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July 16, 2025

The Honorable Adam Smith  
Ranking Member, HASC  
2216 Rayburn House Office Building  
Washington, D.C. 20515

Subject: Coordinate with Committee on Oversight and Government Reform on OMB Policy

Dear Hon. Ranking Member Smith:

Please coordinate with the Committee on Oversight and Government Reform to enact legislation that will require the Office of Management and Budget (OMB) to revise OMB CIRCULAR NO. A-11 PREPARATION, SUBMISSION, AND EXECUTION OF THE BUDGET.

OMB CIRCULAR NO. A-11 includes the following:

Agencies must use a performance-based acquisition management or earned value management system, based on the American National Standard Institute (ANSI)/EIA Standard 748, to obtain timely information regarding the progress of capital investments.

Note: The above statement is in error. EIA Standard 748 is not an ANSI Standard.

Currently, a revised EIA-748 standard, EIA-748E, is undergoing a balloting process that is administered by the SAE International G-47 Systems Engineering (SE) Committee. That committee is not qualified to comment on the revision or to complete a ballot because EIA-748 is not a SE standard. Per the SAE website, the G-47 SE Committee serves as an industry focal point for SE by developing and maintaining standards, coalescing industry positions, preparing and coordinating positions on government policies & practices, and promoting sharing of best practices on the engineering of systems.

I am on that committee and submitted the following comment:

The G-47 Systems Engineering (SE) Committee should withdraw from the balloting process because EIA-748 is not a SE standard. Per the SAE website, the Committee serves as an industry focal point for SE by developing and maintaining standards, coalescing industry positions, preparing and coordinating positions on government policies & practices, and promoting sharing of best practices on the engineering of systems. Per the draft EIA-748, SE is a complementary system to Earned Value Management. This standard has nothing to do with best practices on the engineering of systems.

The NDIA did not even assign responsibility for the EIA 748 standard to its SE Division. Instead, the NDIA Integrated Program Management Division (IPMD) has that responsibility. As recommended previously, EIA-748 should be replaced with a Program/Project Management standard certified by the American National Standard Institute.

The NDIA has botched its opportunity to fix EIA-748. It chose to obtain approval of a standard that enables Service Acquisition Executives and traditional defense contractors to use botched, manipulated metrics of the quantity of work performed regardless of progress towards achieving needed capabilities.



Paul Solomon

CC:

John Wicker Chairman, SASC

Hon. Pete Hegseth, Sec. Def.      Hon. Stephen Feinberg, Undersec. Def.

Hon. Mike Rogers, HASC      Hon. Tom Cole, HAC

Hon. Robert J. Wittman, HASC      Hon. Donald Norcross, HASC

Hon. Ro Khana, HASC      Hon. Jim Jordan, HCOA

Hon. Joni Ernst, SASC      Honorable Ken Calvert (HAC)

Hon. Elizabeth Warren, SASC      Hon. Pat Harrigan, HASC

Hon. John Phelan, Sec. of the Navy

Hon. Dan Driscoll, Sec. of the Army

DOGE      Hon. Emil Michael, USD(R&E)

Shelby Oakley, GAO      Mona Sehgal, GAO

Jon Sindreu, WSJ      Anthony Capaccio, Bloomberg News