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The Honorable David Norquist
President & CEO
National Defense Industrial Association
2101 Wilson Blvd, Suite 700
Arlington, VA 22201

Subj: EIA-748E Eludes Integrated Program Management and Evidence-based Decision-making

Dear Hon. NDIA Pres. Norquist:

The House Armed Services Committee stated the following objectives in its Report on H.R. 3838 (NDAA for FY 2026):

1. Improve processes that impede effective and integrated program management (IPM) of new and legacy systems across multiple domains.
2. Shift from document-driven processes to evidence-based decision-making that delivers improved capability for the warfighter at the speed of relevance.
3. Remove the “Valley of Death” between the introduction of technology and its integration into a program of record which is a persistent and prevalent threat to businesses attempting to work with the Department.

The NDIA IPM Division is the author and steward of the draft SAE/EIA-748E Earned Value Management System (EVMS) standard. Like its predecessor, the expired EIA-748D, is void of business practices, engineering practices, or processes that support IPM.

Evidence-based

SAE/EIA-748E enables decision-making that is not evidence-based because it tolerates management assessment, as follows:

“Management assessment may be used to determine the percentage of work completed for a task or group of tasks. Earned value is then calculated by applying that percentage to the total budget for the work. Management assessment may include the use of metrics for work measurement.”

In my opinion, calculating earned value by assessing the percentage of drawings completed, lines of code completed, or other measures of work does not provide objective evidence of true schedule performance. Artifacts that have been completed are Authoritative Sources of Truth (AsoT) and evidence of schedule performance.

Document-driven

The DoD and NDIA EVMS Implementation and Intent Guides provide abundant examples of documents such as typical work products and typical outputs. So, compliance with the SAE/EIA-748E guidelines entails much

documentation and is counter-productive to achieving the digital engineering objectives of automated schedule status with real-time situational awareness.

IPM

It is ironic that the expired SAE/EIA-748D includes the statement:

“An Earned Value Management System (EVMS) **for IPM** integrates the work scope of a program with the schedule and cost elements for optimum program planning and control.”

The draft revision, SAE/EIA-748E:

1. Absolves the NDIA IPM Div. from supporting IPM. The revised, truncated statement omits “for IPM.”
2. Refers to systems or methodologies such as systems engineering (SE), cost estimating, manufacturing/enterprise resource planning, and Agile software development, as “complementary.”

Consequently, the potential SAE approval of SAE/EIA-748E and retention of the DFARS EVMS clause will impede, not enable, effective and IPM of new and legacy systems across multiple domains.

Again, please request the NDIA IPM Div. to cease and desist all approval/balloting effort unless it collaborates with the SE Division to inject it with requirements management tools for systems and software engineering programs. If EIA-748 is not cancelled, it should be overhauled to include best practices for automated, real time schedule status based on ASoTs as well as best engineering practices.

Yours truly,



Paul Solomon

CC:

Hon. Adam Smith, HASC	Hon. USD Michael Duffey
Hon. Mike Rogers, HASC	Hon. David Norquist NDIA
Hon. Roger Wicker, SASC	Hon. Troy Meink, Sec. of the Air Force
Hon. Dan Driscoll, Sec. of the Army	Russell Vought, Director, OMB
Hon. SON John Phelan	Dep. Sec. Defense Hon. Stephen Feinberg
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