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The Honorable USD (R&E) Emil Michael
Office of the Under Secretary of Defense, Research and Engineering (USD(R&E))
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: DCMA Earned Value Management Compliance Metrics Still Exclude Technical Performance

Dear Hon. USD (R&E) Emil Michael:

The DCMA has ignored my requests, since 2011, to assess the use Technical Performance Measures (TPM). I examined the current DCMA Earned Value Management System (EVMS) Compliance Metrics (DECM) and found only metric regarding TPM. That metric, which is ineffective and not cost-justified, follows:

“Are the contractor’s Level of Effort work packages supportive in nature and/or do not produce technical content leading to an end item or product?”

Excerpts from my letter to Lt. Gen. Masiello, Subject: DCMA EVMS Compliance Procedures and Metrics Ignore Technical Performance Measurement, Third Request, dated June 9, 2024, follow:

...third request...to expand the scope of DECM and DCMA EVMS compliance reviews. The added scope includes assessing the use of TPM.

My letter to Lt. Gen Bassett, dated May 16, 2021, cited integrated TPM and EVM. Both the DCMA EVMS compliance procedures and DECMs were silent on technical performance and still are.

My letter to USD LaPlante, Subject: Recommendations for Pending Program Management Guides and DCMA EVMS Compliance Metrics, dated June 5, 2022, stated: ...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.” The DECMs are also silent on progress against requirements, development maturity, and Minimum Viable Products. The gaps should be closed.

My assessment...to former HASC Chair McKeon, 9/13/11, Subj: Defense Acquisition Reform, is still valid. “Even if a DCMA compliance review determines that a contractor is compliant with the guidelines, the loopholes enable a contractor to overstate progress and understate final costs. Consequently, a DCMA compliance review can provide false assurance to the Program Manager. This is like relying on Standard & Poor’s “no risk” ratings of mortgage-backed securities before the financial collapse.”

Excerpts from my letter to then PTDO OUSD(A&S) Morani, Subj: How NDIA and DCMA Weasel Worded the EIA-748 EVMS Standard and DCMA Manual, dated March 19, 2025, follow:

Unfortunately, unscrupulous contractor’s do not integrate technical performance. They don’t have to and DCMA doesn’t care. So, contractors may ignore technical performance/quality and report only the quantity of work performed in the SOW.

EVM: "...easily Manipulated and Inadequate to the Task" (a)



EIA-748 Enables Easy Manipulation:

4 legs of the stool to fool:

1. Measure work (SOW), not technical performance (Product)
2. % Complete Earned Value Technique with "90% Rule"
3. Rework not planned (Budget from MR)
4. Deferred Functionality not Accounted For

(a) Commission on PLANNING, PROGRAMMING, BUDGETING AND EXECUTION
Report finding: "EVM systems have long been criticized as..."



Please take immediate steps to terminate counterproductive DCMA EVMS surveillance. It is not required by statute or regulation. Then get rid of the DFARS EVMS clause and implement the other acquisition reforms that I recommended.

Please ensure that my recommendation (in Italics, above) is enacted in the pending announcement of major reforms to streamline military acquisitions.

Yours truly,

A handwritten signature in blue ink that reads 'Paul J. Solomon'.

Paul Solomon

CC:

Hon. Adam Smith, HASC

Hon. Mike Rogers, HASC

Hon. Roger Wicker, SASC

Hon. Dan Driscoll, Sec. of the Army

Hon. SON John Phelan

Hon. Gen. B. Chance Saltzman, U.S. Space Force

Hon. Pete Hegseth, Sec. of War

Jon Sindreu, WSJ

Meg O'Keefe SAE G-47 SE Committee

Hon. USD Michael Duffey

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Russell Vought, Director, OMB

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