



DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY
QUANTICO, VA 22134-6801



Federal Investigations Notice (FIN)

Notice No. 25-04

September 15, 2025

Subject: Notification of Customer Funding Requirements for Submitting Requests to the Defense Counterintelligence and Security Agency for Products and Services

Overview and General Announcement of Reimbursement Protocols for Personnel Vetting Products and Services. This notice announces Defense Counterintelligence and Security Agency's (DCSA) funding protocols and requirements, identifying general guidance and procedures for delivering to DCSA funding to support the submission of requests for personnel vetting services, effective October 1, 2025. The work and specific support includes vetting products such as background investigations, continuous vetting (CV) services, and other products and services related to suitability, credibility, and eligibility access determinations in support of national security.

Rationale for the Notification. In collaboration with senior officials within the Department, to better support customers, to promote efficiencies, and to strengthen the soundness of its working capital fund, DCSA has determined that improved customer reimbursement processes, as part of overall operating business rules, are warranted. The below described requirements ensure compliance with statute, regulation, and issuance and support DCSA and any customer agency or organization (the "Requesting Agency") to properly budget, control, and account for the costs of all products and services ordered.

Reimbursement Protocols Upfront for Products and Services. Effective October 1, 2025, DCSA will require all customer agencies and organizations submitting requests for products and services to provide DCSA with a funding document which is sufficient to cover the cost of service request submissions. DCSA will begin procedures to terminate the beginning of any work on these submissions until the Requesting Agency delivers to DCSA appropriate funding reimbursement documentations as more fully described below. This policy is consistent with Federal law, regulation, and issuance, to include, but not limited to, (1) 31 U.S.C. §§ 1341, 1342, and 1517, (the "Anti-Deficiency Act"); (2) 10 U.S.C. § 2208; (3) 31 U.S.C. § 1535; (4) OMB Circular No. A-11, Preparation, Submission, and Execution of the Budget (July 2024), Sections 20.12(a), 145, and 150; and (5) DoD 7000.14-R, Financial Management Regulation (FMR).

Effective October 1, 2025, DCSA shall require the following supporting documents for reimbursable orders:

1. A fully completed General Terms and Conditions (GT&C) on file with DCSA no later than October 1, 2025. Acceptable GT&Cs include the FS Form 7600A or processed G-Invoicing GT&C. DCSA encourages a Requesting Agency to engage and collaborate with the DCSA Office of the Chief Financial Officer (OCFO) to develop multi-year GT&Cs which maximize the efficiency of this requirement.
2. A fully completed and processed financial order obligating agency funding for DCSA services **prior** to any agency submission requests. Acceptable orders include the FS Form 7600B or G-Invoicing Order.

Procedures for Failure of Requesting Agency to Submit Required Funding-Related Documents and a Corresponding Funded Order. If the Requesting Agency fails to submit a funded order sufficient to cover its submissions, DCSA will initiate procedures with the Office of the Under Secretary of War (OUSW) (Comptroller) and the Office of Management and Budget (OMB) to obtain funding. If still unsuccessful in securing funding for reimbursement purposes, DCSA will begin the process of suspending the Requesting Agency's ability to submit case requests until the Requesting Agency submits required funding documentation and DCSA accepts funding.

Limited Alternative to Required Documentation and a Funded Order. DCSA fully understands and appreciates challenges in obtaining and processing funding documents, particularly at the start of a fiscal year or during and soon after periods of a continuing resolution (CR). These challenges include financial system downtimes and both external and internal agency appropriation process flow timelines. To counter urgent situations which arise prior to receipt of a regular funding order or when necessary to begin work of an emergency nature [e.g., unforeseen security situations or urgent requirements], Volume 11B, Chapter 11 of the DoD FMR provides that the Requesting Agency may submit a "Letter of Intent" to DCSA. With a Letter of Intent from the Requesting Agency, DCSA will begin the service requests while the Requesting Agency finalizes the formal order obligating funds. The Letter of Intent constitutes an obligation of the Requesting Agency in a stated amount sufficient to cover the advance costs that may be incurred. With the Letter of Intent contractual in nature between DCSA and the Requesting Agency, the request for services and products must be funded upon issuance.

The Letter of Intent is extraordinary and should be used in only rare and unusual circumstances. Consistent with the DoD Financial Management Regulation, DCSA may not accept the Letter of Intent as an alternative to any lack of advance planning or to circumvent normal administrative lead times. The Letter of Intent expires within 30 days from the date of issuance, and funding must be in place with DCSA before the 30-day period ends. If the Requesting Agency does not provide funding by the Letter of Intent expiration date, DCSA will be required to begin the process of suspending the Requesting Agency's ability to submit requests for services and products. DCSA will accept one Letter of Intent from the Requesting Agency per fiscal year. Nevertheless, DCSA will accept a Letter of Intent covering each CR from the Requesting Agency if there are multiple CRs in any given fiscal year. A Requesting Agency may use the attached Letter of Intent template to craft and submit requests in urgent or emergency situations.

Reimbursement Protocols related to Continuous Vetting (CV) Services. DCSA will also require customers to have sufficient funding in place to cover new and ongoing CV services. Because CV serves as a critical national security instrument, DCSA will not disenroll any Requesting Agency's employees from CV; nor will DCSA otherwise disrupt the Requesting Agency CV service from DCSA. If the Requesting Agency's funding to DCSA for CV service is not provided at the start of the fiscal year or the funding becomes deficit at any time, DCSA will engage with the OUSW (Comptroller) and OMB to begin other funding and collection alternatives. Furthermore, DCSA may suspend the Requesting Agency's ability to submit initial vetting requests until the Requesting Agency corrects the CV funding deficiency. If, under the rare circumstances, a gap in service based upon non-reimbursement occurs, then DCSA will expeditiously resume initial vetting requests for the Requesting Agency once a funding document, sufficient to fund existing initial vetting orders, or anticipated orders in the case of new orders, has been submitted and accepted.

Protocols for Remediating Reimbursement Deficiencies from Prior Fiscal Years. During the first quarter of FY 2026, DCSA will notify and coordinate with any Requesting Agency which is delinquent in providing reimbursement for completed services in previous fiscal years. As part of resolving reimbursement deficiencies, DCSA will also engage with the OUSW (Comptroller) and OMB at the start of FY 2026 to address those funding and reimbursement challenges. Starting January 1, 2026, DCSA will begin procedures to terminate the beginning of any new orders from any Requesting Agency which still possesses unresolved funding and reimbursement issues from prior fiscal years.

Objectives of Meeting Customer Needs and Promoting Sound Financial Readiness and Strategic Stewardship of Resources. DCSA remains committed to outstanding customer service as DCSA balances numerous interests, including dedicated support to Requesting Agency needs, DCSA's requirement for full financial management compliance, DCSA's robust management of its working capital fund, and audit readiness across the enterprise. DCSA looks forward to continuing relationships and cooperative efforts with other agencies and organizations to provide quality services and products in the interest of national security while adhering to fiscal requirements and protocols.

Please contact your customer liaison or your DCSA OCFO representatives for further information and assistance.

A handwritten signature in black ink, appearing to read "DmCattler", with a stylized flourish at the end.

David M. Cattler
Director

Attachment: Letter of Intent Template

LETTERHEAD**OFFICE SYMBOL****DATE**

MEMORANDUM FOR Chief Financial Officer, Defense Counterintelligence and Security Agency

SUBJECT: FYXX Personnel Vetting Services Funding Letter of Intent

1. References:

a. DoD 7000.14-R, Financial Management Regulation, Volume 11B, Chapter 11,

b. Office of Management and Budget (OMB) Circular No. A-11, Preparation, Submission, and Execution of the Budget (July 2024)

2. Under the prevailing circumstances, the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] must incur limited costs in advance of the receipt of a regular funding order because of [DETAIL URGENT SITUATION OR EMERGENCY FACTORS].

3. Pursuant to Volume 11B, Chapter 11, paragraph 2.6 of reference (a), and consistent with reference (b), this memorandum is provided as a funding letter of intent to support commencement of the execution of personnel vetting services orders, effective MONTH XX, XXXX, and constitutes an obligation of [INSERT NAME OF REQUESTING AGENCY/ORDERING ACTIVITY] in the below stated amount to cover advance costs that may be incurred in Defense Counterintelligence and Security Agency's (DCSA) delivery of products and services related to personnel vetting in support of national security.

4. Accounting data. The total amount subject to this letter of intent is \$X.XX; Requesting Agency/Ordering Activity Location Code: XXXX; Appropriation type and year: XXXX/FYXX

5. The REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] hereby represents and certifies that funding is available through an enacted FYXX Appropriations Bill, Continuing Resolution Authority (CRA)¹ (through MONTH XX, XXXX), or working capital/revolving fund, to fund the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] operations, including the payment of personnel vetting services to the levels identified in this letter of intent.

6. As a valid obligation of the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable], the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] hereby

¹ If available pursuant to CRA, the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] acknowledges and agrees that the amount guaranteed under this letter of intent does not exceed the REQUESTING AGENCY'S/ORDERING ACTIVITY'S [as applicable] current obligational authority under the CRA.

agrees to implement administrative controls to reserve these funds for the stated purpose. REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] agrees to provide a funding document in support of the identified requirements as soon as practicable, including at a minimum, those guaranteed under this letter of intent. REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] understands that this letter of intent expires 30 days from the effective date indicated in paragraph 2. Upon expiration, any work undertaken pursuant to this letter of intent must cease if DCSA has not received sufficient funding as reimbursement. REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] also understands that if it does not provide full funding to the level of this letter of intent, or any lower level of work performed, within 60 days of the date funds are made available as indicated in paragraph 4, then DCSA shall notify the Office of the Undersecretary of War and/or the Office of Management and Budget, and request authorization to directly bill the proper appropriation account of REQUESTING AGENCY/ORDERING ACTIVITY. Upon authorization, DCSA will initiate self-reimbursement, citing the appropriation of the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable].

7. If this letter of intent is supported by CRA, the CRA expires and the CRA is not otherwise extended or replaced with an appropriation legislation, then REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] acknowledges and understands that any delivery of products and services from DCSA, provided pursuant to this letter of intent, must cease until such time as the CRA is extended or re-enacted or an Appropriations Bill is enacted.

8. In my position as [insert appropriate detail or position title] for the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable], I certify and represent that I am a duly authorized representative to issue this letter of intent and to obligate the REQUESTING AGENCY/ORDERING ACTIVITY [as applicable] as set forth herein.

9. For questions or concerns regarding this letter of intent, please contact TITLE, FIRST NAME LAST NAME at OFFICE NUMBER or EMAIL.

XXXX X. XXXXX

Title

REQUESTING AGENCY/ORDERING
ACTIVITY [as applicable]