



Memorandum

TO: Department of Procurement Services (FMPS)
THROUGH: Eddie Ahmad
Director, Procurement Services
FROM: Brien Lorenze
Executive Director
SUBJECT: FAR Class Deviation for FAR Part 38 in
Support of Executive Order 14275, Restoring
Common Sense to Federal Procurement

DATE: August 18, 2025

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1. **Purpose.** This memorandum approves a class deviation to Federal Acquisition Regulation (FAR) Part 38 for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text 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 Consumer Product Safety Commission (CPSC) acquisition workforce shall 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, under the "FAR Overhaul" link, and is incorporated into this class deviation.
 - Contracting activities must 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 CPSC procurements.
6. **Authority.** This class deviation is issued under the authority of EO 14275, OMB Memo M-25-26, 48 CFR 1.4, and RFO FAR 1.304.
7. **Effective Date.** This class deviation is effective October 1, 2025 and remains in effect until rescinded or incorporated into the FAR.
8. **Points of Contact.** Questions regarding this class deviation may be directed to the CPSC Director of Procurement Services, Eddie Ahmad, at aahmad@cpsc.gov.