



OFFICE OF MISSION SUPPORT

WASHINGTON, D.C. 20460

MEMORANDUM

DATE: September 19, 2025

SUBJECT: Environmental Protection Agency (EPA) Interim Policy Notice (IPN) 25-19, Federal Acquisition Regulation (FAR) Class Deviation, RFO-2025-46, for FAR Part 46 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

FROM: Stefan Martiyan
EPA Senior Procurement Executive
Office of Acquisition Solutions

TO: EPA Acquisition Community

1. Purpose. This IPN approves a class deviation to the FAR for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text to FAR Part 46.

2. Background. [Executive Order \(E.O.\) 14275 on 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 46, Quality Assurance, has been updated for clarity and usability.

Statutory requirements and presidential directives retained in the RFO FAR Part 46 model deviation include, but are not limited to, the following:

- 41 U.S.C. § 1711, Value Engineering
- 41 U.S.C. § 3307, Preference for Commercial Products and Commercial Services
- Pub. L. 103-355, Federal Acquisition Streamlining Act of 1994 (FASA)
- Pub. L. 112-81 Sec 818, Detection and Avoidance of Counterfeit Electronic Parts

Change	Description
Retained	<ul style="list-style-type: none"> ● Subparts 46.1, 46.2, 46.3, 46.4, 46.5, 46.6, 46.7, 46.8 and the sections therein, remain mostly intact and are streamlined, with some shifting and reorganizing of sections and subsections throughout. ● All “Definitions” at 46.101 are retained. ● All existing clauses are retained (or remain reserved if previously reserved) with no changes to the text.
Removed	<p>Contractor Responsibilities – Redundant</p> <p>Section 46.105 Contractor Responsibilities is deleted and marked reserved, as the content was redundant to contract clauses.</p> <p>Authority for use of warranties – Otherwise Unnecessary</p> <p>Section 46.704 Authority for use of warranties is deleted and marked reserved. This section stated that warranty use must be approved by agency procedures. This language does not need to be included in the FAR. Thereby this language will be moved and added to the EPA Acquisition Policy (EPAAP) Chapter 46 via a Change Notice.</p>

*This table is not an exhaustive list

4. Instructions. The EPA acquisition workforce must follow the RFO Part 46 model deviation text instead of FAR Part 46 as codified at 48 CFR Chapter 1. The Council’s RFO Part 46 model deviation text is available at [Acquisition.gov/far-overhaul](https://www.acquisition.gov/far-overhaul) and is incorporated into this class deviation. At this time there is no impact to EPA’s Acquisition Regulations (EPAAR) or EPA Acquisition Policy (EPAAP).

5. Applicability. This class deviation applies to all EPA procurements.

6. Authority. This class deviation is issued under the authority of E.O. 14275, [OMB M-25-26](#), and 48 CFR 1.4 and RFO FAR 1.304.

7. Effective Date. This class deviation is effective immediately and remains in effect until rescinded or incorporated into the FAR.

8. Points of Contact. Questions regarding this class deviation may be directed to OMS-ARM-OAS-AcquisitionPolicy@epa.gov.