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September 8, 2019

Ms. Margaret Weichert  
Deputy Director for Management  
The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

cc: Mr. Kevin Fahey  
Assistant Secretary of Defense for Acquisition, DoD

Sen. Joni Ernst, SASC

Subj: Recommended GAO Report Scope: High-Risk Series, Progress in Implementing PMIAA

Dear Ms. Weichert:

In the referenced, attached letter, I asserted that the PMIAA should be applicable to all agencies, with no exception for DoD. The cited white paper, "DoD Acquisition Reform: EVMS-lite to Program/Project Management (P/PM)," includes specific recommendations and an implementation plan which are structured to lower the cost of capital acquisitions, reduce government oversight, and meet the requirements of PMIAA.

The revised white paper, dated Sept. 8, 2019, includes arguments and evidence that the PMIAA provisions, are not "substantially similar to or duplicative of...policy, guidance, or instruction of the DoD related to program management" and that DoD's policy, guidance, or instruction is not consistent with widely accepted standards for P/PM planning and delivery. DoD's primary P/PM instruction mandates the use of Earned Value Management (EVM) in accordance with the EVM System Standard, EIA-748-D.

Your memo dated April 5, 2019, defined "P/PM competencies to select, assess, and train program and project management talent for the 21st century." The memo included four technical competencies for which guidance is absent from EIA-748-D:

1. Quality Management - Knowledge of the principles, methods, and tools of quality assurance, quality control, and reliability used to ensure that a project, system, or product fulfills requirements and standards.
2. Requirements Management - Knowledge of the principles and methods to identify, solicit, analyze, specify, design, and manage requirements.
3. Risk Management - Knowledge of the principles, methods, and tools used for risk assessment and mitigation, including assessment of failures and their consequences.
4. Scope Management - Knowledge of the strategies, techniques, and processes used to plan, monitor, and control project scope; includes collecting requirements, defining scope, creating a work breakdown structure, validating scope, and controlling scope to ensure project deliverables meet requirements (i.e., features, functions).

GAO Report, GAO-19-157SP, "High-Risk Series, Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas," includes a discussion of the PMIAA. The report stated that DOD can benefit from improving P/PM. The report states "In December 2019, we will report on OMB's progress in implementing PMIAA."

I recommend that the scope of the GAO report include an assessment of DoD's policy, guidance, or instruction related to P/PM to determine:

1. If the PMIAA provisions are substantially similar to or duplicative of DoD's policy, guidance, or instruction.
2. If they are consistent with widely accepted standards for P/PM planning and delivery.
3. If they cover the P/PM technical competencies cited above.

Please contact me if I can provide further assistance.

A handwritten signature in blue ink that reads "Paul J. Solomon". The signature is written in a cursive style with a long horizontal stroke at the end.

Paul J. Solomon  
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Attachments:

1. Letter to Weichert and Fahey, Subj: Successful Implementation of PMIAA by all Agencies, including DoD, dated July 26, 2018
2. White paper, DoD Acquisition Reform: EVMS-lite to Program/Project Management, dated Sept. 8, 2019