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

Subj: Executive Order, Restoring Gold Standard Science

Dear Hon. Dep. Secretary of Defense Feinberg:

The Executive Order (EO), Restoring Gold Standard Science, is intended for research. However, Section 4 applies it to use: "Use, Interpretation, and Communication of Scientific Data." Although the policies and rules in the EO are not applicable to non-scientific aspects of agency decision-making, please apply the tenets of the EO to all DoD policies, training, and compliance reviews relating to Earned Value Management Systems (EVMS) as implemented with the DFARS EVMS clause.

There is no scientific data to verify that the output of the NDIA EIA-748 process is "Scientific information" or that its cost or schedule metrics were based on scientific information. The Budgeted Cost of Work Performed (BCWP) and its nefarious derivatives, Cost/Performance Index (CPI) and Schedule Performance Index, have been used to deceive, not inform.

To cut wasteful spending, please terminate all software licenses and consulting services that promote the false claim that BCWP and its derivatives provide valid situational awareness of cost, schedule, and technical performance or can be used to predict future performance.

DCMA should also purge those DCMA EVMS Compliance Metrics (DECM) that are based on metrics such as CPI and SPI.

It is ironic that the Defense Acquisition University promotes a defective DAU EVM **Gold** Card. DAU should recall it. Unscientific misinformation from the card follows:

DAU EARNED VALUE MANAGEMENT
'GOLD CARD'

ESTIMATE @ COMPLETION = ACTUALS TO DATE + [(REMAINING WORK) / (PERFORMANCE FACTOR)]

$EAC_{CPI} = ACWP_{CUM} + [(BAC - BCWP_{CUM}) / CPI_{CUM}]$

$EAC_{Composite} = ACWP_{CUM} + [(BAC - BCWP_{CUM}) / (CPI_{CUM} * SPI_{CUM})]$

TO COMPLETE PERFORMANCE INDEX (TCPI) § #

$TCPI_{Target} = \text{Work Remaining} / \text{Cost Remaining} = (BAC - BCWP_{CUM}) / (Target - ACWP_{CUM})$

§ To Determine the TCPI for BAC, LRE, or EAC Substitute TARGET with BAC, LRE, or EAC

To Determine the Contract Level TCPI for EAC, You May Replace BAC with TAB

I also recommended that you request the GAO to purge the GAO *Cost Estimating and Assessment Guide* of all unscientific guidance such as use of the CPI or the erroneous assertion that a Best Practice is "If EVM data are used, the EVM system has been validated against the EIA-748 guidelines."

The Section 809 Panel and the PBBE Final Reports were skeptical that DoD received management value from EVM. The NDIA Integrated Program Management Division members have access to abundant data. Invite the NDIA to locate scientific evidence, including a valid cost/benefits analysis, to justify retaining, not terminating, the FAR/DFARS EVMS clause and DCMA compliance reviews. Ask why NDIA did not make any substantial changes to the submitted EIA-748E and why it defends the status quo. Ask DCMA Dir. Lt. Gen. Masiello to defend the use of defective DECMs. Ask your colleagues who worked for nontraditional contractors why they did not use processes that were based on EIA-748.

Yours truly,



Paul J. Solomon

CC:

Hon. Pete Hegseth, USD	Hon. Tammy Duckworth, SASC
Hon. Glen Grothman, HOAC	Hon. Adam Smith, HASC
Hon. Mike Rogers, HASC	Hon. Ken Calvert , HAC
Hon. Robert J. Wittman, HASC	Hon. Donald Norcross, HASC
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Jon Sindreu, WSJ	Anthony Capaccio, Bloomberg News