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The Honorable USD (R&E) Emil Michael
 Office of the Under Secretary of War, Research and Engineering (USW(R&E))
 1010 Defense Pentagon
 Washington, DC 20301-1010

Subj: GAO Finding on Leading Practices and Policies for Weapon System T&E

Dear Hon. USD (R&E) Emil Michael:

GAO report GAO-26-107009, *DOD Needs to Update Policies to Better Support Modernization Efforts*, December 11, includes recommendations to revise policies for weapon system test and evaluation (T&E), digital engineering (DE), systems engineering, and weapon system acquisition to fully reflect leading practices for product development by requiring:

- a. The use of and access to digital twins and digital threads.
- b. Development of test strategies and test plans that reflect an iterative, integrated testing approach enabled by digital twins and digital threads to support delivery of minimum viable products (MVP).
- c. Development of acquisition strategies that include testing-related topics such as the use of and access to digital twins and digital threads.

Figure 4 of the GAO Report includes T&E policies that do not fully reflect leading practices regarding digital twins, digital threads, and MVPs.

Figure 4: Key DOD-wide Policies Applicable to Weapon System Test and Evaluation Do Not Fully Reflect Selected Leading Practices

Selected leading practices for product development	Application of leading practice to test and evaluation	Test and evaluation policies		Other test-related policies	
		DODI 5000.89 November 2020 (current developmental test policy)	DODI 5000.98 December 2024 (current operational and live-fire test policy)	DODI 5000.88 November 2020 (systems engineering policy)	DODI 5000.97 December 2023 (digital engineering policy)
Overall	MCA and MTA	Overall	MCA and MTA	Overall	Overall
Involvement in early acquisition decisions	Employ and empower right-sized teams of multi-disciplined stakeholders	Involve test officials early in defining the development program, including in the development of the acquisition strategy and by providing access to the key items, such as digital twins and digital threads, needed to conduct testing.	● MCA MTA	● ●	○ ○
Iterative development	Implement iterative testing processes to generate a minimum viable product	Develop test plans that reflect an iterative testing approach and integrate developmental and operational testing to support rapid development of a minimum viable product.	● ○	● ○	○ ○
	Use modern design tools, including digital twins and digital threads	Ensure testers use key modern design tools, including digital twins and digital threads developed by the design contractor and needed to support iterative government testing.	● ○	● ●	○ ○

Your office concurred on the need to adopt leading T&E practices. The attached white paper, *Integrating the Embedded Software Path, Model-Based Systems Engineering, MOSA, and Digital Engineering with Program Management*, December 12, 2025. Table 3 of the white paper is titled, *Recommended Revisions to Authoritative Sources of Truth for Embedded Software and DE Metrics Specifications (To comply with 2025 SOW Hegseth Memo: Transforming the Defense Acquisition System and 2025 GAO Recommendations)*. Table 3 includes recommended revisions to the following policies to address digital twins, digital threads, and MVPs.

- DODI 5000.87 (2 revisions)
- DODI 5000.88 (8 revisions)

- DODI 5000.97 (3 revisions)

I again remind you that compliance with the Earned Value Management Standard (EVMS) EIA-748 guidelines is not only a waste of money and management focus. EVMS metrics are not outcome-based and provide schedule performance data that is inconsistent with leading practices for product development and the revisions in Table 3.

Yours truly,



Paul Solomon

CC:

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Hon. Mike Rogers, HASC

Hon. David Norquist NDIA

Hon. Roger Wicker, SASC

Hon. Troy Meink, Sec. of the AF

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