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

Subj: No More Stinking, Ineffective **Bullshit** Reviews

Dear Hon. Dep. Secretary of Defense Feinberg:

Yesterday, I recommended that you eliminate the DFARS and statutory requirements for Integrated Baseline Reviews (IBR) and replace the IBR with the technical reviews described in the Systems Engineering Plan Outline (SEP). For your convenience, I reviewed the SEP and extracted a subset of the most pertinent components for use when IBR-type reviews are needed.

The streamlined SEP is attached. It is called *Not a DoD SEP Outline for IBR*.

### **Failings of the *NDIA Guide to the IBR***

The NDIA Guide to the IBR (Guide) is unsuitable for use. Per the Guide, one purpose of an IBR is to confirm the contract Performance Measurement Baseline covers the entire *technical scope of work*. Yet, it states, the IBR **should** (not “shall”) discuss Key Performance Parameters and technical performance measures (TPM).” Also, the Guide fails to address the product scope or technical baseline. Instead, it has a narrow and useless focus on the “**work**” scope in the following excerpts:

- The Customer will evaluate the Supplier’s Integrated Master Plan /Integrated Master Schedule to determine if it fully captures the scope associated with the contract...Statement of **Work** (SOW).
- The Contract Work Breakdown Structure outlines the scope of **work** down to the level needed to understand the deliverable elements of work.

The foundation of the chasm between the SOW and the product scope or technical baseline is in *DoD HANDBOOK PREPARATION OF SOW MIL-HDBK-245E* in the following excerpt:

4.2 Relationship between SOW and appropriation. The SOW defines (either directly or by reference to other documents) all work (**non-specification**) performance requirements for contractor **effort**.

So, I repeat the mantra, **DoD needs to Buy a Product that Works, not a SOW**.

### **DoD SEP Outline**

The IBR should be non-contractual and should be based on review guidance already in the SEP. The SEP focuses on the product, the technical baselines, and TPMs, not the work. It should also address the implementation of digital engineering (DE). Excerpts follow:

- The SEP will include the engineering management approach to include technical baseline management; requirements traceability; linkage to the system architecture; configuration management (CM); risk, issue, and opportunity management; and technical trades and evaluation criteria (DoDI 5000.88, Para 3.4.a.(3).(b, d and I)).

### 3.2.10 Configuration and Change Management

If a configuration management plan is available, then embed, attach, or cite the digital ecosystem reference. Otherwise, provide the following:

- **Technical Baseline Artifacts** – List and describe baseline artifacts. Describe how the program will track and manage baselines within its digital ecosystem. At a minimum, describe the artifacts of the concept, functional, allocated, and product baselines and when each technical baseline has been or will be established and verified. If practicable, the PM will establish and manage the technical baseline as a digital authoritative source of truth. (See SE Guidebook (2022) Configuration Management Process, for additional guidance)
  - Minimum Viable Product (MVP)/Minimum Viable Capability Release (MVCR)

### Proposed, Unofficial SEP for IBR



To provide guidance for conducting useful IBRs that are already within the scope of SE reviews, I drafted an unofficial *Not a DoD SEP Outline for IBR* (SEPIBR). By focusing on the product, the status of requirements, and the sufficiency of TPMs instead of the **SOW**, the program manager can finally utilize the FAR/DFARS statement that “The IBR is a joint assessment by the offeror or contractor, and the Government, of the (1) Ability of the project’s technical plan to achieve the objectives of the scope of work.”

The unofficial *SEP for IBR* is a subset of the *DoD SEP*. I have led or supported many IBRs that, like the Littoral Combat Ship IBR, wasted money and time and provided false assurance of the quality and technical completeness of the Performance Measurement Baseline and the performance measures.

Please cease and desist all planned or pending contractual IBRs that will be based on the NDIA document, including the F-47 program. The SEPIBR, the program SEP, and the contractor’s SE Management Plan (SEMP) should be the primary documents for technical reviews. Also, please utilize a program’s SE specialists and schedulers as the leads of the IBR-type review, not the EVMS specialists.

I sent a letter to Rep. Wittman, Subj: More Lessons Learned: “Earned Value? We don’t need no stinking Earned Value,” dated December 13, 2023. Excerpt:

In 2009, DoD reported to the committee that “a program could perform ahead of schedule and under cost according to EVM metrics but deliver a capability that is unusable by the customer” and stated the program manager should ensure that the EVM process measures the quality and technical maturity of technical work products instead of just the quantity of work performed.”

The NDIA recently submitted an update to its EIA-748 Standard to the SAE for approval. It has no substantial changes. The *NDIA Guide to the IBR* is as flawed as EIA-748. Use SEP and SEMP documents for all reviews. We don’t need more stinking, **Ineffective Bullshit Reviews**.

Yours truly,

A handwritten signature in blue ink that reads "Paul J. Solomon". The signature is written in a cursive style with a long horizontal line extending from the end.

Paul J. Solomon

CC:

Hon. Pete Hegseth, USD

Hon. Glen Grothman, HOAC

Hon. Mike Rogers, HASC

Hon. Robert J. Wittman, HASC

Hon. Ro Khana, HASC

Hon. Roger Wicker, SASC

Hon. Elizabeth Warren, SASC

Jon Sindreu, WSJ

Hon. Tammy Duckworth, SASC

Hon. Adam Smith, HASC

Hon. Ken Calvert , HAC

Hon. Donald Norcross, HASC

Hon. Jim Jordan, HCOA

Hon. Joni Ernst, SASC

DOGE

Anthony Capaccio, Bloomberg News