



Office of the Chief
Acquisition Officer

Date: July 25, 2025

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Chief Acquisition Officer

To: Office of the Chief Acquisition Officer (OCAO)

Subject: CLASS DEVIATION (CD) in Support of Executive Order (EO) 14275,
"Restoring Common Sense to Federal Procurement" - Deviation to FAR Part 18,
Foreign Acquisitions

1. Purpose

This Class Deviation (CD) implements the FAR Council's model deviation text for FAR Part 18, "Foreign Acquisition." This action aligns with Executive Order (EO) 14275, "Restoring Common Sense to Federal Procurement," and the Revolutionary FAR Overhaul (RFO) initiative. The revised FAR Part 18 describes streamlined acquisition policies and procedures for conducting foreign acquisitions. Burdensome, duplicative, or outdated language not required by statute has been removed. Key changes include:

- Streamlining paperwork and processes for international procurements.
- Emphasizing compliance with statutory requirements for foreign acquisitions.
- Clarifying procedures for acquisitions conducted outside the United States.
- Simplifying language related to international agreements and trade acts.

2. Background

EO 14275, signed on April 15, 2025, established a policy that the FAR should contain only provisions required by statute or those essential for sound procurement. To implement this EO, the Office of Federal Procurement Policy (OFPP) is leading the Revolutionary FAR Overhaul (RFO) initiative, supported by the Federal Acquisition Regulatory Council. The initiative aims to eliminate unnecessary regulations and policies across all levels of the federal government.

Further guidance was provided by OMB Memorandum M-25-26, "Overhauling the Federal Acquisition Regulation," issued on May 2, 2025.

The RFO FAR Part 18 model deviation text provides a simplified framework for foreign acquisition, emphasizing a mission-first approach, prudent use of taxpayer dollars, and efficiency in international procurement operations.

3. Summary of Changes

FAR part 18, Emergency Acquisitions, has been updated to streamline the acquisition flexibilities available for emergency acquisitions, and to retain increased thresholds, commercial procedures, and award preferences during an emergency.

Statutory requirements retained in the RFO FAR part 18 deviation include, but are not limited to, the following:

- 41 U.S.C. § 1903, Special Emergency Procurement Authority
- 42 U.S.C. Ch. 68, Stafford Disaster Relief and Emergency Assistance Act
- 10 U.S.C. § 101(a)(13), Contingency Operation
- 22 U.S.C. § 2292b, International Disaster Assistance
- 46 U.S.C. § 55305, Cargo Preference Act of 1954
- 41 U.S.C. § 153, Contract in Support of Humanitarian or Peacekeeping Operation

Important Note: General acquisition flexibilities that support emergency procurement have been removed and are now located at <https://acquisition.gov/emergencyprocurement>.

Change	Description
Retained	<ul style="list-style-type: none">● Increased thresholds for:<ul style="list-style-type: none">○ Contingency operations○ Defense or recovery from certain events, to include cyber, nuclear, biological, chemical, or radiological attacks○ International disaster assistance○ Emergency or major disaster response○ Humanitarian or peacekeeping operations● Statutory requirements related to:<ul style="list-style-type: none">○ Emergency declarations and major disaster declarations○ Humanitarian or peacekeeping operations○ Award preference for local organizations● Waiver of provisions for ocean transportation by U.S. flag vessels.
Removed	<ul style="list-style-type: none">● General acquisition flexibilities covered in other sections of the FAR that support emergency procurement are now listed at https://acquisition.gov/emergencyprocurement.● References to resources such as the National Response Framework and Office of Federal Procurement Policy (OFPP) "Emergency Acquisitions Guide" are expected to be moved to non-regulatory guidance, as needed.

This table is not an exhaustive list.

4. FAR Streamlining

As part of the RFO, the FAR will be streamlined to include only statutory requirements. Non-statutory content will be moved to new buying guides, collectively known as the Strategic Acquisition Guidance (SAG). The Council will first issue model deviation guidance by FAR part, followed by formal rulemaking through the notice and comment process. Agencies have 30 days to issue class deviations based on the model text once released.

A. Streamlining Agency Acquisition Supplements: Agencies must streamline their FAR supplements by removing regulations not based on statute or executive orders and by aligning with the FAR Council's deviation guidance. Supporting policies must also be updated to reflect these changes. This is an excellent opportunity for NARA to formally publish a streamlined NARA FAR Supplement, ensuring consistency with the new FAR.

B. FAR Buying Guides and Supplemental Companion Guides (CG): As the FAR and agency supplements are streamlined, helpful non-regulatory content will be moved to these new FAR Buying Guides. These guides will offer practical instructions and best practices for implementing effective contracting methods, including for foreign acquisition. The RFO Part 18 model deviation text is a plain language version that will be adhered to by all NARA contracting personnel.

5. Instructions

The NARA acquisition workforce shall follow the RFO Part 18 deviated text instead of FAR Part 18 as codified at 48 CFR Chapter 1, Subchapter C, Part 18. The FAR Council's RFO text is available at [FAR Overhaul - Part 18 | Acquisition.GOV](#) and is incorporated by reference into this deviation.

6. Applicability

The requirements in this CD apply to all new solicitations and contract actions involving foreign acquisition or performance outside the United States, issued or awarded on or after **July 25, 2025**.

7. Authority

This class deviation is issued under the authority of E.O. 14275, OMB M-25-26, 48 CFR Subpart 1.4.

8. Effective Date

This CD is effective as of the date signed and shall remain in effect until the provisions of the RFO are formally implemented in the FAR through a final rulemaking.

cc: NGC