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July 26, 2018

Ms. Margaret Weichert
Deputy Director for Management
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Mr. Kevin Fahey
Assistant Secretary of Defense for Acquisition
DoD

Subj: Successful Implementation of PMIAA by all Agencies, including DoD

Dear Ms. Weichert and Mr. Fahey:

The PMIAA should be applicable to all agencies, including DoD. The cited white paper, "DoD Acquisition Reform: EVMS-lite to Program/Project Management," includes specific recommendations and an implementation plan which are structured to lower the cost of capital acquisitions, reduce government oversight, and meet the requirements of PMIAA.

The recommended acquisition reforms will enable more effective program and project management (P/PM). The initial steps of the plan will provide immediate benefits by eliminating an ineffective regulatory requirement to use an Earned Value Management System (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 P/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. Although the testimony addressed the personnel system, the following excerpts apply equally to the acquisition of capital assets.

- "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.

I have been recommending specific acquisition reforms to OMB, DoD, HASC, and SASC since 2008. Many recommendations have been implemented into DoD "guidance" but none have led to regulatory change. Consequently, contractors are not required to integrate cost, schedule, technical performance, and risk management. This letter is a follow-up to communications that I sent to the following:

- Letter to Mr. Zientz, OMB, Subj: Section 302 of the Weapon System Acquisition Reform Act (EVM), Dec. 13, 2009
- Letter to Pres.-elect Trump, Subj: DoD Acquisition Reform - Under Budget and Ahead of Schedule, Nov. 13, 2016
- Letter to Mr. Mulvaney, Subj: Project Management of High Risk DoD Acquisitions, Jan. 17, 2018
- Latest Email to Mr. Fahey, July 13, 2018, subj: Director Mulvaney's PMIAA memo etc.

The letters and the white paper are summarized and may be downloaded from two tabs on my web site www.pb-ev.com. The tabs are "Acquisition Reform" and "PMIAA Project Management."

Please contact me if I can provide further assistance.

A handwritten signature in blue ink that reads "Paul J. Solomon" followed by a horizontal flourish.

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