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The Honorable Stephen A. Feinberg
Dep. Secretary of Defense
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: Eliminate DFARS Requirement for Integrated Baseline Review

Dear Hon. Dep. Secretary of Defense Feinberg:

Please initiate actions to eliminate the DFARS and statutory requirements for Integrated Baseline Reviews (IBR). These actions are necessary to comply with the Executive Order, MODERNIZING DEFENSE ACQUISITIONS AND SPURRING INNOVATION IN THE DEFENSE INDUSTRIAL BASE, dated April 9, 2025, as follows.

Sec. 4. Internal Regulations Review. The Secretary of Defense shall oversee the review of and, as appropriate, propose revisions to relevant Department of Defense instructions, implementation guides, manuals, and regulations relating to acquisition to:

(a) Eliminate or revise any unnecessary supplemental regulations or any other internal guidance, such as relevant parts of the...DFARS.

Justification for Elimination

Technical Performance Measurement is Optional

First, per FAR 34.202 IBR, the IBR is supposed to be a joint assessment by the contractor and the Government, of the degree to which the management process provides effective and integrated technical/schedule/cost planning and baseline control. However, as with the Earned Value Management System (EVMS) Standard EIA-748, the IBR provides false assurance that technical is planning is integrated with schedule and cost planning.

Technical performance measurement (TPM) and measures are not an element of the EVMS Standard EIA-748. Furthermore, per the *NDIA Guide to the IBR*, "If the Customer and Supplier teams have not already done so, they **should** (not "shall") discuss Key Performance Parameters (KPP) and TPMs to ensure that both parties understand their intent and how they will be defined and measured." The *NDIA Guide* further states, "This will ensure that KPPs and TPMs are measured consistently." However, NDIA failed to put its metrics where its mouth is by failing to include guidance to integrate TPMs with EVM in EIA-748.

IBR is a Redundant Process

Even if the IBR process was enhanced by requiring TPMs, it would still require an ineffective, redundant review compared with the process and reviews in the DoD Systems Engineering Plan Outline Version 4.1 (SEP) and the contractor's SE Management Plan.

Key excerpts of SEP follow:

3.2 Technical Performance Measures

TPMs provide the ability...to:

(1) gain quantifiable insight to technical progress, trends, and risks;
(2) empirically forecast the impact on program cost, schedule, and performance; and
(3) provide measurable feedback of changes made to program planning or execution to mitigate potentially unfavorable outcomes. TPMs are metrics that show how well a system is satisfying its requirements or meeting its goals.

- A set of TPMs covering a broad range of core categories, rationale for tracking, intermediate goals, and the plan to achieve them with as-of dates.
- SE leading indicators to provide insight into the system technical maturation relative to a baseline plan.
- Identify SW measures for SW technical performance, process, progress, and quality.

3.2.13 Technical Reviews, Audits and Activities

Summarize key planned SE, integration, and verification activities for all future acquisition phases, including updated risk reduction and mitigation strategies and technical and manufacturing maturity. (Note: EIA-748 is silent on risk mitigation)

3.1.1.1 Schedule Management

- Describe how identified technical risks are incorporated and tracked into the program's IMP, IMS, and digital ecosystem.
- If used, discuss how the program uses EVM cost reporting to track/monitor the status of IMS execution and performance to plan. (Note: including technical performance)
- If EVM is not used, state how often and discuss how the IMS is tracked according to contract requirements and how performance is tracked to budget.

Anecdote

In 2002 or 2003, I was Northrop Grumman's lead EVM expert and its representative on the NDIA Integrated Program Division. So, I was loaned out to support the IBR of the Littoral Combat Ship. I asked many questions (unanswered) regarding establishing milestones to define TPMs and to complete requirements definitions and trade studies. The Navy IBR leader dismissed me after only two days because I was not a team player. Subsequently, \$ Billions were wasted on that program. Don't waste future defense dollars on ineffective IBRs that involve DoD and contractor personnel and travel costs and often, highly paid EVM consultants. Worse yet, the "successful" IBRs lull stakeholders and establish false expectations that future EVMS status reports will be accurate and useful.

My disgust with that farce catapulted my acquisition reform efforts.

Conclusion

This letter is moot if the DFARS EVMS clause is finally rescinded. However, if the clause is retained, please cooperate with Congress to remove the IBR requirement. Replace it with the technical reviews described in the SEP to assess the degree to which the management process provides effective and integrated technical/schedule/cost planning and baseline control.

Yours truly,



Paul J. Solomon

CC:

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