of the RGQA. When performing GQA for a foreign government, the U.S. is considered the host nation and DCMA the appropriate national authority.

Delegator. The appropriate authority of a purchasing nation requesting GQA in a supplying nation.

Deviation Permit (See Concession). Permission to depart from the originally specified contract requirements of a product prior to realization. NOTE: A deviation permit is generally given for a limited quantity of product or period of time, and for a specific use. (Source: ISO 9000)

Host Nation. The nation that performs the GQA or financial audit services in their nation on behalf of another nation or NATO organization. When DCMA performs the GQA or financial audits in this capacity, the U.S. is the host nation.

International Agreement. Any agreement concluded with one or more foreign governments (including their agencies or organizations) or with an international organization that;

- Is signed or agreed to by appropriate-level personnel of the DoD
- Signifies the intention of the parties to be bound in international law
- Can be in the form of an international agreement, memorandum of understanding, memorandum of agreement, memorandum of arrangements, technical arrangement, cooperative agreement, or any other name

International Traffic in Arms Regulations (ITAR). Set of U.S. Government regulations that control the export and import of defense articles and services including related technical data identified on the United States Munitions List (USML) (22 CFR, Part 121). These regulations implement the provisions of the AECA (Reference (d)), and are described in 22 CFR Parts 120–130. ([See Chapter 9 for ITAR-related definitions.](#))

Outside of the United States (U.S.). Refers to all other areas not included in the definition for the United States (U.S.).

United States (U.S.). Refers to the 50 states, the District of Columbia and outlying areas, such as the Commonwealth of Puerto Rico, Guam, etc. For further definition of outlying areas, refer to FAR 2.101, Definitions.

GLOSSARY

ACRONYMS

AECA	Arms Export Control Act
ALRE	air launch and recovery equipment
AQAP	Allied Quality Assurance Publication
CAR	corrective action request
CAS	contract administration service
CCP	Central Control Point
CFR	Code of Federal Regulations
CMO	contract management office
CPIC	Contract Policy and International Contracting
CSI	critical safety items
CTR	contract technical review
CUI	controlled unclassified information
DCA	data collection and analysis
DCMAI	DCMA International
DCN	Document Control Number
DDTC	Director, Defense Trade Controls
DFARS	Defense Federal Acquisition Regulation Supplement
DFB	delegation feedback
DoDCCP	Department of Defense Central Control Point
DoS	Department of State
DPAP	Defense Procurement and Acquisition Policy
DTC	Defense Trade Cooperation
ECARS	electronic Contract Administration Request System
EoL	exchange of letters
FAR	Federal Acquisition Regulation
FMS	Foreign Military Sales
GCQA	Government Contract Quality Assurance
GQA	Government Quality Assurance
GQACR	Government Quality Assurance Closure Report
GQAR	Government Quality Assurance Representative
HQ	headquarters
IAW	in accordance with
ITAR	International Traffic in Arms Regulation
MLA	Manufacturing License Agreement

MOU	Memorandum of Understanding
NASA	National Aeronautics and Space Administration
NATO	North Atlantic Treaty Organization
OPR	office of primary responsibility
OSD (AT&L)	Office of the Undersecretary of Defense (Acquisition, Technology & Logistics)
PCO	Procurement Contracting Office
PGI	Procedures, Guidance, and Instruction
PLAS	Performance Labor Accounting System
QA	quality assurance
QUALI	Quality Assurance Letter of Instruction
RGCAS	Request for Government Contract Audit Services
RGQA	Request for Government Quality Assurance
RGQAR	Response to Government Quality Assurance Request
RIAC	Risk Identification, Assessment and Communication
RPP	Risk Profile and Plan
STANAG	Standardization Agreement
SOF	safety of flight
TAA	Technical Assistance Agreement
US	United States
USC	United States Code
USML	United States Munitions List