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January 20, 2025

The Honorable Glenn Grothman
House Committee on Oversight and Accountability
Chairman, Subcommittee on National Security, the Border, and Foreign Affairs
1511 Longworth H.O.B.
Washington, D.C. 20515

Subj: DOGE Caucus: Defund DCMA Earned Value Management Compliance Reviews

Dear Hon. Representative Grothman:

This letter augments my letter to you, Subj. Unfinished Business to Reduce DoD Wasteful Spending and Inefficiencies, Vs. 2, dated January 17, 2025.

The previous letter included a recommendation to remove the DFARS Earned Value Management Systems (EVMS) Clause. Both statutory and regulatory actions are required.

As an interim solution, please request that the Congressional DOGE Caucus recommend defunding DCMA's ability to conduct EVMS compliance reviews. The reviews are authorized by DFARS SUBPART 242.3--CONTRACT ADMINISTRATION OFFICE FUNCTIONS, (a)(7) (S-71). DCMA has responsibility for reviewing EVMS plans and for verifying initial and continuing contractor compliance with DoD EVMS criteria.

It is wasteful to continue funding contractor reviews for compliance with the DFARS EVMS requirement because the reviews are ineffective. As stated in my letter to USD LaPlante, Subject: Recommendations for Pending Program Management Guides and DCMA EVMS Compliance Metrics (DECM), dated June 5, 2022: "Both the DCMA EVMS compliance procedures and the DECMs are silent on technical performance. Consequently, there is no assurance that the DCMA EVMS Center can accomplish its mission of "assessing contractor effectiveness which provides stakeholders with expectations of future performance and potential impacts on individual contractors and/or programs." As stated in my letter to DCMA Director LT. Gen. Massielo, dated June 9, 2024, the DECMs are also silent on progress against requirements, development maturity, and Minimum Viable Products. Finally, both the Section 809 Panel Report and the PBBE Final Report corroborated my assessments regarding compliance with the EVMS EIA-748 guidelines.

Even if you believe DoD's and NDIA's false claims about the management value of EVM, then compliance reviews are unnecessary. The contractors and program managers would voluntarily implement EVM correctly in order to achieve cost, schedule, and technical objectives. So, compliance reviews are unnecessary, costly, and divert resources from the real job of developing and testing a product that works.

Comprehensive justifications to deregulate the use of EVM are in my white papers:

- "Common Sense Project Management: "When you come to a fork in the road...", 1/19/25
- "DOD Acquisition Reform: EVMS-lite and Integrated Program Management, rev. 13," 1/19/25

Finally, DCMA's funding requirements are much lower than before because of recent legislation to raise the minimum dollar criteria for EVMS and to not require that EVM be used for all acquisition pathways.

I will also send this letter directly to DOGE with a request that the President use an executive order to cut wasteful spending on EVMS compliance reviews ASAP.

Yours truly,

Paul J. Solomon

CC: Hon. Bill LaPlante (USD)

Hon. Andrew Hunter, AF Asst. Sec. for AT&L

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Hon. Adam Smith,

HASC Hon. Carlos Del Toro, Secretary of the Navy

Nickolas Guertin (ASN RD&A)

Honorable David L. Norquist,

NDIA Hon. Robert J. Wittman,

HASC Hon. Heidi Shyu, (USD(R&E))

Hon. Donald Norcross, HASC

Hon. Rep. Julia Brownley

Hon. Ro Khana, HASC

Anthony Capaccio, Bloomberg News

Shelby Oakley, GAO

Jon Ludwigson, GAO