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The Honorable Stephen A. Feinberg Dep. Secretary of Defense 1010 Defense Pentagon Washington, DC 20301-1010

Subj: Re-align the Integrated Program Management Division of Acquisition Policy and Innovation

Dear Hon. Dep. Secretary of Defense Feinberg:

You re-aligned the CDAO under USD(R&E) and directed R&E to provide recommended updates to the CDAO's original Chartering Directive to supply "a recommended path forward for Advana and Maven Smart Systems that recommends optimal stewardship models and details platform transition considerations, sustainment costs, required authorities, and full operational capability milestones."

My letter to the Hon. USD Emil Michael, Subj: Advana, Maven Smart Systems, and Digital Engineering (DE), dated August 19, included recommendations for that path. I recommended a path to a DE ecosystem that includes the capabilities, output-based metrics, engineering best practices, and digital artifacts specified in my two *Defense Acquisition Magazine* articles about DE.

Now, I recommend that you also re-align the Integrated Program Management (IPM) Division of Acquisition Policy and Innovation (API) (API IPM Div.) to the USD(R&E). In my opinion, the API IPM Div. has failed to accomplish its Mission and purpose, which follow:

Mission: "Promoting data driven decisions that improve acquisition outcomes through recognized management practices, flexible policy and guidance, innovative methods, and IPM knowledge/expertise."

Purpose:

- 1. Ensure sound planning and resourcing of all tasks required for contract performance.
- 2. Promotes an environment where contract execution data...in which emerging problems are identified, pinpointed, and acted upon as early as possible.
- 3. Provides a structured, objective, and quantitative method to integrate technical work scope, cost, and schedule objectives into a cohesive contract baseline plan...for tracking contract performance.

As stated in my white papers and letters and corroborated by the Section 809 Panel and the PBBE Commission, the API IPM Div.'s reliance on the NDIA Earned Value Management (EVM) System standard, SAE/EIA-748, failed to provide valid, timely data for improving acquisition outcomes or to identify emerging problems for early corrective action. It is also deceptive to claim to "integrate *technical work scope*, cost, and schedule objectives." What about the product scope or technical baseline?

The transfer of the API IPM Div. to the USD(R&E) will enable the integration of EVM (if EVM is even needed) with systems engineering and DE. It will give the CDAO Officer the authority, direction, and control needed for success in the following responsibilities and functions regarding IPM:

- 1. Adoption of data, analytics, and AI capabilities, as well as other relevant digital technologies, to generate competitive advantage across the defense enterprise; developing data, analytics, and AI strategic guidance and formulating related policy; creating enabling digital services which consist of the iterative development and delivery of digital assets (e.g., code, data, content), software (e.g., code, application programming interfaces, applications), and services (e.g., technical guidance, training, best practices) that support DoD Components' development and deployment of data, analytics, and AI solutions; and ensuring unity of mission and tighter integration for DoD enterprise-wide digital, data, analytics, and AI organizations.
- 2. Remove outdated and counterproductive barriers to data.
- 3. Support and assist DoD Components in the development and deployment of data, analytics, and AI capabilities by identifying, supporting, and accelerating the use of infrastructure, platforms, tools, and services.
- 4. Develop an overarching framework and standards for development, delivery, and adoption of data, analytics, and AI capabilities.
- 5. Promote enterprise alignment among disparate data sources and data domains through policy oversight of data management practices.
- 6. Advise PSAs and DoD Component heads on the acquisition and use of data, analytics, visualizations, and tools to support capability portfolio management (CPM), including:
 - Develop, document, and manage authoritative data, including the standardization of data format, sharing of data assets, and publication of data assets, data models, and data rights to support CPM.
 - b. Ensure transparency, availability, and applicability of data, data models, and visualization of data pursuant to all relevant law and policy.
- 7. Leverage data automation and DE pursuant to the DoD DE Strategy.

The realignment should be an element of the path forward for Advana and Maven Smart Systems. Outcome-based metrics should replace manipulated, botched metrics of the quantity of work performed.

Finally, the realignment will support your commitment at the confirmation hearing to transform to digital acquisition: "...Al, digital twin technology, and MBSE significantly enhance the department's T&E approaches and decision-making. Advancements in these technologies lead to faster product development and reduced costs, ultimately supporting improved acquisition decisions and outcomes, even into sustainment."

Yours truly,

Paul J. Solomon

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CC:

Hon. Adam Smith, HASC
Hon. USD Michael Duffey
Hon. Mike Rogers, HASC
Hon. David Norquist NDIA

Hon. Roger Wicker, SASC
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Jon Sindreu, WSJ Anthony Capaccio, Bloomberg News