



United States  
Department of  
Agriculture

Office of the  
Assistant Secretary  
for Administration

Office of  
Contracting and  
Procurement

1400 Independence  
Ave., SW  
Mailstop 9308  
Room 126-W  
Whitten Building

Washington, DC  
20250-9308

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## MEMORANDUM FOR USDA CONTRACTING ACTIVITIES

**From:** Hilary Erickson  
Senior Procurement Executive  
Office of Contracting and Procurement

**Subject:** Federal Acquisition Regulation (FAR) Class Deviation for FAR Part 34 in  
Support of Executive Order 14275 on Restoring Common Sense to  
Federal Procurement

**1. Purpose.** This memorandum approves a class deviation to Federal Acquisition Regulation (FAR) Part 34 for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text to FAR Part 34.

**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- Remove duplicative or outdated language.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.

FAR Part 34 describes acquisition policies and procedures for use in acquiring major systems consistent with OMB Circular No. A-109; and the use of an Earned Value Management System in acquisitions designated as major acquisitions consistent with OMB Circular A-11, Part 7.

The RFO Part 34 model deviation text retains FAR Subparts 34.1 and 34.2. Subpart 34.1 deals with statutory requirements tied to 50 U.S.C. 4531 et seq. Subpart 34.2 deals with Earned Value Management requirements tied to OMB Circular A-11. Non-statutory requirements removed from FAR Part 34 include the general guidance provided in sections 34.001 through 34.005.

**3. Instructions.** The USDA acquisition workforce shall follow the RFO Part 34 model deviation text instead of FAR Part 34 as codified at 48 CFR Chapter 1. The Council's

RFO Part 34 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 class deviation applies to all USDA procurements.

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

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 Effective Date.** This class deviation is effective immediately and remains in effect until rescinded or incorporated into the FAR.

**7. Points of Contact.** Questions regarding this class deviation may be directed to the USDA Procurement Policy Division at [procurement.policy@usda.gov](mailto:procurement.policy@usda.gov).