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May 16, 2021

Lt. Gen. David G. Bassett Director, DCMA 3901 A Ave. Fort Lee, VA 23801

Subject: DCMA EVMS Compliance Procedures and Metrics Ignore Technical Performance Measurement

Dear Lt. Gen. Bassett:

Both the DCMA EVMS compliance procedures and the DCMA EVMS Compliance Metrics (DECM) are silent on technical performance. Consequently, there is no assurance that the DCMA EVMS Center can accomplish its mission of "assessing contractor effectiveness which provides stakeholders with expectations of future performance and potential impacts on individual contractors and/or programs."

OMB and DOD Needs for Effective Technical Performance Measurement (TPM)

The need for TPM, integrated with EVM, is stated in OMB and DOD guides, as follows.

- The OMB Capital Programming Guide provides guidance for contractors to "achieve integrated cost, schedule, and technical performance management using EVM during systems acquisitions."
- The DOD EVMS Implementation Guide (EVMSIG) states:
 - "Objective technical performance goals and measures are incorporated throughout the schedule hierarchy based on the completion criteria."
 - "Technical progress indicators, ensures performance assessments reflect the true technical performance of the program."

In March 2018, I submitted the following DECM change request, which was rejected:

Do Control Accounts use TPMs when appropriate? System Engineers determine which TPMs should be used, by WBS. Then EVM monitors determine which CAs should use TPMs.

DCMA's rejection was consistent with NDIA's rejections of similar change requests to the EVMS standard, EIA-748. Per EIA-748, the use of TPMs is optional, not mandatory. Thus, the Section 809 Advisory Panel reported that "another substantial shortcoming of *EVM* is that it *does not measure product quality*. A program could perform ahead of schedule and under cost according to EVM metrics but deliver a capability that is unusable by the customer."

Please expand the scope of DECMs and DCMA EVMS compliance reviews to include the effective use of TPMs. Support OMB and DOD needs for integrated TPM and EVM.

Yours truly,

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Paul J. Solomon

CC:

Hon. Kathleen Hicks, Dep. Sec. of Defense

Hon. Stacy A. Cummings, Acting Under Sec. Def. for Acquisition and Sustainment

Hon. Sen. Adam Smith, HASC