



U.S. COMMODITY FUTURES TRADING COMMISSION
Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581
www.cftc.gov

CFTC Class Deviation RFO-2025-38

TO: CFTC's Procurement Office

FROM: William M. Roberson, Senior Procurement Executive

DATE: August 20, 2025

SUBJECT: FAR Class Deviation for FAR Part 38 in Support of Executive Order 14275, Restoring Common Sense to Federal Procurement.

- 1. Purpose:** This memorandum approves a class deviation to Federal Acquisition Regulation (FAR) part 38 for the purpose of implementing the FAR Council's model deviation to FAR part 38.
- 2. Background:** [Executive Order \(E.O.\) 14275, Restoring Common Sense to Federal Procurement](#), signed April 15, 2025, mandates a comprehensive review and simplification of the FAR.

The FAR is being updated to:

- Eliminate non-statutory language
- Remove redundant or obsolete language
- Enhance clarity through plain language
- Align with the new FAR framework
- Preserve essential governmentwide acquisition standards

This project is referred to as the Revolutionary FAR Overhaul (RFO) initiative. This initiative will make the FAR more concise, understandable, and focused on core procurement requirements.

3. **Summary of Changes:** FAR part 38, Federal Supply Schedule Contracting, is removed in its entirety. Guidance and procedures for the Schedule program will be moved from FAR part 38 and subpart 8.4 to GSAR part 538.
4. **Instructions:**
 - The CFTC acquisition workforce must follow the RFO part 38 model deviation text instead of FAR part 38 as codified at 48 CFR Chapter 1. The Council's RFO part 38 model deviation text is available at [Acquisition.gov/far-overhaul](https://www.acquisition.gov/far-overhaul), and is incorporated into this class deviation.
 - Review templates and related standard operating procedures to align with this class deviation and remove unnecessary processes and steps.
5. **Applicability:** This class deviation applies to all CFTC procurements.
6. **Authority:** This class deviation is issued under the authority of [E.O. 14275](#), [OMB Memo M-25-26](#), 48 CFR 1.4, and RFO FAR 1.304.
7. **Effective Date:** This class deviation is effective as dated and shall remain in effect until it is incorporated into the FAR or until this class deviation is otherwise rescinded.
8. **Point of Contact:** Questions regarding this class deviation may be directed to CFTC's Senior Procurement Executive, William M. Roberson, at wroberson@cftc.gov.

Rest of Page Intentionally Left Blank