

Paul Solomon
3307 Meadow Oak Drive
Westlake Village, CA 91361
Paul.solomon@pb-ev.com

July 15, 2025

The Honorable Mike Rogers
Chairman, HASC
2216 Rayburn House Office Building
Washington, D.C. 20515

Subject: Request for Markup; Earned Value Management System DFARS Clause

Dear Hon. Chairman Rogers:

This is a follow-up to my letter dated June 4, Subj: Your **X** Post on Legislation to Overhaul Outdated Defense Acquisition Processes. It included the following **X** post:



The current markups are insufficient to “overhaul current outdated defense acquisition processes.” They do not enable a digital engineering ecosystem or enable real-time and iterative data collection, management, analysis, and feedback loops across the life cycle of tested systems.

Please markup the NDAA “to eliminate the DFARS Earned Value Management System (EVMS) clause and to upgrade requirements for program and project management to be in accordance with standards accredited by the American National Standards Institute.

The adjudicated draft of Revision E of EIA-748, EVMS, was sent out today by the SAE for ballot. It still focuses on the **quantity of work performed**, not the output-based metrics that measure schedule progress towards achieving required capabilities.

Excerpts from the proposed EIA-748E follow:

Performance Measurement

Earned value is a direct measurement of the **quantity of work accomplished**. **The quality and technical content of work performed is controlled by other processes**. Earned value is computed based on the budget assigned to the **completed work scope**.

Schedule Performance

The time-phased budget is the schedule (plan) for expenditure of the resources necessary to accomplish program work scope requirements. The budget for a period is compared to the earned value for the same period to determine and quantify the schedule performance for the program. The resultant metric is the schedule variance. It represents the **quantity, i.e., the value, of the work that**

is ahead of or behind schedule. The specific activities and events that are contributing to the variance can be identified in program schedules.

Please markup the NDAA for FY 2026 to remove the DFARS EVMS clause. Buy a product that works, not a SOW.

Yours truly,



Paul Solomon

CC:

John Wicker Chairman, SASC

Hon. Pete Hegseth, Sec. Def.

Hon. Adam Smith, HASC

Hon. Robert J. Wittman, HASC

Hon. Ro Khana, HASC

Hon. Joni Ernst, SASC

Hon. Elizabeth Warren, SASC

Hon. John Phelan, Sec. of the Navy

Hon. Dan Driscoll, Sec. of the Army

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Shelby Oakley, GAO

Jon Sindreu, WSJ

Hon. Stephen Feinberg, Undersec. Def.

Hon. Tom Cole, HAC

Hon. Donald Norcross, HASC

Hon. Jim Jordan, HCOA

Honorable Ken Calvert (HAC)

Hon. Pat Harrigan, HASC

Hon. Emil Michael, USD(R&E)

Mona Sehgal, GAO

Anthony Capaccio, Bloomberg News