



Class Deviation
RFO 2025-38

November 19, 20205

MEMORANDUM FOR DEPARTMENT OF LABOR CONTRACTING OFFICERS

FROM: CARL V. CAMPBELL
Senior Procurement Executive

SUBJECT: 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 purposes of implementing the FAR Council's (Council) 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 the General Services Administration Regulation (GSAR) part 538.

4. Instructions

The Department of Labor's (DOL) acquisition workforce must follow the RFO part 38 model deviation text instead of FAR part 38 as codified at 48 CFR Chapter 38. 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.

5. Applicability

This class deviation applies to all DOL 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This class deviation is effective November 3, 2025, and remains in effect until rescinded or incorporated into the FAR.

8. Questions

Questions regarding this Class Deviation should be directed to the Procurement Policy Branch at OSPE-Policy@dol.gov.