



Office of the Chief
Acquisition Officer

Date: July 25, 2025

From: Darnese M. Wilkerson *DMW*
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 43,
Contract Modifications

1. Purpose

This Class Deviation (CD) implements the FAR Council’s model deviation text for FAR Part 43, "Contract Modifications." 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 43 describes streamlined policies and procedures for executing contract modifications. Burdensome, duplicative, or outdated language not required by statute has been removed. Key changes include:

- Streamlining processes for issuing contract modifications.
- Consolidating and simplifying requirements for administrative, change, and supplemental agreements.
- Reducing administrative burden and documentation for routine modifications.
- Revising associated clauses to reflect the streamlined approach.

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 43 model deviation text provides a simplified framework for contract modifications, emphasizing efficiency, flexibility, and the prudent use of taxpayer dollars while ensuring necessary changes to contracts are executed effectively.

3. Summary of Changes

FAR part 43, Contract Modifications, has been streamlined to provide the essential contract modification standards for the workforce to limit risk to the public and government.

Statutory requirements retained in the RFO FAR part 43 model deviation include, but are not limited to, the following:

- 31 U.S.C. § 1501, Documentary Evidence Requirement for Government Obligations
- 31 U.S.C. § 1341, Anti-Deficiency Act
- 41 U.S.C. §§ 7101-7109, Contract Disputes Act of 1978

Change	Description
Retained	<ul style="list-style-type: none"> • Non-statutory definitions and procedures for contract modifications are retained to maintain uniformity across Government. • Instructions for documenting and definitizing change orders are retained and clarified.
Removed	<ul style="list-style-type: none"> • Plain language edits have been made throughout, resulting in a 300 word decrease.

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 contract modifications. The RFO Part 43 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 43 deviated text instead of FAR Part 43 as codified at 48 CFR Chapter 1, Subchapter G, Part 43. The FAR Council's RFO text is available at <https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-43> and is incorporated by reference into this deviation.

6. Applicability

The requirements in this CD apply to all contract modifications issued or processed 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