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The Honorable Steven J. Morani
PTDO OUSD(A&S)
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: Eliminate the Acquisition Policy and Innovation (API) Integrated Program Management Div.

Dear PTDO OUSD(A&S) Morani:

To cut costs and eliminate non-essential personnel, please consider eliminating the Acquisition Policy and Innovation (API) Integrated Program Management Division (IPM Div). IPM Div is “the focal point for all policy, guidance, and competency relating to Earned Value Management (EVM)/IPM. This action should be taken in parallel with terminating counterproductive DCMA EVMS surveillance personnel.

IPM Div is unable to execute its Mission: “Promoting *data driven* decisions that improve acquisition outcomes through *recognized management practices*, flexible policy and guidance, innovative methods, and IPM knowledge/expertise.”

First, IPM Div. states that its policy is to prescribe the NDIA “industry standard EIA-748's "32 EVMS Guidelines". That standard is not a commercially recognized management practice. The Project Management Institute, not the NDIA, is the only source of commercially recognized project management practices.

IPM Div.'s “Organizational Pillars” sound appropriate but its policies are counterproductive to its mission. Two of its pillars follow.

Innovating at the Speed of Relevance Become the center of excellence for IPM methodologies through data analytics , IPM innovation cell, and repository of IPM approaches, lessons learned , and best practices	Fostering IPM Expertise and Knowledge Improve and maintain IPM expertise and knowledge in conjunction with DAU, Government, and industry
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The efforts of the IPM Div. are also counterproductive to the objectives of the Acquisition Policy and Innovation Division (API). API “is the lead for enabling innovative acquisition approaches that deliver warfighting capability at the speed of relevance. Our priority is to support the development of *data-driven decision* making, through our initiatives such as implementing the Adaptive Acquisition Framework and providing acquisition data governance, access, and *analytics*.” Data derived from EVM reports is useless for data-driven decision making and supporting analytics, as reiterated in my white papers and previous letters to you.

Excerpt from my previous letter that applies to the IPM Div:

Please ask the DOGE team to assess whether continuing the IPM Div. is cost-beneficial to the Taxpayer. Can Musk’s engineering managers answer these questions? Do you believe the false claim in the *DoD EVMS Interpretation Guide* that:

EVM is a *widely accepted* industry *best practice* for program management...used across DoD, the Federal government, **and the commercial sector**. Government and industry program managers use EVM as a program management tool to provide joint situational awareness of program status and to assess the cost, schedule, and technical performance of programs for proactive course correction.

In my opinion, engineering managers should apply their time and skills to develop and test a product that works for the Warfighter instead of proving compliance with the EVMS process guidelines.

Mr. Norquist, listen to your systems engineers. Contractors deceive us with botched EVM SOW metrics. Is EVMS an acronym for **E**laborate **V**alue **M**anipulation **S**cam? Or Enhanced Value Magnification Scheme?

Conclusion from Previous Letter

EVM: “...easily Manipulated and Inadequate to the Task” (a)

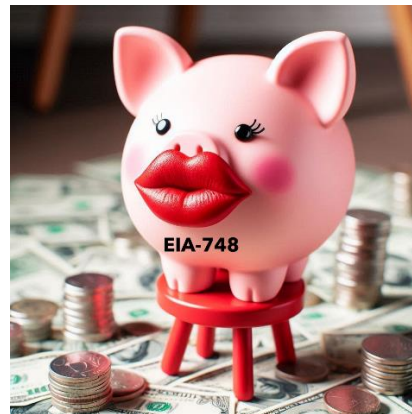


EIA-748 Enables Easy Manipulation:

4 legs of the stool to fool:

1. Measure work (SOW), not technical performance (Product)
2. % Complete Earned Value Technique with “90% Rule”
3. Rework not planned (Budget from MR)
4. Deferred Functionality not Accounted For

(a) Commission on PLANNING, PROGRAMMING, BUDGETING AND EXECUTION
Report finding: “EVM systems have long been criticized as...”



Buy a Product that Works, not a SOW.

Yours truly,

Paul Solomon

CC:

Hon. Pete Hegseth, USD

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Hon. Jim Jordan, HCOA

Hon. Joni Ernst, SASC

DOGE

Anthony Capaccio, Bloomberg News