



National Aeronautics and
Space Administration
Washington, DC 20546

Procurement Class Deviation

PCD 25-08

July 11, 2025

CLASS DEVIATION FROM FEDERAL ACQUISITION REGULATION (FAR) AND NASA FAR SUPPLEMENT (NFS) PARTS 18 AND 1818 TO IMPLEMENT THE REVOLUTIONARY FAR OVERHAUL (NASA Case 2025-N010)

PURPOSE: To provide a Class Deviation from the FAR to implement the FAR Council's model deviation text to FAR Part 18, Emergency Acquisitions, and deviation to NFS 1818.

BACKGROUND: On April 15, 2025, the Executive Order (E.O.) 14275, ["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." To implement E.O. 14275, the Office of Federal Procurement Policy (OFPP) is leading the **Revolutionary FAR Overhaul (RFO)** initiative. This effort is supported by the Federal Acquisition Regulatory Council (the Council) member agencies—which includes GSA, DOD, NASA, along with other agencies. In line with the E.O., the initiative aims to eliminate unnecessary regulations and policies across all levels of the federal government.

The Office of Management and Budget (OMB) memorandum, M-25-25 issued on May 2, 2025, titled, Overhauling the Federal Acquisition Regulation, provided additional guidance to federal agencies regarding the FAR overhaul.

FAR Streamlining. As part of the RFO, the FAR will be streamlined to include only statutory requirements, while non-statutory content will move to new buying guides, collectively forming 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 will have 30 days to issue class deviations based on the model text once it is released.

Streamlining Agency Acquisition Supplements. Agencies must streamline their FAR supplements by removing regulations not based on statute or executive orders and aligning with the FAR Council's deviation guidance. Supporting policies must also be updated to reflect these changes. This approach ensures the NASA FAR Supplement (NFS) remains consistent with the streamlined FAR.

FAR Buying Guides and NFS Companion Guide (CG) (coming soon). As the FAR and the NFS are streamlined, helpful non-regulatory content will be moved to new FAR Buying Guides and NFS CG. These guides are intended to offer practical instructions and best practices for implementing effective contracting methods.

RFO Part 18, Emergency Acquisitions, is the fourth of the model deviations released by the FAR Council. RFO Part 18 establishes flexibilities contracting officers can exercise when the country experiences an emergency or urgent need. Burdensome, duplicative, or outdated language and language not required by statute have been removed from FAR Part 18. This plain language version of FAR Part 18 shall be adhered to.

To align with the RFO FAR Part 18, the NFS 1818, Emergency Acquisitions, is revised to remove non-statutory and outdated language. This deviation implements the revised RFO Part 18 and NFS Part 1818.

GUIDANCE:

(1) Contracting officers shall follow the RFO Part 18 deviated text instead of FAR Part 18 as codified at 48 CFR Chapter 18. The FAR Council's RFO text is available at <https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-18>.

(2) COs shall also follow the NFS Part 1818 deviated text enclosed within this deviation.

ACTION REQUIRED BY CONTRACTING OFFICERS: Effectively immediately, ensure that new contract actions issued on or after the effective date complies with the policy in the PCD.

EFFECTIVE DATE: This PCD is effective as dated and shall remain in effect until implemented in the FAR and NFS or otherwise rescinded.

PROVISION AND CLAUSE CHANGES:

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Enclosure

Changes in the NFS Deviation text below are identified as follows:
Deletions shown as ~~strike-throughs~~ and additions are shown as **[bold in brackets]**.

**PART 1818
EMERGENCY ACQUISITIONS**

**TABLE OF CONTENTS
[RESERVED]**

~~1818.000-70~~ ~~Pre-Emergency Planning~~

**PART 1818
EMERGENCY ACQUISITIONS
(September 2015)
[RESERVED]**

TABLE OF CONTENTS

1818.000-70 — Pre-Emergency Planning

PART 1818

Emergency Acquisitions

1818.000-70 Pre-Emergency Planning.

~~(a) Contracting officers shall include in Performance Work Statements or Statements of Work in contracts for major, on-site support activities, such as general facilities support/base operations; property management; security/guard/law enforcement services; information technology services to include information technology infrastructure maintenance and service, language substantially the same as follows:~~

Emergency Preparedness and Response

~~The Contractor's obligation may include resolution of unusual or emergency situations. The Contractor may be required to assist NASA, within the general scope of work, in preparation for, or in response to emergencies. Obligations under this requirement shall only arise when one or more of the criteria at FAR 18.001, enabling NASA to utilize "Emergency Acquisition Flexibilities," are met.~~

~~If the emergency preparedness and response requirements result in changes to the contract, all contract adjustments will be processed in accordance with the changes clause of this contract.~~

~~(b) Contracting officers should list contracts that contain the language referenced in 1818.000-70(a) in the Center Continuity of Operations Plans.~~

CLEAN REGULATORY VERSION WITH CHANGES INCORPORATED:

PART 1818
EMERGENCY ACQUISITIONS

TABLE OF CONTENTS

RESERVED

PART 1818
EMERGENCY ACQUISITIONS
RESERVED