

**Paul Solomon**  
**3307 Meadow Oak Drive**  
**Westlake Village, CA 91361**  
Paul.solomon@pb-ev.com

November 7, 2024

Trump Transition Committee

Subj: 2025 Presidential Transition Project: PMI Project Management, not NDIA Earned Value

Dear President-elect Trump:

This letter augments my letter, Subj: DOD De-Regulation - Under Budget and Ahead of Schedule, 8 years later, dated November 6, 2024. The proposed acquisition reform below addresses the 2025 Presidential Transition Project (2025 Project) needed DOD reform to decentralize Defense Acquisition University (DAU) offerings and expand the DAU mission to include accreditation of non-DOD institutions. The 2025 Project incorporates my recommendation to Russ Vought, in 2020, who is a 2025 Project author.

The DAU falsely claims that “Earned Value Management (EVM) is a widely accepted best practice for program management, used across the DoD. Program managers (PM) use EVM as a tool to provide joint situational awareness of program status and to assess the cost, schedule, and technical performance for proactive course correction.”

Per the 2025 Project:

The critical shortage of trained and certified acquisition personnel must be addressed with urgency in order to support DOD mission objectives and goals. With the rapid evolution of training and educational technologies, including remote and virtual practices, there is no reason for DAU to maintain a monopoly on the knowledge and certification that are required to perform as acquisition professionals. Further, the cost to private contractors and non-DOD civilians who aspire to such a role limits the supply of trained and certified candidates. DAU has become an unnecessary barrier to entry in a career field that is vital to the DOD mission.

My previous letters to OMB leadership proposed that accreditation of the Project Management Institute (PMI) training and certification be institutionalized by DOD instead of teaching EVM as proselytized by the NDIA in the EIA-748 EVM System guidelines. The pertinent letters follow:

- Mick Mulvaney, Director, Subj: Project Management of High Risk DoD Acquisition, 1/17/18
- Margaret Weichert, Dep. Dir., Subj: Successful Implementation of PMIAA by all Agencies, including DoD, July 26, 2018
- Russ Vought, Dir., Subj: Recommendations to Improve Program/Project Management (P/PM) and Achieve the President’s Management Agenda (PMA), October 27, 2020

**Excerpts from letters to OMB:**

**Mulvaney:**

The primary PM standard used by DoD is the EVMS Standard, ANSI 748. The most widely accepted standard for PM, planning, and delivery is the “PMI Project Management Body of Knowledge”

(PMBOK® Guide). In comparing the two standards, it is obvious that EVMS has fatal deficiencies. The characteristics of EVMS that fail to meet the needs of a PM are:

1. EVMS addresses only the work scope but is silent on product.
2. The use of technical performance measures is optional, not mandatory.
3. Earned value is a direct measurement of the quantity of work accomplished. The quality and technical content of work performed is controlled by other processes. I call this the “Quality Gap.”

Please read, my article in the Nov. 2015 issue of *Defense AT&L Magazine*, “A Contract Requirement Rule for PMs.” I proposed that the EVMS standard be replaced by PMBOK® Guide. This acquisition reform would enable any PM to identify and pinpoint emerging problems on a timely basis and act as early as possible to resolve problems.

**Weichert:**

The PMIAA should be applicable to all agencies, including DoD.

...eliminating an ineffective regulatory requirement to use an EVMS Voluntary Consensus Standard (VCS) which is no longer practical, effective, or even reaffirmed. The EVMS guidelines in that standard have not substantially changed in 20 years and are still based on the Cost/Schedule Control System Criteria of 50 years ago. They fail to incorporate modern PM and systems engineering best practices and processes.

This letter is directly responsive to Ms. Weichert’s testimony before the Committee on Oversight and Government Reform on May 16, 2018.

- “The Federal Government still operates with many capabilities and processes established in the mid-20th Century.”
- “Data, accountability, and transparency will provide the tools and framework to deliver better outcomes to the public and to hold agencies accountable to taxpayers.”

**Vought:**

I have read the PMA and am pleased that the Administration appreciates important contributions from citizens. I have previously sent recommendations to Ms. Weichert and am providing updated recommendations to:

1. Reduce the accumulated regulatory burden.
2. Improve management of major acquisitions.

As pointed out in the PMA, CAP Goal 11: “Yet major acquisitions often fail to achieve their goals because many Federal managers lack the program management and acquisition skills required to successfully manage and integrate large and complex acquisitions into their projects. These shortcomings are compounded by complex acquisition rules that reward compliance over creativity and results.”

**Conclusion of Previous EVM Recommendations**

EIA-748 is a mid-20th Century relic. It is no longer a VCS because it is ineffective and impractical. It does not meet the statutory requirements of the PMIAA. It is recommended that the Capital

Programming Guide and federal regulations be updated to cite the PMI documents, ANSI/PMI 19-006-2019 in concert with PMBOK® Guide, instead of OMB-developed standards. Finally, the PMI documents should also be used as a source to develop core P/PM training.

**Current Recommendations to OMB:**

The following recommendations, if implemented, will fill the VCS vacuum, help to close the GAO findings, and help to meet legislative requirements:

- (1) Adopt the VCSs for P/PM from the PMI, including ANSI/PMI 19-006-2019 in concert with PMBOK® Guide, instead of OMB-developed standards and
- (2) Replace EIA-748 in the Capital Programming Guide with ANSI/PMI 19-006-2019 in concert with PMBOK® Guide.

The letters may be downloaded from [www.pb-ev.com](http://www.pb-ev.com) at the Acquisition Reform tab. The article is at the Articles and Tutorial tab.

Paul Solomon