Response to NASA OIG Report IG-25-012 pursuant to the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Public Law 117-263, Section 5274

Section 5274 of Public Law 117-263, the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 requires Offices of Inspector General (OIG) to notify all non-governmental organizations or business entities that are specifically mentioned in an OIG report. Section 5274 further requires the OIG to attach any response received from a non-governmental organization or business entity to the report in which they are mentioned. Therefore, in accordance with Section 5274, attached is a response provided to the NASA OIG regarding the report on *NASA's Management of ISS Extravehicular Activity Spacesuits*, report number IG-25-012, issued September 30, 2025.

This response represents the views of Collins Aerospace. NASA OIG did not evaluate this response and offers no comment and makes no representations, expressed or implied, of any nature with respect to the matters stated therein.

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October 30, 2025

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Subject: Collins Aerospace (Collins) Response to NASA OIG Report IG-25-012 (A-24-14-00-HED)

Collins appreciates the opportunity to respond to the OIG report titled "NASA's Management of ISS Extravehicular Activity Spacesuits," dated September 30, 2025 (IG-25-012). We recognize the significance of the OIG's role in evaluating program performance to ensure the continued success of NASA's mission. Collins takes the referenced findings seriously and remains steadfast in our commitment to address our performance challenges. Collins would also like to offer the following clarification and context.

The Extravehicular Mobility Unit (EMU) spacesuits astronauts wear during spacewalks on the International Space Station (ISS) were designed more than 50 years ago. Notably, one of the program's most remarkable achievements is extending the EMU's operational life from 15 years to more than 50 years – well beyond the original requirement. (*See* IG-25-012 p.12.) While extending the EMU's life has resulted in schedule and cost complexities, it has also enabled over 100 successful ISS spacewalks, when industry has produced no available alternative. (*See* IG-25-012 p.9, next-generation spacesuits are imperative.)

I. Safety

Regarding the EMU Risks discussed in the report, NASA has determined that those issues are not attributable to Collins. (*See* IG-25-012 p.4-6.) Collins does, however, support and will continue to support investigations and "real-time operations by monitoring the health of the spacesuit and ensuring timely responses to anomalies" – as astronaut safety is paramount. (*See* IG-25-012 p.6.) Collins has been "consistently praised" for its assistance with "critical EVA activities." (*See* IG-25-012 p.16.) Collins remains fully committed to maintaining the highest safety standards and supporting NASA in its ongoing efforts to ensure astronaut safety.

II. Extravehicular Activity Space Operations Contract (ESOC) Performance

Collins acknowledges it has experienced schedule delays, cost overruns, and quality issues, and Collins remains committed to addressing these concerns. The report, however, labeled Collins as the "overarching root cause" for ESOC "performance issues." (*See* IG-25-012 p.12.) This aging "niche" program would have experienced some performance impacts, due to a "relatively small" and shrinking industrial base regardless. As the report notes, the operation of EMUs "decades past their intended lifespan" means that historic suppliers "may no longer produce the required parts" or even "be in business," and that "[t]hese [supplier] challenges are not unique to Collins." (*See* IG-25-012 p.12.) The report even empathizes with NASA's "lack of realistic alternatives in [this] niche industry," resulting in elevated "risk exposure to schedule delays, cost increases and poor contractor performance." (IG-25-012 p.14.) The same constraints and risks are true for Collins. Even so, Collins recognizes its own performance challenges and continues to implement corrective actions to improve quality, performance and supply chain resilience to ensure astronauts can safely perform their missions without interruption.

III. Award Fee

The report focuses on "contractual tools," such as the Award Fee, as the primary drivers to "motivate" Collins and opines that the Award Fee has been inflated to date. (*See* IG-25-012 p.14.) Unfortunately, adjusting the Award Fee will not enable Collins to overcome the product lifespan and industrial base challenges cited above and throughout

the report. In fact, the report acknowledges that neither decreasing Collins' CPARS ratings nor recent reductions in Collins' award fee scores have resolved performance issues. Additionally, the Award Fees to date are not inflated. (*See* NASA FAR Supplement Section 1816.402)[1] Rather, they reflect reductions due to Collins' performance challenges *and* the value of performing as a *sole* provider in a complex environment. The complexity of this environment is illustrated by the fact that "no potential contractors expressed interest in competing for the spacesuit maintenance work," which the report recognizes "was an unsurprising outcome given that Collins was the *only known contractor capable* of doing so and NASA was the only customer for that specific type of work*."* (*See* IG-25-012 p.14 *emphasis added.*) NASA believes that the score was fair based on "Collins' performance over the entire ESOC contract scope." (*See* IG-25-012 p.16.)

IV. Path Forward

Collins acknowledges its critical role on the ESOC program, as well as its performance challenges. Collins takes the report and its recommendations very seriously. Collins has implemented several corrective actions and our performance is improving. As an example, while the report incorrectly noted an historical "4 percent on-time delivery" rather than the actual 70% on-time delivery rate, Collins has admittedly struggled with on-time delivery. (*See* IG-25-012 p.13.) As a result, Collins has implemented several corrective actions, resulting in a current on-time delivery rate of 83%. Collins strives to ensure that its on-time delivery rate and its overall ESOC performance continue to improve as we implement our recovery plan in partnership with NASA. Collins has also partnered with NASA to amend the ESOC contract updating the Award Fee in accordance with recommendations 1 and 2 in the report which, along with NASA's closure of item 3, closes all report recommendations.

Collins is proud of its legacy as NASA's provider of the EMU, as well as its contributions to advancing human space exploration and ensuring U.S. leadership in space. We look forward to continuing our collaboration with NASA to ensure the safety and success of future space missions.

Best regards,

Collins Aerospace

[1] "When considering the use of a quality, performance, or schedule incentive" the NFS expressly notes a positive, or negative, incentive is not appropriate unless "[t]he attainment of the higher level of performance is clearly within the control of the contractor" - or conversely "[a] target level of performance can be established, which the contractor can reasonably be expected to reach with a diligent effort.(NASA FAR Supplement Section 1816.402) More critically, the NFS goes on to state "[t]he relationship between any given incentive, either positive or negative, and its associated unit of measurement should reflect the value to the Government of that level". (1816.402-270 NASA technical performance incentives).