



OFFICE OF MISSION SUPPORT

WASHINGTON, D.C. 20460

MEMORANDUM

DATE: July 30, 2025

SUBJECT: Environmental Protection Agency (EPA) Interim Policy Notice (IPN) 25-04, Federal Acquisition Regulation (FAR) Class Deviation, RFO-2025-34, for FAR Part 34 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

FROM: Pamela D. Legare
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EPA Senior Procurement Executive

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 34.

2. Background. [Executive Order \(E.O.\) 14275 on Restoring Common Sense to Federal Procurement](#), signed on 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: In explaining the Federal Acquisition System, the RFO FAR Part 34 model deviation text establishes guiding principles. The RFO FAR Part 34 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.

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.

Change	Description
Retained	<ul style="list-style-type: none"> Industrial resources essential to national defense (50 U.S.C. 4531 et seq., Presidential authorization for the national defense) Earned Value Management System (EVMS) in major acquisitions (OMB Circular A-11, Preparation, Submission, and Execution of the Budget)
Removed	<ul style="list-style-type: none"> FAR 34.001-34.005 are non-statutory, general guidance that is best managed at the Agency level as necessary.

*This table is not an exhaustive list.

4. Instructions. The EPA acquisition workforce shall follow the RFO Part 34 model deviation text instead of FAR Part 34 as codified at 48 CFR Chapter 34. 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. 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 Subpart 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.