

# Memorandum

**TO:** Office of Management Services

**DATE:** January 12, 2026

**FROM:** Cindy Hennigan  
Deputy Managing Director  
Office of Managing Director  
Senior Procurement Executive

**SUBJECT:** Class Deviation for Federal Acquisition Regulation Part 34 in Support of Executive Order on Restoring Common Sense to Federal Procurement

1. **Purpose:** To issue a class deviation to Federal Acquisition Regulation (FAR) Part 34 for purposes of implementing the FAR Council's model deviation text to FAR Part 34.

2. **Effective Date:** Immediately.

3. **Expiration Date:** Expires when incorporated into the FAR or is otherwise rescinded.

4. **Background:** On April 15, 2025, the Executive Order (E.O.) 14275 on Restoring Common Sense to Federal Procurement was signed. Section 2 of the E.O. establishes the policy that the FAR "should only contain provisions required by statute or essential to sound procurement, and any FAR provisions that do not advance these objectives should be removed."

The FAR is being updated to:

- Remove language that is not required by statute
- Remove duplicative or outdated language
- Clarify or provide more plain language
- Revise language for the new FAR framework
- Retain language necessary for 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.

**5. Summary of Changes.** 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.

Change	Description
Retained	<ul style="list-style-type: none"><li>• FAR Subpart 34.1 deals with statutory requirements tied to 50 U.S.C. 4531 et seq.</li></ul>

	<ul style="list-style-type: none"><li>• FAR Subpart 34.2 deals with Earned Value Management requirements tied to OMB Circular A-11</li></ul>
<b>Removed</b>	<ul style="list-style-type: none"><li>• Non-statutory requirements removed from FAR Part 34 include the general guidance provided in sections 34.001 through 34.005.</li></ul>

This table is not an exhaustive list.

**Required Action:** The FMC acquisition workforce shall follow the RFO Part 34 model deviation text instead of FAR Part 34 as codified at 48 CFR Chapter 1. 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.

**6. Applicability:** This class deviation applies to all FMC procurements.

**7. Authority:** This deviation is issued under the authority of Executive Order 14275, OMB Memo M-25-26, and 48 CFR 1.4.

**8. Point of Contact:** If you have any questions please contact Michelle Calhoun, Procurement Analyst ([mcalhoun@fmc.gov](mailto:mcalhoun@fmc.gov)) or (202) 523-5901.