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The Honorable Emil Michael  
Office of the Under Secretary of Defense, Research and Engineering (USD(R&E))  
The Pentagon, Washington, DC 20301

Subj: Eliminate DFARS Earned Value Management System Statute and Regulation

Dear Hon. Under Secretary of Defense Michael:

I agree with you that "Engineering serves as the foundation for technology development, transition, acquisition, and sustainment" and your commitment to "prioritize modular open systems architecture, digital engineering (DE), and workforce training to deliver capabilities to the warfighter (in letter dated June 3). Please join with SON Phelan to request that Chairmen Wicker and Rogers fix the NDAA for FY 2026 to prevent more Nunn-McCurdy breaches and an incapable DoD. The fix is to eliminate the statute and DFARS requirement for traditional contractors to comply with the guidelines in the Earned Value Management System (EVMS) standard, EIA-748.

My letter to SON Phelan, Subj: ADM Caudle's Testimony at SASC Hearing and Your Commitments, dated July 24, 2025, stated that neither the SPEED Act nor the FoRGE Act provide statutory relief. Consequently, a new capability may be demonstrated by a nontraditional contractor and appear technically mature but that outcome will be futile without "the integration of all the systems, the timely delivery of all that, and the turnkey ability of that ship, once it's ready." "Unless the EVM clause is eliminated, the old rules, process, and red tape will apply to major capability acquisitions and traditional contractors. Metrics based on the quantity of work performed, not the product, will be submitted to the program manager. You and ADM Caudle will have obscured situational awareness of cost, schedule, and technical performance. How can you hold program managers and contractors accountable for outcomes if there are no outcome-based metrics from the DE ecosystem?

The DFARS EVMS clause must go. The pending revision to the Standard, EIA-748E, remains counter-productive and antithetical to the objectives of DoDI 5000.97 DE. It focuses on the quantity of work performed and states that systems engineering and Agile software development are complementary systems or methodologies that *interface* with the EVMS (not integrated with). Excerpts from DoDI 5000.97 follow.

(3)(a) The digital thread informs decision makers throughout a system's life cycle by providing the capability to access, integrate, and transform data into actionable information.

(3)(b) The digital thread allows different audiences with different perspectives to extract data from and adjust usage of models to carry out different activities, including, but not limited to:

5. Cost estimating.

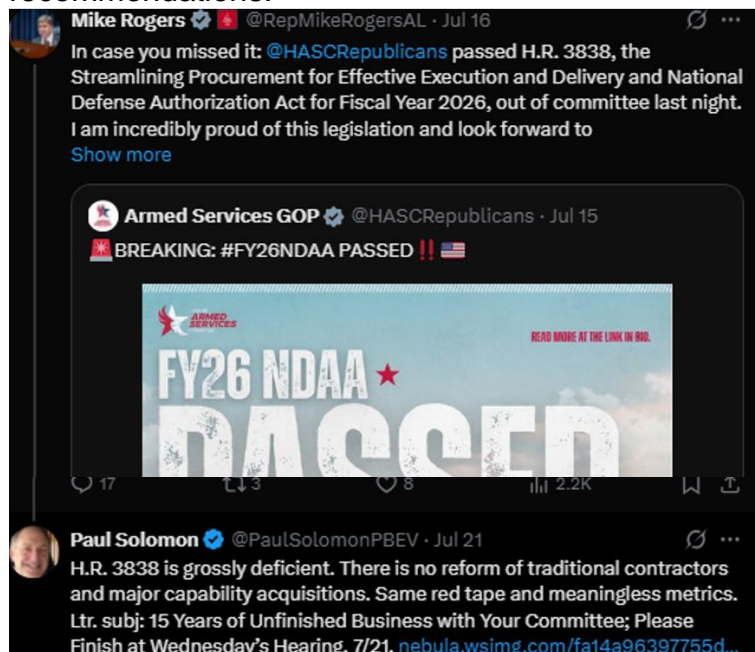
(4) Digital Artifacts.

Digital artifacts are the digital products and views that can be dynamically generated directly from digital models. These artifacts are created from the standards, rules, tools, and infrastructure within a DE ecosystem. Some common examples of digital artifacts include, but are not limited to:

(k) Schedules.

FYI, your predecessor, the Hon. Heidi Shyu, agrees with me.

The following tweet from Chairman Rogers, with my response and referenced letter, summarize my recommendations.



Detailed implementation actions are in my revised white paper, Subj: Common Sense Project Management: "When you come to a fork in the road..." dated June 14, 2025. The letters and white paper may be downloaded from [www.pb-ev.com](http://www.pb-ev.com) at the "Acquisition Reform" and "White Papers" tabs.

Yours truly,

Paul J. Solomon

CC:

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