



# UNITED STATES DEPARTMENT OF EDUCATION

## OFFICE OF FINANCE AND OPERATIONS

September 25, 2025

### ACQUISITION ALERT 2025-33

TO: Heads of Contracting Activities

FROM: Calvin J. Mitchell Jr. **CALVIN MITCHELL**  
Deputy Assistant Secretary for the Office of Acquisition Management  
Senior Procurement Executive

Digitally signed by CALVIN MITCHELL  
Date: 2025.09.25 12:01:22 -04'00'

SUBJECT: FAR Class Deviation for FAR Part 30

- 1. Purpose.** This Acquisition Alert (AA) adopts a class deviation to Federal Acquisition Regulation (FAR) Part 30 for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text to FAR Part 30.
- 2. Background.** On April 15, 2025, the Executive Order (E.O.) 14275 on Restoring Common Sense to Federal Procurement was signed. Section 2 of the E.O. establishes the policy that the FAR "should only contain provisions required by statute or essential to sound procurement, and any FAR provisions that do not advance these objectives should be removed." On May 31, 2025, the enclosed class deviation was issued for the use of all Revolutionary FAR Overhaul (RFO) model deviation texts and corresponding EDAR deviations.
- 3. Summary of Changes.** FAR Part 30, Cost Accounting Standards Administration, has undergone a comprehensive revision that includes a complete structural reorganization to align with the acquisition lifecycle, enhanced clarity, and a strategic consolidation of policies coupled with the elimination of obsolete requirements.

Statutory requirements retained in the RFO FAR Part 30 model deviation include, but may not be limited to, the following:

- 10 U.S.C. § 3702, Required Cost or Pricing Data and Certification
- 10 U.S.C. § 3761, Restructuring Costs
- 26 U.S.C. § 6621, Determination of Rate of Interest
- 41 U.S.C. §§ 1501 et seq, Cost Accounting Standards
- Pub. L. 100-679 Sec 5, Cost Accounting Standards Board
- Pub. L. 106-65 Sec 802, Streamlined Applicability of Cost Accounting Standards

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Change	Description
Retained	<ul style="list-style-type: none"> <li>● The revised part <b>structure consolidates</b> all relevant guidance into <b>process-oriented</b> subparts: <ul style="list-style-type: none"> <li>○ Subpart 30.1 - <b>General</b></li> <li>○ Subpart 30.2 - <b>Presolicitation</b></li> <li>○ Subpart 30.3 - <b>Evaluation and Award</b></li> <li>○ Subpart 30.4 - <b>Postaward</b></li> </ul> </li> <li>● “<b>Definitions</b>” at 30.001, are retained, streamlined, and updated for clarity.</li> <li>● Subpart “<b>30.1 - General</b>” is retained and updated to consolidate helpful reference information: <ul style="list-style-type: none"> <li>○ The references in the previously reserved <b>Subparts 30.3 (CAS Rules and Regulations), 30.4 (Cost Accounting Standards), and 30.5 (Cost Accounting Standards for Educational Institutions)</b> have been moved into the new section 30.101 as paragraphs (e), (f), and (g).</li> <li>○ References for <b>cognizant Federal agency official (CFAO)</b> and auditor responsibilities and disclosure requirements are added as paragraphs (c) and (d). This information was previously buried deeper within the regulation in Subpart 30.2.</li> <li>○ Note - The FAR Companion Guide provides <b>best practice considerations for coordination with the cognizant Federal agency official (CFAO)</b>.</li> </ul> </li> <li>● Subpart “<b>30.2 - Presolicitation</b>” now logically groups all CAS-related determinations and requirements that a contracting officer must address before a solicitation is issued. It retains, but reorganizes, content such as <b>waiver information and exemptions</b>. <ul style="list-style-type: none"> <li>○ Note - The FAR Companion Guide provides <b>best practice considerations for exemptions and waivers</b>.</li> </ul> </li> <li>● Subpart “<b>30.3 - Evaluation and Award</b>” now logically groups all CAS-related activities that occur after proposals are received but before a contract is awarded. It retains and reorganizes content such as <b>contractor disclosure statements and processing changes identified pre-award</b> (e.g., unilateral, or desirable changes to a contractor's cost accounting practices identified during the evaluation phase).</li> <li>● Subpart “<b>30.4 - Postaward</b>” is now the comprehensive location for all postaward CAS administration activities. It retains and reorganizes content such as <b>CAS administration responsibilities, processing changes, materiality, remedies,</b></li> </ul>

	<p><b>resolving cost impacts, and subcontract administration.</b></p> <ul style="list-style-type: none"> <li>• The following provisions and clauses are <b>retained with edits</b> (mostly to reflect new cross-references within the part). <ul style="list-style-type: none"> <li>○ 52.230-1 Cost Accounting Standards Notices and Certifications <ul style="list-style-type: none"> <li>■ Alternate I is deleted. This alternate applied only to contracts with educational institutions contemplated prior to July 1, 1997. As this date is long past, the alternate is obsolete and its removal updates the regulation</li> </ul> </li> <li>○ 52.230-2 Cost Accounting Standards</li> <li>○ 52.230-3 Disclosure and Consistency of Cost Accounting Practices</li> <li>○ 52.230-4 Disclosure and Consistency of Cost Accounting Practices-Foreign Concerns</li> <li>○ 52.230-5 Cost Accounting Standards-Educational Institution</li> <li>○ 52.230-6 Administration of Cost Accounting Standards</li> </ul> </li> <li>• The following provision was retained with no changes to the text: <ul style="list-style-type: none"> <li>○ 52.230-7 Proposal Disclosure-Cost Accounting Practice Changes</li> </ul> </li> </ul>
Removed	<ul style="list-style-type: none"> <li>• There are no longer six subparts. Content from subparts <b>30.5 and 30.6 is moved and reorganized</b> within the new part structure.</li> <li>• The contact information for "<b>Cost Accounting Standards Board Publication</b>," formerly at section 30.102, is removed and the part now includes a direct hyperlink to the electronic Code of Federal Regulations (eCFR) providing immediate access to the source regulations.</li> <li>• The prescription at 30.201-3(b), which applied to awards contemplated to an <b>educational institution prior to 1997</b> is obsolete and removed.</li> <li>• Instructions for contracting officers to support the determination of a contract's exemption from cost accounting standards was moved from 30.202-7 (Adequacy determinations) to the FAR Companion Guide.</li> </ul>

This table is not an exhaustive list.

#### 4. Instructions.

- The Department of Education's acquisition workforce shall follow the RFO Part 30 and corresponding 52 model deviation text instead of FAR Part 30 and 52 as codified at 48 CFR Chapter 1. The Council's RFO Part 30 model deviation text is available at <https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-30> and is incorporated into this class deviation. A separate Acquisition Alert will be issued for any corresponding changes to the EDAR.

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

- For new solicitations or contracts, when using any provisions or clauses that have been revised, utilize the RFO model deviation language at <https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-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.
  - Review templates and related standard operating procedures to align with this deviation and remove unnecessary processes and steps.
5. **Training.** Acquisition Professionals are highly encouraged to complete “Practitioner Album: FAR Part 30 - Cost Accounting Standards Administration” at [https://www.acquisition.gov/sites/default/files/practitioner\\_albums/far-part-30-cost-accounting-standards-administration/content/index.html#/](https://www.acquisition.gov/sites/default/files/practitioner_albums/far-part-30-cost-accounting-standards-administration/content/index.html#/) within 30 days. Please complete the Practitioner Album and mark “yes” under the completion attestation within FAI CSOD.
  6. **Effective Date.** This class deviation to FAR Part 30 is effective November 3, 2025, and remains in effect until rescinded or incorporated into the FAR.
  7. **Points of Contact.** Direct questions regarding this class deviation to your respective policy points of contact.
  8. **Enclosure.** Determination and Findings - Class Deviation for the Revolutionary FAR Overhaul

**DETERMINATION AND FINDINGS**  
Department of Education, All Contracting Activities  
Class Deviation for the Revolutionary FAR Overhaul

This approves a class deviation to all Federal Acquisition Regulation (FAR) and Department of Education Acquisition Regulation (EDAR) parts for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text.

**Findings**

On April 15, 2025, the Executive Order (E.O.) 14275 on Restoring Common Sense to Federal Procurement was signed. Section 2 of the E.O. establishes the policy that the FAR "should only contain provisions required by statute or essential to sound procurement, and any FAR provisions that do not advance these objectives should be removed."

The FAR is being updated to:

- Remove language that is not required by statute
- Remove duplicative or outdated language
- Clarify or provide more plain language
- Revise language for the new FAR framework
- Retain language necessary for governmentwide acquisition standards

This project is referred to as the Revolutionary FAR Overhaul (RFO) initiative.

In explaining the Federal Acquisition System, the RFO FAR Part deviation text establishes bedrock principles. Most centrally, it sets a "mission first" message at the top of the guiding principles. The RFO model deviation also increases the emphasis on the best use of taxpayer dollars and calls out the value of time as another guiding principle. Additionally, it retains a focus on satisfying the customer, maximizing use of commercial products and services, promoting competition, and encouraging innovation.

The FAR Council Deviation guidance allows for agencies to deviate agency acquisition regulation supplements as it relates to the RFO.

**Determination**

In accordance with FAR 1.404 and EDAR 3401.404, I hereby issue a class deviation for the use of all RFO model deviation texts and corresponding EDAR deviations. The adoption date for each RFO part model deviation text will be the date of the corresponding Acquisition Alert. EDAR deviation texts may be issued in a separate Acquisition Alert. All Department of Education contracting activities must follow the RFO model deviation texts instead of the FAR Parts codified at 48 CFR. Should the language of the RFO FAR contradict any statutorily granted procurement authorities to the Department of Education including the Office of Federal Student Aid, the statutorily granted authorities prevail.

In the unlikely event that the Department wishes to vary from a RFO model deviation text, a separate deviation will be issued. This class deviation will remain in effect until incorporated into the FAR, EDAR or rescinded.

**RICHARD LUCAS** Digitally signed by RICHARD LUCAS  
Date: 2025.05.31 08:30:12 -04'00'

Richard Lucas

Acting Chief Acquisition Officer (CAO)

Date