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

Subj: NDIA Earned Value Management System Standard Loophole Makes It Unfit for Use

Dear Hon. USW (A&S) Michael Duffey:

This letter augments a previous letter, Subj: Recommendations for Fostering One Strong Industrial Base, Part 2, dated September 20, 2026. The NDIA Integrated Program Management Division (IPMD) guide provides insufficient guidance to meet Office of Management and Budget (OMB) Capital Programming Guide information needs regarding technical objectives.

Per the NDIA IPMD Earned Value Management System (EVMS) EIA-748-E Intent Guide (NDIA Guide), May 14, 2026, it "provide(s) additional context to the EVMS EIA-748 Standard as an aid in understanding and applying EVM practices." However, a contractor may apply those practices and comply with the EVMS guidelines yet fail to meet the following requirement in the OMB Capital Programming Guide:

> "The contractor's EVMS ***will*** provide the following information for analysis: Understanding of whether technical objectives are being achieved."

The NDIA Guide includes a loophole which allows a contractor to ignore technical specifications in the measurement and reporting of earned value. The loophole is provided in the following excerpt:

> The WBS Dictionary document is used to describe the scope of work for all WBS elements. This "description ***should include***…specific details such as technical specifications."

The NDIA Guide's loophole regarding technical specifications and its discussion of the work scope, not the product scope, are evidence that the EIA-748 Standard is unfit for use to monitor contractor performance in achieving the cost, schedule, ***and*** (technical) performance goals.

Yours truly,



Paul Solomon

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