



OFFICE OF FINANCE AND ADMINISTRATION

WASHINGTON, D.C. 20460

MEMORANDUM

SUBJECT: Environmental Protection Agency (EPA) Interim Policy Notice (IPN) 25-17, Federal Acquisition Regulation (FAR) Class Deviation, RFO-2025-38, for FAR Part 38 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

FROM: Stefan Martiyan
EPA Senior Procurement Executive
Office of the Chief Procurement Officer

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MARTIYAN

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STEFAN MARTIYAN
Date: 2026.01.26
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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 38.

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 38, Federal Supply Schedule Contracting, is removed in its entirety. Guidance and procedures for the Schedule program will be moved from FAR Part 38 and subpart 8.4 to [GSAR Part 538](#).

4. Instructions. The EPA acquisition workforce must follow the RFO Part 38 model deviation text instead of FAR Part 38 as codified at 48 CFR Chapter 1. The Council's RFO Part 38 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 This class deviation is effective immediately and remains in effect until rescinded or incorporated into the FAR.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 OFA-OCPO-AcquisitionPolicy@epa.gov.