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April 15, 2021

The Honorable Adam Smith  
Chairman, HASC  
2216 Rayburn House Office Building  
Washington, D.C. 20515

Subject: Your Rejected NDAA Provision for Program and Project Management

Dear Chairman Smith:

Previously (12/12/20), I requested that you repropose a bill that failed to pass in the NDAA for FY 2021. The provision (Sec. 1745) on Program/Project Management (P/PM) was rejected by the Senate per the Conference Report. If it had passed, the current USC provision that requires OMB to “*Adopt governmentwide standards, policies, and guidelines for P/PM for executive agencies that are “**consistent with widely accepted** standards” would be amended. Instead, OMB would be required to adopt P/PM standards that are “**in accordance with** standards accredited by the **American National Standards Institute** (ANSI).”*

The only P/PM standards that are ANSI-accredited are those of the Project Management Institute (PMI). I have requested this acquisition reform since 2010, to no avail. Please read the attached email to Peter Levine, former SASC General Counsel, and Andrew Hunter, former HASC staff member, Subj: Acquisition Reform Provision in NDAA, November 5, 2010.

The assertions in the 2010 email are still valid, including the F-35 comments. Excerpts follow:

This reform is needed to require that contractors provide accurate progress and credible estimated costs and schedule at completion on major contracts that use Earned Value Management (EVM). Currently, the FAR and DFARS fail to require contractors to measure and report technical performance in their monthly reports. The EVM reporting requirements are costly to administer. However, government program managers often receive flawed reports that lack credibility, transparency, and accountability.

Most commercial companies use the **PMI** standard, Guide to the Project Management Body of Knowledge (PMBOK® Guide), not EIA-748.

Replace EIA-748 or augment it with components of the PMBOK® Guide and Systems Engineering standards.

Add a definition of a project's product scope, not just the work scope, as defined in the PMI PMBOK Guide.

The F-35 program is an excellent example of the failure of EVM to provide accurate performance measurement and an early warning of future cost and schedule overruns. I worked on it for two years. The EVM implementation failures were not just compliance problems. If there had been mandated TPM integration, the cost and schedule performance issues would have been disclosed years earlier, starting with Preliminary Design Reviews and Critical Design Reviews.

To repeat my assertion in yesterday's letter, your re-proposal of the bill will directly support your National Security objectives to improve efficiencies and eliminate waste, fraud, and abuse in the DOD.

Yours truly,

A handwritten signature in blue ink that reads "Paul J. Solomon". The signature is written in a cursive style and is positioned above the printed name.

Paul J. Solomon

CC:

Hon. Sen. Joni Ernst, SASC

Hon. Sen. Alex Padilla

Mr. Andrew Hunter, Biden-Harris Transition Team

Hon. Kathleen Hicks, Dep. Sec. of Defense

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