



OFFICE OF MISSION SUPPORT

WASHINGTON, D.C. 20460

MEMORANDUM

DATE: July 30, 2025

SUBJECT: Environmental Protection Agency (EPA) Interim Policy Notice (IPN) 25-05, Federal Acquisition Regulation (FAR) Class Deviation, RFO-2025-43, for FAR Part 43 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

FROM: Pamela D. Legare
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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 43.

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: FAR Part 43, Contract Modification, 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

Changes	Description
Retained	<ul style="list-style-type: none"> • Non-statutory definitions and procedures for contract modification 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.

*This table is not an exhaustive list.

4. Instructions. The EPA acquisition workforce shall follow the RFO Part 43 as codified at 48 CFR Chapter 43. The Council's RFO Part 43 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 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.