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The Honorable Michael McCord  
USD (Comptroller)/CFO  
1000 Defense Pentagon  
Washington, DC 20301

Subj: Augmented PBBE Recommendation Cites ANSI Project Management Standards

Dear Hon. USD McCord:

The previous letter, PBBE Recommendations Regarding Output-based Performance Metrics, dated August 29, urged you to work with Rep. Adam Smith to revoke the DFARS EVMS clause and replace it with "Something of Value." It included recommended DoD actions to:

1. Request to OMB...that EIA-748 be replaced by program and project management (P/PM) policies, procedures, and guides that are consistent with...Project Management Institute (PMI) standards for P/PM planning and delivery."
2. Establish a strategic plan for integrated program management (IPM) that is consistent with PMIAA of 2015 and leads to the use of standards and policies that are in accordance with the *Guide to the PMI Body of Knowledge (PMBOK Guide®)*, American National Standards Institute (ANSI)/PMI 19-006-2019, GAO Guides, and systems engineering (SE) standards.

The HASC initiated the replacement of EIA-748 when former Rep. Joan Speier introduced a bill in the NDAA for FY 2021, HR 6395, Sec. 1745, Requirements Relating to P/PM. It included: "Section 503(c)(1)(D) of title 31, United States Code, is amended by striking "consistent with widely accepted standards" and inserting "in accordance with standards accredited by the ANSI." The bill was receded in Conference.

Please collaborate with Rep. Adam Smith and Sen. Eric Schmitt to revive it. The PMI standards are ANSI--accredited. The white paper, *DOD Acquisition Reform: EVMS-lite and IPM*, includes, in Table 1, "PMBOK® Guide Standards and Principles that are Absent from EIA-748." One of these principles is a definition of "product scope," the features and functions that characterize a product. EIA-748 has a narrow focus on the work scope and is silent on the product scope or technical baseline.

Another white paper cites PMBOK Guide® as a source of output-based metrics of progress towards completing "a freaking product at the end of the day."

Yours truly



Paul J. Solomon

CC:

Hon. Andrew Hunter, AF Asst. Sec. for AT&L

Hon. Jack Reed, Chair, SASC

Hon. Adam Smith, HASC

Nickolas Guertin (ASN RD&A)

Hon. Robert J. Wittman, HASC

Hon. Donald Norcross, HASC

Hon. Eric Schmitt, SASC

Shelby Oakley, GAO

Hon. William LaPlante (USD)

Hon. Carlos Del Toro, Secretary of the Navy

Hon. David L. Norquist, NDIA

Hon. Heidi Shyu, (USD(R&E))

Hon. Elizabeth Warren, SASC

Anthony Capaccio, Bloomberg News

Jon Ludwigson, GAO