



## OFFICE OF MISSION SUPPORT

WASHINGTON, D.C. 20460

### MEMORANDUM

DATE: July 30, 2025

SUBJECT: Environmental Protection Agency (EPA) Interim Policy Notice (IPN) 25-06, Federal Acquisition Regulation (FAR) Class Deviation, RFO-2025-06, for FAR Part 6 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 6.

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 6, Competition Requirements, has been streamlined to strengthen clarity and focus, helping to ensure procedures that support full and open competition are easier to understand and apply.

Statutory requirements retained in the RFO FAR Part 6 model deviation include, but are not limited to, the following:

- 41 U.S.C. § 1705, Advocates for Competition
- 41 U.S.C. § 3301 and 10 U.S.C. § 3201, Full and Open Competition
- 41 U.S.C. § 3303 and 10 U.S.C. § 3203, Exclusion of Particular Source or Restriction of Solicitation to Small Business Concerns
- 41 U.S.C. § 3304, Use of Noncompetitive Procedures
- 10 U.S.C. § 3204, Use of Procedures Other than Competitive Procedures
- 15 U.S.C. Chapter 14A, Aid to Small Business
- 42 U.S.C. § 5150, Major Disaster and Emergency Assistance, Use of Local Firms and Individuals

Change	Description
Retained	<ul style="list-style-type: none"> <li>• FAR Part 6 continues to apply to all acquisitions, with limited exceptions for specific contracts and orders.</li> <li>• Advocates for Competition, previously at subpart 6.5, has been moved to section 6.003. Details about the role and responsibilities have been streamlined.</li> <li>• Guidance pertaining to Sealed Bidding has been streamlined and moved from subpart 6.4 to section 6.101.</li> <li>• Authorities for other than full and open competition, including only one responsible source, remain.</li> <li>• Contracting officers retain discretion to set aside acquisitions for small business concerns, including contract actions conducted under the Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) programs, and local firms during a major disaster or emergency.</li> <li>• Justification and approval requirements to support noncompetitive procedures. <ul style="list-style-type: none"> <li>○ These requirements have been significantly streamlined.</li> <li>○ The revised language highlights that contracting officers require support from the broader acquisition team when making decisions regarding competition.</li> <li>○ The approval levels are now reflected in a plain language table format.</li> </ul> </li> </ul>
Removed	<ul style="list-style-type: none"> <li>• Unnecessary or redundant language was removed throughout. Examples include – <ul style="list-style-type: none"> <li>○ The word “advance” was removed from the phrase, “A lack of advance planning by the requiring activity.” The language now reads, “A lack of planning by the requiring activity.” This avoids ambiguity surrounding the meaning of “advance” planning.</li> <li>○ The list of specific small business socioeconomic categories was removed and replaced with a reference to Part 19.</li> </ul> </li> <li>• Illustrative examples of when to use certain exceptions to full and open competition have been removed and may be moved to non-regulatory content.</li> </ul>

\*This table is not an exhaustive list

4. Instructions. The EPA acquisition workforce shall follow the RFO Part 6 model deviation text instead of FAR Part 6 as codified at 48 CFR Chapter 6. The Council's RFO Part 6 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](mailto:OMS-ARM-OAS-AcquisitionPolicy@epa.gov).