



Office of the Chief
Acquisition Officer

Date: January 26, 2026

From: Darnese M. Wilkerson, Chief Acquisition Officer

To: Office of the Chief Acquisition Officer (OCAO)

Subject: CLASS DEVIATION (CD) in Support of Executive Order (EO) 14275, “Restoring Common Sense to Federal Procurement” - Deviation to FAR Part 6, Competition Requirements

1. Purpose

This Class Deviation (CD) implements the FAR Council’s model deviation text for FAR Part 6, Competition Requirements. This action aligns with Executive Order (EO) 14275, "Restoring Common Sense to Federal Procurement," and the Revolutionary FAR Overhaul (RFO) initiative.

The revised FAR Part 6 enhances usability and clarity, ensuring procedures that support full and open competition are easier to understand and apply.

2. Background

EO 14275, signed on April 15, 2025, established a policy that the FAR should contain only provisions required by statute or those essential for sound procurement. To implement this EO, the Office of Federal Procurement Policy (OFPP) is leading the Revolutionary FAR Overhaul (RFO) initiative, supported by the Federal Acquisition Regulatory Council. The initiative aims to eliminate unnecessary regulations and policies across all levels of the federal government.

Further guidance was provided by OMB Memorandum M-25-26, "Overhauling the Federal Acquisition Regulation," issued on May 2, 2025.

FAR Streamlining

As part of the RFO, the FAR will be streamlined to include only statutory requirements. Non-statutory content moved to new buying guides, collectively known as the Strategic Acquisition Guidance (SAG). The Council will first issue model deviation guidance by FAR part, followed by formal rulemaking through the notice and comment process. Agencies have 30 days to issue class deviations based on the model text once released.

A. Streamlining Agency Acquisition Supplements: Agencies must streamline their FAR supplements by removing regulations not based on statute or executive orders and by aligning with the FAR Council’s deviation guidance. Supporting policies must also be updated to reflect these changes. This is an excellent opportunity for NARA to formally publish a streamlined NARA FAR Supplement, ensuring consistency with the new FAR.

B. FAR Buying Guides and Supplemental Companion Guides (CG): As the FAR and agency supplements are streamlined, helpful non-regulatory content will be moved to these new FAR Buying Guides. These guides will offer practical instructions and best practices for implementing effective contracting methods, including those related to competition. The RFO Part 6 model deviation text is a plain language version that will be adhered to by all NARA contracting personnel.

3. Summary of Changes

FAR part 6, Competition Requirements, has been streamlined to strengthen clarity and focus, helping to ensure procedures that support full and open competition are easier to understand and apply.

Statutory requirements retained in the RFO FAR part 6 model deviation include, but are not limited to, the following:

- 41 U.S.C. § 1705, Advocates for Competition
- 41 U.S.C. § 3301 and 10 U.S.C. § 3201, Full and Open Competition
- 41 U.S.C. § 3303 and 10 U.S.C. § 3203, Exclusion of Particular Source or Restriction of Solicitation to Small Business Concerns
- 41 U.S.C. § 3304, Use of Noncompetitive Procedures
- 10 U.S.C. § 3204, Use of Procedures Other than Competitive Procedures
- 15 U.S.C. Chapter 14A, Aid to Small Business
- 42 U.S.C. § 5150, Major Disaster and Emergency Assistance, Use of Local Firms and Individuals

Change	Description
Retained	<ul style="list-style-type: none"> ● FAR part 6 continues to apply to all acquisitions, with limited exceptions for specific contracts and orders. ● Advocates for Competition, previously at subpart 6.5, has been moved to section 6.003. Details about the role and responsibilities have been streamlined. ● Guidance pertaining to Sealed Bidding has been streamlined and moved from subpart 6.4 to section 6.101. ● Authorities for other than full and open competition, including only one responsible source, remain. ● Contracting officers retain discretion to set aside acquisitions for small business concerns, including contract actions conducted under the Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) programs, and local firms during a major disaster or emergency. ● Justification and approval requirements to support noncompetitive procedures. <ul style="list-style-type: none"> ○ These requirements have been significantly streamlined. ○ The revised language highlights that contracting officers require support from the broader acquisition team when making decisions regarding competition. ○ The approval levels are now reflected in a plain language table

	format.
Removed	<ul style="list-style-type: none"> ● Unnecessary or redundant language was removed throughout. Examples include- <ul style="list-style-type: none"> ○ The word “advance” was removed from the phrase, “A lack of advance planning by the requiring activity.” The language now reads, “A lack of planning by the requiring activity.” This avoids ambiguity surrounding the meaning of “advance” planning. ○ The list of specific small business socioeconomic categories was removed and replaced with a reference to part 19. ● Illustrative examples of when to use certain exceptions to full and open competition have been removed and may be moved to nonregulatory content.

This table is not an exhaustive list.

4. Instructions

The NARA acquisition workforce shall follow the RFO Part 6 deviated text instead of FAR Part 6 as codified at 48 CFR Chapter 1. The FAR Council’s RFO text is available at [FAR Overhaul - FAR Part 6 - Acquisition.gov](#) and is incorporated by reference into this deviation.

Review templates and related standard operating procedures to align with this deviation and remove unnecessary processes and steps.

5. Applicability

The requirements in this Class Deviation (CD) apply to all solicitations and contract actions issued or awarded on or after **February 1, 2026**.

6. Authority

This class deviation is issued under the authority of Executive Order 14275 and OMB Memorandum M-25-26, 48 CFR Subpart 1.4.

7. Effective Date

This CD is effective as of the date signed and shall remain in effect until the provisions of the RFO are formally implemented in the FAR through a final rulemaking.

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cc: NGC