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The Honorable Michael Duffey
Under Secretary of Defense for Acquisition and Sustainment
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: Recommendations for Your Commitments at the Senate Confirmation Hearing

Dear Hon. USD (A&S) Duffey:

Please consider adopting the strategic objectives and tactics herein to fix the acquisition process.

Strategic **objectives** to transform the acquisition of weapon systems.

1. Hold contractors and DoD program managers **accountable** for **outcomes**.
2. Tear down NDIA's **barrier** to entry facing non-traditional defense contractors.
3. Eliminate regulations that increase costs and enable false reporting.
4. Institutionalize digital engineering (**DE**).

Implementation Tactics

1. Compliance requirements and reviews divert a program manager's focus from the product to the process. Reward real engineering, not financial engineering.
2. Reduce personnel at contractors and DoD that perform non-value-added tasks.
3. Real-time, automated status reports that are based on Authoritative Sources of Truth. Replace botched metrics with **outcome-based** metrics.
4. Ensure the acquisition workforce is trained in the necessary skills to perform critical acquisition tasks, such as SE, DE, agile software development, and testing.

Your Responses to APQs at Confirmation Hearings

You responded to Advance Policy Questions (APQ) at the confirmation hearing. Your commitments support the recommended strategic objectives and implementation tactics above.

Duffey Hearing Advance Policy Questions and Responses (Excerpts)		
Objective	Question	Response
Outcomes, Accountability	By what metrics will you measure your progress towards achieving these priorities and addressing these challenges?	improve our data collection, analytics, and measurement capability and aligns with the cutting edge of 21st century corporate management best practices...The prioritization of data-driven oversight and decision-making will enable more robust awareness of system performance in delivering results and the effectiveness of reforms
Barrier, DE	What are your views on the maturity and availability of digital twin or model-based systems engineering (SE) tools in the	Industry has seen notable progress in digital twin and model-based SE tools. These technologies demonstrate the ability to improve efficiency, reduce costs, and enhance system availability. DoD

	commercial space, and their potential applicability for DOD needs.	must overcome barriers to scalability, complexity, security, and interoperability to fully realize the benefits of these tools...improve policy, guidance, and digital standards consistent with commercial best practices.
DE, Barrier	Does the Department of Defense have sufficient systems engineering expertise in its current workforce and contractor base	These efforts focus on equipping individuals with the necessary skills to perform critical acquisition tasks, such as SE, DE, production, quality assurance, manufacturing, information technology, agile software development, and testing...enable new contractors to compete for DoD business so that we have a more robust ecosystem.
DE	What changes, if any, do you believe should be made in the Department's (SE) organizations and practices?	Engineering serves as the foundation for technology development, transition, acquisition, and sustainment. Studies of DoD acquisition outcomes have shown that implementing rigorous foundational engineering activities early in the capability life cycle leads to improved cost, schedule, and performance results. To achieve this, the Department must prioritize modular open systems architecture, DE, and workforce training to deliver capabilities to the warfighter.
DE	What are your views on the adequacy and effectiveness of the DoD's developmental T&E evaluation activities?	align T&E test activities with the new Adaptive Acquisition Framework. ensure that T&E processes are properly structured to assess software-intensive systems, new capabilities such as artificial intelligence-enabled autonomous systems, and to leverage new SE approaches such as DE.
DE	how will you seek to balance the need to rapidly acquire and field innovative systems while ensuring acquisition programs stay on budget and schedule?	ensure that disciplined and thoroughly informed baselines are established in the first instance in cooperation with the SAEs.
DE, Training	What other reforms would you recommend to improve the timeliness, efficiency, and effectiveness of the test and evaluation process to more quickly correct technical deficiencies in weapon systems?	<p>increase the use of digital ecosystems to integrate mission engineering, SE, and T&E to mitigate weapon system deficiencies.</p> <p>ensure the acquisition workforce is fully trained on new acquisition authorities and best practices, so that it can make informed decisions about when and how to use the different acquisition pathways and tools available to it.</p>
Accountability, DE	How do you propose to enforce accountability for acquisition decisions and processes under your purview?	<p>enhance transparency and increase data-driven decision making by modernizing the acquisition enterprise, <i>digitizing the practice of acquisition</i>, and continually measuring and managing through data-driven insights into program execution against key performance indicators (KPIs) like schedule, cost, and performance goals.</p> <p>leverage data analytics by implementing advanced data analytic tools and artificial intelligence to</p>

		<p>identify trends, assess risks, inform decision making throughout the acquisition lifecycle, strengthen performance management, and align incentives while tying program performance to personnel evaluations and prioritizing results over effort.</p> <p>linking program manager and acquisition workforce performance evaluations to program outcomes, we can reward success and address underperformance.</p> <p>structure contracts with industry partners to incentivize on-time delivery, cost controls, and delivery to performance specifications, with an intent to recognize and reward excellence from individuals and teams that demonstrate exceptional performance in acquisition program management.</p> <p>appropriate consequences for poor performance, focusing on implementing corrective action plans for programs experiencing significant schedule delays, cost overruns, or performance shortfalls, re-baselining or terminating failing programs, and holding individuals accountable for poor performance or misconduct through appropriate administrative and disciplinary actions.</p>
Training	<p>What is your assessment of the Department's training, education, certification, and credentialing programs for the acquisition workforce? Are there "health metrics" that the DOD is or could be using to help ensure that the acquisition workforce is adequately sized for all of the tasks assigned to it?</p>	<p>work with the Military Services and Defense Acquisition University (DAU) to ensure training, education, certification and credentials are optimized to equip the acquisition workforce to do their part to rebuild the military and reestablish deterrence.</p>
Training	<p>what steps would you take to ensure the acquisition workforce is fully trained on new acquisition authorities and best practices, so that it can make informed decisions about when and how to use the different acquisition pathways and tools available to it?</p>	<p>empower the workforce with the tools that allow it to innovate, upskill, and operate as an agile and enduring advantage supporting the new National Defense Strategy.</p> <p>training must evolve to align with new acquisition approaches, such as the Adaptive Acquisition Framework.</p> <p>will review (workforce initiatives in progress) to make sure we have effective planning and investments to support the workforce.</p>

I provided specific recommendations to meet those commitments in letters to Sec. Hegseth, Deputy Secretary Feinberg, and to former USD Shyu. Please consider implementing those recommendations to improve cost, schedule, and performance results.

Letters:

To	Subj:	Date	Comments
Shyu	Modernize SE Processes to Leverage Digital Engineering and MBSE; Reduce Risks to GBSD Program	12/16/21	Recommendations were subsequently incorporated into DoDI 5000.87, DoDI 5000.97, DoDM 5000.100, and the SE Plan Outline.
Hegseth	Comments on Emil Michael's Confirmation Hearing and To Do List for Mr. Michael	3/30/25	Addresses responses to APQs on DE and barriers to entry. Addresses unfinished business with former USD(R&E) Heidi Shyu and with F-35 Program.
Feinberg	Resurrecting Earned Value Management Specialists	6/2/25	Addresses workforce training.
Driscoll	Updated Recommendations for Army Policy and the Army Transformation Initiative	6/5/25	My (and GAO's) recommendations to Sec. Driscoll for digital twins, digital threads, and outcome based metrics should be institutionalized throughout DoD.

Also, detailed implementation actions are in my revised white paper, Subj: Common Sense Project Management: "When you come to a fork in the road..."

The documents may be downloaded from www.pb-ev.com at the "Acquisition Reform" and "White Papers" tabs.

This letter and the cited letters are posted on my website, www.pb-ev.com, at the "Acquisition Reform" tab. The following white papers (at the White Papers tab) provide detailed implementation plans to achieve your objectives.

- "Outcome-based Metrics + SE = Integrated Program Management"
- "Integrating the Embedded Software Path, Model-Based Systems Engineering, MOSA, and Digital Engineering with Program Management"

The "Common Sense" paper includes open deficiencies in the acquisition process that were reported by DoD to the HASC and SASC in 2009. The NDIA, the steward and author of the EVMS standard, EIA-748, has never made constructive changes to the EIA-748 guidelines. The guidelines are substantially the same as the 1967 guidelines, then called Cost/Schedule Control Systems Criteria.

Although NDIA favors less DCMA compliance oversight, I believe that that it will recommend retaining the DFARS EVMS clause. The regulation protects the franchise of the traditional contractors, consultants, and software vendors. The regulation, DCMA's successful compliance reviews, and counterproductive incentives keep funds and fees flowing. For those contractors that manipulate the numbers or just take advantage of the loopholes and ambiguities in EIA-748 to deceive, the regulation perpetuates their license to steal.

Yours truly,



Paul Solomon

CC:

Hon. Pete Hegseth, Sec. Def.	Hon. Dep. Sec. Def. Stephen Feinberg
Hon. Glen Grothman, HOAC	Hon. Adam Smith, HASC
Hon. Mike Rogers, HASC	Hon. Ken Calvert , HAC
Hon. Robert J. Wittman, HASC	Hon. Donald Norcross, HASC
Hon. Ro Khana, HASC	Hon. Jim Jordan, HCOA
Hon. Roger Wicker, SASC	Hon. Joni Ernst, SASC
Hon. Elizabeth Warren, SASC	Hon. Pat Harrigan, HASC
Hon. Troy Meink, Sec. of the Air Force	
Hon. John Phelan, Sec. of the Navy	
Hon. Dan Driscoll, Sec. of the Army	
DOGE	Hon. Emil Michael, USD(R&E)
Jon Sindreu, WSJ	Anthony Capaccio, Bloomberg News