

12589 - DoD Acquisition Documentation Streamlining and the PESHE

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Environment, Energy Security &
Sustainability Symposium
May 11, 2011



U.S. AIR FORCE

Report Documentation Page

Form Approved
OMB No. 0704-0188

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1. REPORT DATE 11 MAY 2011		2. REPORT TYPE		3. DATES COVERED 00-00-2011 to 00-00-2011	
4. TITLE AND SUBTITLE DoD Acquisition Documentation Streamlining and the PESHE				5a. CONTRACT NUMBER	
				5b. GRANT NUMBER	
				5c. PROGRAM ELEMENT NUMBER	
6. AUTHOR(S)				5d. PROJECT NUMBER	
				5e. TASK NUMBER	
				5f. WORK UNIT NUMBER	
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Booz Allen Hamilton,8283 Greensboro Drive,McLean,VA,22102				8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)				10. SPONSOR/MONITOR'S ACRONYM(S)	
				11. SPONSOR/MONITOR'S REPORT NUMBER(S)	
12. DISTRIBUTION/AVAILABILITY STATEMENT Approved for public release; distribution unlimited					
13. SUPPLEMENTARY NOTES Presented at the NDIA Environment, Energy Security & Sustainability (E2S2) Symposium & Exhibition held 9-12 May 2011 in New Orleans, LA.					
14. ABSTRACT					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT Same as Report (SAR)	18. NUMBER OF PAGES 15	19a. NAME OF RESPONSIBLE PERSON
a. REPORT unclassified	b. ABSTRACT unclassified	c. THIS PAGE unclassified			

Bottom Line Up Front - BLUF

- ▶ Despite our concerns, the current Office of the Secretary of Defense (OSD) acquisition document streamlining initiative actually made improvements to the integration of Environment, Safety, and Occupational Health (ESOH) into the Systems Engineering (SE) process

ODUSD(I&E) Efforts to Influence the Process were Successful

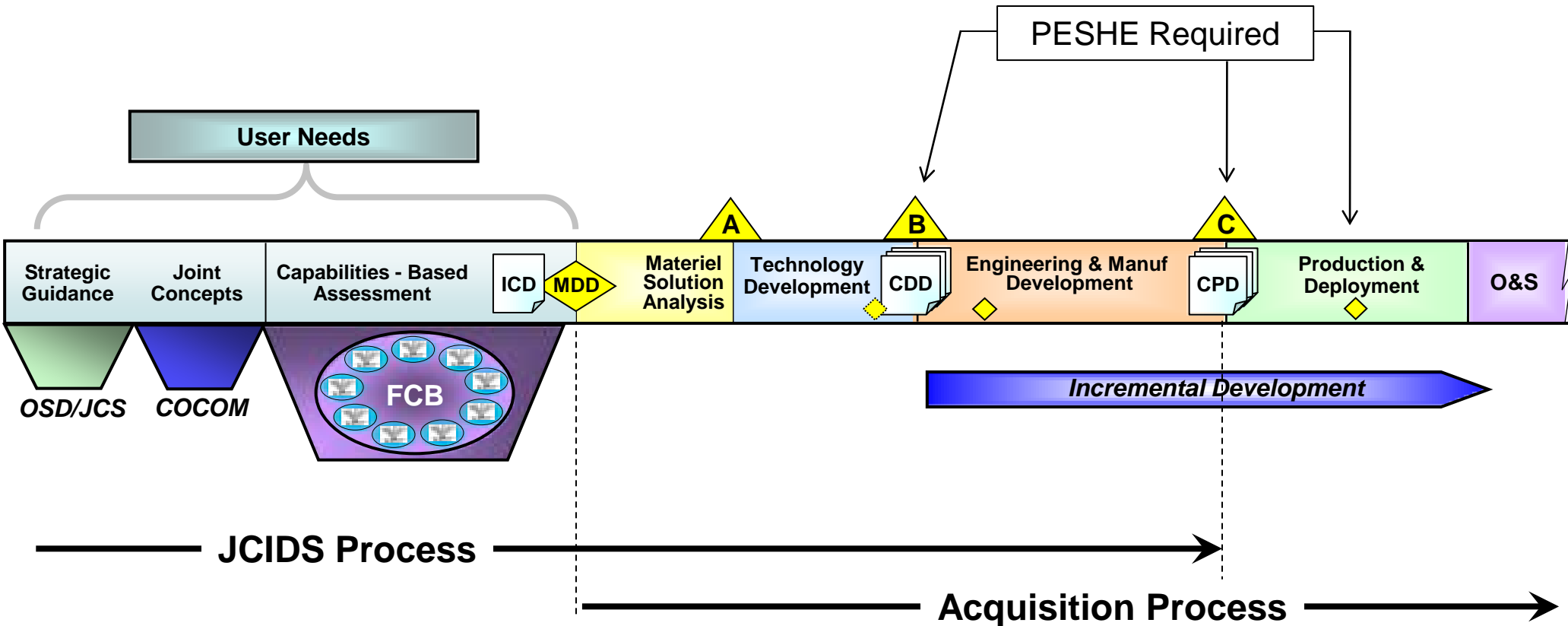
Programmatic Environment, Safety, and Occupational Health Evaluation (PESHE)

- ▶ Only mandatory acquisition ESOH document (required by DoDI 5000.02 for all programs regardless of ACAT level)
- ▶ Required of all DoD acquisition programs
- ▶ Must address following key points
 - Strategy for integration of ESOH into Systems Engineering using the system safety methodology described in MIL-STD-882D
 - Identification of ESOH responsibilities
 - Identification of ESOH risks and their status
 - Description of the hazard tracking method for the system's life cycle
 - Identification of hazardous materials, wastes, and pollutants (discharges/emissions/noise) associated with the system and plans for their minimization and/or safe disposal
 - A compliance schedule covering all system-related activities for NEPA.

Situation Pre 20 April 2011 in DoDI 5000.02

- ▶ PESHE
 - Required at MS B, C & Full-rate Production Decision Review (and at Program Initiation for ships)
 - Approval limited to Program Office (vice higher authority)
- ▶ PESHE with National Environmental Policy Act (NEPA) Compliance Schedule must be summarized in the Acquisition Strategy
- ▶ Systems Engineering Plan (SEP) required at MS A, B, and C
 - Approval by DASD(SE) required
 - ESOH not required to be addressed in the SEP, the primary systems engineering planning document
- ▶ The December 2008 DoDI 5000.02 moved the Preliminary Design Review (PDR) to occur Pre-milestone (MS) B

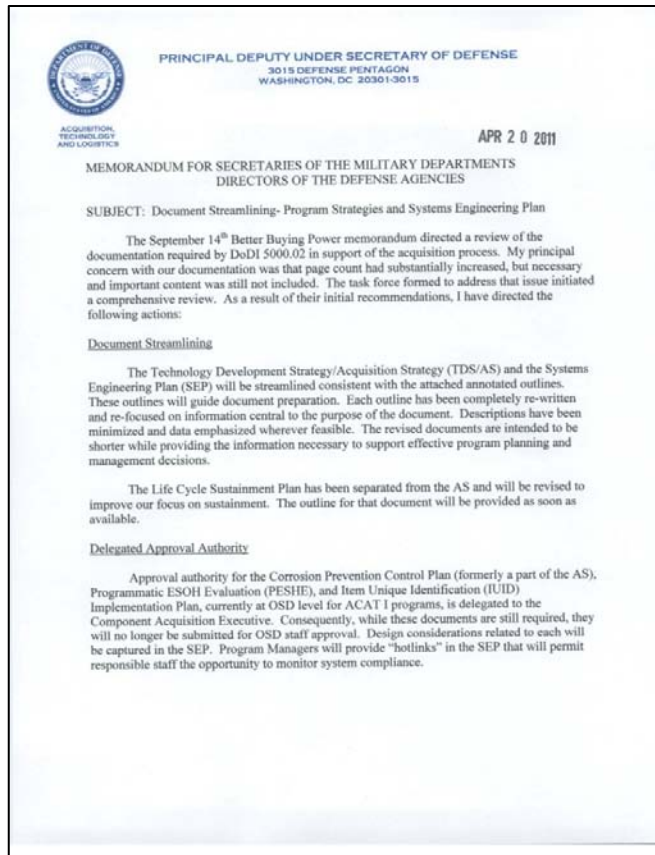
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ESOH Concerns with Pre 20 April 2011 Situation

- ▶ PDR moved from Post-MS B to Pre-MS B
 - Many key engineering activities “moved to the left” to Pre-MS B
 - 60 - 80% design completed by PDR, Pre-MS B
- ▶ PESHE requirement now late to need since not required until MS B
 - No Acquisition Strategy until MS B (so no PESHE summary until MS B)
 - Design development could occur without ESOH involvement

“Document Streamlining- Program Strategies and Systems Engineering Plan” memo, dated 20 April 2011



- ▶ Issued by PDUSD(AT&L), Mr. Kendall
- ▶ ODUSD(Installations & Environment) was a member of the Acquisition Documentation Streamlining Task Force and advocated for inclusion of ESOH considerations:
 - at MS A
 - in the SEP

<https://dap.dau.mil/Pages/NewsCenter.aspx?aid=148>

“Document Streamlining- Program Strategies and Systems Engineering Plan” memo, dated 20 April 2011

- ▶ “The September 14th Better Buying Power memorandum directed review of the documentation required by DoDI 5000.02 in support of the acquisition process. My Principal concern with our documentation was that the page count had substantially increased, but necessary and important content was still not included. The task force formed to address that issue initiated a comprehensive review. ...”

“Document Streamlining- Program Strategies and Systems Engineering Plan” memo, dated 20 April 2011

- ▶ “The Technology Development Strategy/ Acquisition Strategy (TDS/AS) and the Systems Engineering Plan (SEP) will be streamlined consistent with the attached annotated outlines.”
- ▶ “The revised documents are intended to be shorter while providing the information necessary to support effective program planning and management decisions.”

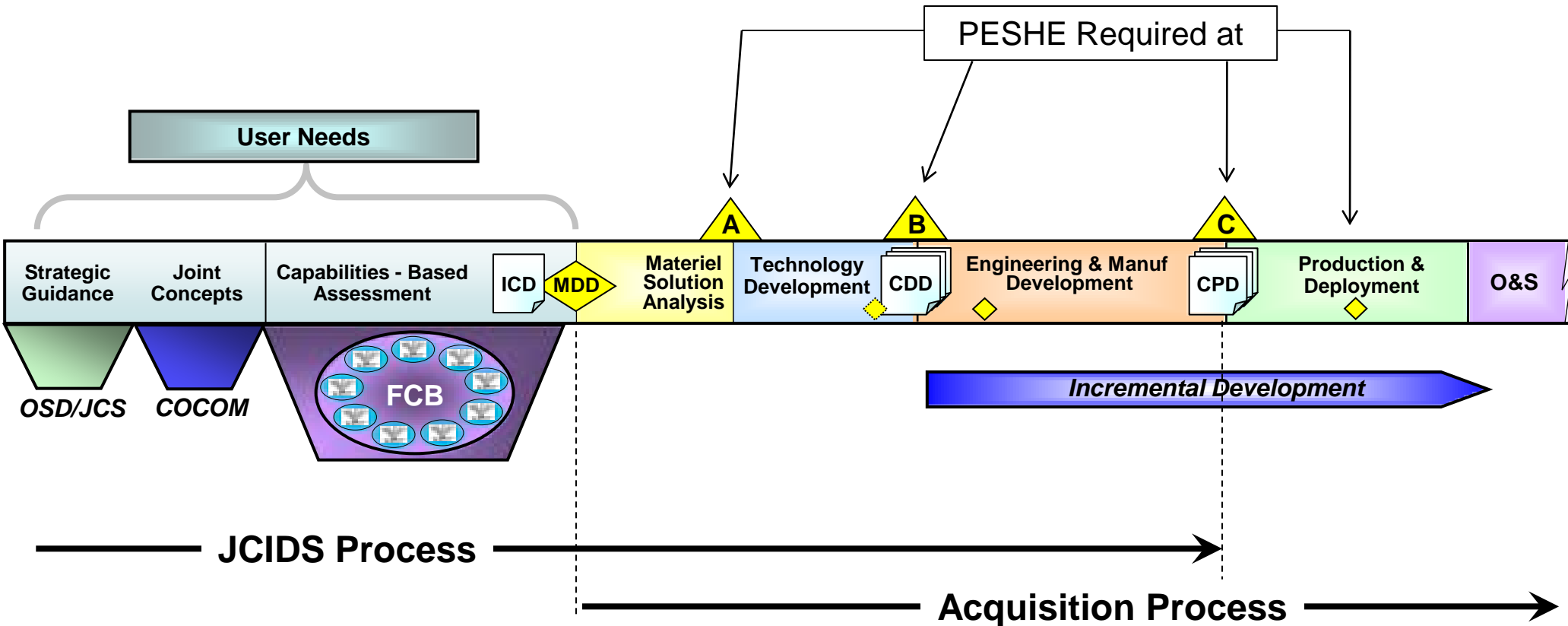
“Document Streamlining- Program Strategies and Systems Engineering Plan” memo, dated 20 April 2011

- ▶ “The approval authority of the Corrosion Prevention Control Plan, Programmatic ESOH Evaluation (PESHE), and Item Unique Identification Implementation Plan, currently at the OSD level for ACAT I programs, is delegated to the Component Acquisition Executive.”
- ▶ “Design considerations for each will be captured in the SEP.”
- ▶ “Program Managers will provide “hotlinks” in the SEP that will permit responsible staff the opportunity to monitor system compliance.”

Situation Post 20 April 2011

- ▶ ESOH design considerations required to be addressed in the SEP (at MS A, B, and C)
- ▶ SEP required to have a hyperlink to the PESHE (at MS A, B, and C)
- ▶ PESHE for ACAT I programs required to be approved by the Component Acquisition Executive (CAE)
 - This represents a significant increase in PESHE visibility
- ▶ PESHE no longer summarized in the Acquisition Strategy

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Significance of the Changes

- ▶ ESOH considerations “moved to the left” – realigned with earlier acquisition changes:
 - ESOH design considerations explicitly required to be included in the SEP
 - SEP required at MS A, so ESOH considerations integrated into the Systems Engineering process from the beginning
 - SEP is required to reference the PESHE via a hyperlink – the implication is that the PESHE must be approved by the CAE prior to MS A
- ▶ Elevated visibility for ESOH considerations within the Systems Engineering and program review processes
- ▶ Puts ESOH on a more equal footing with other “ilities” for consideration in contracts, trades, funding, resources from the beginning

ODUSD(I&E) and the Services will work to explicitly include the PESHE at MS A in the DODI 5000.02 Revision

Summary

- ▶ The December 2008 DoDI 5000.02 changes moving PDR to Pre-MS B, made PESHE “late to need” at MS B
- ▶ The “Document Streamlining- Program Strategies and Systems Engineering Plan” memo dated 20 April 2011, corrected this deficiency
 - ESOH design considerations required to be addressed in the SEP at MS A
 - SEP required to have a hyperlink to the PESHE
 - PESHE for ACAT I programs required to be approved by the CAE
- ▶ Technical and programmatic visibility of the Programmatic ESOH Evaluation elevated



Questions?