



Pension Benefit Guaranty Corporation
445 12th St, SW, Washington, DC 20024

Class Deviation PBGC-2026-0001

MEMORANDUM FOR PBGC ACQUISITION WORKFORCE

Date: February 3, 2026

From: Damon Q. McClure, Senior Procurement Executive

Subject: FAR Class Deviation for FAR Part 1 in Support of Executive Order on Restoring Common Sense to Federal Procurement

1. Purpose: This class deviation is issued in accordance with FAR 1.304 and pursuant to the Office of Federal Procurement Policy memorandum entitled, “Deviation Guidance to Support the Overhaul of the Federal Acquisition Regulation,” to provide contracting officers with revised FAR Part 1 language and remove FAR provision 52.201-1.

2. Background: On April 15, 2025, [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- Remove duplicative or outdated language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 the 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 1 model deviation text establishes bedrock principles. Most centrally, it sets a “mission first” message at the top of the guiding principles. The RFO FAR Part 1 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 the use of commercial products and services, promoting competition, and encouraging innovation.

Statutory requirements retained in the RFO FAR Part 1 model deviation include, but are not limited to, the following:

- 31 U.S.C. 3702, Authority to Settle Claims
- 41 U.S.C. 13 et seq, Acquisition Councils
- 41 U.S.C. 17 et seq, Agency Responsibilities and Procedures
- 41 U.S.C. 1908, Inflation Adjustment of Acquisition Thresholds
- 41 U.S.C. 3102, Delegation and Assignment of Powers, Functions, and Responsibilities

Non-statutory requirements removed from FAR Part 1 include, but are not limited to, the following:

- The list of OMB approved control numbers contained in Subpart 1.1. These control numbers are now listed on [Acquisition.gov](https://www.acquisition.gov)
- Subpart 1.2 - Administration
- Subpart 1.5 - Agency and Public Participation procedures

Other key changes include:

- Class deviations require approval by the FAR Council except where required to implement agency- specific executive or statutory direction.

3. Instructions: The PBGC acquisition workforce shall follow the RFO Part 1 model deviation text instead of FAR Part 1 as codified at 48 CFR Chapter 1. The Council's RFO Part 1 model deviation text is available at [Acquisition.gov/far-overhaul](https://www.acquisition.gov/far-overhaul) and is incorporated into this class deviation.

4. Applicability: This deviation applies to all Pension Benefit Guaranty Corporation solicitations and new contracts.

5. Authority: This class deviation is issued under the authority of Executive Order (E.O.) 14275, [OMB M-25-26](#), 48 CFR Subpart 1.4.

6. Effective Date: This Class Deviation remains in effect until the changes described herein are incorporated in the FAR, superseded, or otherwise rescinded.

7. Point of Contact: Questions or comments on this class deviation may be sent to Jeff Gangi at gangi.jeffrey@pbgc.gov.