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

Subj: Your testimony at HASC Hearing and NDIA VITAL SIGNS 2025 Report

Dear Mr. Norquist:

I am a member of the NDIA and a former VP of the NDIA Integrated Program Management Div. (IPMD). I have comments about your testimony at the HASC hearing, "Strengthening America's Defense Industrial Base (DIB), Workforce, and Production Lines to Deter War." I also have comments about the *NDIA VITAL SIGNS 2025 REPORT*. Please consider my assessments and recommendations below.

At the hearing, you said, "as the Congress moves forward to reduce regulatory burdens and incentivize novel contracting approaches to attract and retain new companies, it is important to give traditional contractors access to the same streamlined system."

The Report included the following summary statements and recommendations:

Summary:

- Traditional DIB companies are weighed down with government policy, statutory, and regulatory requirements that both increase cost and stifle speed and innovation.
- Policymakers want to attract and retain small and non-traditional companies into the U.S. defense ecosystem, but they are struggling to reduce significant barriers to entry and retention, including increasing regulatory compliance costs.

Recommendation

DoD must...harmonize and streamline the layers of compliance requirements. This must start with an industry engagement to nominate compliance requirements to target. While a review of acquisition processes that do not require a change in statute can start quickly, the biggest regulatory changes will require Congress to act.

NDIA's Failure to Perform

Like many DoD traditional contractors that rely on Earned Value Management System (EVMS) reports, the IPMD is behind schedule in reaffirming the EVMS standard, EIA-748D. IPMD may have followed the reaffirmation *process*, but it has failed to achieve project success. The EIA-748E *product* is one year behind schedule. IPMD should have been using guidance from the Project Management Institute (PMI). PMI's purpose follows:

**Our purpose is
to maximize
project success
to elevate our
world**

Our purpose is more than a statement. It's our reason for being and the force that guides everything we do. The world needs more projects to succeed. We need Project Professionals to take ownership of project success and successful implementation of critical projects. And we believe we have the unique ability to help. Together, we can impact our world through project success.

NDIA's has failed to publish. Consequently, DoD operates without a current Voluntary Consensus Standard, VCS, as defined by OMB Circular A-119. DCMA is continuing to perform regulatory-required contractor compliance reviews based on expired EIA-748D guidelines. In my opinion, the lack of a current VCS is not a risk to program success. In my white paper, *DoD Acquisition Reform: EVMS-lite and Integrated Program Management*, I make the case that the DCMA compliance reviews are costly and unnecessary.

My Nomination: Target EVMS Compliance Requirements

My nomination for streamlining compliance requirements is to revoke the statute and FAR/DFARs clauses for a contractor's processes to be compliant with EIA-748 guidelines. Discontinue compliance reviews. NDIA and DOGE should concur with and recommend these actions. OMB, DoD, and Congress should implement these actions on a fast track. This acquisition reform will decrease costs and accelerate speed and innovation.

The justification, benefits, and detailed implementation plans are in my white papers.

Excerpts from Prior Letter

This letter supersedes my letter to you, Subj: DoD's Need for Output-based Performance Metrics, March 21, 2024. Excerpts from that letter:

The NDAA for FY 2022 requires an assessment of the DoD's mechanisms and systems for monitoring DoD's program execution, including the use of performance metrics. The Final Report of the Commission on PPBE Reform, March 2024 reconfirmed prior reports with an unfavorable assessment of EVM: "EVM systems have long been criticized as easily manipulated and *inadequate to the task.*"

We can't let this chronic disease go untreated.

Despite two unfavorable reports that were submitted to the SASC and HASC in 2009 (report by DoD that was required by WSARA) and in 2018 (Section 809 Panel Report), IPMD has not fixed revised the guidelines. The 2009 DoD report to Congress stated "The program manager should ensure that the EVM process measures the **quality** and technical maturity of technical work products instead of just the **quantity** of work performed."

Not Cost-Effective

Other NDIA members have proclaimed that EVM works if implemented correctly. I agree. However, there is no evidence that EVM, as administered in compliance with the EIA-748 guidelines, is cost-effective.

Please inform DOGE, OMB, and USD Hegsmeth that you concur.

Yours truly,



Paul Solomon

CC:

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