



OFFICE OF MISSION SUPPORT

WASHINGTON, D.C. 20460

MEMORANDUM

DATE: July 30, 2025

SUBJECT: Environmental Protection Agency (EPA) Interim Policy Notice (IPN) 25-08, Federal Acquisition Regulation (FAR) Class Deviation, RFO-2025-11, for FAR Part 11 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

FROM: Pamela D. Legare
EPA Senior Procurement Executive
Office of Acquisition Solutions

TO: EPA Acquisition Community

1. Purpose. This IPN approves a class deviation to the FAR for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text to FAR Part 11.

2. Background. [Executive Order \(E.O.\) 14275 on Restoring Common Sense to Federal Procurement](#) signed April 15, 2025, mandates a comprehensive review and simplification of the FAR.

The FAR is being updated to:

- Eliminate non-statutory language
- Remove redundant or obsolete language
- Enhance clarity through plain language
- Align with the new FAR framework
- Preserve essential governmentwide acquisition standards

This project is referred to as the Revolutionary FAR Overhaul (RFO) initiative. This initiative will make the FAR more concise, understandable, and focused on core procurement requirements.

3. Summary of Changes. FAR Part 11, Describing Agency Needs, has been streamlined to strengthen clarity and focus, on policies for describing agency needs.

Statutory requirements retained in the RFO FAR Part 11:

- 41 U.S.C § 3306(a) and 10 U.S.C. § 3206, Planning and solicitation requirements
- 41 U.S.C. § 3307 and 10 U.S.C. § 3453, Preference for commercial products and commercial services

- 15 U.S.C. § 637 (d)(4)(f), Additional Powers

Change	Description
Retained	Defense Priorities and Allocations Systems (DPAS), a Department of Commerce regulation in support of approved national defense, emergency preparedness, and energy programs still apply.
Removed	<p>Requirements for establishing delivery or performance schedules are being moved to the FAR Companion Guide. This move allows acquisition teams greater flexibility and discretion to consider techniques which are most appropriate to their acquisition.</p> <ul style="list-style-type: none"> • Prescriptive procedures (e.g., early engagement) have been removed to reduce unnecessary burden. Best practices will be reconciled and shared through the FAR Companion Guide. <p>The following twelve (12) clauses and provisions were removed and should be handled as part of the contractual requirement and/or delivery schedule:</p> <p>The following provisions related to related to the <i>availability of Federal specifications</i>:</p> <ul style="list-style-type: none"> • Availability of Specifications Listed in the GSA Index of Federal Specifications, Standards and Commercial Item Descriptions, FPMR Part 101-29 (52.211-1) • Availability of Defense Specifications, Standards, and Data Item Descriptions in the Acquisition Streamlining and Standardization Information System (ASSIST) Website (52.211-2) • Availability of Defense Specifications, Standards, and Data Item Descriptions in the Acquisition Streamlining and Standardization Information System (ASSIST) Website (52.211-2) • Availability of Defense Specifications, Standards, and Data Item Descriptions in the Acquisition Streamlining and Standardization Information System (ASSIST) Website (52.211-2) <p>The following provisions related to <i>brand name or equal procurements</i>:</p> <ul style="list-style-type: none"> • Brand Name or Equal (52.211-6) • Alternatives to Government – Unique Standards (52.211-7) <p>The following provisions related to <i>delivery schedules for the contract</i>:</p> <ul style="list-style-type: none"> • Time of Delivery (52.211-8) • Desired and Required Time of Delivery (52.211-9) • Commencement, Prosecution, and Completion of Work (for construction contracts only) (52.211-10) <p>The following provisions address variations from firm fixed price contracts:</p> <ul style="list-style-type: none"> • Variation in Quantity (52.211-16) • Delivery of Excess Quantities (52.211-17) • Variation in Estimated Quantity (52.211-18)

*This table is not an exhaustive list

4. Instructions. The EPA acquisition workforce shall follow the RFO Part 11 model deviation text instead of FAR Part 11 as codified at 48 CFR Chapter 11. The Council's RFO Part 11 model deviation text is available at [Acquisition.gov/far-overhaul](https://www.acquisition.gov/far-overhaul) and is incorporated into this class deviation. At this time there is no impact to EPA's Acquisition Regulation (EPAAR) or EPA Acquisition Policy (EPAAP).

5. Applicability. This class deviation applies to all EPA procurements.

6. Authority. This class deviation is issued under the authority of E.O. 14275, [OMB M-25-26](#), and 48 CFR 1.4 and RFO FAR 1.304.

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

8. Points of Contact. Questions regarding this class deviation may be directed to OMS-ARM-OAS-AcquisitionPolicy@epa.gov.