



National Aeronautics and  
Space Administration  
Washington, DC 20546

# Procurement Class Deviation

PCD 25-16

September 7, 2025

---

## CLASS DEVIATION FROM FEDERAL ACQUISITION REGULATION (FAR) PART 5 AND NASA FAR SUPPLEMENT (NFS) PART 1805 TO IMPLEMENT THE REVOLUTIONARY FAR OVERHAUL (NASA Case 2025-N018)

**PURPOSE:** To provide a Class Deviation from the FAR to implement the FAR Council's model deviation text to FAR Part 5, Publicizing Contract Actions and deviation to NFS 1805.

**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— General Services Administration, Department of Defense and 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-25-26 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 5 establishes policies and procedures for publicizing contract opportunities and award information in the Government Point of Entry. Burdensome, duplicative, or outdated language and language not required by statute have been removed from FAR Part 5. This plain language version of FAR Part 5 shall be adhered to.

To align with the RFO FAR Part 5, the NFS 1805, is revised to remove non-statutory and outdated language. This deviation implements the revised RFO Part 5 and NFS Part 1805.

***GUIDANCE:***

(1) Contracting officers shall follow the RFO Part 5 deviated text instead of FAR Part 5 as codified at 48 CFR Chapter 5. The FAR Council's RFO text is available at [FAR Overhaul - Part 5 | Acquisition.GOV](#).

(2) COs shall also follow the NFS Part 1805 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:*** N/A

***HEADQUARTERS CONTACT:*** Erica D. Jones, NFS Manager, HQs Procurement and Grants Policy Division, email: [erica.d.jones@nasa.gov](mailto:erica.d.jones@nasa.gov).

Marvin Horne  
Digitally signed by Marvin Horne  
Date: 2025.08.27 05:40:16  
-04'00'

**Marvin L. Horne**  
Acting Assistant Administrator for Procurement  
**Enclosure**

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

**PART 1805**  
**PUBLICIZING CONTRACT ACTIONS**

**TABLE OF CONTENTS**

<b>SUBPART</b> <del>1805.101</del>	<b><u>1805.1</u></b>	<b><del>DISSEMINATION OF INFORMATION</del></b> <del>Methods of disseminating information.</del>
<b>SUBPART</b> <del>1805.205</del> <del>1805.207</del> <del>1805.207-70</del>	<b><u>1805.2</u></b>	<b><del>SYNOPSSES OF PROPOSED CONTRACT ACTIONS</del></b> <del>Special Situations.</del> <del>Preparation and transmittal of synopses.</del> <del>Synopses of Architect Engineer Services.</del>
<b>SUBPART</b> <del>1805.303[2]</del> <del>1805.303-70</del> <del>1805.303-71</del>         <del>1805.303-72</del>	<b><u>1805.3</u></b>	<b><del>SYNOPSSES OF CONTRACT AWARDS</del></b> <b><del>[Public] [a]Announcement of contract awards.</del></b> <del>Definitions.</del> <del>Actions requiring NASA Headquarters public</del> <del>announcement or Administrator Notification of a</del> <del>Significant Contract Action (ANOSCA)</del> <del>Announcement (PA).</del> <del>Procedures.</del>
<b>SUBPART</b> <del>1805.402</del> <del>1805.403</del>	<b><u>1805.4</u></b>	<b><del>RELEASE OF INFORMATION</del></b> <del>General public.</del> <del>Requests from Members of Congress.</del>
<b>SUBPART</b> <del>1805.502</del>	<b><u>1805.5</u></b>	<b><del>PAID ADVERTISEMENTS</del></b> <del>Authority.</del>
<b>SUBPART</b> <del>1805.7001</del>	<b><u>1805.70</u></b>	<b><del>NASA Strategic Sourcing Repository</del></b> <del>General</del>

## PART 1805 PUBLICIZING CONTRACT ACTIONS

### Subpart 1805.1—Dissemination of Information

#### **~~1805.101 Methods of disseminating information.~~**

~~(b)(4) For NASA policy regarding paid advertisements, see 1805.502.~~

### Subpart 1805.2—Synopsises of Proposed Contract Actions

#### **~~1805.205-70 Special situations.~~**

~~In accordance with NPD 5000.2, Small Business Subcontracting Goals, a Sources Sought Notice shall be posted for a minimum of 10 business days for proposed contract actions that exceed \$50 million. The posting requirement is optional for proposed contract actions of \$50 million or less.~~

#### **~~1805.207 Preparation and transmittal of synopsis.~~**

~~(c)(10) The description of the duration of the contract period shall include the basic contract and any option period, including the period permitted by FAR 52.217-8, Option to Extend Services.~~

~~(c)(15) Notices for non-competitive solicitations, including non-competitive follow-on actions to contracts initially awarded utilizing full and open competition, shall provide sufficient information regarding the proposed requirement to allow potential sources to determine whether they possess the requisite capabilities and to make an informed business decision regarding whether to respond.~~

#### **~~1805.207-70 Synopsises of Architect-Engineer Services.~~**

~~(a) Architect-Engineer Services.~~

~~(1) Each notice publicizing the acquisition of architect-engineer services shall be headed "C. Architect-Engineer Services."~~

~~(2) In addition to meeting the requirements of FAR 5.207(c), the project description shall—~~

~~(i) State the relative importance the Government attaches to the significant evaluation criteria and the date by which responses to the notice must be received, including submission of Standard Form 330, Architect-Engineer Qualifications, Part I—Contract Specific Qualifications, if required;~~

~~(ii) Describe any specialized qualifications, security classifications, and limitations on eligibility for consideration;~~

~~(iii) Describe qualifications or performance data required from architect-engineer firms;~~  
~~and~~

~~(iv) If the acquisition is to be set aside for small business, state this fact, indicating the specific size standard to be used and requiring that eligible responding firms submit a small business representation.~~

### Subpart 1805.3—Synopsises of Contract Awards

#### **1805.303 [2] [Public] [a]Announcement of contract awards.**

(a) In lieu of the threshold cited in FAR 5.303[2](a), a NASA Headquarters public announcement is required for award of contract actions that have a total anticipated value, including unexercised options, of \$7 million or greater.

(1) Agency procedure is to make a public announcement of awards \$7 million or greater when the authority of section 8(a) of the Small Business Act is utilized.

~~[PN 20-04]~~

#### **~~1805.303-70 Definitions.~~**

~~“Anticipated values” as used in this subpart, means—~~

- ~~(a) The estimated value of the contract (including unexercised options);~~
- ~~(b) The expected definitized value of a letter contract or undefinitized contract action; or~~
- ~~(c) The maximum value of an indefinite delivery, time and material, or labor hour contract.~~

~~“Contract actions” as used in this subpart, means in addition to the definition found in FAR 5.001, letter contracts and undefinitized contract actions.~~

~~[PN 20-04]~~

#### **~~1805.303-71 Actions requiring NASA Headquarters public announcement or Administrator Notification of a Significant Contract Action (ANOSCA)~~**

~~(a) NASA Headquarters public announcement. Contracting officers shall submit a NASA HQ public announcement for the following:~~

~~(1) Contract actions with anticipated values equal to or greater than \$7 million, but less than \$30 million.~~

~~(2) Exercise of option(s) with values equal to or greater than \$30 million.~~

~~(b) ANOSCA and NASA Headquarters public announcement. Contracting officers shall submit both an ANOSCA and a NASA Headquarters public announcement for contract actions with anticipated values equal to or greater than \$30 million.~~

~~(c) For other potentially significant contract actions at any dollar value that may be of major interest to NASA Headquarters or have public information implications, the contracting officer shall contact the cognizant Procurement Strategic Operations Division Procurement Analyst in Headquarters’ Office of Procurement to determine whether an ANOSCA or NASA Headquarters public announcement is required. Examples of other potentially significant actions may include—~~

- ~~(1) Terminations;~~
- ~~(2) Contract modifications;~~
- ~~(3) Issuance of stop work orders;~~
- ~~(4) Classified actions;~~

- (5) Cost overrun modifications, or
- (6) Orders placed under single or multiple award contracts (including GSA).

~~[PN 20-04]~~

**~~1805.303-72 Procedures.~~**

~~(a)(1) Contract actions requiring an ANOSCA or NASA Headquarters public announcement shall not be distributed nor shall any source outside NASA be notified of its status until the following procedures have been completed (However, see below for the exception for Small Business Set Aside notifications to Offerors prior to ANOSCA approval, as described in (a)(3)(i)):~~

~~(2) The contracting officer shall prepare an ANOSCA or NASA Headquarters public announcement using the NASA Notification of Contract Action Template.~~

~~(3) The NASA Notification of Contract Action shall be submitted electronically encrypted to the cognizant Procurement Operations Division Procurement Analyst in Headquarters' Office of Procurement.~~

~~(i) For set aside actions under small business programs, the CO shall submit the NASA Notification of Contract Action not later than concurrently with the issuance of the preaward notice to offerors described in FAR 15.503(a)(2). Following the required time period for small business size challenges described in FAR 19.302(d), the CO shall inform the cognizant Procurement Strategic Operations Division Procurement Analyst, via email, if any size challenges were received. If NASA does not receive any timely size challenges, then the procurement analyst shall complete the ANOSCA routing process.~~

~~(ii) For actions to exercise an option, the CO shall submit the NASA Notification of Contract Action immediately after the issuance of the preliminary notice of intent to exercise an option, in accordance with FAR 52.217-9 for services, or when providing the written notice to the contractor to exercise an option as permitted by the option clause in the contract.~~

~~(iii) For all other actions, the NASA Notification of Contract Action shall be submitted at least three (3) business days prior to the planned public announcement.~~

~~(4) The contracting officer shall confirm receipt of the NASA Notification of Contract Action from the cognizant Procurement Strategic Operations Division Procurement Analyst in Headquarters' Office of Procurement.~~

~~(5) NASA Headquarters Office of Legislative and Intergovernmental Affairs will coordinate the timing for notifying offerors with the contracting officer such that the offerors are notified prior to Congress, and Congress is notified prior to public announcement.~~

~~(a) Installations may proceed with award and local release of the information after NASA Headquarters Office of Communications makes the public announcement, which occurs at 5:00 PM ET on the agreed upon date, consistent with FAR 5.303.~~

~~[PN 20-04, 23-01]~~

## **Subpart 1805.4—Release of Information**

### **1805.402—General public.**

(1) Unless the head of the contracting activity determines that disclosure would be prejudicial to the interests of NASA, the following information on NASA acquisitions may be released:

- (i) The names of firms invited to submit offers.
- (ii) The names of firms that attended any pre-bid or pre-proposal conferences.

(2) Other requests for information under the Freedom of Information Act shall be processed in accordance with FAR 24.2 and [1824.2](#).

### **1805.403—Requests from Members of Congress.**

(a) All proposed replies to congressional inquiries shall be prepared and forwarded, with full documentation, to the Headquarters Office of Legislative and Intergovernmental Affairs for approval and release.

## **Subpart 1805.5—Paid Advertisements**

### **1805.502—Authority.**

Use of paid advertisements for procurement purposes (except FBO announcements) is not authorized in NASA.

## **Subpart 1805.70—NASA Strategic Sourcing Repository**

### **1805.7001—General.**

The [NASA Office of Procurement Strategic Sourcing Repository](#) is a searchable tool used to identify existing NASA contracts available for Centers to use to fulfill emerging needs. In order to keep the repository up to date, the contracting officer shall complete and submit the information specified on the [Office of Procurement Strategic Sourcing Publicizing Instructions](#) webpage not later than thirty days after award of an Agency wide contract, Multi-Center contract, or Center wide contract. The definitions for Agency wide, Multi-Center, and Center wide contract can be found on the [Office of Procurement Strategic Sourcing website](#).

*[PN 18-04, PN 20-07]*

CLEAN REGULATORY VERSION WITH CHANGES INCORPORATED:

**PART 1805**  
**PUBLICIZING CONTRACT ACTIONS**

**TABLE OF CONTENTS**

<b>SUBPART</b>	<b><a href="#"><u>1805.3</u></a></b>	<b>SYNOPSIS OF CONTRACT AWARDS</b>
1805.302		Public announcement



## **Subpart 1805.3—Synopses of Contract Awards**

### **1805.302 Public announcement.**

In lieu of the threshold cited in FAR 5.302(a), a NASA Headquarters public announcement is required for award of contract actions that have a total anticipated value, including unexercised options, of \$7 million or greater.