

# Presentation 22299 Environment, Safety, and Occupational Health (ESOH) Risk and Requirements Management Proposal for the new Department of Defense Adaptive Acquisition Framework (AAF)

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#### **Overview**



- Bottom Line Upfront (BLUF)
- Department of Defense (DoD) Restructuring of Systems Engineering (SE) and Environment, Safety, and Occupational Health (ESOH)
  - Organizational
  - Policy
- Proposed ESOH Responses to Restructuring
  - Focus on fundamental / core ESOH management issues
    - ESOH risks
    - ESOH requirements
  - Focus on data vice documents (plans and reports)
  - Scope of efforts and Priorities

#### **BLUF**



- Yesterday Acquisition and Sustainment ESOH policy in DoD Instruction (DoDI) 5000.02 Enclosure 3, Systems Engineering
- Today New Defense Acquisition System (DAS) evolving to an Adaptive Acquisition Framework with multiple pathways to rapid development and fielding of mission enabling technologies
  - No "Systems Engineering" policy; No "ESOH" policy
  - Recommendation made to address Systems Engineering (SE) and ESOH requirements as part of Life-Cycle Sustainment Planning
- The Office of the Under Secretary of Defense (USD) acquisition reorganization moved ESOH functions into two separate organizations USD Acquisition and Sustainment [USD(A&S)] & USD Personnel & Readiness [USD(P&R)]; not in USD Research and Engineering [USD(R&E)]
- ESOH risks and requirements management must align with the new DAS and USD organizational constructs and focus on:
  - Fundamental ESOH management issues
  - Data vice plans and reports

#### DoD Restructuring of SE and ESOH – Organizational



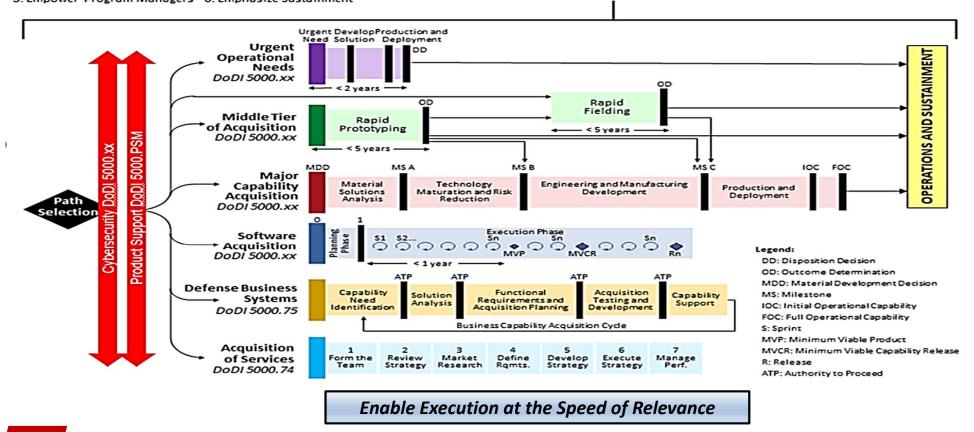
- USD for Acquisition, Technology, and Logistics (AT&L) reorganized into:
  - USD(R&E)
  - USD(A&S)
- SE is in USD(R&E) along with:
  - Technology Development
  - Digital Engineering (DE) / Model-Based Systems Engineering (MBSE)
  - Mission Engineering and Systems of Systems Engineering
  - Systems Security / Cyber Security
- Environmental Management is in USD(A&S) / Office of the Assistant Secretary of Defense [ASD)(Sustainment)] / Deputy Assistant Secretary of Defense [DASD)(Environment)]
- Safety (Operational and System) and Occupational Health are in USD(P&R) / ASD(Readiness)



#### Tenets of the Defense Acquisition System

- 1. Simplify Acquisition Policy
- 4. Data Driven Analysis
- 2. Tailor Acquisition Approaches 5. Active Risk Management
- 3. Empower Program Managers 6. Emphasize Sustainment

DoDD 5000.01: The Defense Acquisition System DoDI 5000.02: Operation of the Adaptive Acquisition Framework





- Goal of this new DAS is "Enable Execution at the Speed of Relevance"
  - Driven by Peer Competitors of China and Russia
  - Can no longer assure victory in one-on-one conflict with our Peer Competitors
- Tenets of the new DAS:
  - Simplify acquisition policy
  - Tailor acquisition approaches
  - Empower Program Managers (PMs)
  - Data driven analysis
  - Active risk management
  - Emphasize sustainment



- DoD Directive 5000.01, "The Defense Acquisition System"
- DoDI 5000.02, renamed "Operation of the Adaptive Acquisition Framework" vice "Operation of the Defense Acquisition System"
  - Policy content streamlined reduced from 170 to 11 pages
  - Deletes functional enclosures, including Enclosure 3 "System Engineering" that incorporated ESOH requirements
- Adaptive Acquisition Framework consists of six acquisition paths (four new and two existing)
   with separate DoDI policy for each
  - Draft DoDI 5000.UB, "Urgent Capability Acquisition" 21 pages
  - Draft DoDI 5000.UC, "Operation of the Middle Tier of Acquisition (MTA)" 13 pages
  - Draft DoDI 5000.MCA, "Major Capability Acquisition" 39 pages
  - Draft DoDI 5000.XX, "Software Acquisition" in development
  - DoDI 5000.75, "Business Systems Requirements and Acquisition," 2 Feb 2017 32 pages
  - DoDI 5000.74, "Defense Acquisition of Services," 5 Jan 2016, Incorporating Change 2
     31 Aug 2018 40 pages



- Adaptive Acquisition Framework:
  - Provides multiple pathways based on unique characteristics and risk profile of the warfighter capability (product, system, service) being acquired
  - Provides greater authority and flexibility to PMs in the management and execution of the acquisition program
  - Emphasizes management of risks cost, schedule, and performance (technical risks) to enable "Speed with Discipline"
  - Requires data driven decision making
  - Relies heavily on DE / MBSE as key enabler of speed with discipline -- digital model of the system is the single authoritative source of all information about the system
- There will also be multiple functional DoD 5000 documents in addition to the eight USD(A&S)
   Adaptive Acquisition Framework documents.



- Separate DoD 5000 Functional Policies and the Preparing Activities:
  - SE by USD(R&E)
  - Developmental Test and Evaluation by USD(R&E)
  - Program Protection by USD(R&E)
  - Information Technology by DoD Chief Information Office
  - Cybersecurity by USD(A&S)
  - Product Support by USD(A&S)
  - Acquisition Intelligence by USD(A&S)
  - Intellectual Property by USD(A&S)
  - Human Systems Integration by USD(P&R)
  - Operational Test and Evaluation by Director of Operational Test and Evaluation
  - Analysis of Alternatives by Director of Cost Assessment and Program Evaluation (DCAPE)
  - Cost Estimating by DCAPE



ISSUANCE	TITLE	STATUS	EST AIR FORCE COORD	EST PUBLISH
DoDD 5000.01	The Defense Acquisition System	OPR (A&S) coord	Mid Oct	Dec-19
DoDI 5000.02	Operation of the Adaptive Acquisition Framework	OPR (A&S) coord	Mid Oct	Dec-19
PATHWAY DODIS				
DoDI 5000.UB	Urgent Capability Acquisition	Formal coord	Complete Sep (AF Response: Concur)	Nov-19
DoDI 5000.UC	Operation of the Middle Tier of Acquisition	Signed; with final legal	Complete Aug (AF Response: Non-concur)	Oct-19
DoDI 5000.mca	Major Capability Acquisition	Prep for OPR (A&S) coord	Mid Oct	Dec-19
DoDI 5000.75	Business Systems Requirements and Acquisition	Delayed: Address FY2020 NDAA	Complete Sep (AF Response: Concur)	Jan-20
Interim Memo	Software Acquisition	Informal coord (multiple versions)	Mid Oct	Dec-19
SEPERATELY ISSUE	FUNCTIONAL POLICY			
DoDI 5000.xx	Systems Engineering	In development	Late Oct	Dec-19
DoDI 5000.xx	Developmental and Operational T&E	In development	Late Oct	Dec-19
DTM	Human Systems Integration	DTM Drafted	Late Sep	
	Analysis of Alternatives	No new policy; adequately covered in DoDD 5105.84		amend as needed
	Cost Estimating and Reporting	No new policy; adequately covered in DoDI 5000.73		expect update
DoDI YYYY.xx	Cybersecurity	New Instruction in development	Late Oct	Dec-19
DoDI 5000.ab	Intellectual Property	Formal coord	Complete Sep (AF Response: Concur)	Oct-19
DoDI 5000.ac	Acquisition Intelligence	Released to WHS for coord	Early Oct	Dec-19
as of 8 Oct 2019				



- During informal / formal reviews of the various USD(A&S) DoD 5000 documents, submitting comments with recommendation of adding ESOH management direction
- Submitting comments via:
  - DoD Acquisition ESOH Integrated Product Team chaired by Mr. David Asiello of DASD(Environment)
  - Service Components
- Tailoring the ESOH input for each of the DoD 5000 Adaptive Acquisition Framework documents
- Recommending SE and ESOH addressed as part of the Life-Cycle Sustainment Planning in the Adaptive Acquisition Framework documents
  - ASD(Sustainment) supports this approach
  - No indication that DoD 5000.XX on SE will require SE Plan or incorporate ESOH



- Focus on fundamental ESOH management issues and data needs for programs
  - ESOH risks
  - ESOH requirements
    - Reviews, approvals, certifications
    - Hazardous Materials (HAZMAT) management
    - National Environmental Policy Act (NEPA) compliance
- Utilize Military and Non-Governmental standards to standardize and expedite management of ESOH risks and requirements
- Generate data to support program decision making instead of generating plans and reports
- Integrate ESOH data on risks and requirements into the system design, especially for programs using DE / MBSE for development and sustainment



- ESOH Risk Management
  - Significant part of a DoD program's efforts to manage cost, schedule, and performance risks
  - Use Military-Standard (MIL-STD)-882E, "DoD Standard Practice to System Safety"
  - Focus on:
    - Identifying ESOH hazards that could cause a system-related mishap resulting in damage to people, equipment, or the environment
    - Assessing the risks (probability / likelihood or severity / consequence) of a mishap
    - Identifying potential mitigations that could lower the risks
    - Selecting mitigations to implement based on tradeoffs involving cost, schedule, and performance implications of each mitigation option
    - Accepting risks prior to exposing people, equipment, or the environment to hazards
      - System users and program management must agree to accept a given risk
      - Risk acceptance decision making must be at the appropriate management levels for a given acquisition framework and risk levels



- ESOH Requirements External Reviews, Approvals, Certifications
  - Programs must identify external reviews, approvals, and certifications that would normally apply to the system
  - Assess value added of those requirements and trade-offs between complying versus requesting approvals to waive
    - These external requirements can drive cost, schedule, and performance impacts
    - However, obtaining waivers can be cost and schedule prohibitive for a program
  - For instance, aircraft will require some type of airworthiness approval to fly in the National Airspace, International Airspace, or on DoD ranges
    - Airworthiness assessments can assist with ESOH risk management and provide critical design criteria
    - Airworthiness approvals can contribute to ability to market the system to allies
    - However, review process can be time consuming and costly



- ESOH Requirements Management HAZMAT Management
  - Use the Aerospace Industries Association (AIA) National Aerospace Standards (NAS) 411 and 411-1
    - AIA developed these standards in conjunction with DoD
    - NAS411: "Hazardous Materials Management"
    - NAS411-1: "Hazardous Materials Target List"
  - Prohibit or restrict the use of HAZMAT In accordance with NAS411-1 either in a system or as required for a system's operation and maintenance
  - As worldwide restrictions increase on HAZMAT usage, these materials can:
    - Become significant supply chain risks
    - Cause limitations on where DoD could employ or sell systems
    - Pose unacceptable risks to people and the environment
    - Drive up total ownership costs



- ESOH Requirements Management NEPA Compliance
  - Programs must work with system user to identify the locations where and when they plan to test, train, and field a new or modified system
    - Include these dates and locations on the Integrated Master Schedule as being on the critical path
    - Work with the system user to verify that the locations can comply with applicable statutory NEPA requirements prior to the planned events
  - Otherwise, programs may encounter potentially significant schedule delays or even work stoppages if programs are not working with the user to track NEPA compliance status
  - NEPA compliance issues are already affecting planning for testing of hypersonic systems and for use of Governmental ranges for contractor-owned / contractor-operated aircraft providing training assets to the Air Force



- ESOH Risk and Requirements Management
  - Execute to the extent possible given resources of time and people
  - Integrate efforts into program's DE / MBSE
- Recommended Management Priorities
  - ESOH Risks:
    - Use MIL-STD-882E methodology to identify hazards and potential High risks
    - Focus management efforts on High risks
  - ESOH Requirements External Reviews, Approvals, Certifications
    - Contact external agencies to inform and assess flexibility, options
    - Inform management of potential show stoppers
  - ESOH Requirements HAZMAT Management
    - Use NAS411 and NAS411-1 without tailoring
    - Focus management efforts on "Prohibited" materials
  - ESOH Requirements NEPA Compliance
    - Work closely with system user, who must take the lead to comply with NEPA
    - Identify system specific data the user will need for NEPA analyses

#### **SUMMARY**



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