



Office of the Chief
Acquisition Officer

Date: January 26, 2026

From: Darnese M. Wilkerson, Chief Acquisition Officer *DMW*

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 7, Acquisition Planning

1. Purpose

This Class Deviation (CD) implements the FAR Council's model deviation text for FAR Part 7, Acquisition Planning. 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 7 enhances usability by restructuring and organizing the part in the logical flow of the acquisition lifecycle. The revision streamlines the part to emphasize flexibility and move away from prescriptive checklists in favor of a dynamic planning process. The update makes clear distinctions between task and delivery orders and award of new contracts, requiring appropriate acquisition planning for each.

Part 7 now includes requirements previously found in FAR part 10 to ensure small business concerns are appropriately considered. Requirements for bundling, substantial bundling, and consolidation are unified to ensure common consideration of any potential negative impact on small business.

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 7 model deviation text is a plain language version that will be adhered to by all NARA contracting personnel.

3. Summary of Changes

FAR Part 7, Acquisition Planning, is streamlined to emphasize flexibility and move away from prescriptive checklists in favor of a dynamic planning process.

The deviation recognizes the distinctions between task and delivery orders and award of new contracts, requiring appropriate acquisition planning for each. The placing of task and delivery orders is a faster and more streamlined process with significantly less pre-award actions required than in awarding new contracts. The level of detail should vary with the size and complexity of the acquisition.

The deviation to Part 7 also picks up on requirements previously found in FAR 10 to ensure small business concerns are appropriately considered. Requirements for bundling, substantial bundling, and consolidation are unified to ensure common consideration of any potential negative impact on small business.

While there is no longer a requirement for acquisition plans with specific elements, there should still be forethought in what is being procured. Having a plan is key to ensuring the guiding principles of the acquisition system are met. By emphasizing early engagement, this change creates more opportunities to foster innovation and achieve successful results, reflecting a shift toward a more agile and strategic approach.

Statutory requirements and executive requirements retained in the RFO FAR Part 7 model deviation include, but may not be limited to, the following:

- 41 U.S.C. §§ 3301 et seq, Planning and Solicitation
- 10 U.S.C. § 3453, Preference for Commercial Products and Commercial Services
- 15 U.S.C. § 657q, Consolidation of Contract Requirements
- 15 U.S.C. § 644, Awards or Contracts
- Pub. L. 115-254, Sec 555, Cost-Effectiveness Analysis of Equipment Rental
- OFPP Policy Letter 11-01, Performance of Inherently Governmental and Critical Functions

Change	Description
New/Retained/ Updated	<ul style="list-style-type: none"> ● <u>Updated</u>: In section 7.000, “Scope of Part”, para (a) is revised from "Developing acquisition plans" to "Acquisition planning and developing acquisition plans". This broadens the scope to encompass the entire planning process, not just the act of creating a document. ● <u>Retained</u>: The definitions at 7.101, “Definitions”, are retained and most have been simplified to improve clarity. ● <u>New</u>: Section 7.102 is renamed “Requirements” and establishes the fundamental requirement for acquisition planning in all acquisitions. It mandates that agencies establish procedures for determining whether a written or oral plan is needed and lists high-level outcomes that planning must promote: <ul style="list-style-type: none"> ○ Acquisition of commercial products or services ○ Full and open competition ○ Selection of appropriate contract type ○ Use of existing contracts <p>Note - Although 7.102 gives agencies discretion in establishing procedures for written or oral plans, 7.102(d) retains the requirement to use a written plan for cost reimbursement and other high-risk contracts.</p> ● <u>Updated</u>: Section 7.103, “Agency-head Responsibilities”, is updated from a long list of specific tasks to a list of high-level responsibilities, such as creating streamlined procedures for different acquisition types (e.g., orders, commercial products and services), establishing criteria for high-risk contracts, and ensuring small business opportunities are considered. ● <u>Updated</u>: Section 7.104, “General Procedures”, is updated to highlight that early planning can create opportunities to structure the procurement approach in a way that promotes competition and innovation. <ul style="list-style-type: none"> ○ Practitioners should review the FAR Companion for best practices for innovative acquisition planning techniques. ● <u>Updated</u>: Section 7.107, “Additional Requirements for Acquisitions Involving Consolidation, Bundling, or Substantial Bundling”, is updated to streamline and standardize the analysis, determination, and notification requirements – there are no longer separate requirements for each, with the goal of ensuring this important step in the acquisition process is understood by the workforce. <ul style="list-style-type: none"> ○ 7.107-1(a) retains the requirement for market research before conducting an acquisition that consolidates or bundles requirements. ● <u>Updated</u>: Section 7.108, “Additional Requirements for Teleworking”, is updated to reflect modern terminology and simplified language. For example, the term “telecommuting” has been updated to “teleworking”. ● <u>Updated</u>: Section 7.403, formerly titled "General Services Administration Assistance and OMB Guidance," has been retitled "OMB Guidance". Paragraphs (a) and (b) of the former section, which described the types of assistance available from GSA, have been removed. The content of the former paragraph (c), which provides references to relevant OMB circulars, has been retained and updated with new hyperlinks. The removal of the GSA assistance information streamlines the text by deleting content that is informational rather than regulatory. The process agencies use to perform a lease-versus-purchase analysis remains intact in clause 52.207-5.

	<ul style="list-style-type: none"> ● Retained: Subpart 7.5, “Inherently Governmental Functions”, is retained and revised for clarity and readability, primarily through plain-language edits and structural reorganization. ● Retained clauses and provisions, with no changes in text: <ul style="list-style-type: none"> ○ 52.207-4 Economic Purchase Quantity—Supplies ○ 52.207-5 Option To Purchase Equipment ○ 52.207-6 Solicitation of Offers from Small Business Concerns and Small Business Teaming Arrangements or Joint Ventures (Multiple-Award Contracts)
Removed	<ul style="list-style-type: none"> ● Section 7.105, “Contents of Written Acquisition Plans” is removed and marked “Reserved.” Relevant content will be reflected in the FAR Companion. ● Section 7.200, “Scope of Subpart” regarding economic quantities of purchases, has been deleted and marked “Reserved” as it is unnecessary. ● Section 7.204, “Responsibilities of Contracting Officers” has been deleted as the content is covered by FAR 52.207-4. ● Subpart 7.3, “Contractor Versus Government Performance”, and its underlying sections have been deleted and marked “Reserved” as Congress has consistently placed a statutory hold on A-76 competitions since 2008. ● The following clause and provisions are removed: <ul style="list-style-type: none"> ○ 52.207-1 Notice of Standard Competition ○ 52.207-2 Notice of Streamlined Competition ○ 52.207-3 Right of First Refusal of Employment

This table is not an exhaustive list.

4. Instructions

- The NARA acquisition workforce shall follow the RFO Part 7 and corresponding 52 model deviated text instead of FAR Parts 7 and 52 as codified at 48 CFR Chapter 1. The FAR Council’s RFO text is available at [FAR Overhaul - FAR Part 7 - Acquisition.gov](https://www.far.gov/far-overhaul-far-part-7-acquisition) and is incorporated by reference into this deviation.
- For new solicitations or contracts, when using any provisions or clauses that have been revised, utilize the RFO model deviation language at RFO FAR Part 52.
- For open solicitations or awarded contracts, the contracting officer has discretion regarding the need to enforce or amend the provisions or clauses. Note that without some of the removed provisions or clauses, the contracting officer may be required to separately address certain aspects in the contract.
- Contracting activities must review templates and related standard operating procedures to align with this class 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