



# UNITED STATES DEPARTMENT OF EDUCATION

## OFFICE OF FINANCE AND OPERATIONS

September 25, 2025

### ACQUISITION ALERT 2025-34

TO: Heads of Contracting Activities

FROM: Calvin J. Mitchell Jr. **CALVIN MITCHELL** Digitally signed by CALVIN MITCHELL  
Deputy Assistant Secretary for the Office of Acquisition Management  
Senior Procurement Executive  
Date: 2025.09.25 12:51:11 -04'00'

SUBJECT: FAR Class Deviation for FAR Part 48

- 1. Purpose.** This Acquisition Alert (AA) adopts a class deviation to Federal Acquisition Regulation (FAR) Part 48 for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text to FAR Part 48.
- 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 48, Value Engineering, has been updated to be more direct, active, and accessible. The model deviation text removes nearly 3,000 words (70%) from the current language.

Statutory and executive requirements retained in the RFO FAR Part 48 model deviation include, but may not be limited to, the following:

- 41 U.S.C. § 1711, Value Engineering
- OMB Circular A-131, Value Engineering

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202-4500  
[www.ed.gov](http://www.ed.gov)

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

Change	Description
<b>Retained</b>	<ul style="list-style-type: none"> <li>• Sections 48.101, “<b>General</b>”, and 48.102, “<b>Policies</b>”, are retained and significantly streamlined.</li> <li>• Prescriptive information previously covered within section 48.104, “<b>Sharing arrangements</b>” is retained in the following clauses: <ul style="list-style-type: none"> <li>○ 52.248-1 covers information previously at 48.104-1, “<b>Determining sharing period</b>”</li> <li>○ 52.248-1(f) and (g) covers information previously at 48.104-2, “<b>Sharing acquisition savings</b>”</li> <li>○ 52.248-1(j) covers information previously at 48.104-3, “<b>Sharing collateral savings</b>”</li> <li>○ 52.248-1(i)(5) covers information previously at 48.104-4, “<b>Sharing alternative-no-cost settlement method</b>”</li> </ul> </li> <li>• Prescriptive information previously covered in section 48.105, “<b>Relationship to other incentives</b>” is retained in clause 52.248-1(k).</li> <li>• All clauses are retained with no changes to the text. <ul style="list-style-type: none"> <li>○ 52.248-1 Value Engineering</li> <li>○ 52.248-2 Value Engineering—Architect-Engineer</li> <li>○ 52.248-3 Value Engineering—Construction</li> </ul> </li> </ul>
<b>Removed</b>	<ul style="list-style-type: none"> <li>• Section 48.000, “<b>Scope of Part</b>” is removed as the content is self-evident and did not add value.</li> <li>• The following terms are removed from section 48.001, “<b>Definitions</b>” as they were duplicative of definitions in clause 52.248-1, Value Engineering: <ul style="list-style-type: none"> <li>○ Government costs</li> <li>○ Negative instant contract savings</li> <li>○ Net acquisition savings</li> </ul> </li> <li>• Information in section 48.102(f) on <b>calculating profit or fees for value engineering change proposal savings</b> will be covered in the FAR Companion Guide.</li> <li>• Section 48.103, “<b>Processing value engineering change proposals</b>” is removed because required information is covered in the clauses at 52.248-1 and 52.248-3. Additional information on implementing approaches and principles will be covered in the FAR Companion Guide.</li> <li>• Information within section 48.104, on <b>establishing sharing periods and rates</b> will be covered in 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 48 and corresponding 52 model deviation text instead of FAR Part 48 and 52 as codified at 48 CFR Chapter 1. The Council’s RFO Part 48 model deviation text is available at <https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-48> and is incorporated into this class deviation. There is no EDAR Part 3448 and therefore no corresponding changes to EDAR are necessary.
  - 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 48 - Value Engineering” at [https://www.acquisition.gov/sites/default/files/practitioner\\_albums/far-part-48-value-engineering/content/index.html#/](https://www.acquisition.gov/sites/default/files/practitioner_albums/far-part-48-value-engineering/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 48 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